

Our Ref: RJC/UDC/NQRNP
Date: 15 June 2018
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Mr N Hargreaves
Newport Quendon & Rickling Neighbourhood Plan
Newport Parish Council
By email steering.group@nqrplan.org

Dear Mr Hargreaves

Re: Newport, Quendon & Rickling Neighbourhood Plan (Regulation 14) consultation

Thank you for consulting Essex County Council (ECC) on this emerging draft Neighbourhood Plan (NP). ECC provides the following response, which reflects ECC's role as the Minerals and Waste Planning Authority, the Highways Authority, the Local Education Authority and Lead Local Flood Authority. ECC is also responsible at the local level for public health. Advisory information is also provided for the consideration of the Neighbourhood Plan Working Group (NPWG).

Requirements of Neighbourhood Plans and Links to emerging new Uttlesford District Local Plan (2011-2033)

The National Planning Policy Framework (NPPF) makes it clear that *'the NPPF must be taken into account in the preparation of (local and) Neighbourhood Plans'*. The NPPF also states (at paragraph 16) that

'The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and*
- *identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.'*

ECC provided a response to the Uttlesford District Draft Local Plan Regulation 18 (2017) consultation, which includes some coverage section on Newport, Quendon & Rickling. It is noted that Newport is classified therein as a 'Key Village' and Quendon & Rickling as a 'Type A' village. This response is attached for your convenience and consideration as NP preparation continues.

Growth / Development Strategy

The NPPF states (at paragraph 184) that:

'Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.'

ECC notes that the NP states that it seeks to plan for a level of homes growth (200 approx.) homes beyond that now proposed by the Uttlesford District Draft Local Plan (no further allocations up to 2033). However, NP groups have the freedom to propose growth above that of the (strategic) Local Plan for that area. The Parish Council will need to consider the following issues to ensure the NP growth strategy can be delivered:

Transport

Policy TR1 – On a terminology point, ECC advises changing current reference to 'Essex Highways' to **'The Highway Authority'**.

Agreed

Policy TR2 – ECC considers that there is no guarantee that this cycleway (along the B1383 route) is deliverable between the villages, and no evidence is provided by the (NPWG) that it can be delivered. This therefore cannot be included in the Uttlesford cycle strategy, which has already been completed, with no funds for further investigation at this point in time. Whilst ECC supports in principle further dedicated cycle infrastructure and cycling and welcomes proposals to achieve this, this particular proposal would need to be considered and treated as an aspiration.

Will be altered to a Recommendation

Policy TR5 seeks to ensure a link to the 'national' network for Carver barracks. The evidence available to ECC indicates that this is unlikely to be deliverable, i.e. another vehicular connection to the M11 and as such should be removed as this would effectively mean that no additional development would come forward for this site. Even if carried forward in any way it should only reflect additional demand over and above existing demand. It should be remembered in this context that the B1383 (having been downgraded in the network route hierarchy) was the original A11 prior to the M11 and used to carry more traffic than it does now.

ECC produce no evidence that the B1383 still carries less traffic than it did prior to the opening of the M11 nearly 40 years ago. Carver Barracks has been commented on in the district as the 'next' new settlement. Being a former two runway cross shaped

wartime airfield it is a very large site. The issue is not just of traffic on the B1383, but the one lane Debden Rd bridge, the T junction, commuter parking and air pollution. The Steering Group stands by its view that traffic from a 'significant' development at Carver Barracks should have an alternative route to the key road network. It is outside of the remit of our Plan as to whether this might make a large development unviable

Policy TR6 appears to propose the removal of white lines in the centre of the road. This works best where roads are much narrower than the B1383. Parallels might be drawn with a Norfolk scheme, with the reference to Starston being a small village on a country lane with vegetation adjacent to the road and properties in a very different environment. Also on a terminology point, ECC advises changing current reference to 'Essex Highways' to **The Highway Authority**.

TR6 is a Recommendation. The terminology will be changed. The Highways officer for local project, at a meeting in the UDC offices, suggested not reinstating the lines after the next resurface as an option.

Local Education Provision

Policy EH2 – primary school places. Objective 1 is supported but the supporting text is inaccurate and the policy accordingly considered to be unworkable. In response, ECC advises the replacement of point 1. ECC suggested text is as follows:

'Under section 14 of the 1996 Education Act, Essex County Council must secure sufficient school places to serve their area. There is a range of school place providers including Academy Trusts. Nationally, schools are placed into 'planning groups' agreed between the local authority and the Department for Education. These groups reflect local geography, historic admission patterns and alternative provision.'

The suggested text does not seem to conflict with point 1. The Steering Group is happy to add the suggested text

ECC also advises the replacement of point 5. ECC suggested text is as follows:

'Essex County Council's '10 Year Plan' to meet the demand for school places notes that Clavering Primary School is being expanded for September 2018 and that a further expansion in 'group 6', which also includes Newport & Rickling primary schools, may be required around 2020.'

Clavering is not in our plan area. The expansion will be noted and the word 'our' replaced by 'Newport and Rickling'. We could find no reference in the 10 year plan 2016 – 2025 to any further expansion. We would expect to see this on p31 of the document

Policy EH2

ECC advises the removal of occupancy restriction and replace with obligation to facilitate appropriate provision in line with the ECC Developers ' Guide to Infrastructure Contributions.

The suggested wording would be a statement of the existing position and would not address the issue as set out primarily in point 4. ECC have just effectively recommended refusal of a large planning application (104 houses at Thaxted) on exactly the same grounds as policy EH2, ie insufficient places at Thaxted and distance to travel, despite Thaxted being in a group of three primaries

ECC notes that this policy suggests that:

'Planning permissions for new homes will require a condition of no occupancy of any property unless the Education Authority has confirmed that places are available, at the nearest primary school, on the date of first occupancy, for the whole of the permitted development'.

This would not be appropriate for a number of reasons and this is making an assumption that all homes will contain children. The 'nearest primary school' would need to be defined and this is not always the school of choice. There is also no mention in the NP of secondary education and Early Years & Childcare provision. As a result, ECC this policy is not workable and should be removed.

The intention is to use the Essex figures from the 10 year plan: 'The factors currently used are 0.3 additional primary school pupils per new house and 0.15 additional pupils per new flat..' Or ratio as subsequently amended by Essex.

So 10 houses would need 3 places and one house at least one place

This will be made clear in the policy

The nearest primary school means exactly that. Our geography is such that there will be no doubt as to which school is nearest. If parents wish to send their children elsewhere that is not a matter for the plan

The policy does not seek to address any matters relating to EY or secondary provision and we do not see that this prevents dealing with primary.

Recommendation SCL 5 – Improve the facilities at Newport Recreation Ground
The location of the land / car parking spaces secured from the 'Ellis Trust Plan' reflect the following considerations:

- Potential expansion of school to south of existing buildings.
- Unknown ownership of the bridleway / uncertain vehicular rights of way.
- Safety considerations / minimising traffic along Frambury Lane in front of the school.

Delete the following points:

- ~~Alter the Ellis Trust plan to move the car park to the west, accessed off the byway.~~
- ~~Rebuild the byway and provide direct access into the school off the car park and ensure there is drop off space.~~

The Recommendation specifies safety improvements. As currently planned the car park would only be used by school staff, which is considered wasteful. Altering its location slightly would not affect use of the land for school expansion.

Other Recommendations: Infrastructure and secondary school
Objective 3: Joyce Frankland Academy (JFA) expansion

Whilst JFA's access issues are recognised, the NP does not offer any solution. Objective 3 thereby conflicts with Objective 1. Any physical expansion of JFA would require planning permission, with the need for additional school places and access issues being given appropriate consideration as part of the planning balance.

Delete recommendation i.e.:

~~'It is recommended that no further expansion of JFA be permitted unless solutions are implemented to the school transport problems.'~~

JFA is currently having new building for a year group expansion. However, the permission for that did not address the issue of school transports parking and drop off.. The reason for the Recommendation is to seek to ensure that any future growth does address this, which is different to and in addition to access just at the site. Inability to currently offer a solution does not preclude recommending that the matter be addressed before permitting expansion which would make it worse

Early Years and Childcare (EYCC)

ECC notes that there does not appear to be any reference to EYCC within the NP. It also needs to be recognised that any potential growth of Newport and Rickling will require additional EYCC to ensure that parents living in the villages can work or study safe in the knowledge that their children are in good or outstanding childcare provision. The NPWG should contact ECC to determine appropriate wording in this regard.

It is presumed that provision would be made regardless of the existence of our Plan. If ECC has a specific reason to include information via the Plan we are happy to oblige, but otherwise the Steering Group does not feel it would have anything to add

ECC Minerals and Waste Planning Role – Background and Safeguarding Minerals Development

ECC is responsible for minerals and waste planning in the area proposed to be covered by the NP. In respect of mineral planning issues, extant policy is set out within the Essex Minerals Local Plan (MLP) (adopted 2014). In respect of waste planning issues, extant policy is set out within the Essex and Southend-on-Sea Waste Local Plan (WLP) (adopted 2017). The WLP includes site allocations and policies to guide future waste development in Essex up to 2032.

Comments on 'What is a Neighbourhood Plan and why does it matter?' section

In the section entitled "National Planning" it is noted that 'Local planning policy represents the third tier of planning in England.' The section then describes the role of the NPPF. The next section, entitled 'Local Planning', describes the Uttlesford Local Plan. Between these two hierarchical tiers sits "County Planning" which includes the Essex Minerals Local Plan 2014 and the Essex and Southend-on-Sea Waste Local Plan 2017. These plans are statutory documents and their policies govern issues relating to minerals and waste planning. Planning decisions taken within the NQR

Neighbourhood Plan area must also be in conformity with the minerals and waste plans (which form part of the adopted Development Plan for the area).

To address this, the NP should contain a small section sitting in-between the 'National Planning' and 'Local Planning' sections which briefly sets out the role of the minerals and waste local plans. This will ensure that the planning policy context is accurately depicted.

This will be added

Comments on 'How a Neighbourhood Plan fits into the Planning System' section

The tests set out in this section do not match those set out in the "The basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum" section of planning guidance. Please see <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

Of particular note is that the NP states that a Neighbourhood Plan must be in "General Conformity with the strategic policies of the adopted Local Plan". However, the test as set out in guidance is that "the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the *development plan* for the area of the authority (or any part of that area)." The 'development plan' includes the minerals and waste local plans and is therefore not limited to the Uttlesford Local Plan. The 'Independent Examination' section of the NP more accurately represents this test.

This will be adjusted

Policy HA1 – Coherence of the Villages

Policy HA1 primarily seeks to limit 'development' to within certain designated areas. It is considered that 'development' needs to be appropriately defined. For example, Policy HA2 refers to 'commercial and / or housing development'. There is a long-held understanding that minerals and waste developments have very different locational requirements from other forms of built development. As minerals and waste developments are a County Matter, it is outside of the remit of the NP to attempt to prescribe the location of all forms of development.

To address this, the NP will need to define 'development' in a manner such that it excludes the County Matters of minerals and waste. This comment applies to all policies where 'development' is referred to. Such a definition can be placed within the Glossary.

A definition of 'development' will be added to the glossary

Site NEW1 – Chalk Farm Quarry, Newport

ECC in its role as Minerals and Waste Planning Authority, issues a holding **objection** against this proposed site allocation.

As noted in the NP, the site "is in the Essex Waste Plan as suitable for inert landfill, leading to eventual reinstatement of the chalk grassland" and "is in the Essex Minerals Local Plan as a safeguarded site". The site is therefore safeguarded by virtue of Policy S8 of the Minerals Local Plan 2014 and Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017.

Through Minerals Local Plan Policy S8 and Waste Local Plan Policy 2, the site is designated as being within a Mineral Consultation Area and a Waste Consultation Area respectively. These areas extend up to 250m around the existing mineral site, which is also an allocated inert recycling and landfill site. ECC as the Minerals and Waste Planning Authority must be consulted on planning applications of all types not excluded by the policies where sites are subject to these mineral and/or waste planning designations. ECC will likely object to proposals that may impact on an active mineral quarry and potentially compromise the delivery of the full Waste Local Plan allocation.

Policy S8 also sets the Policy Context for Mineral Safeguarding Areas. Site NEW1 is within the Chalk Mineral Safeguarding Area and therefore further sections of Policy S8 of the Minerals Local Plan apply to this site. Please see the 'Whole Plan – Mineral Planning Issues' section of this response for more information.

The site description for site allocation NEW1 in the NP states that “a combination of inert landfill and housing, or mixed commercial [development] and housing, is considered viable, beneficial and a good use of the site and would give partial implementation of the Essex and Southend Waste Local Plan as well as this Plan.”

The Essex and Southend-on-Sea Waste Local Plan 2017 is an adopted, strategic plan which forms part of the Development Plan for the area. A policy approach that advocates a 'partial implementation' of that already adopted Waste Local Plan content is therefore contrary to the Development Plan. It is subsequently considered that the Neighbourhood Plan test evidenced above, namely that Neighbourhood Plans be “in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)” is not met.

The proposals put forward by the NP may sterilise permitted chalk reserve and/or jeopardise the restoration scheme for the quarry. Chalk extraction was last approved at the site recently, in November 2017 (application reference ESS/32/17/UTT) and any proposals which run contrary to this and the approved restoration scheme will likely be opposed (see ensuing text for further comment).

Finally, the Waste Local Plan 2017 states (in Table 16) that the waste operations will be in effect until 2042. Whilst the NP does not include timescales for delivery of Site NEW1, it is noted that 2042 is beyond the stated time horizon of the NP.

Given the current policy status of Site NEW1 through its inclusion in the Minerals Local Plan 2014 and Waste Local Plan 2017, its current inclusion in the NP is subjected to a holding **objection**.

Should the NP group wish to continue to promote this site for non-mineral and/or non-waste development, the Minerals and Waste Planning Authority will require entering into dialogue with the landowner or an advocate to understand their intentions for this site. Should such dialogue result in changes to the viability of the site as a mineral and/or waste development, the policy context of the site could be amended appropriately and the holding objection potentially removed.

The Steering Group has discussed the matter again with the owners. They wish to keep open all options but are not at present ready to negotiate with ECC within the

timeframe needed for inclusion in the Neighbourhood Plan. Therefore the Steering Group has agreed with the owners that we will carry forward the site as a Recommendation not a Policy.

Whole Plan – Mineral Planning Issues

As a requirement of the NPPF, safeguarding mineral resources of national and local importance is carried out by the Mineral Planning Authority through the designation of Mineral Safeguarding Areas (MSA).

MSAs aim to ensure mineral resources are considered and reflected adequately and effectively in land use planning decisions to prevent sterilisation by non-minerals development. The MSA designation signifies to the Local Planning Authority, Neighbourhood Planning Authority and prospective developers of non-mineral related proposals to the potential presence of economically viable mineral resources. This ensures that the presence of minerals is considered at the earliest opportunity in the Plan/development process, although the Minerals Local Plan acknowledges that this does not create a presumption that the resources defined will ever be worked.

Policy S8 of the Minerals Local Plan identifies Mineral Safeguarding Areas around economically viable mineral deposits in the County. Policy S8 is part of the Development Plan for the Neighbourhood Plan area so all decisions must be taken in accordance with it.

Implications for the NP

There are several areas of mineral resources (sand and gravel, and chalk) which are subject to protection through an MSA within and in close proximity to the Neighbourhood Area, as outlined in Map 1 and Map 2. Whilst it is recognised that the proposed development areas may not always be subject to an MSA, or be of a size to trigger Policy S8 of the Minerals Local Plan, all maps used within the NP should include the MSA for sand and gravel, and chalk, as shown within the map accompanying this response. This information can be provided by ECC. It should be noted that ECC must be consulted on any planning application on a site located within a Sand and Gravel MSA that is 5ha or greater, or in the case of a Chalk MSA, greater than 3ha. This is in line with Policy S8 of the Minerals Local Plan.

It appears no alteration to the Plan is required?

General Note

Widdington Pit is a permitted mineral extraction and landfill site which is to be returned to agriculture by 30th September 2023 (ESS/03/16/UTT and ESS/04/16/UTT). Until such a time this site is also subject to a Mineral Consultation Area and Waste Consultation Area extending 250m from the site boundary. With the site being 140m from the NP area, the eastern edge of these consultation areas fall inside the NP area. It is recognised that this area of land is not promoted for development in the NP, and as such this General Note is included for information only. Widdington Pit and its associated consultation area is shown on Map 2.

This note therefore requires no particular change to the NP.

Economic Growth

Policy BL1: ECC is supportive of this policy, particularly with regard to endorsement of Uttlesford District Council's Policy EMP3 to ensure employment sites are retained wherever possible (no change to the Neighbourhood Plan is therefore recommended in response).

Policy BL2 ECC has no objection to this Policy.

Policy BL2 ECC has no objection to this Policy.

Policy BL3 ECC is supportive of this policy.

General Points

Whilst the NP makes reference to the fact that "Poor broadband and mobile coverage has been a significant disadvantage, which is planned to be resolved during 2018 with very fast connections being made available" ECC would suggest the inclusion of broadband policy with regard to the development of any new employment units.

In response to this, ECC would suggest that policy wording should be considered to ensure that any new employment space that is generated would ensure Fibre to the Premises (FTTP) connectivity (or reasonable access to Fibre To the Cabinet) to ensure commercial viability of any such units.

Reference to FTTP will be added. Also as businesses may be operated from houses, this will be included as being supported for all new houses, as a business policy. However it is noted that the current option via Gigaclear in Quendon is considered by residents as expensive to both install and per month. It provides capacity very significantly above normal requirements but there is no choice of service providers so users are locked in and popular premium channels eg for sport are currently not available.

Ecology

Recommendation EN7 Wicken Water Marsh Local Wildlife Site (LoWS)

ECC supports the recommendation that Wicken Water Marsh LoWS is included within the remit of the Community Land Trust (CLT) for the 95 house development to allow active conservation management.

The NP should also identify other LoWS within the plan area:

- Ufd89 Newport - Debden Road Protected Roadside Verge – a site with a surviving fragment of chalk grassland vegetation.
- Ufd80 Quendon Park - grasslands of Quendon Deer Park have a floristically rich sward

Background to Greenspaces and Environment Policies Footpaths and access to the countryside (P34)

Quendon Wood is a statutory designated site Site of Special Scientific Interest (SSSI) and Ancient woodland is a Priority habitat. These can be viewed on the 'Magic map' website, produced by Department for Farming and Rural Affairs (magic.defra.gov.uk/). Ancient woodlands should be identified as they are recognised as irreplaceable habitats in Paragraph 118 of the NPPF.

Site 'NEW1'

As the lower, flat part of this potential LoWS (Uttlesford PLoWS 9) Newport Pond Chalk Pit has been allocated for development “for up to 150 dwellings, or a mixed commercial / residential development”, subject to ECC’s substantive comments and advice provided above (which is not negated by these latter points) consideration should be given to biodiversity. The Uttlesford LoWS Review 2007 recommended extensive surveys of flora, invertebrates and reptiles for this chalk quarry to allow review of LoWS criteria. However the survey data will be needed to assess development in this location.

This chalk pit is also in the Essex Waste Plan for landfill, leading to eventual reinstatement of the chalk grassland. Although not a Flagship site identified in ECC Minerals Restoration to Biodiversity SPG, inert landfill on the remaining part should be restored to chalk grassland to deliver partial implementation of the Essex and Southend Waste Local Plan as well as this NP.

The NP should also reference consultation with Natural England and text on p56 “Proposals must be accompanied by:” should include biodiversity survey and assessment.

This will be added

Site Check Results	
Site Check Report Report generated on Thu Jun 07 2018	
You selected the location: Centroid Grid Ref: TL524331	
The following features have been found in your search area:	
	Planning applications for quarries, including, new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc. Oil & gas exploration/extraction.
Rural Non Residential	Large non residential developments outside existing settlements/urban areas where net additional gross internal floorspace is > 1,000m ² or footprint exceeds 0.2ha.
Residential	Residential development of 100 units or more.
Rural Residential	Any residential development of 50 or more houses outside existing settlements/urban areas.
Air Pollution	Any industrial/agricultural development that could cause AIR POLLUTION (incl: industrial processes, livestock & poultry units with floorspace > 500m ² , slurry lagoons > 200m ² & manure stores > 250t).
Combustion	General combustion processes >20MW energy input. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.
Waste	Landfill. Incl: inert landfill, non-hazardous landfill, hazardous landfill.

Allocations

Site NEW1 and Site '13 New 15' both lie within the Impact Risk Zone (IRZ) for Debden Water SSSI, so Natural England (NE) comments will be required on the NP or any application for development.

Site '2 Que 15', allocated for up to 19 dwellings - this does not trigger consultation with NE as the IRZ for this location only refers to residential development of 100 units or more.

SSSI Impact Risk Zones (which can be found at <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>) – are provided to help assess planning applications for likely impacts on SSSIs.

Reference to SSSI and IRZs for allocations would be appropriate.

Concluding Comments

ECC looks forward to engaging constructively, actively and on an on-going basis during the continued preparation of the Newport, Quendon & Rickling Neighbourhood Plan. This will ensure the continuation of a robust, long-term strategy for the area that provides a reliable basis on which ECC may plan future services and provide (or commission) the required social and physical infrastructure for which it is responsible.

If you wish to discuss any of the above matters in further detail please do not hesitate to contact me.

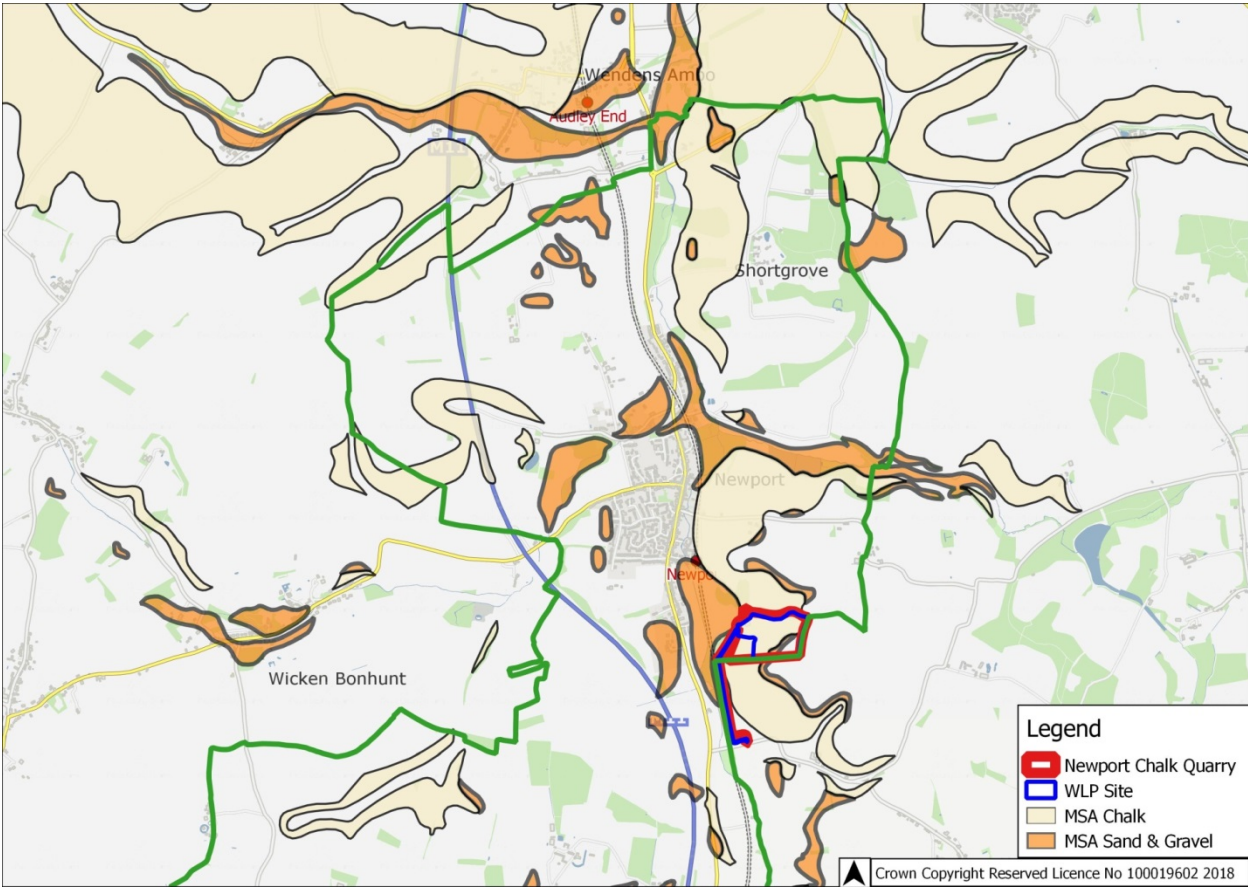
Yours sincerely,

Rich Cooke
Principal Spatial Planner
Planning, Transport and Development
Essex County Council
County Hall
CHELMSFORD
CM1 1QH

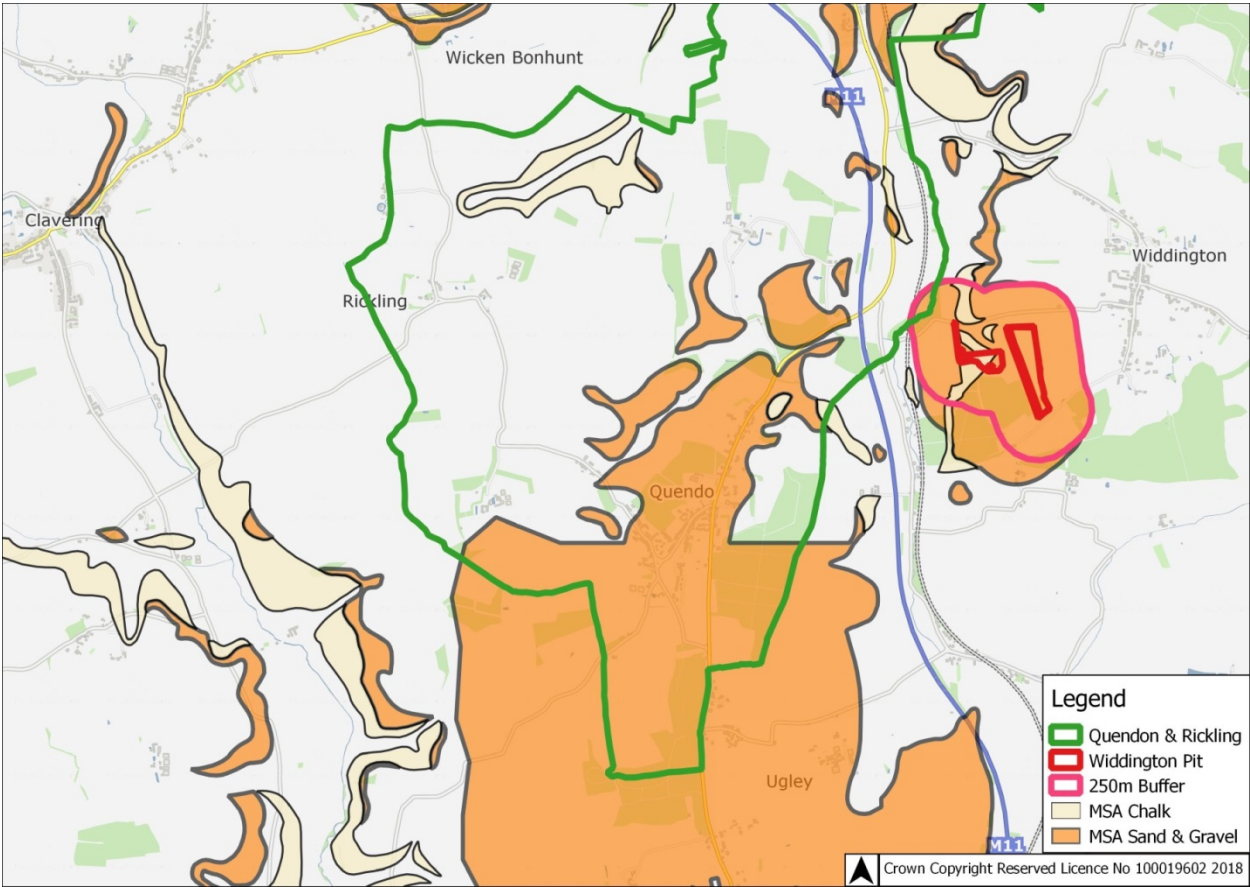
cc. S Miles & P Bylo, Planning Policy, UDC

Minerals and Waste Plans Map

Map 1 – Newport Area of NQR Neighbourhood Plan



Map 2 – Quendon and Rickling Area of NQR Neighbourhood Plan



Appendix 1: Policy S8, Essex Minerals Local Plan 2014

Policy S8- Safeguarding mineral resources and mineral reserves

By applying Mineral Safeguarding Areas (MSAs) and/ or Mineral Consultation Areas (MCAs), the Mineral Planning Authority will safeguard mineral resources of national and local importance from surface development that would sterilise a significant economic resource or prejudice the effective working of a permitted mineral reserve, Preferred or Reserve Site allocation within the Minerals Local Plan (MLP). The Minerals Planning Authority shall be consulted, and its views taken into account, on proposed developments within MSAs and MCAs except for the excluded development identified in Appendix 5 of the MLP.

Mineral Safeguarding Areas

Mineral Safeguarding Areas are designated for mineral deposits of sand and gravel, silica sand, chalk, brickearth and brick clay considered to be of national and local importance, as defined on the Policies Map.

The Mineral Planning Authority shall be consulted on:

- a. all planning applications for development on a site located within an MSA that is 5ha. or more for sand and gravel, 3ha. or more for chalk and greater than 1 dwelling for brickearth or brick clay; and
- b. any land-use policy, proposal or allocation relating to land within an MSA being considered by the Local Planning Authority for possible development as part of preparing a Local Plan (with regard to the above thresholds).

Non-mineral proposals that exceed these thresholds shall be supported by a minerals resource assessment to establish the existence or otherwise of a mineral resource of economic importance. If, in the opinion of the Local Planning Authority, surface development should be permitted, consideration shall be given to the prior extraction of existing minerals.

Mineral Consultation Areas

MCAs are designated within and up to an area of 250 metres from each safeguarded permitted minerals development and Preferred and Reserve Site allocation as shown on the Policies Map and defined on the maps in Appendix 6. The Mineral Planning Authority shall be consulted on:

- a. Any planning application for development on a site located within an MCA except for the excluded development identified in Appendix 5,
- b. Any land-use policy, proposal or allocation relating to land within an MCA that is being considered as part of preparing a Local Plan.

Proposals which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development, Preferred or Reserve Mineral Site allocation shall be opposed.