

## Comments on Draft Mineral Resources DPD: Preferred Options

### Objections

#### Page 38 para 4.34

This paragraph mentions a **criteria based** policy for new sand and gravel sites outside existing permitted reserves. It is not clear which policy this sentence refers to. A link to the correct policy within the document is needed, or if the policy is published elsewhere, a reference should be made.

### **Spatial Objectives**

In general it is not clear how the spatial objectives have been derived. Is there another policy document which details their development? If so, it should be referred to.

Spatial Objective L omits the need to conserve natural resources. This is different to protecting and enhancing. It also uses the word 'area' to cover designated sites and landscapes. A more specific wording would help to distinguish these two different designations from each other. At the same time, the phrase 'to have regard to the need to protect' is cumbersome and could be simplified as 'to protect' without losing its effectiveness.

The Objective does not mention the historic environment. This is an important component of the resources of the County on a par with biodiversity or landscape character.

The last phrase uses the words 'protect from' minerals development. This gives the impression that minerals development is always negative when in fact it can offer opportunities to enhance the County's natural resources.

The objective could be re-worded as;

To protect, conserve and enhance natural and cultural assets, including internationally and nationally designated landscapes and sites, landscape character, biodiversity, the historic environment and geodiversity, through minerals development.

### **Policies**

Policy M7 follows government guidance in PPS 7 and deals well with the conservation of the Shropshire Hills AONB. However, its effectiveness would be enhanced if it was linked more thoroughly with the preferred options and spatial objectives. See 'comments on the general approach' for more detail.

There is a need for an extra policy covering the protection, conservation and enhancement of natural assets such as biodiversity and the historic environment. This would help the translation of spatial objective L into policy.

## **Comments on the general approach**

### **1.**

The spatial objectives, the preferred options and the implementing policies (tables 3.1 and 3.2) do not link together very well. For example, preferred option (xii) (table 3.2) is shown as linking to objective L. However, option (xii) deals solely with local materials and makes no reference to the need to protect or conserve the County's natural assets for their own sake. Neither does it refer to opportunities to enhance these assets through minerals development. This leads in turn to a very poor context for policy M7 on the Shropshire Hills AONB, which appears ungrounded, compared with many of the other policies. This lack of follow through from objective L also leads to the absence of any policy dealing with the protection, conservation or enhancement of biodiversity, geodiversity, landscape character or the historic environment in areas other than the Shropshire Hills AONB.

At the same time, some of the preferred options appear for the first time in table 3.2 so that options (i), (iii) and (iv) are not linked to any of the issues. Some explanation should be given as to the development of these options and why they have not been consulted on in the same way as the other preferred options.

Lastly, the links between the preferred options and the implementing policies are not always accurate. For example, policy M7 (protection of the Shropshire Hills AONB) does not implement option (iii) (sub regional apportionments for aggregate materials). Likewise, option (vii) is not implemented by policy M10, it is implemented by policy M11 and it is not clear how policy M11 implements option (iv).

A re-examination of the links between the spatial objectives, the preferred options and the policies should be undertaken. Any inconsistencies can then be addressed to provide a more clearly defined progression from spatial objectives to preferred options and policies. Amendments should be aimed at grounding policy M7 (on the Shropshire Hills AONB) firmly within the process. The option of including an additional policy covering protection, conservation and enhancement of natural assets can also be assessed. This re-examination would also provide an opportunity to explain how options (i) (iii) and (iv) were derived without the same level of consultation as the other options.

### **2.**

The Shropshire Hills AONB Management Plan has specific objectives (F1 and F2, pages 96 and 97) to raise the profile of the designated area. The title of the designation is often used incorrectly. It is preferable to use the term 'Shropshire Hills AONB' rather than just 'AONB' throughout the document, except where it is repeated close together.

## **Support**

Paragraph 4.22 on page 35 gives clear guidance on development in the Shropshire Hills AONB

Policy M10 provides for the conservation of a distinctive landform (Wenlock Edge) in the Shropshire Hills AONB

Paragraph 4.88 sets out clearly that minerals development in the Shropshire Hills AONB will only be approved under exceptional circumstances.