

**Written statement on Supplementary Questions (6/5/20) on behalf of:  
Barton in Fabis Parish Council, Clifton Village Residents Association, Lark Hill  
Retirement Village Residents, Thrumpton Parish Meeting and SAVE  
Campaign Group**

**Matter 2 – Vision, Strategic Objectives and Strategic Policies**

**Question 6: Should Strategic Objective SO1 refer to sustainability in terms of the environmental dimension?**

Yes. We contend that it should refer to sustainability in terms of the environmental dimension and be consistent with principles outlined in the NPPF particularly regarding ‘enhancing the natural and local environment’ (para 170 a), b), d) e)) and ‘habitats and biodiversity’ (paras 175 (d) and 177).

**Question 7: Does the statement in the penultimate sentence of Strategic Objective SO1 imply that extensions to existing sites will be developed before new sites? If so, does this require clarification?**

Yes. This does require clarification. We would support the development of sites in relation to projected demand based on actual and reliably forecast demand, and note the Inspector’s Question 28 under MP1. Future aggregate demand must be impacted by the potential for a future recession influenced by economic circumstances arising from Covid-19 and its aftermath. This point is also relevant to the consideration of **Question 11** and **Question 12**.

As a result, it is sensible to adopt a cautionary approach of developing extensions to existing sites first before any new sites are allocated, and this should be made explicit in SO1.

**Question 10: Should text (or a footnote) be added to paragraph 3.5 to refer to the exception in paragraph 177 of the National Planning Policy Framework (the Framework)?**

Yes. A specific (but not exclusive) reference to NPPF para 177 would be useful.

**Question 13: Should Policy SP2 refer to the need to achieve a net gain in biodiversity?**

- 13.1. Yes. This would be consistent with NPPF para’s 170(d) and 175 (d) in particular and is further highlighted in **Question 31** in relation to MP2p and the site at Mill Hill Barton in Fabis.
- 13.2. The policy of ensuring that there is ‘no net loss’ of biodiversity as a result of development is now well established in the UK, and it is therefore disappointing that there is no reference to it in Section SP2. Instead the text relating to SP2 merely describes in simple terms what biodiversity-led restoration entails and the kinds of habitat that might be restored in the context of mineral development. There is no explanation of the constraints associated with biodiversity-led restoration, or the issues that need to be considered if proposals for such restoration are to be considered adequate. As a result the application of the principle of biodiversity-led restoration in the plan is inadequate.

- 13.3. The draft strategic policy for biodiversity restoration (SP2) proposed in the Minerals Plan is inadequate because it fails to set restoration objectives in the context of the 'mitigation hierarchy' that is recognised in current planning policy that aims to halt the loss of biodiversity.
- 13.4. It should also be recognised in the Plan that, although planning policy recognises that restoration provides an opportunity for the recreation of new habitats, it is not a substitute for conservation of existing resources. The current draft plan is flawed because it needs to make a strong and meaningful link between the statements on biodiversity-led restoration and those in relation to sustainability objective SO6 (i.e. Protecting and Enhancing Natural Assets). Biodiversity-led restoration is not an alternative to conservation – but rather a part of a broader mitigation strategy.
- 13.5. The sections of the Plan relating to restoration also needs to be strengthened by reference to criteria that will ensure that where biodiversity-led restoration is appropriate, then ecologically appropriate robust schemes are brought forward with appropriate monitoring and realistic restoration management time-frames. There should be a clear statement in relation to the expectation of ensuring net biodiversity gain.

**Question 19: Is the requirement of Policy SP4 (2) (a) for new mineral workings and related development to be within close proximity to markets sufficiently clear?**

- 19.1. No. The requirement for new mineral workings and related development to be within close proximity to markets is neither clear nor has been justified.
- 19.2. In our other representations on Matter 2 to the Inspector's MIQs we have already outlined issues in relation to prioritising proximity to markets as a criteria for judging sustainability over other criteria outlined in the Plan. The Plan does not meet the area's objectively assessed needs in a way that is consistent with achieving sustainable development both local and nationally. In summary:
- In any positively prepared plan, the proposed geographical allocation of sites needs to be consistent with the full range of criteria used to judge the sustainability of actions; unless it does so it is not consistent with National Policy as set out in the NPPF.
  - There also needs to be a statement about how different sustainability criteria are to be weighed against each other when assessing different geographical options, and why market access and HGV transport are prioritised over other factors. A sustainable spatial distribution of sites is not one which is simply determined by proximity to market and transport costs.

**Question 21: Should further text be added to paragraph 3.49 to refer to national policy in securing a net gain in biodiversity? I suggest the following, but the Council may wish to suggest alternative wording: "It is therefore important that new minerals development is correctly managed and to ensure that no adverse impacts occur to designated sites, or priority habitats and species as far as possible. Policy SP2 promotes a biodiversity-led restoration approach which seeks to maximise the biodiversity gains resulting from the restoration of mineral sites and a net gain in biodiversity".**

We support the change in wording and suggest that it could be strengthened further by emphasising that net gain in biodiversity should be considered both at the site and landscape (county-wide) levels. Para 170 d) of the NPPF states that Planning policies and decisions should include “establishing coherent ecological networks that are more resilient to current and future pressures. Para 171 further emphasises the importance of taking a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.

Reference to biodiversity gains at the wider landscape/County level would also make the text consistent with the statement in SO6: ‘Protecting and enhancing natural assets’, that policies should “.....Maximise net biodiversity gain by enhancing and re-connecting existing habitat and creating new habitat through a landscape-scale approach....”

**Question 22: Should supporting text be added in relation to air quality, including its potential effect on biodiversity?**

Yes, we agree that it should include reference to air quality, along with other potential impacts on biodiversity arising from noise, dust, light and modification of flood regimes.