Cheshire East Local Plan
Minerals and Waste DPD
Issues Paper
Report of Consultation
October 2017
# Cheshire East Local Plan

## Report of Consultation:
Minerals and Waste Development Plan
Document – Issues Paper

October 2017

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1. **Introduction**

1.1. The Council is committed to putting in place a comprehensive set of up-to-date planning policies to support our ambition of making the Borough an even greater place to live, work and visit. The first part of the new Local Plan - the Local Plan Strategy (LPS) - was adopted by the Council on 27 July 2017, following receipt the previous month of the Inspector’s final report of Examination. The Council is now progressing with the preparation of the remaining two parts of the Local Plan.

1.2. The Minerals and Waste Development Plan Document (“MWDPD”) will form the third and final part of the Local Plan. It will allocate sites and areas to enable the Council to meet its minerals and waste needs and set out detailed planning policies to guide decisions on planning applications in the Borough.

1.3. Consultation on the Issues Paper for this part of the Local Plan was the first opportunity to tell us what you think it should contain and the direction its policies should take. The Issues Paper identified a range of matters and issues that the MWDPD is likely to address, and asked a series of questions to seek feedback on these matters and issues.

1.4. This Report of Consultation sets out the details of consultation and publicity carried out on the MWDPD Issues Paper and associated call for sites exercise. It also reports on the key issues raised by those who responded to the consultation.

1.5. Consultation on the MWDPD Issues Paper took place for six weeks from 24 April to 5 June 2017. At the same time, there was also a ‘call for sites’ exercise, whereby interested parties were invited to submit sites for consideration to inform future land allocations in the MWDPD. The consultation was carried out in accordance with the requirements of the Cheshire East Council Statement of Community Involvement.

1.6. The decision to approve the MWDPD Issues Paper for publication and consultation was made at a meeting of the Cabinet Member of Housing and Planning on 4 April 2017.

1.7. The production of the MWDPD document will be informed by an ongoing Sustainability Appraisal process, to assess its social, environmental and economic impacts. A Draft SA Scoping Report (identifying the scope and methodology for the Sustainability Appraisal) was the subject of a separate consultation between 27 February and 10 April 2017. This coincided with the Issues consultation on the second part of the local Plan i.e. the Site Allocations and Development Policies Document (SADPD). Details of the responses to these consultations are available on the Spatial Planning pages of the Council’s website.
2. **Consultation Documents**

2.1. Comments on the MWDPD Issues Paper could be made on the following documents:

- MWDPD Issues Paper comments form;
- Call for sites form for Minerals; and
- Call for sites form for Waste.

2.2. In addition, the following supporting documents were published:

- Consultation guidance note; and
- MWDPD formal notice (statement of representations procedure);

2.3. Copies of the consultation documents and supporting documents were available for inspection at:

- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ;
- Macclesfield Customer Service Centre, Town Hall, Market Place, Macclesfield SK10 1EA;
- Municipal Buildings, Earle Street, Crewe CW1 2BJ;
- Westfields, Middlewich Road, Sandbach CW11 1HZ; and
- All public libraries in Cheshire East (including the mobile library service).

2.4. All of the documentation was available on the Council’s Consultation Portal, accessed via www.cheshireeast.gov.uk/localplan. The Consultation Portal also allowed representations to be submitted online.

2.5. Responses were accepted:

- Using the portal accessed via a link from www.cheshireeast.gov.uk/localplan;
- by email to localplan@cheshireeast.gov.uk;
- by post to Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ; and
- by hand to the Council Offices, Westfields, Middlewich Road, Sandbach CW11 1HZ.

3. **Notification of the Consultation**

3.1. Notification of the consultation was sent to all stakeholders on the Council’s Local Plan consultation database. This consisted of 3,929 hard copy letters sent on 5 May 2017 and 11,119 emails sent on 24 April 2017. Some of the emails were subsequently resent when it came to the Council’s attention that a proportion had not reached their destination due to issues with the email system. The stakeholders on this consultation database include local residents, landowners and developers, along with the ‘specific consultation bodies’, ‘general
consultation bodies’, and ‘residents and other persons carrying on business in the Local Planning Authority’s area’ as set out in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

3.2. A copy of the general stakeholder notification email and letter is included in Appendix 1.

3.3. Separate letters were also sent to Natural England, Historic England, the Environment Agency and Natural Resources Wales as statutory consultees. Email letters were sent to all Cheshire East Councillors, all Town and Parish Councils in Cheshire East and all MPs whose constituencies lie partly or wholly within Cheshire East Borough.

3.4. Town and Parish Councils adjoining Cheshire East in neighbouring authority areas are included in the general consultation database and received the letter / email as detailed in paragraph 3.1. The Council also sent letters to neighbouring planning authorities and more distant Minerals and Waste planning authorities with potential strategic minerals and waste links with Cheshire East to meet Duty to Co-operate requirements.

4. Other Publicity

4.1. The Cheshire East Council website homepage (www.cheshireast.gov.uk) signposted the consultation in the ‘Have Your Say’ section. The Local Plan page (www.cheshireeast.gov.uk/localplan) also signposted the consultation in a prominent position.

4.2. A press release title ‘Local Plan moves forward with consultation on blueprint details’ was issued on 20 April 2017. A copy of the press release is included in Appendix 2.

4.3. The press release resulted in a number of associated articles being published in the local and regional press, both in printed and online form.

4.4. A formal notice (statement of representations procedure) was produced for the MWDPD Issues Paper and displayed in the public notices section of the Council website and in all the deposit locations listed in paragraph 2.3. Copies of the formal notices are included in Appendix 3.

4.5. The consultation was also highlighted in the April and May editions of the Council’s ‘Spatial Planning Update’, which is sent to all Town and Parish Councils and displayed on the Council’s website.
5. Representations Received

Mineral and Waste Development Plan Document Issues Paper

5.1. In total, 240 responses were received to the questions in the issues paper during the consultation period. These were from a total of 77 different individuals or organisations.

5.2. The method of submission was predominantly by email, rather than by post or directly onto the Council’s online consultation portal. The Council have subsequently put all the responses received onto its online consultation portal and these can be viewed at:

http://cheshireeast-consult.limehouse.co.uk/portal/planning/cs/mw/mwip

5.3. The number of comments received on each question is shown below.

Table 1: Number of Comments by Question

<table>
<thead>
<tr>
<th>Question Number</th>
<th>Question</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Have all workable and viable mineral resources present in Cheshire East been identified and is the information provided accurate?</td>
<td>10</td>
</tr>
<tr>
<td>2</td>
<td>Do you have any comments on the demand and supply of mineral resources, particularly aggregates and silica sand, in Cheshire East which the Council should consider in preparing the MWDPD?</td>
<td>14</td>
</tr>
<tr>
<td>3</td>
<td>Does the MWDPD require the development of a more detailed vision and priorities for minerals or are those already included in the LPS sufficient? If you think a more detailed vision and priorities are required, please explain why and indicate what these should cover?</td>
<td>13</td>
</tr>
<tr>
<td>4</td>
<td>What approach do you think should be taken for each of the minerals present in Cheshire East to ensure that the MWDPD delivers an adequate and steady supply of minerals?</td>
<td>16</td>
</tr>
<tr>
<td>5</td>
<td>Do you have any comments on how the Council can ensure the prudent, efficient and sustainable use of minerals resources through its policies in the MWDPD?</td>
<td>8</td>
</tr>
<tr>
<td>6(a)</td>
<td>Which mineral resources in Cheshire East do you consider warrant safeguarding?</td>
<td>13</td>
</tr>
<tr>
<td>Question Number</td>
<td>Question</td>
<td>Responses</td>
</tr>
<tr>
<td>-----------------</td>
<td>----------</td>
<td>-----------</td>
</tr>
<tr>
<td>6(b)</td>
<td>Should Mineral Safeguarding Areas cover the full extent of the available resource or should it exclude existing urban areas?</td>
<td>12</td>
</tr>
<tr>
<td>6(c)</td>
<td>Should buffer zones be used and should any distinction be made between different mineral resources and the buffer distances that apply?</td>
<td>13</td>
</tr>
<tr>
<td>6(d)</td>
<td>Which mineral related infrastructure in the Borough should be considered for safeguarding?</td>
<td>9</td>
</tr>
<tr>
<td>7</td>
<td>Do you have any comments on the Council’s evidence regarding current and forecasted waste arisings?</td>
<td>10</td>
</tr>
<tr>
<td>8</td>
<td>Do you have any comments on the capacity gap findings and recommendations identified in the Council’s latest Waste Management Needs Assessment?</td>
<td>10</td>
</tr>
<tr>
<td>9</td>
<td>Does the MWDPD require the development of a more detailed vision and priorities for waste management or are those already included in the LPS sufficient? If you think a more detailed vision and priorities are required, please explain why and indicate what these should cover?</td>
<td>10</td>
</tr>
<tr>
<td>10</td>
<td>Do you have any comments on the strategy the Council should develop in its MWDPD to manage its waste needs? Do you agree the suggested approach above would be suitable?</td>
<td>11</td>
</tr>
<tr>
<td>11</td>
<td>Do you have any views on the scale of facilities that should be provided in the Borough for different waste streams?</td>
<td>9</td>
</tr>
<tr>
<td>12</td>
<td>Do you have any comments on the factors or approach the Council should consider when determining the suitability of sites or locations intended for accommodating waste management facilities? Are any factors of particular importance within the context of Cheshire East?</td>
<td>16</td>
</tr>
<tr>
<td>13</td>
<td>Do you have any comments on the approach the Council should adopt to safeguard waste sites and areas from development? Should this approach focus on both existing and allocated sites and areas or just those proposed to be allocated in the Plan?</td>
<td>10</td>
</tr>
<tr>
<td>14</td>
<td>Are there any other issues that the MWDPD should address?</td>
<td>56</td>
</tr>
</tbody>
</table>
5.4. A summary of the key issues raised for each question is set out in Appendix 4.

Call for Sites

5.5. The call for sites exercise which was undertaken in parallel with the Issues paper consultation resulted in 26 proposals being put forward in relation to minerals. These can be broken down to proposals for 14 new sites, 3 extensions to existing sites, 3 preferred areas and 6 areas of search. In some instances a range of alternatives are put forward for the same land as part of the call for sites submissions i.e. for a new site, preferred area or area of search. When this has happened the site is recorded as a new site for the purpose of the figures just quoted to avoid double or multiple counting. However, each proposal will be separated assessed on their merits in due course.

5.6. In terms of waste, a total of 20 sites were put forward through the call for sites exercise. Four sites were proposed as a facility to manage a single waste stream, while the remainder were intended to provide a range of waste management facilities (i.e. waste transfer station, recycling facilities, in-vessel composing etc.) to accommodate a number of different waste streams including waste from households, commercial and industrial waste, and construction, demolition and excavation waste.

6. Next Steps

6.1. All comments received will be fully considered in the production of the first draft version of the Minerals and Waste Development Plan Document. There will be further public consultation on this draft MWDPD before producing a revised draft for publication, further public consultation and submission to the Secretary of State for an independent examination.

6.2. A final version of the SA Scoping Report has now been published by the Council following consideration of the comments received during consultation on the draft version earlier this year. This will form the basis for the integrated sustainability appraisal work that will be undertaken on an on-going basis throughout the preparation of the MWDPD.

6.3. Sites submitted to the Council through the call for sites exercise will now be considered through the site selection process, utilising the Council site selection methodology alongside other evidence including Sustainability Appraisal, where appropriate. Consideration will also be given to proposals for Preferred Areas and Areas of Search.
outcomes of these considerations and the site selection process will be consulted on, in the form of the draft Minerals and Waste Development Policies document in due course.
Appendix 1 – Copy of Main Notification Letter and Email

Dear Sir / Madam

Minerals & Waste Development Plan Document – Issues Paper Consultation

You have received this letter as you have previously responded to a Local Plan consultation or you have asked to be kept informed of future Local Plan consultations.

I write to notify you that the Council has started work on its Minerals and Waste Development Plan Document (MWDPD) which will form the third and final part of the Council’s Local Plan. The Local Plan covers the period 2010 to 2030. The other two parts comprise the Local Plan Strategy, which is expected to be adopted in the summer, and the Site Allocations and Development Plan Document, which allocates non-strategic sites for development (such as housing, employment, retail and leisure) and sets out more detailed policies to guide planning application decisions in the Borough on matters other than minerals and waste. This latter document has recently been subject to a separate issues paper consultation

The MWDPD Issues Paper represents the start of the plan making process and provides a first opportunity for you to tell us what you think it should contain and the direction its policies should take. There will be further opportunities for you to help shape this Plan as it is developed. The consultation is accompanied by a ‘Call for Sites’ exercise which will enable the minerals and waste industry and others to put forward sites and areas that they think would be suitable for allocation in the MWDPD.

The MWDPD consultation document and call for sites / comments forms are available on the Council’s website at www.cheshireeast.gov.uk/localplan and in Cheshire East customer service centres and libraries. The Council would encourage those wishing to respond to this consultation to do so via its Local
Plan consultation portal at the above website address. However, the Council will also accept responses made by email to localplan@cheshireeast.gov.uk or by post to Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ. These should be received by the close of consultation at 5:00pm on Monday 5 June 2017.

Further information can be obtained by telephone on 01270 685893, from the Council’s website www.cheshireeast.gov.uk/localplan, or by email to localplan@cheshireeast.gov.uk.

Yours faithfully

[Signature]

Adrian Fisher
Head of Planning Strategy
The email below was sent to 11,119 email addresses held in the consultation database:

**From:** LOCAL PLAN  
**Sent:** 24-Apr-2017 11:51  
**To:** LOCAL PLAN  
**Subject:** Cheshire East Minerals and Waste Development Plan Document - Issues Paper Consultation

Dear Sir / Madam,

**Minerals & Waste Development Plan Document – Issues Paper Consultation**

You have received this email as you have previously responded to a Local Plan consultation or you have asked to be kept informed of future Local Plan consultations.

I write to notify you that the Council has started work on its Minerals and Waste Development Plan Document (MWDPD) which will form the third and final part of the Council’s Local Plan. The Local Plan covers the period 2010 to 2030. The other two parts comprise the Local Plan Strategy, which is expected to be adopted in the summer, and the Site Allocations and Development Plan Document, which allocates non-strategic sites for development (such as housing, employment, retail and leisure) and sets out more detailed policies to guide planning applications decisions in the Borough on matters other than mineral and waste. This latter document has recently been subject to a separate issues paper consultation.

The MWDPD Issues Paper represents the start of the plan making process and provides a first opportunity for you to tell us what you think it should contain and the direction its policies should take. There will be further opportunities for you to help shape this Plan as it is developed. The consultation is accompanied by a ‘Call for Sites’ exercise which will enable the minerals and waste industry and others to put forward sites and areas that they think would be suitable for allocation in the MWDPD.

The MWDPD consultation document and call for sites / comments forms are available on the Council’s website at www.cheshireeast.gov.uk/localplan and in Cheshire East customer service centres and libraries. The Council would encourage those wishing to respond to this consultation to do so via its Local Plan consultation portal at the above website address. However, the Council will also accept responses made by email to localplan@cheshireeast.gov.uk or by post to Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ. These should be received by the close of consultation at **5:00pm on Monday 5 June 2017.**

Further information can be obtained by telephone on 01270 685893, from the Council’s website www.cheshireeast.gov.uk/localplan, or by email to localplan@cheshireeast.gov.uk.

Yours faithfully,

**Adrian Fisher**

Head of Planning Strategy
Local Plan moves forward with latest consultation on blueprint details

April 20, 2017

Cheshire East Council is launching a consultation on the third and final part of its blueprint for development in the borough up to 2030.

The authority’s Local Plan Strategy sets out the strategic framework for development and has been broadly backed by a planning inspector, subject to some necessary changes.

A secondary Site Allocations and Development Policies’ ‘issues document’ – which provides much of the detail – has also just completed a six-week public consultation.

Now the council is seeking views on the third component of its development blueprint – the Minerals and Waste Development Plan Document (MWDPD).

This allocates sites and areas which will enable the council to meet its identified minerals and waste needs. It also sets out detailed policies to guide planning application decisions in the borough and includes a related ‘call for sites’.

Councillor Ainsley Arnold, Cheshire East cabinet member for housing and planning, said: “Now that the Local Plan Strategy is nearing completion we want to press on and complete the third and final, more detailed stage of the plan and a related call for potential sites, relating to both waste and minerals.
“It is relatively early days in this particular element of the process, so I would encourage all who have an interest in the areas of waste and mineral deposits – and who care about the future of our borough – to get involved in the consultation.

“The Local Plan is the council’s most important tool for shaping development in Cheshire East to 2030, so I would encourage people to take the time to share their views.”

The latest Minerals and Waste Development Plan Document will be subject to a six-week consultation starting on Monday (April 24). Following this, an initial draft plan will be prepared and further consultation will follow.

In the meantime, the document launch is accompanied by a ‘call for sites’ so the council can gain an up-to-date picture of what land is potentially available for future development. Landowners and developers with sites and areas suitable for minerals or waste purposes are being asked to put them forward during the consultation process.

The consultation documents will be available, from Monday April 24, from Cheshire East Council customer service centres and all Cheshire East libraries. They can also be viewed and downloaded from the council’s consultation portal.

People can take part in the new six-week consultation from Monday, April 24 until 5pm on Monday June 5, 2017 by returning their representation forms as follows:

- Online: www.cheshireeast.gov.uk/localplan
- Email: localplan@cheshireeast.gov.uk
- By hand: At the Council Offices, Westfields, Middlewich Road, Sandbach CW11 1HZ
- By post: Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ.

If you require further copies of representation forms or guidance notes, or if any of the consultation documents go missing, please contact the council’s spatial planning team at localplan@cheshireeast.gov.uk or on 01270 68589.
Appendix 3 – Formal Notice (Statement of Representations Procedure)

Statement of Representations Procedure:
Local Plan Minerals and Waste Development Plan Document Issues Paper Consultation

Subject Matter: The Cheshire East Local Plan is being prepared in three parts. The Local Plan Strategy is the first part of the new Local Plan and is likely to be adopted in the summer of 2017. The Site Allocations Development Policies Document (SADPD) Issues Paper and Call for Sites has recently been consulted on and forms the second part of the new Local Plan. This Minerals and Waste Development Plan Document (MWDPD) will form the third part of the Local Plan. It will:

• Allocate sites and areas which will enable the Council to meet its minerals and waste needs; and
• Set out detailed policies to guide planning application decisions in the Borough.
• Include a Call for Sites for Minerals and Waste asking landowner, developers and the minerals industry to submit suitable and available sites for minerals and waste development.

The issues paper is the first consultation in the preparation of this document and it identifies a range of matters that the MWDPD is likely to address. The consultation seeks your views on these matters and there is an opportunity to tell us if there are any other matters you think the document should cover.

Area Covered: Whole of Cheshire East Borough, excluding the part within the Peak District National Park.

Representation Period: A six week period from Monday 24 April 2017 to 5:00pm on Monday 5 June 2017. To be valid, all comments must be submitted within this period and received by the Council at Cheshire East Council, Spatial Planning, Westfields, Middlewich Road, Sandbach CW11 1HZ by 5:00pm on Monday 5 June 2017. Comments received after this deadline and anonymous representations will not be considered.

Comments: Can be made electronically on the Council’s consultation portal, accessed from its website www.cheshireeast.gov.uk/localplan or in writing on a comments form available from the locations listed below. Comment forms must be returned to: Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ by 5:00pm on Monday 5 June 2017.

Location of Documents for Inspection: The Minerals and Waste Development Plan Document: Issues Paper is available for inspection at the locations below. Comment forms can also be obtained from these locations:
- Cheshire East Council website: www.cheshireeast.gov.uk/localplan
- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ (Mon, Wed, Thu, Fri 8:45am - 5:00pm; Tue 8:45am - 4:00pm);
- Macclesfield Customer Service Centre, Town Hall, Market Place, Macclesfield SK10 1EA (Mon - Fri 8:45am - 5:00pm)
- Municipal Buildings, Earle Street, Crewe CW1 2BJ (Mon - Fri 9:00am - 5:00pm)
- Westfields, Middlewich Road, Sandbach CW11 1HZ (Mon - Fri 9:00am - 5:00pm)
- All public libraries in Cheshire East (locations and opening times can be obtained by telephoning 0300 123 5018 or online at http://www.cheshireeast.gov.uk/libraries/libraries_opening_hours.aspx) Further information and paper copies of all documents can be requested from the Spatial Planning Team by email localplan@cheshireeast.gov.uk or telephone 01270 685893. Please note that a reasonable charge will be made to cover printing and postage costs.
Appendix 4: Summary of Key Issues Raised During Consultation

Question 1 – Have all workable and viable mineral resources present in Cheshire East been identified and is the information provided accurate?

Key issues raised:

1. Lack of information/consultation regarding exploration of hydrocarbons and the implication of granting licences (especially parish of Weston & Basford PEDL293).

2. Support for the notification that coal is an important energy mineral present in CE and that in some areas coal seams are close to the surface.

3. Supports the identification that conventional and unconventional hydrocarbons are present within the CE area.

4. Map 2.1 and title should be changed to ‘Cheshire East Current Mineral Sites’ as this is what it shows rather than ‘mineral resources’.

5. Para 2.8: This sentence should read ‘Maintaining a steady and adequate supply of silica sand is a national issue….’ in order to reflect national policy set out in the (NPPF).

6. Oppose any fracking operations in Alsager.

7. Oppose any further mineral extraction extensions at White Moss Quarry.

8. With regard to Para 2.13 (Salt), suggest alternative wording to explain the brine extraction process.

9. Greater detail should be provided in respect of the potential after use for salt cavities. There are other types of storage being utilised throughout the world such as compressed air energy, hydrogen storage and waste disposal which could be developed in Cheshire to help address any future national energy crisis. These alternative uses should not be excluded from the suite of after use options potentially available.

10. Ensure all minerals have been appropriately identified and considered.
Question 2 – Do you have any comments on the demand for and supply of mineral resources, particularly aggregates and silica sand, in Cheshire East which the Council should consider in preparing the MWDPD?

Key issues raised:

1. Demand can only increase with projected house building rates and the Government’s policy to build 200,000 new homes each year.

2. The evidence base needs to be updated with the most recent LAA data available.

3. Consider cross boundary strategic issues in future LAA reviews. Policy MIN1 in the Peak District National Park Authority does not allow for further new quarries or extensions to new quarries, in order to reduce progressively the amount and proportion of aggregate grade crushed rock that is quarried from within the Park to protect the nationally protected landscape. Whilst the majority of this supply is acknowledged as coming from Derbyshire, which has substantial permitted reserves; this is a cross boundary strategic issue which needs to be considered.

4. Para 2.36: The sentence ‘This would indicate the likely need for further provision to be made for silica sand….’ is too vague. There is clearly a need for further provision to be made for silica sand and the sentence should be altered to state this fact.

5. Para 2.36: The final sentence does not make sense. Why would the further provision of silica sand ‘contribute to the overall aggregate landbank’, particularly as the sentence goes on to state ‘since aggregate production in CE is currently only an ancillary product of silica sand quarrying’? This final sentence should be deleted.

6. The recycling of aggregates should be carried out on sites being re-developed with particular reference to brownfield sites with all the associated benefits to the environment.

7. With respect to salt, reference should be made to the NPPG Minerals Paras 232, 233 and 235. Consideration should also be given to the ODPM/BGS Mineral Planning Factsheets on Salt which provides useful and informative detail of salt and brine extraction.
8. The draft 2015 LAA indicates that only one of the four silica sand sites in CE has a stock of permitted reserves of at least 10 years rather than two as stated in the Issues Paper.

9. The MWDPD should state that there is a definite and present need for further silica sand provision to accord with advice in the NPPF.

10. Para 2.35 - lists a number of factors that will influence demand for construction aggregates in the Plan area and this should include an assessment of existing site capacity to produce aggregates over the Plan period. A review of existing/proposed quarries capable of exporting material into the area should be considered.

11. Clarification should be provided regarding provision of aggregates from industrial sand quarries and the extent to which reserves at these quarries can contribute to meeting the demand for aggregates.

12. Para 146 of the NPPF relates to processing plant sites for industrial minerals rather than extraction areas. NPPF para 146, bullet point 3, states that a stock of permitted reserves to support investment in new or existing plant should be at least 10 years. With regard to how stocks of permitted reserves should be calculated, NPPG (para ref ID: 27-088-20140306) states that "The overall amount required should be directly linked to the scale of capital investment to construct and operate the required facility (such as a cement plant or brick factory)". The ten year landbank of permitted reserves is therefore in relation to these processing plant sites which may or may not be supplied with feedstock from multiple extraction areas.

13. The MPA Annual Mineral Planning Survey Report (2016) shows a sharp increase in demand nationally for aggregates. Data recently published by the MPA in their long-term aggregates demand and supply scenarios, 2016-2030 demonstrates that sales are likely to recover to pre-2007 levels during the period of the M&WLP. Replenishment rates published of 61% are low and if this continues there will be a national shortfall of permitted reserves within the timeframe of the M&WDPD.

14. It is necessary for CEC to develop a robust methodology for the forecasting of supply and demand and to ensure that an adequate supply of suitable minerals is identified and made available for extraction throughout the plan period. Reliance on the 10 year and 3 year averages alone would not provide for a sufficiently robust assessment of the likely demand for aggregate within the area over
the plan period. Such information may include, for example, levels of planned construction and housebuilding in their area and throughout the country, neighbouring authorities and planned infrastructure projects. The north of the borough adjoins the Greater Manchester boroughs, where there are a number of proposed allocations which should be taken into consideration.

15. NPPG is clear that 'landbanks' apply to aggregate sand only and as such the term should not be used with reference to industrial (silica) sands. A 'landbank' is a stock of permitted reserves expressed as a period over which those reserves are expected to last before they are used up through excavation and sales and is a measure of the generality of supply capability in an area, accepting that different quarries will be at different stages in their lives (in planning terms). National planning policy expects that sand and gravel landbanks at any time (usually across an MPA) will be expected to last for at least seven years, If landbanks are below that, then the case is enhanced for a planning permission for additional reserves to be granted at that time. A landbank is therefore understood as an ongoing generalised commitment to supply mineral across an area. A landbank is therefore very different from a commitment (in the words of the NPPF) to "providing a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant.." at an individual quarry (para 146), and (in the words of the PPG) "The overall amount required (of reserves permitted) should be directly linked to the scale of capital investment to construct and operate the required facility" (Reference ID:27-088-20140306). That is why neither the NPPF nor the Minerals PPG uses the term 'landbank' in relation to industrial minerals. Please see Planning Practice Guidance paragraphs 087/088/089.

16. Furthermore paragraph 2.41 suggests that the LAA is reporting the position with regard to silica sand supply which appears to conflate sand used as aggregate and industrial sands. We suggest this needs further attention.

17. Paragraphs 2.30 and 2.31 - will the Council be using the 10 year sales figures or sub-regional apportionment? This should be set out in the DPD, along with the reasons for this.

18. What will the approach to the Rudheath Lodge silica sand site be in the DPD? Will it be allocated for silica sand?
19. How is the level of contribution from recycled aggregates going to be assessed? Is information available from the Aggregate Working Party monitoring?

20. There is little information on building stone.

21. CEC needs to be more robust about the clear need for silica sand production in the area.
Question 3 – Does the MWDPD require the development of a more detailed vision and priorities for minerals or are those already included in the LPS sufficient? If you think a more detailed vision and priorities are required, please explain why and indicate what these should cover.

Key issues raised:

1. A more detailed vision is required including a projection of increased demand/extraction rates; assessment of impact on local communities, environment, safeguards and sustainable transport by rail and site restoration and mitigation agreed with local communities and should include more recycling.

2. A more detailed vision and priorities in order to strike an appropriate balance between the need for mineral extraction and the impact on the quality of life of residents. Adequate highways infrastructure should be a pre-requisite for granting planning permission. Arguably, this is not the case in respect of Holmes Chapel which is located centrally within the silica sand triangle. HGV traffic generated by mineral extraction along the A50 corridor is subject to a weight restriction in the Village centre which includes a conservation area. It must therefore use residential roads which are unsuitable for the existing volume of HGV traffic thereby making life a misery for many of our residents.

3. The vision and priorities identified appear to be appropriate.

4. The MWDPD should better reflect the advice on the preparation of minerals policy in the NPPF.

5. The MWDPD requires a more detailed vision and priorities to reflect the broad range of mineral types that can be found within the area. The current vision within the LPS states only that “The supply of important natural mineral resources such as silica sand and salt will be achieved in the most sustainable way possible”. This need to be broadened to encompass a commitment to the steady supply of aggregates. In order to deliver the vision of the LPS, the Council has prepared four strategic priorities, namely: promoting economic prosperity, creating sustainable communities, protecting and enhancing environmental quality of the built and natural environment; and reducing the need to travel. All these priorities are reliant upon the secure and steady supply of minerals and a new, detailed vision for the MWDPD should be developed which reflects the important contribution minerals make to the economy and our way of life.
6. The Plan needs to demonstrate how it will deliver a steady supply of minerals whilst still safeguarding those elements that contribute to the significance of the heritage assets of the area. It also needs to show how the scale of future mineral provision is based upon a robust assessment of the likely impacts which the level of extraction proposed might have upon the environment. It needs to examine to what extent the assessed demand for the area’s mineral resources are capable of being met whilst still safeguarding its historic assets. The Plan needs to ensure that the strategy for minerals development and in particular, the locations identified for future extraction are delivered in a manner which safeguards those elements which contribute to the significance of the heritage assets of the CE area. The Plan needs to demonstrate how it will ensure that the after use strategy for mineral sites safeguards the historic environment. This will require a strategic approach to restoration which sets out an effective and coordinated after-use strategy.

7. Priorities should also include safeguarding the existing network of minerals infrastructure and mineral safeguarding areas. These should be supported by a monitoring framework to enable assessment of their achievement.

8. The LPS refers to protecting and enhancing environmental quality. Restored mineral sites have the potential to deliver significant benefits for biodiversity. It is estimated that if the opportunities for the creation of priority habitats at restored mineral sites were realised then restored quarries alone could deliver habitat creation in excess of the national targets set for the following priority habitats:

- Lowland Dry Grasslands
- Lowland Wood Pasture and Parkland
- Lowland Heathland
- Purple Moor Grass and Rush Pasture
- Reedbeds
- Coastal and Floodplain grazing marsh
- Saline Lagoons
- Lowland meadows
- Upland Hay Meadows.

9. The prioritisation of the restoration of completed quarries to priority habitat should be specifically referred to in the MWDPD.
10. The vision and priorities could be stronger by requiring post-extraction restoration proposals to include the enhancement of both the natural environment and public access for informal outdoor recreation.

11. Current vision and priorities is too generic and needs to be specific towards policy requirements for minerals reflected in the NPPF as it applies to CEC.
Question 4 – What approach do you think should be taken for each of the minerals present in Cheshire East to ensure that the MWDPD delivers an adequate and steady supply of minerals?

Key issues raised:

1. Prioritise specific sites and preferred sites to give certainty.

2. Specific areas should be identified for each mineral extraction which takes into account the current environmental value of proposed sites/areas. Prefer to see a combined approach with specific sites and preferred areas underpinned by a criteria based selection procedure. The criteria should incorporate the following environmental considerations:
   
   - Site selection should take into account any possible impacts on sites protected for nature conservation including cumulative or indirect impacts on the features for which a site was designated
   - The hierarchy of protected sites must be taken into account
   - The position of the proposed sites in relation to the identified ecological networks for CE (an exercise currently underway)
   - The current biodiversity value of each proposed site (in biodiversity units as described by Defra 2012)
   - Whether restoration proposals are able to deliver a net gain/no net loss of biodiversity units when taking into account the time lag factor (methodology as described by Defra 2012)
   - The current value of each site for protected and priority species, especially those whose habitats are difficult to mitigate/compensate for, such as habitat for ground nesting birds, bat foraging habitat, European brown hare habitat, barn owl habitat
   - Avoidance of the re-use of previously developed land of high environmental value (a priority habitat)

3. The Local Plan requires a policy to cover all the hydrocarbons that are potentially found in the area licenced by the Department of Energy & Climate Change (DECC) under the Petroleum Exploration & Licence (PEDL) regime and could be extracted over the plan period.

4. Onshore hydrocarbons are important to the UK because they are a potential long-term source of indigenous natural gas. The Local Plan needs to recognise that there are a range of sources of this resource and policy should cover all onshore hydrocarbons, and recognise that the planning and other regulatory process provide sufficient
safeguards to enable the LDP to contain a positive statement of support for the process, in line with the support given in NPPF. The full range of onshore hydrocarbon extraction including:

- Conventional onshore oil and gas development
- Extraction of petroleum or hydrocarbon oils and gases by drilling and pumping
- Capture of methane that has accumulated in mines
- Coal bed methane and gas derived from shale reservoirs

5. In the case of onshore hydrocarbon extraction there is strong regulation outside the planning process. Planning provides significant controls to monitor the land use implications. Having regard to these safeguards there is no reason for the Local Plan not to contain a positive statement of support through policy and its supporting text.

6. Support within the emerging Local Plan and future associated documents is therefore essential to enable long term onshore hydrocarbon development strategy to realise these nationally valuable resources.

7. It is considered important that an energy policy framework is set within the Core Strategy & the Minerals Plan to recognise Coal Bed Methane (CBM), unconventional gas and other forms of onshore oil and gas as a source of national energy production and the national, strategic and spatial implications of the proposed use of CBM and unconventional gas as part of the energy suite of resources.

8. It is important that an energy policy framework is set within the Local Plan to recognise oil, CBM, shale gas and other forms of onshore oil and gas (as listed above) as a source of national energy production and the national, strategic and spatial implications of their proposed use as part of the range of energy resources.

9. The area covered by the Local Plan contains potentially significant reserves of unworked coal along with other hydrocarbon resources that can make a positive contribution to the nation’s energy supply and sustainable economic development of the area by embracing new energy technologies, including CBM and shale gas. It is therefore vital that the Local Plan recognises the guidance contained in Minerals PPG and the importance of unworked coal seams and oil and shale reservoirs establishing a vision for the area for the next 10 – 15 years.
10. Suggested Policy Approach - It notes that the main concerns are with the environment and residential amenity but as there are other policies dealing with such impacts, each containing assessment criteria, the oil and gas development policy of the plan does not need to list these considerations in its policy. The supporting text should provide background and justification, which links to the NPPF and other Government policies, and the PEDLs are mapped and safeguarded. Suggested wording for onshore hydrocarbons policy and glossary is provided.

11. In respect of proposals for coal extraction coming forward, based on the information available, the Coal Authority considers that a criteria based approach is the most appropriate.

12. In relation to silica sand only – the MWDPD should allocate sufficient resources of silica sand to ensure that a landbank of at least 10 years can be maintained at each silica sand site at the end of the MWDPD Plan period (2030).

13. To ensure that the MWDPD delivers an adequate and steady supply of silica sand, adopting a combination of Specific Sites, Preferred Areas and Areas of Search is supported.

14. The type of allocation will depend upon the quality of geological information available for the proposed area and the level of certainty that it can be developed within the Plan period.

15. A Specific Site should be a tightly delineated area of land that contains a proven resource of silica sand. Geological survey data, including the results of borehole surveys, should be provided to demonstrate the quantity of silica sand within the Specific Site. For land to be allocated as a Specific Site it should be necessary to demonstrate that the Site is deliverable, in terms of land ownership, within the Plan period. It should be a requirement to demonstrate that the Site is either in the control of the mineral operator or that the allocation of the land as a Specific Site for silica sand extraction is supported by the landowner(s). It is expected that a planning application to work silica sand from a Specific Site will cover all, or the majority of, the land and mineral resource within the Specific Site.

16. A Preferred Area should be an area of land within which future silica sand extraction is proposed to take place. A Preferred Area should provide flexibility as to the extent of the silica sand extraction area that will be proposed in a planning application. A Preferred Area should
contain a proven resource of silica sand but the geological data may not be as detailed as for a Specific Site. The resource tonnage figure provided for a Preferred Area is likely to be a maximum figure and any planning application for silica sand extraction within the Area may be for a smaller land area and tonnage. This will provide the mineral operator with flexibility in maintaining its supply of silica sand during the Plan period. Preferred Areas should also be a ‘back up’ resource where Specific Sites (if allocated) cannot be brought forward due to unforeseen circumstances.

17. Areas of Search should be allocated for silica sand as there is sufficient geological information available to define the nationally important silica sand resource within CE. In the unlikely event that any Specific Sites and Preferred Areas cannot be brought forward due to unforeseen circumstances, future planning applications for silica sand extraction should come from within the Areas of Search.

18. In respect of ensuring adequate supply of salt through controlled solution mining only (as opposed to rock salt extraction) we support an approach that identifies ‘Preferred Areas’ for extraction. Whilst identification of specific sites provides certainty for the wider community, it lacks the flexibility that may be necessary to reflect change in land ownerships or development requirements over time.

19. Areas of Search or criteria based policies provide greater flexibility but can provide uncertainty to communities and investors of both mineral developments and other developments which may preclude mineral development coming forward or may be influenced by the development of mineral sites in the future.

20. A ‘Preferred Area’ strategy allows for a level of flexibility that can allow for changes in circumstances during the plan period, but is specific and focused enough so that mineral developers can invest in the future needs whilst allowing for other land uses to be directed appropriately so that they do not preclude mineral requirements.

21. A mixed approach is advocated of site specific, where such sites have been proposed, and preferred areas and areas of search where there is less certainty about reserves. However, criteria based policies are appropriate for areas which fall outside the allocations.

22. Agree that the potential allocation of specific sites should be the preference for addressing any potential shortfall in supply. NPPG outlined Preferred Areas and Areas of Search as other potential options for addressing the shortfall in supply, although the ability to
define these will be determined by the level of geological information available. The certainty of geological information is the key issue on which the ability to define Preferred Areas is predicated. If no additional information is supplied by landowners or the mineral industry it may not be possible to define Preferred Areas due to a lack of geological information above and beyond that available from the BGS. If it is not possible to allocate sufficient specific sites, Preferred Areas or Areas of Search, then a criteria-based policy may provide a pragmatic and proactive approach to addressing the shortfall in supply.

23. Silica sand is an industrial mineral not an aggregate and as such reserves should not be included within the LAA, with the exception of soft sand for construction use inter alia that is not deemed to be silica sand. As set out silica sand should be planned via 'permitted reserves'.

24. It is important that the planning of silica supplies is based on a consideration of demands across the UK over the entire plan period and is not based just on local and/or historical demand patterns.

25. Provision should be made within the MWDPD for the establishment of borrow pits to serve construction projects.

26. As a general principle, TEM supports the principle of prior extraction of mineral reserves.

27. The Tatton Estate is not a developer for hydrocarbon forms of development and does not have a stated position on the benefits or otherwise of the extraction of oil and gas by either conventional or unconventional methods, the estate does though have extensive landholdings within an area covered by a PEDL. This should be acknowledged within the plan and criteria based policies developed to manage the development of above ground infrastructure through the exploration, appraisal and development stages.

28. The authority should identify new sites where possible in conjunction with the industry. The minerals industry will be key in identifying areas where future extraction can take place, without this support it would be difficult to identify anything other than Areas of Search. A criteria based approach would not be sufficient in meeting CE’s requirements as this would not provide any indication that CE has the resources available to meet its needs and would not meet the requirements of NPPF para 143.
29. The MWDPD should identify specific sites for mineral extraction, including extensions to existing sites, where these do not impact upon other sensitive land uses (e.g. residential areas and allocated residential sites). This will provide a high degree of certainty for the minerals industry, and local communities where mineral extraction might take place.

30. The approach to provision of sufficient reserves will depend upon need (based on current sales figures and current supply) and availability of sites identified through the Mineral Call for Sites. As such, the approach cannot be decided until this information is available.

31. The combination approach is more practicable in view of the variation of minerals within CEC.
Question 5 – Do you have any comments on how the Council can ensure the prudent, efficient and sustainable use of minerals resources through its policies in the MWDPD?

Key issues raised:

1. Encourage more recycling and re-use with technological innovation for material recovery together with more education regarding cost, relationship and implications of mineral extraction and waste disposal.

2. The current policy in the CRMLP to not permit applications for the winning and working of minerals where it would involve the use of high quality minerals for low grade purposes is supported. This principle should not be extended to restrict the sale of permitted silica sand reserves to specific markets. Silica sand extraction and processing is complex and expensive and the resultant products are sold to the appropriate markets for high quality silica sand (including some specialist aggregate products). Low grade sand extraction and processing constitute a small but variable proportion of overall sales, as the quantity of low grade material is dictated by the variable nature of the silica sand deposit being worked.

3. Para 2.48: The last sentence of this paragraph ‘Silica sand and products manufactured from it can be reused and recycled together with some newly dug sand’ is not clear at all. This sentence requires clarification and further explanation.

4. In respect of ensuring an adequate supply of salt through controlled solution mining only (as opposed to rock salt extraction) we would support an approach that identifies ‘Preferred Areas’ for extraction. A ‘Preferred Area’ strategy allows for a level of flexibility that can allow for changes in circumstances during the plan period, but is specific and focused enough so that mineral developers can invest in the future needs whilst allowing for other land uses to be directed appropriately so that they do not preclude mineral requirements.

5. The sustainable development of minerals should be inherent within the MWDPD. The Council will help to ensure the prudent, efficient and sustainable use of minerals by preparing an up to date MWDPD which is in compliance with the NPPF. Mineral operators will then be in a better position to plan for the extraction of mineral resources in accordance with demand expressed through the market mechanism resulting in the right products being provided in the right quantities at the right time.
6. The prudent, efficient and sustainable use of minerals resources is aided by the recycling of products such as glass and foundry sand, which is a normal part of mineral production processes.

7. It is our strong view that the Council should not attempt to restrict the use of primary materials by restricting markets for the sale of certain minerals. This would distort markets, which are the real drivers of sustainability and be anti-competitive.

8. The mitigation of environmental impacts associated with mineral extraction through the timely restoration of sites and provision for their long term aftercare is an important aspect of sustainability, and should be recognised as such.

9. It is clear that there remains a very strong national demand for primary aggregates and appropriate provision should be made within the MWDPD to satisfy that demand. It is essential that high quality minerals are not utilised for a purpose that can be filled by lower quality primary or secondary aggregates. The MWDPD should establish policies which seek to prevent inappropriate use of high quality minerals and enable their substitution from other sources. The Issues Paper rightly identifies the need for integration of policies concerning the provision of waste management facilities for the production of secondary and recycled aggregates.

10. The Council should establish policies within the MWDPD that support the establishment of a network of facilities for the production of recycled and secondary aggregates. Appendix B of the NPP for Waste identifies the locational criteria to be used when testing the suitability of sites in the preparation of local plans and planning authorities should take into account these factors. As a major landowner, the Tatton Estate is able to provide access to land which meets the requirements of the locational criteria. On this basis, TEM has proposed sites for inclusion within the MWDPD.

11. Policies regarding the sustainable use of mineral resources are not specific just to the MWDPD. This is recognised in para 2.46 which states the LPS is already encouraging the use sustainable alternatives to land won minerals, and it needs to be recognised that all development has a role to play in delivering this, not just minerals development. This will be a key component in delivering the ambitions of a circular economy, and the strategy could pick up on this.
12. CEC should not seek to restrict the use of primary materials by restricting markets in to which minerals may be sold. This would skew the markets and be anti-competitive.
Question 6(a) – Which mineral resources in Cheshire East do you consider warrant safeguarding?

Key issues raised:

1. The full area of silica sand mineral resources should be safeguarded to ensure sufficient infrastructure is in place and environmental protection is capable of being implemented.

2. All mineral resources which are capable of being sterilised by non-mineral development should be identified by safeguarding.

3. The area which would need to be allocated for future Preferred Areas for salt would need to be sufficiently extensive to allow for flexibility in ownership/development option changes etc. Unlike other minerals, salt is transported in saturation as brine through underground pipelines and as such the need to safeguard infrastructure associated with bulk transport (e.g. storage and handling facilities) is not necessary. On the proviso that the Council allocate sufficient land as a Preferred Area for brine extraction to meet the needs of British Salt through the plan period, then safeguarding of additional land is not necessary.

4. Para 143 of the NPPF states that in preparing local plans, LPAs should set out policies to encourage the prior extraction of minerals, where practicable and feasible, if it is necessary for non-mineral development to take place. The need for some level of protection of mineral assets is acknowledged but is of the view that the local policy framework that relates to this must clearly set out that competing development needs will be suitably balanced.

5. It is considered that minerals that are either scarce, in shortfall, or are an important mineral resource for construction should be safeguarded. It is considered that silica sand and sand and gravel should become safeguarded mineral resources, and that due to the large landbank safeguarding is unnecessary for crushed rock.

6. All resources which are considered economically viable and for which future provision is likely to be required should be safeguarded. The Greater Manchester Minerals Plan does not include the urban area within mineral safeguarding areas. This is because it was considered likely that mineral resources in the urban area would have already
been worked and any prior extraction within the urban area would be unlikely to be acceptable in terms of adverse impact on amenity.

7. The answer to these questions will depend on the current supply and demand for minerals and how future requirements are likely to be met. If future requirements are higher and insufficient sites will be allocated to meet the likely need, the safeguarding areas become more important and may need to be wider and potentially to include buffer zones.

8. All resources identified in the document should be safeguarded together with existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials; and existing; planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.
Question 6b – Should Mineral Safeguarding Areas cover the full extent of the available resource or should it exclude existing urban areas?

Key issues raised:

1. Safeguarding the entirety of all economic minerals would be advantageous and help to achieve significant resources from sterilisation. The Peak District National Park Authorities approach has been to define MSA’s on the basis of the geological resource without excluding areas for other planning reasoning. It would be helpful if each mineral type was safeguarded to allow differentiation where resources are of varying quality.

2. MSA’s should cover the full extent of the available resources and should not exclude urban areas.

3. MSA’s are essential to protect the important silica sand resource in CE from sterilisation by built development. MSA’s should cover the full extent of the known silica sand resource in CE. This should include existing permitted silica sand reserves and associated operations (processing plant etc.) as well as areas designated for future silica sand extraction (Specific Sites, Preferred Areas and Areas of Search).

4. Should exclude urban areas, by reference to the fact that the Planning Authorities are granting planning permission on sites of a significant distance from Town Centres.

5. Whilst it is important that other development does not come forward which precludes the development of future salt cavities, we would submit that on the proviso that the Council allocate sufficient land as a Preferred Area for brine extraction to meet the needs of British Salt through the plan period, then safeguarding of additional land is not necessary.

6. A pragmatic approach should be expressed through any policy and its supporting text to ensure that a positive approach can be taken by the LPA when making an assessment of the merits of competing development needs. The defined MSAs, should exclude existing urban areas and areas on the edge of existing settlements, where residential and/or employment development is considered appropriate and sustainable.

7. The BGS mineral resource should be the starting point for the definition of MSA. Para 2.50 mentions ‘proven resources’ in relation to
safeguarding, it is important to note that a resource is only likely to be 'proven' following site investigation and assessment, which is unlikely to be possible across the resource at this stage. MSA should be defined initially by reference to the BGS data, supplemented by any detailed information in the possession of the MPA, or geological information supplied by the minerals industry. A suitably worded safeguarding policy would ensure that non-mineral development within MSAs has to carry out site investigation/assessment as part of any application process, which the MPA can respond to. The "Mineral Safeguarding in England: Good Practice Advice" (DCLG/BGS 2009) para 4.2.10 states that in normal circumstances MSAs should extend under urban areas to take into account the potential for regeneration schemes to provide opportunities for prior extraction. If a particular mineral resource is widespread across the area of the MPA it may be appropriate to concentrate safeguarding to the particular areas (known as beds/or mineral members) that have been most often used for mineral working, as an indication of potential viability.

8. Support the development of a policy enabling the prior extraction of mineral insofar as that did not harm the viability of development proposals or give rise to other impacts upon the environment or amenity.

9. Where appropriate, existing urban areas, and land on the edge of urban areas allocated for alternative uses, should be excluded from Safeguarding Areas where the safeguarding of land would potentially lead to delays in development (e.g. over ground, open cast extraction such as sand and gravel). This is a particularly important matter for urban areas and proposed residential allocations.

10. The PPG is clear (Para 004 Ref ID 27-004-20140306) safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so.
Question 6c – Should buffer zones be used and should any distinction be made between different mineral resources and the buffer distances that apply?

Key issues raised:

1. Agree with buffer zones around existing communities and protecting those areas allocated for development in the Local or Neighbourhood Plan.

2. The buffer zones advised within BGS/Coal Authority guidance should be used i.e. coal and sandstone 500 metres. Sand and gravel 250 metres.

3. With regard to PEDLs - an area sufficient to prevent damage to the gas storage caverns should be protected from further development.

4. In respect of surface coal resource there is no specific requirement to identify a buffer.

5. A buffer zone of 200 metres is considered appropriate for silica sand.

6. On the proviso that the Council allocate sufficient land as a Preferred Area for brine extraction to meet the needs of British Salt through the plan period, then safeguarding of additional land is not necessary.

7. CEC should seek to implement buffer zones around mineral sites; the buffer should be assessed on a site by site basis, rather than using a prescriptive approach that lacks the necessary flexibility. A blanket policy that seeks to prevent the delivery of sustainable growth opportunities, where it is demonstrated that minerals will be sterilised, is considered contrary to guidance set out in the Framework.

8. Buffer zones around safeguarding areas should be supported to avoid the unnecessary sterilisation of resources and infrastructure by incompatible neighbouring development taking place close to a resource.

9. The need for buffer zones should be used where either the mineral resources is spatially limited such that the potential for sterilisation from adjacent uses is likely to have a significant impact on the quantity of the resources potentially available.

10. It is not considered appropriate to establish a `one size fits all’ policy. It is more appropriate to establish a suite of development management
policies which protect residential amenity and other interests of acknowledged importance.

11. Concerned that the introduction of such buffers may stifle the development of land capable of residential development and therefore their use should be avoided.
Key issues raised:

1. NPPF requires that all existing, planned and potential rail heads, wharfage and associated storage, handling, processing facilities for the bulk movement of minerals are safeguarded. The safeguarding of existing transportation infrastructure, which is currently used, or could be used for the transport of minerals and any potential infrastructure should be safeguarded. Also safeguard sites for recycling, reprocessing and transfer of materials including construction and demolition waste.

2. Development in proximity to (mineral related infrastructure) has the potential to prejudice the continued operations, especially where that development would have noise-sensitive receptors such as housing.

3. The types of minerals infrastructure could include existing, planned and potential storage, handling and transport sites. This could include rail sidings, wharves, asphalt plants, concrete batching plants and recycling plants.
Question 7 – Do you have any comments on the Council’s evidence regarding current and forecasted waste arisings?

Key issues raised:

1. MWDPD should refer to most up to date figures of 36,000 houses and 380 ha of employment together with Government’s drive for more housing. Any figures need to be an overestimate rather than an underestimate as proposed.

2. The projections for LACW and Agricultural Waste seem counter intuitive given the amount of approved development on previously agricultural/horticultural land. The figures do not appear to take into account the quantity and variety of material that is “fly tipped”.

3. Would like to see more Recycling and Organic waste management in both the public and private sector and the re-use of materials and arisings.

4. The data is from the Waste Needs Assessment dated 2014 and figures for waste generated in the area appear to be from different years but it appears to be mainly from 2012. This is somewhat out of date now because the latest EA WDI reports on data from 2015. Growth targets also appear to be out of date.

5. The breakdown of forecasted waste arisings by management method within the WMNA (2014), assumed no increase in the proportion of recycling, reuse, compost and AD waste arisings (53% of total waste arisings). It stated that the figure was based upon the fact that CE had at that time, already met the national recycling target for local authorities of 50% by 2020 and did not therefore intend to invest in new collection or education initiatives (Page 25). This conflicts with Strategic Priority 3 of the LPS which indicates a commitment to managing waste in the most sustainable and environmentally sensitive way possible through its prevention and utilisation as a resource and the preamble to policy SE11 refers to a move towards a ‘zero waste economy’ in which material resources are re-used, recycled or recovered wherever possible, and only disposed of as the last option. The Issues Paper also refers to the need to increase recycling and reuse rates in line with EU targets (p.26).

6. Concerned with how the authority should plan for the management of waste and that the arisings have been forecast up to 2030 (not 2020), it is considered that there should be greater clarity in this area and that
strategic decisions of this nature should form part of the consultation (i.e. whether to plan for minimum targets only and potentially cap the amount of recycling, or whether to adopt a more progressive approach).

7. In developing the Issues Paper the Council has had regard to those waste types identified within the NWMP and used a robust evidence base to determine the current and forecasted arisings. The creation of industrial grade salt from brine extracted from cavities at the Warmingham brine field naturally generates wastes that are currently disposed of back down one of the cavities (BS2). This represents the most sustainable and efficient way in which to dispose of brine with no social or environmental impacts. Disposal is undertaken under licence issued by the EA, and whilst only one cavity is currently used for disposal purposes four additional cavities are covered by the current licence. It is unclear if the disposal requirements are included within the calculations provided with Table 3.1, and it is likely that if they are, then this would be accounted for within the Commercial and Industrial waste stream. It would be acknowledging the fact that brine waste is, and will continue to be, disposed of within cavities within the Warmingham brine field under licence, and that any future needs would be met by utilising those cavities created on-site. Irrespective of the intentions of the waste hierarchy this will continue to be the most sustainable means of managing this element of the waste stream.

8. It would be more appropriate to comment on the actual figures once a revised Waste Needs Assessment is available. It would also be useful to include some information regarding the long term management of LACW and the split between the amount landfilled and the amount processed through EfW facilities, especially if this materially is not to be handled locally as indicated in the discussion text for residual waste management.

9. The low range of the forecast for local authority collected waste seems very ambitious, particularly given the recent increase in waste collected. This will presumably be reviewed in the update to the Waste Needs Assessment.
Question 8 – Do you have any comments on the capacity gap findings and recommendations identified in the Council’s latest Waste Management Needs Assessment?

Key issues raised:

1. Fly tipping is not tackled in the policy. As food waste has a different method of management from green waste there should be segregation at source to enable the material to be directed to the correct disposal solution.

2. The capacity gap needs closing. Encourage more recycling and waste and energy recovery with each Authority meeting its own needs where possible.

3. Clear capacity gap of 43,000 tonnes per year of Organic Waste. Encourage prevention of food waste/home composting before consideration of anaerobic digestion plants. Unclear how shortfall of 70% recycling capacity will be met. How will residual waste (black bin) capacity gap be dealt with owing to the lack of landfill sites capacity?

4. Page 26 of the Issues Paper refers to the need to increase recycling and reuse rates in line with EU targets; however the capacity gap findings outlined in the WMNA are based on the assumption of recycling rates remaining stationary. There appears to be some inconsistency between the Needs Assessment, the LPS and the Issues Paper. The capacity gap for recycling may therefore be even greater than identified. If the Council aims to encourage increased rates of recycling and reuse (which it is maintained should form part of this consultation) then the forecasted waste arisings and capacity gap calculations should be updated accordingly.

5. It is requested that as part of the MWDPD, CEC confirm which sites have consent for infilling with inert waste, referred to as Construction, Demolition and Excavation Waste (CDEW), along with details concerning their lifetime and capacity.

6. It is requested that the updated WMNA is published at the earliest opportunity so the need for inert landfill capacity can be confirmed.

7. Whilst it is accepted that information on waste is not comprehensive, the consultation paper identifies (para 3.37) that there is a clear capacity gap with time limited landfill capacity to 2027 and no recovery facilities for residual non-hazardous waste in the Plan area. The study
identified that it may not be economically viable to deliver a new strategic facility (energy recovery or gasification facility) in the Plan area and options for utilising other available facilities in nearby authorities should be explored.

8. Para 3.16 acknowledges that the remainder of LACW (40%) which is not currently sent to landfill is transported for incineration at an 'energy from waste' facility in Stoke on Trent (Hanford). The Hanford site is protected within the Staffordshire and Stoke on Trent Joint Waste Local Plan 2010-2026 (policy 2.4 Strategic waste facilities to be safeguarded).

The consultation paper (at Para 3.34) comments on waste movements between Waste Planning Authorities and available data from the Interrogator (NWDI) which shows that a significant proportion of the waste generated in the Plan area is processed in Staffordshire and Stockport.

There are no specific policies about providing for waste from outside the Staffordshire and Stoke on Trent Plan area (and specifically from neighbouring WPA including CE) but there is an allowance for cross boundary flows (refer to policy 2 of the Staffordshire and Stoke on Trent Joint Waste Local Plan 2010-2026 and supporting text). There is no land use planning reasons why the current pattern of waste movements from CE cannot continue to Staffordshire, Discussions, however, should take place with Staffordshire CC as the Waste Disposal Authority in respect of utilising available recovery facilities for residual waste. I refer you also to our Staffordshire and Stoke on Trent Joint Waste Local Plan appendices and in particular Appendix 5 which sets out our waste infrastructure and hazardous, non-hazardous and inert landfill sites.

9. The capacity gap for organic waste management, recycling and residual waste management are noted. In Cheshire West and Chester, there is a current surplus for organic waste from LAWC and C&I sources, although if CD&E organic waste is included, there is potentially insufficient capacity. There is sufficient capacity for dry recycling waste generated within the borough with a modest surplus of 65-68 ktpa by 2030. There is also sufficient capacity in residual treatment (up to 1.5 million tpa by 2030), but assumes that sites with planning permission not yet implemented will come forward.
Question 9 – Does the MWDPD require the development of a more detailed vision and priorities for waste management or are those already included in the LPS sufficient? If you think a more detailed vision and priorities are required, please explain why and indicate what these should cover?

Key issues raised:

1. Should include future proofing waste management, adoption of the latest technology and investment in new forms of treatment, recycling, heat recovery.

2. There is a lack of clear proposals for dealing with the capacity shortfall. We need to know what facilities are required and where they are to be provided.

3. The vision and priorities should be expanded upon. The LPS does not currently identify the role that expansion and enhancement of existing facilities can play in meeting the waste needs of CE, the importance of improvements to existing facilities to provide greater efficiency and capacity, or the manner in which this will be supported by the LPA. This should be addressed within a more detailed vision in the MWDPD.

4. The role of small-medium waste facilities should be identified and the means in which the Council will support their continued and viable operation.

5. The sustainability of waste management plans and provision and the preferred approach in terms of the spatial distribution of facilities within and outside of CE should be identified.

6. Clarity should be provided on whether the Council is seeking to increase overall recycling rates, or simply maintain minimum targets.

7. The MWDPD should provide more detail about the proposed sites for waste management. Specifically, details should be provided on the consented sites for infilling with CDEW, along with details concerning their lifetime and capacity.

8. The current vision and priorities within the LPS do not adequately address the increasingly important role that the management of waste plays in the provision of sustainable development, the important role that waste management plays in developing and securing strong and sustainable communities and how those communities should take responsibility for the waste which they produce and the proximity
principle. The vision and supporting principles should provide a clear recognition of the role that waste management plays in sustainable development and commitment to the management of waste in accordance with the proximity principle as required by the NPP for Waste.

9. The existing vision and priorities seem appropriate.

10. The MWDPD should contain more detailed waste-related vision and priorities than are already set out in the LPS. This should include a commitment to moving waste up the hierarchy as well as safeguarding. In addition, as noted for minerals, this should be linked to the monitoring framework with measurable indicators.

11. The Plan needs to ensure that the strategy for waste management and in particular, the locations identified for future waste developments are delivered in a manner which safeguards those elements which contribute to the significance of the heritage assets in CE. The Plan needs to show how encouraging the reuse or adaption of existing buildings might assist in reducing the amounts of construction and demolition waste. This can include exploring how it can include appropriate policies to encourage the reuse of existing buildings. Consideration should also be given to the encouragement of the development of appropriate facilities for the re-use of demolition waste particularly where these might help facilitate the repair of the area’s historic buildings.
Question 10 – Do you have any comments on the strategy the Council should develop in its MWDPD to manage its waste needs? Do you agree the suggested approach above would be suitable?

Key issues raised:

1. Waste management outside the Borough increases transport costs and can cause disruption. It also increases reliance on other Councils which may have less capacity in future. Disposal sites should be located close to where waste is generated.

2. The document is unclear as to whether it seeks to address the waste arisings from the National Park part of CE. The PDNPA adopted Core Strategy does not set out a strategy for any specific waste facility provision (other than community facilities meeting the needs of the local communities only) within the National Park. This is as a result of the previous East Midland Regional Plan exempting the National Park Authority from having to make provision sufficient to meet the waste arisings from the Park. Instead it sets out a policy framework for the surrounding urban areas to be utilised as locations to meet the waste arisings from the National Park. It is therefore assumed that this cross-boundary policy context has and will be considered in the development of the MWDPD waste strategy.

3. There is no facility at Household Recycling Centres of “pre-loved” items to be segregated and put to a new use. These items are still functional but are contributing to the volume of overall waste. Is there any opportunity for a partnership with a charity to save some waste volume?

4. The Local Plan should not develop a strategy that focuses solely on encouraging new waste management facilities (for the waste streams identified at 3.43 of the Issues Paper). It should also plan to support the development and expansion of existing facilities that may be capable of meeting a portion of the capacity gap and improving performance in relation to the waste hierarchy and the proportion of waste that is recycled.

5. Develop policies that support transfer and bulking stations to increase the separation of recyclable materials and undertake some of the functions of MRFs where there is forecast to be a significant capacity gap.
6. Diversification of existing waste facilities into other management types/streams and expansion of multifunctional sites should be encouraged as this can reduce the need to transport waste to multiple facilities and reduces vehicle miles and emissions.

7. It is unlikely that the waste management needs of CE will be unfulfilled if a Staffordshire material recycling facility, or organic treatment facility could not accept a waste stream of just over 5,000 tonnes per annum. Key areas on which to focus Duty to Co-operate discussions given the capacity gap identified in the Plan area, are the recovery capacity for residual waste or landfill void capacity.

8. It does not seem appropriate for the Council to base its strategy on data which it acknowledges itself to be out of date and is likely to render any plan produced on that basis unsound. We therefore do not agree that the suggested approach would be suitable. A revised strategy based upon the revised waste needs assessment should be developed to provide the robust framework in which communities and businesses can take more responsibility for their own waste as required by the NPP for Waste.

9. The Council should identify sites/areas suitable to meet the additional requirements set out in the Waste Needs Assessment or develop a criteria based policy approach. Certain wastes will move across boundaries for management elsewhere and it is important to identify such movements and liaise with the relevant local authorities. For LACW, detailed information on the long term contract of this waste would also be useful as this is a waste stream for which a level of certainty about treatment can be provided.

10. The suggested approach seems reasonable. However, it will be important to keep under review the delivery of proposed sites with permission for treatment of residual waste for combustion in areas such as Cheshire West if these are to be relied on.
Question 11 – Do you have any views on the scale of facilities that should be provided in the Borough for different waste streams?

Key issues raised:

1. The existing waste disposal sites should be retained for local communities to use. Due to the shortage of sites within the Borough there should not be any waste imported from outside the Borough.

2. Household Recycling Centres should be kept local in order to discourage fly tipping.

3. The DPD should plan to support the development and expansion of facilities of different scales to meet the needs of CE in the most sustainable manner. This will depend on a number of factors, including the availability and nature of suitable sites and the potential for existing facilities to expand.

4. With respect to CDEW, the MWDPD should seek to provide one large strategic facility to meet all the Borough's needs. However, this will be dependant on the findings of the updated Waste Management Needs Assessment to be prepared by the Council and may result in a number of smaller facilities or indeed a larger facility which has the potential to accommodate waste from multiple authorities.

5. The figures presented within the Issues Paper are done so in the knowledge that they do not accurately reflect the likely provision of housing and employment land over the plan period following examination of the LPS. Until such time as a robust evidence base is provided which enables “meaningful” engagement on the implications of projected housing numbers and employment land requirements, it is not possible to answer the question on the scale of facilities required.

6. Paragraph 3.47 is clear that there is likely to be a different answer to each waste facility type and as such it is not always possible to apply to the same approach across the plan area. Unless the authority is delivering the facilities, it is also hard to state the size of facility that will be developed, as such decisions on the scale of facilities will most likely be developer/operator led.

7. Given the level of requirements in the borough, there would not appear to be justification for a sub regional scale facility in CE at the current time. The large 'resource recovery park' at Ince in Cheshire West is now gradually being developed, but the slow speed of delivery
suggests that demand for large scale waste facilities in the area is relatively limited.
Question 12 – Do you have any comments on the factors or approach the Council should consider when determining the suitability of sites or locations intended for accommodating waste management facilities? Are any factors of particular importance within the context of Cheshire East?

Key issues raised:

1. CE contains a significant network of canals. Matters relating to M&W such as land stability, pollution, ecological impact and visual impact are of important considerations. The Macclesfield Canal and Trent Mersey Canal are designated as conservation areas. It is important to ensure that any sites near the canal preserve or enhance its character and do not adversely impact on its setting or ecology. Development of these sites would need to fully assess these impacts and include detailed mitigation measures. There is potential to have an adverse impact on our waterways through visual impact and increased noise / general disturbance.

2. Suitability, accessibility, deliverability and sustainability should be the key drivers. Impact on local communities and local roads balanced against any potential local benefits such as community heating and local employment opportunities.

3. The use of brownfield and industrial sites should be the first consideration for the disposal of waste.

4. Waste collection and transfer sites are to be sensibly placed away from residences and local people.

5. As a rural parish being able to access local Household Recycling Centres is important. Consolidation and processing of the collection should not be done other than in designated industrial areas.

6. A criteria based selection procedure is recommended. The criteria should incorporate the following environmental considerations:

   - Site selection should take into account any possible impacts on sites protected for nature conservation including cumulative or indirect impacts on the features for which a site was designated.
   - The hierarchy of protected sites must be taken into account.
   - The position of the proposed sites in relation to the identified ecological networks for Cheshire East (an exercise currently underway)
• The current biodiversity value of each proposed site (in biodiversity units as described by Defra 2012).
• Whether any restoration proposals are able to deliver a net gain/no net loss of biodiversity units when taking into account the time lag factor (methodology as described by Defra 2012).
• The current value of each site for protected and priority species, especially those whose habitats are difficult to mitigate/compensate for, such as habitat for ground nesting birds, bat foraging habitat, European brown hare habitat, barn owl habitat.
• Avoidance of the re-use of previously developed land of high environmental value (a priority habitat).

7. While a broad distribution of sites is important for some waste streams, it will often be preferable from a planning, landscape, sustainability and amenity perspective to encourage the expansion of existing waste management facilities as opposed to developing new facilities.

8. The expansion of existing waste transfer and bulking facilities that wish to process construction, demolition and excavation wastes, or undertake the sorting of recyclables should be encouraged.

9. Provision should be made throughout the borough to provide for a balanced spatial distribution of sites across the area.

10. Any sites that are identified must be subject to pragmatic, robust analysis and assessment, with the housing and employment needs of the borough being suitably balanced with the need for waste/recycling sites.

11. With respect to CDEW, further consideration should be given to sites within the Borough which have been excavated for minerals and have available void space, along with other features such as accessibility which supports the operations.

12. The council may also wish to consider local heat networks and heat mapping that may have been undertaken to identify where facilities (for different waste streams) could be developed which would offer this benefit. A review of past allocations to see how successful that approach has been would also be advisable. Area allocations seem to provide the flexibility needed by operators whilst also offering certainty locally to people close by and also the developers bringing sites forward as to the locations where certain types of facility could be developed.
13. Waste management facilities should not be located on any sites with existing environmental value. Sites with potential environmental value (such as former minerals sites with potential to deliver benefits as a result of restoration) should also be avoided.

14. Physical and environmental constraints on development, including existing and proposed neighbouring land uses, should be a key consideration when considering the location of waste management facilities. More appropriate locations for such areas would be those where residential impact may not be a factor, such as existing industrial areas or sites identified for employment use, which is an approach that is also supported in national policy.

15. Tourism is a significant contributor to the CE economy. Determination of site suitability should take into consideration any potential impact which the waste management site may have on existing leisure and tourism facilities and visitor accommodation and on the location of heritage assets and where appropriate to its landscape setting (Alvaston Hall Hotel).
Question 13 – Do you have any comments on the approach the Council should adopt to safeguard waste sites and areas from development? Should this approach focus on both existing and allocated sites and areas or just those proposed to be allocated in the Plan?

Key issues raised:

1. The Council should protect existing and future waste sites from development.

2. CEC should protect existing and future waste sites from development and should not be closing any Household Waste Recycling Sites. Public should have access to waste transfer stations for a repair and re-use hub.

3. It may be desirable to safeguard strategically important sites; however existing small-medium sized sites need not be specifically safeguarded from redevelopment unless there appears to be a threat of this occurring across CEC to the extent that it undermines the ability of the Council to meet its waste capacity requirements. There is an overwhelming need to support the operation and future development of existing sites in line with bullet 3 to paragraph 123 of the NPPF.

4. Concerned with the approach suggested within Key Issue 6, whereby the Council adopts an approach where waste sites are safeguarded from non-waste development. The approach in the NPPF to safeguarding of waste is entirely different to minerals and protecting waste sites from development will inhibit their development or effective use. There should be a proportionate approach to protection, and that a safeguarding policy which allows no reasonable flexibility would be unsound. Consideration should be given to the inclusion of a policy which allows alternative development on the basis of need and viability.

5. It is vital that any policies seeking to safeguard sites from non-waste development are suitably flexible to ensure that future decision making can be appropriately balanced between the need to safeguard waste sites and the need for the planning process to enable all development that the area requires to meet its future needs.

6. The MWDPD should adopt an approach that seeks to safeguard specific sites proposed to be allocated in the Plan, as opposed to focussing on protecting wider identified areas, allowing residential development in sustainable locations to assist the Council in meeting its objectively assessed development needs for housing and economic development.
7. The MWDPD will need to provide detailed guidance on the categories of development that will be exempt from any safeguarding policies. Criteria should be identified setting out the exceptions that may allow certain non-waste development to proceed within Safeguarding Areas; those exceptions should be clearly defined. This should include clarification as to the scale of development that falls within the policy.

8. Waste management facilities not only require planning permission but are also regulated by the EA through The Environmental Permitting (England and Wales) Regulations 2016. In many instances, the EA stipulates the proximity of residential development to a proposed facility, for example the EA maintains a standing objection to the location of open windrow composting facilities within 250m of residential development in the absence of a site-specific bio-aerosol risk assessment which demonstrates that the facility could be operated without giving rise to impacts upon air quality. In these circumstances, it would seem appropriate to establishing appropriate safeguarding areas around existing and allocated sites to ensure that conflicts between waste and non-waste development are minimised.

9. Identify and safeguard those facilities required to deliver the waste strategy – including future land which may be required. Any sites which are considered strategically important should also be safeguarded to protect them from encroachment. For plan allocations, only sites should be safeguarded for waste use, areas do not need to be safeguarded for such use when they form part of wider employment land allocations where waste development could be acceptable.

10. The Council may wish to consider safeguarding existing waste management capacity, rather than safeguarding existing sites, this approach is useful where, for example, historic sites are not necessarily in areas the council would wish to promote for waste management use going forward and where capacity could be relocated elsewhere through safeguarding existing waste management capacity rather than specific sites.

11. The approach in Cheshire West (Local Plan policy ENV8) to safeguarding existing waste management sites and those with planning permission against alternative, non waste uses is working well. Safeguarding existing sites can support the co-location of waste management facilities, by providing certainty about future uses. A similar approach could also be used in CE.
Question 14 – Are there any other issues that the MWDPD should address?

Key issues raised:

1. The plan should consider whether it is feasible to plan for separate food waste collection. Suitable digester site(s) where food waste can be processed to provide eco-friendly power.

2. Consultation is focused on “safeguarding” the supply of silica sand and the environment. There are no attempts to safeguard residents who live in the affected areas (specifically in relation to the Rudheath Lodge planning application). There is no reference to the use of silica sand as “frac sand”.

3. Prioritise the extension of existing mineral extraction sites. Recognise the significant local concerns raised in relation to the Rudheath Lodge planning application which is wholly unsuitable and unsustainable location to be considered as a Preferred Area, a Larger Area of Search or indeed a Criteria Based Policy as a direct result of the impact upon the local highway, significant disruption to local residents and businesses and the complete lack of any community benefits included.

4. Support CEC draft approach to waste tonnage thresholds beneath which movements of waste between administrative boundaries are not considered strategic, and thus not meritling ongoing consultation between Dudley Council and yourselves.

5. The plan needs to be monitored and reviewed on an annual basis to take account in rates of growth across the Borough, demand for mineral resources and the sustainable disposal of waste.

6. When assessing sites brought forward as part of the Call for Sites exercise, it is important to note that sites may have United Utilities assets running through them, and these assets will need to be afforded due regard in the planning process for a site.

7. It would be useful to have a strategic approach to the restoration of mineral workings based on the wider landscape rather than on a site by site basis.

8. Stockport Council would like to highlight the need to undertake a Strategic Transport Assessment. This should assess the potential effects on the transport network within CE as a result of the policies contained within the emerging plan, and review any cross-boundary
impacts to ensure that any adverse consequences are mitigated within Stockport.

9. Reference should be made to the Airport's safeguarding zones, and that consideration is made to the relevant aerodrome safeguarding criteria, as part of any site appraisal process for mineral and waste sites. Also suggest an aerodrome safeguarding related policy is included to guide the determination of planning applications. With regard to the formulation of a relevant policy within the MWDPDD, we recommend that this is linked to that which we have requested be included within your SADPD, as follows: "Development which would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted".

10. The process for site selection for mineral extraction should include significant consideration of the impact on local communities by the proposed activity (i.e. mineral extraction) and also the use of the site upon completion of the extraction activities.

11. The CEC area contains coal resources which are capable of extraction by surface mining operations. These resources cover an area amounting to approximately 3.79% of the CEC area. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.

12. Suggest that the PEDL's listed are not included in the MWDPD, as it can only encourage applications for licences, leading eventually to unwanted development, such as we are witnessing currently in other areas of the Plan.

13. Alsager TC supports Sandbach TC - in their objection to the closure of Arclid HWRC as this would result in Sandbach residents utilising the Alsager HWRC instead. We already have instances of people wishing to visit the site queueing on Hassall Road to use the facilities and with Alsager having to accommodate some 2050 new houses this is a 40% increase in Alsager residents and will only increase usage of Alsager HWRC.

14. The plan should set out a flexible approach to operating hours for different types of waste facilities and the circumstances under which extended operating hours will be permissible. These operating hours
should take account of the specific operational requirements of the businesses/facilities and their clients and the desirability of delivery vehicles leaving and arriving at their destinations prior to the morning rush hour.

15. The MWDPD should reflect the advice contained within paragraph 123 of the NPPF and have particular regard to the third bullet point of this paragraph.

16. The MWDPD should contain positive and proactive policies that provide for the expansion of existing waste management facilities and give clarity on the manner in which such applications will be assessed.

17. Hough and Chorlton Parish are included within the areas indicated for coal and licensed hydrocarbon extraction. We are concerned about HGV movements and pedestrian safety on rural roads; the long-term impact on the quality of life of our residents with the resultant traffic movements, noise, dust, air pollution and lighting; the proposals will affect the quality of agricultural land, which potentially could negatively impact on the livelihoods of our farmers. The ecology and wildlife in our area will be much disrupted. The exploratory work may conflict with other developments such as the HS2 safeguarding corridor.

18. Sibelco reiterate its objection to the wording of CELPS Policy SE10, the preamble to the policy and its supporting text. In addition Figure 13.4 of the CELPS the plan is confusing since it suggests that the area diagonally cross hatched blue is worked extensively for silica sand. This is not the case as deposits, while potentially only being present in this area, are isolated occurrences. It is suggested that this is annotated as "General area within which silica (industrial) sand resources may be located".

19. Concerned about the monitoring and enforcement of conditions attached to planning permissions (particularly relating to White Moss Quarry).

20. Disposal of wastes for landscaping, engineering or for the improvement of agricultural land is an issue at a local level and your Authority should consider criteria for the acceptable use of waste for such purposes (note policy 1.4 of the Staffordshire and Stoke on Trent Joint Waste Local Plan 2010-2026).

21. The MWDPD should recognise the important role that the continued supply of suitable building materials plays in the maintenance of the historic environment and plan for the provision of a supply of
appropriate building materials, this could be either through the identification of preferred areas or sites for building stone, or the establishment of criteria based policies which would support the establishment of building stone quarries where geology indicates the presence of a particular resource.

22. Suggest including an intention to work with other MPAs within the Plan. This would seem to fit best within paragraph 2.8 along the following lines: Maintaining a supply of silica sand is a national issue and there are few locations in the UK where high quality silica sand deposits occur in enough quantities to be economically viable to extract. CE proposes to work proactively with other MPAs and the mineral industry in England to ensure a steady and adequate supply of silica sand.

23. Suggest it would be worthwhile making reference to the statement of common ground on silica sand currently being prepared.

24. Use the term 'permitted reserve' to describe the amount of silica sand available.

25. The MWDPD needs to ensure that a strategy is developed which will enable sufficient additional reserves of silica sand and sand and gravel to come forward to meet identified needs during the plan period, since the LAA is showing there to be a shortfall in their supply.

26. Strategic cross boundary issues that affect the built environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues such as World Heritage sites, major quarries for building and roofing stone e.g. Portland Stone, which also safeguards sources of supply and strategic issues will have to be considered on an area by area basis. These issues will not necessarily always be the same as the strategic policies for the protection and enhancement of the historic environment included in the Plan but is likely to be a sub-set of them. Local circumstances may indicate that strategic approaches may not always be needed. The sustainability appraisal scoping report should help identify what is important for a particular plan area.

27. The EU has been moving towards a circular economy for some time, and although we are moving out of the EU, this is an idea that is starting to become important within local policy and is likely to be the forward way of thinking, especially for waste planning. As such it would be useful for the MWDPD to address this.
28. Essex County Council would welcome the safeguarding of the four active silica sand sites to ensure their continued viability, to avoid additional pressure on the national silica sand market, which may require additional provision from resources in Essex.

29. Mineral allocations will need a greater focus on hydrology, soils and Best and Most Versatile Land. Evidence should be sufficient to support the plans strategic approach to enhancing the natural environment particularly in the details of the site specific restoration proposals. The allocations should recognise that mineral extraction has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the extraction process.

30. Peat should not be included as a MSA, because of its particular ecological qualities and its importance as a carbon sink; new peat extraction should neither be included in Plans nor safeguarded.


32. The Landbank policy and LAA may be a useful reference when assessing environmental effects. Landbanks outline the current provision of aggregates and what may be required in the future in order to meet demand.

33. The plan must ensure the high quality restoration and aftercare of mineral sites, including for agriculture, geodiversity, biodiversity, native woodland, the historic environment and recreation.

34. Natural England will be looking for the plan to set out the following key principles for restoration: Opportunities to enhance landscape character; an assessment of existing and potential components of ecological networks; a strategic approach in for the creation, protection, enhancement and management of networks of biodiversity (linked to national and local targets) and green infrastructure; opportunities to provide better facilities for public rights of way users, and access to nature in general.

36. The plan must closely cross reference to the Sustainability Appraisal and Habitats Regulations Assessment as they are prepared to ensure a full assessment of environmental effects have been carried out, including an assessment of alternatives, to ensure the most sustainable and least environmental sensitive sites are included in the Plan.
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