

Appendix 1 – Summary of Representations to the Hertfordshire Minerals Local Plan Initial Consultation 2015

Responses are in Issue order

Table 1: Vision – Issues 1-3

General Statement covering Vision 1 & 2:

Planning positively and providing points that can be translated into policy were both within the top few selections made by respondents to both versions of the vision.

Preferences between the two alternative visions included in the document were roughly split, with members of industry preferring the emphasis on the requirements of the NPPF in Vision 1 and those more interested in the impact on landscape and character perceiving Vision 2 to have more of a focus on these aspects.

Along with a few minor amendments to terminology, it is therefore proposed the vision to be included in the draft Plan will be a merged version of Visions 1 and 2. The content and language of Vision 1 will be combined with the shorter paragraphs and slightly re-ordered Vision 2.

The timescale specified at the start of the vision will be amended to match the Plan period (which was not confirmed at the time of the Initial Consultation publication) rather than the period to 2040 as in Vision 2. Whilst forward thinking, the vision refers to a limited period of time within which the plan can have influence (15 year plan period). As such the vision should be forward thinking up to 2032.

Comments received stated that there should not be a distinction between the landscape and natural environment. The term ‘natural environment’ is included to refer to the species and habitats as opposed to the visual aspect of the landscape which is why two terms have been included. Consideration will be given to using the terms character and quality.

In response to comments regarding sustainable transport, this is promoted within the NPPF although it is recognised that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. The nature and location of the site has an impact upon whether or not the use of sustainable transport modes is appropriate. The encouragement to use alternative modes of transport to the road network will be included within a policy in the Plan. The potential use of sustainable transport methods will be included within the sustainability appraisal and will be determined on a case by case basis. Due to the location of mineral reserves in relation to alternative transport modes, it may result in HGV movements being the main method of transporting minerals. A transport assessment would be required to support a mineral planning application and the use of sustainable transport would be addressed.

The need to maintain a landbank of reserves would be written into supporting text within the Plan and is included within the need to provide a steady and adequate supply. The permitted reserves for Hertfordshire are set out within the Local Aggregates Assessment. Agree there should be reference made to permitting reserves in the county.

In response to comments regarding the protection of specific designations, the vision sets out the broad aims of the Minerals Local Plan. The protection of specific designated sites such as AONB, SSSI, RAMSAR etc is not referred to in the vision. This issue will be addressed within the site selection methodology and policy in the Plan.

The AONB is a designated area and does not describe the environment. Whilst it is similar to the Green Belt, with its designation indicating a rural character, the presence of the AONB is not overwhelming like the Green Belt.

Mitigation should be carried out only after there are efforts to avoid impacts and reduce them where possible. All impacts of mineral extraction cannot be avoided and there needs to be recognition that they need to be dealt with if they arise. They could however be reduced in the first place and therefore the term 'minimised' would be appropriate. The term 'seek to' does not give any certainty that this will happen and therefore is not considered appropriate.

In respect of the comments surrounding the terminology of rural and urban areas, the visions refer to the rural character/areas of the county with towns and some densely populated urban areas. Villages and hamlets are implied as part of the rural character. The City of St Albans is not specified either. The vision should refer to urban areas or settlements as an all-encompassing term to cover all populated areas.

A number of comments were received regarding the Green Belt. The Green Belt aims to prevent urban sprawl and as such is mainly within rural areas. The vision makes reference to the Green Belt within the county which contributes to its predominant rural character. Its policy designation does not however reflect the quality of the landscape. Hertfordshire has a large expanse of Green Belt compared with other counties, which provides its distinction. Omitting reference to the Green Belt would not provide a true impression of Hertfordshire. Green Belt is a land designation that is a material consideration for any mineral development. However, its boundary can be amended by district councils. The Minerals Planning Authority will take this into account throughout plan production and seeks to include a policy on Green Belt in the Minerals Local Plan.

Restoration has been identified as another area of concern from the comments received. Restoration is an integral part of a mineral planning application and opportunities for improvements will be sought in the most appropriate form on a case by case basis. All opportunities should be encouraged where possible which is the essence of the overall vision. However opportunities for all forms of improvement may not necessarily be possible, an example would be biodiversity improvements potentially being hindered by the introduction of outdoor recreation in the immediate vicinity. Planning applications will be considered against policies within the Plan to seek positive restoration to maximise improvements on the natural environment after mineral extraction has taken place. This is sought to be put into practice as soon as extraction ceases. Being time specific is not always appropriate and is best if it starts to

take place in a phased approach before the extraction ceases and before any closure of a site. The term ‘subsequent management’ refers to the need to ensure that the high quality restoration is maintained into the future. Not all benefits such as improved ecology can be established immediately upon completion of restoration and therefore requires on-going management. There is a prescribed after-care process beyond the restoration stage and in certain cases there may be the need for a management company to manage the land beyond this stage.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 1 Which aspects of national policy and Hertfordshire County Council priorities does Vision 1 cover adequately? (Please select all that apply)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Planning positively <input type="checkbox"/> Driving towards sustainable development and economic growth <input type="checkbox"/> Locally distinctive to Hertfordshire <input type="checkbox"/> Provides a vision for what the county will be like in 20 years <input type="checkbox"/> Based on current trends and trajectories <input type="checkbox"/> Clear <input type="checkbox"/> Concise <input type="checkbox"/> Realistic <input type="checkbox"/> Measurable <input type="checkbox"/> Provide points that can be translated into policy <input type="checkbox"/> Shared vision for future development <input type="checkbox"/> Meets the needs of the communities <input type="checkbox"/> Protects against sterilisation of minerals citizen focussed <input type="checkbox"/> Acting with integrity <input type="checkbox"/> Getting things right <input type="checkbox"/> Innovative <input type="checkbox"/> Every penny counts 				

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>General Statement:</p> <p>Of the aspects listed in Vision 1 it was considered that the top three aspects that the vision covers adequately were:</p> <ul style="list-style-type: none"> • planning positively, • driving towards sustainable development and economic growth; & • provides points that can be translated into policy. <p>The three aspects that were not considered to be covered by the vision adequately were:</p> <ul style="list-style-type: none"> • Innovative; • Every penny counts; & • Getting things right. <p>The average number of selections that respondents made was 5 which means that most respondents were happy that vision 1 covered approximately a third of the aspects adequately. The main issues raised related to the format of the vision, the importance of the Green Belt and AONB, rural character of the county and suggested additions to the wording of the vision.</p>				
MLPIC2	1	Trustees of the Brocket Estate (Stuart Gray)	Positive Sustainable Acts with integrity	Selections noted. No response necessary.
MLPIC21	1	North Hertfordshire & Stevenage Green Party (Karen Harmel)	Sustainable; Locally distinctive; Current trends; Concise; Translates into policy; and Protects against sterilisation. Clear on mineral extraction and how to fulfil national policy. It is not compatible with Green Party policies on the economy, which emphasise that increasing	Selections noted. The county council as Minerals Planning Authority has a statutory duty to produce a Minerals Local Plan and identify reserves with potential for extraction that can be used to assist with economic growth. The Minerals Planning Authority is continuing with its requirement that has been in place over some period of time and has a legal duty to take carry out a

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>resource extraction, industrial throughput and waste production is incompatible with ecological sustainability.</p> <p>Vision is unclear with important aspects missing. The terms "sustainable" in this context means "can continue" and "positive" means "in favour of" - which makes the Vision unclear to people who associate a different meaning to those words.</p> <p>The wording is vague and allows partial or non-effective response to environmental issues. Recycling/re-use is not defined (belies the "every penny counts"). CD&E waste reduction is not defined although it is an intrinsic part of the MLP where it overlaps with the WLP.</p> <p>The needs of citizens/the community are not met. Lacks integrity (lots of wriggle room) towards environmental issues and is definitely not "getting things right". Vision is not positive, realistic or measurable and leads to lack of shared vision of the county for the future. The plan is not innovative.</p> <p>Phrases like "respect" for the Greenbelt must change to "protect" the Greenbelt. It's not enough to "mitigate against the impacts" or "seek to improve", should be prevent impacts, conditions should improve and should say how this will be shown.</p>	<p>Sustainability Appraisal/Strategic Environmental Assessment of the Minerals Local Plan to ensure compliance with sustainable development principles in terms of environmental, social and economic matters.</p> <p>Minerals are finite resources and can only be extracted where they are found. However sustainability is taken into account to ensure mineral extraction is not to the detriment of the environment. Mitigation measures will be considered to ensure protection is in place where needed. Sustainability does not imply that extraction will continue indefinitely nor does it imply that it should not take place at all. The words positive or in favour of are not included in draft vision 1.</p> <p>There is no specific reference to recycling, re-use and CD&E waste reduction within the draft vision which requires a definition. These are detailed within the main body of the document.</p> <p>The vision aims to meet all needs of the community in all aspects of mineral planning to account for the needs and the supply of minerals in the most appropriate way. There are different groups and individuals with different aspirations for</p>

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			"Restoration as early as possible" leaves a lot of room for manoeuvre, this needs to be clarified, for example "within one year of closure". The natural environment is only "conserved and enhanced" <i>after</i> mineral extraction and part of the Vision needs to focus on the current conservation of species and habitat protection. There are nearly 200 nature reserves and conservation sites in Hertfordshire and these sites need properly worded protection.	the county in terms of future development who need to share the vision. Mitigation can be put in place within the MLP where there is the need for this. Prevention cannot always be achieved to accommodate all shared visions for future development and the Minerals Local Plan needs to be aware of this. See General Statement regarding Green Belt. See General Statement for restoration.
MLPIC45	1	Wheathampstead Parish Council (Julia Warren)	Planning Positively	Selections noted. No response necessary.
MLPIC57	1	Bovingdon Brickworks Ltd. (Les Cook)	Planning Positively Driving towards sustainable development and economic growth Clear Concise Realistic	Selections noted. No response necessary.
MLPIC65	1	Three Rivers District Council (Martin Wells)	The vision adequately covers all aspects of national policy listed. Vision 1 provides broad overview of the intention for minerals planning and the need to identify sites. Support the encouragement of high quality restoration at the earliest opportunity particularly as the district contains a number of landscape areas. Object to mineral workings in Chilterns AONB which the district is partly within.	See General Statement regarding specific designations.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC85	1	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	<p>Positive Sustainable Locally distinctive Translates to policy Community needs Prevents sterilisation Integrity. Concise but jumbled and loses clarity e.g. Sustainable transport does not relate to steady and adequate supply of aggregates. Should have reference to maintaining landbanks of permitted reserves and state provision would be from sources in Herts. Secondary aggregates should be stated earlier.</p>	<p>Selections noted. Vision 2 was written for the reason of trying to separate issues and is the preference for this respondent.</p> <p>See General Statement regarding sustainable transport and landbanks.</p>
MLPIC92	1	Historic England (Kayleigh Wood)	<p>Clear Concise Translates to policy Historic England welcomes the general notion of Vision 1 and that the vision not only highlights the need to mitigate adverse impacts on the Historic Environment through mineral operations but also aspires to improve.</p>	<p>Selections noted. No response necessary.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC114	1	Central Bedfordshire Council (Natalie Chillcott)	Positive Sustainable Locally distinctive 20 year vision Clear Realistic Measurable Translates to policy Shared Community needs Prevents sterilisation Citizen focussed Acts with integrity Getting things right	Selections noted. No response necessary.
MLPIC150	1	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Positive Sustainable Locally distinctive Clear Realistic Translates to policy Shared Community needs Prevents sterilisation Citizen focussed Encapsulates the principles of NPPF, future extraction and supply in Herts which is welcomed. Statement flows. Provides positive vision.	Selections noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC166	1	Mineral Products Association (David Payne)	Positive Sustainable Clear Realistic Translates to policy Community needs Vision 1 sets the right tone for positively planning to maintain a steady & adequate supply of materials throughout the plan period. However, this should be followed by clear reference to this being through permitting sand and gravel extraction as well as import of rock that then informs the objectives.	Selections noted. Agree there should be reference made to permitting reserves in the county. In addition vision 1 lacks the reference to importing non-indigenous rock like vision 2, which should be inserted.
MLPIC178	1	Tarmac (Mike Pendock)	Sustainable 20 year vision Prevents sterilisation Vision 1 sets the right tone in terms of positively planning to maintain a steady and adequate supply to meet local and wider needs but the link to the permitting of applications for sand and gravel extraction could be made more explicit.	Selections noted. Agree that there should be reference made to permitting reserves in the county.
MLPIC185	1	Codicote Parish Council (Lorraine Ellis)	20 year vision Current trends Translates to policy Not driving towards sustainable development, doesn't meet the needs of communities and is not a shared vision. It is not clear, concise, realistic and measurable. Vision does not include villages.	Selections noted. See General Statement for rural and urban terms.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC199	1	CPRE Hertfordshire (Steve Baker)	<p>It is not a NPPF requirement to express overall aims of Plan as a 'Vision', and the HCC 'corporate' plan is not relevant to the Plan's function as a statutory DPD. The wording does not adequately address the fundamental necessity of protection of the people living in the County, and of the environment, from harm, while meeting the expectations of national policy to supply minerals.</p> <p>In any amended wording, the word 'towns' in first paragraph of the Vision, should be changed to 'settlements' to reflect the equal contribution of distinct villages and hamlets to the character of the County.</p>	<p>The council has a statutory function as the Minerals Planning Authority to produce a Minerals Local Plan. Alongside this the council has a corporate plan which sets out the key priorities for the county and how the council intends to deliver its vision for Hertfordshire, the County of Opportunity. Whilst this is produced as a separate function of council policy, the council in the work that it does needs to ensure that there is no indirect impact upon residents being able to thrive and have healthy lives, make active contribution to local areas and impact on Hertfordshire's economy.</p> <p>See General Statement for rural and urban terms.</p>
MLPIC215	1	D K Symes Associates (D K Symes)	<p>Positive Current trends Locally distinctive Clear Concise Realistic Measurable Translates to policy Community needs</p>	<p>Selections noted. No response necessary.</p>
MLPIC251	1	Buckinghamshire County Council (Emily Hodgson)	<p>No comment</p>	<p>No response necessary.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC287	1	HCC Ecology (Martin Hicks)	<p>Positive Sustainable Locally distinctive 20 year vision</p> <p>There can be conflicts between the demands of outdoor recreation and improved biodiversity due to disturbances associated with the former. Furthermore, ecological interest may be dependent upon some form of ongoing management – such as appropriate grazing - which is not so readily delivered as a new footpath with a sign.</p>	<p>Selections noted.</p> <p>See General Statement for restoration.</p>
MLPIC294	1	HCC Landscape (Jennifer Clarke)	<p>The Vision could look beyond the plan period and be more aspirational and descriptive and demonstrate that it will contribute to the strategic vision for landscape across the County, as set out in relevant landscape strategies (ie. Green Infrastructure plans).</p> <p>The "rural" character of Hertfordshire is too specific - It should say "the distinct character" of Hertfordshire to respect other important landscapes such as per-urban & industrial. Green Belt is referenced as a feature of Hertfordshire's rural character - Green Belt is a strategic area on a map to prevent urban sprawl and is NOT designated with regard to the character or quality of the landscape. The "sustainable and beneficial" uses of materials need clarifying - what are they and what will they mitigate the impacts of? NPPF para 143 can give guidance for clarifying the nature of impacts</p>	<p>See General Statement for time period.</p> <p>As with the corporate aims, there is a need to be joined up in the approach to delivering the strategic vision for landscape and therefore reference should be made within the vision.</p> <p>The principal character of the county has been used in the term 'rural'. Whilst it is understood that there are other landscapes to protect, 'distinct character' does not indicate what these are. Vision 2 is more explicit by stating that the rural character is the predominant character and therefore vision 1 should align with this.</p> <p>See General Statement regarding Green Belt.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>(positive/negative or acceptable/unacceptable etc)</p> <p>The Vision should reference the "effects of climate change" rather than improving "Climate Change"</p> <p>High quality restoration should be "started" as early as possible, and "carried out for the long term", not "carried out as early as possible".</p> <p>There should not be a distinction between the landscape and natural environment - Landscape includes aspect of the natural environment. The vision should be worded "...to conserve and enhance the character and quality of Hertfordshire's landscapes".</p>	<p>Agree that it is the effects of climate change that need to be considered.</p> <p>See General Statement for restoration. .</p> <p>See general statement regarding natural environment.</p>
MLPIC299	1	Bedford Borough Council (Natalie Chillcott)	<p>Positive</p> <p>Sustainable</p> <p>Locally distinctive</p> <p>20 year vision</p> <p>Clear</p> <p>Realistic</p> <p>Measurable</p> <p>Translates to policy</p> <p>Shared</p> <p>Community needs</p> <p>Prevents sterilisation</p> <p>Citizen focussed</p> <p>Acts with integrity</p> <p>Getting things right</p>	<p>Selections noted. No response necessary.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC320	1	East Herts District Council (Jenny Pierce)	East Herts supports the wording of Vision 1 but recommend that the paragraphs are further divided.	Agree that the vision needs to be broken down into paragraphs for ease of reading.
MLPIC343	1	Chilterns Conservation Board (Lucy Murfett)	<p>Add reference to Chilterns AONB in the vision eg “Mineral extraction will respect the rural character of Hertfordshire with its Area of Outstanding Natural Beauty, large expanse of Green Belt...”</p> <p>The vision should introduce a sequential approach by avoiding or reducing harm, before you consider mitigating it, by adding wording as follows: “The sustainable and beneficial use of materials will seek to avoid, reduce and mitigate against impacts”</p>	<p>See General Statement regarding specific designations.</p> <p>Mitigation should be carried out only after there are efforts to avoid impacts and reduce them where possible. All impacts of mineral extraction cannot be avoided and there needs to be recognition that they need to be dealt with if they arise. They could however be reduced in the first place and therefore the term ‘minimised’ would be appropriate. The term ‘seek to’ does not give any certainty that this will happen and therefore is not considered appropriate.</p>

Issue 2

Which aspects of national policy and Hertfordshire County Council priorities does Vision 2 cover adequately?

(Please select all that apply)

- Planning positively**
- Driving towards sustainable development and economic growth**
- Locally distinctive to Hertfordshire**
- Provides a vision for what the county will be like in 20 years**
- Based on current trends and trajectories**
- Clear**
- Concise**
- Realistic**

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p> <input type="checkbox"/> Measurable <input type="checkbox"/> Provide points that can be translated into policy <input type="checkbox"/> Shared vision for future development <input type="checkbox"/> Meets the needs of the communities <input type="checkbox"/> Protects against sterilisation of minerals citizen focussed <input type="checkbox"/> Acting with integrity <input type="checkbox"/> Getting things right <input type="checkbox"/> Innovative <input type="checkbox"/> Every penny counts </p> <p>General Statement:</p> <p>Of the aspects listed in Vision 2 it was considered that the top three aspects that the vision covers adequately were:</p> <ul style="list-style-type: none"> • planning positively, • locally distinctive to Hertfordshire; & • provides points that can be translated into policy. <p>The three aspects that were not considered to be covered by the vision adequately were:</p> <ul style="list-style-type: none"> • Every penny counts; • Innovative; & • Getting things right; plus jointly - based on current trends and trajectories. <p>The average number of selections that respondents made was 5 which means that most respondents were happy that vision 2 covered approximately a third of the aspects adequately. The main issues raised related to the vision being beyond the plan period, the importance of the Green Belt and AONB, rural character of the county, sustainable transport not being deliverable, impact on District Local Plans, Corporate Plan's aims not being relevant and suggested additions to the wording of the vision.</p>				

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC2	2	Trustees of the Brocket Estate (Stuart Gray)	Positive Sustainable Locally distinctive Translates to policy Shared Community needs Prevents sterilisation Innovative	Selections noted. No response necessary.
MLPIC21	2	North Hertfordshire & Stevenage Green Party (Karen Harmel)	Sustainable; Locally distinctive; 20 year vision; Current trends; Concise; Translates to policy. This Vision starts in 2040 and therefore beyond the scope of this plan which should only be 15 years long. This is the reason the vision should be rejected - it isn't yet relevant and will have a reduced effect on daily operations. The wording and emphasis appears to be different from Vision 1, but the two visions hardly vary at all. The similarity between the vision is given away by the fact that the objective list fits both visions. Neither Vision is acceptable in current form as the Greenbelt, the environment, biodiversity, climate change, human health, outdoor recreation, land and water management are afterthoughts/buzzwords in each vision with weak non-specific protection. The two Visions are not equivalent to each other and a choice between one or the other is not a choice of "like compared	Selections noted. See General Statement for time period. Vision 2 does not differ from that of vision 1 in that they both provide a basis from which the plan objectives are formed. The order within which the issues are mentioned including the acknowledgement of the presence of over half of the county covered by Green Belt designation and the need to conserve and enhance all aspects of the environment are not in order of ranking. All of the issues mentioned are of equal importance. The plan will provide further details within the policies and site briefs regarding the specific means of protection that should be afforded to each aspect of environmental protection.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			with like".	
MLPIC34	2	Hertsmere Borough Council (Richard Blackburn)	Positive Sustainable Locally distinctive 20 year vision Current trends Clear Concise Realistic Measurable Translates to policy Shared	Selections noted. No response necessary.
MLPIC45	2	Wheathampstead Parish Council (Julia Warren)	Planning Positively	Selections noted. No response necessary.
MLPIC57	2	Bovingdon Brickworks Ltd. (Les Cook)	Planning Positively Sustainable Clear Concise Realistic Shared Community needs Prevents sterilisation Integrity	Selections noted. No response necessary.
MLPIC65	2	Three Rivers District Council (Martin Wells)	Prefer vision 1 due to comments stated in MLPIC65 - Issue 1.	See General Statement regarding specific designations.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC85	2	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	<p>Positive Sustainable Locally distinctive clear concise realistic Translates to policy Shared Community needs Prevents sterilisation Citizen focused Integrity. Much clearer. Should have reference to maintaining landbanks of permitted reserves and state provision would be from sources in Herts. Mineral extraction and associated activities are not inconsistent with the aims of green belt policy. Sustainable transport methods may not be deliverable. HGV may remain the main method.</p>	<p>Selections noted. Vision 2 was written for the reason of trying to separate issues. The need to maintain a landbank of reserves would be written into supporting text within the Plan and is included within the need to provide a steady and adequate supply. It is a means of measuring the permitted reserves of which can only be counted if they are reserves permitted within Hertfordshire to which the Plan relates. Agree that there should be reference made to permitting reserves in the county. See General Statement regarding Green Belt. See General Statement regarding sustainable transport and landbanks.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC92	2	Historic England (Kayleigh Wood)	Positive Locally distinctive Clear Concise Realistic Measurable Translates to policy Historic England supports the general notion of vision 2. Vision 2 seems to go one step further than Vision 1 in terms of protecting the Historic Environment by seeking that minerals operations will have 'maximised improvements on the ... Historic Environment'. Historic England strongly supports this stance and considers it more consistent with National Policy.	Selections noted. No response necessary.
MLPIC114	2	Central Bedfordshire Council (Natalie Chillcott)	Positive Sustainable Locally distinctive 20 year vision Clear Realistic Measurable Translates to policy Shared Community needs Prevents sterilisation Citizen focussed Acts with integrity Getting things right	Selections noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC150	2	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Sustainable Locally distinctive 20 years Translates to policy Prevents sterilisation Citizen focussed Vision is ridged and does not evoke positive planning. Provides clear direction.	Selections noted. No response necessary.
MLPIC166	2	Mineral Products Association (David Payne)	Positive Locally distinctive 20 year vision Clear Realistic Translates to policy This Vision reads better in setting out conditions expected at the end of the Plan period. Reference to the 'steady; and adequate supply' of sand and gravel should be first, given that this is for the Minerals Plan.	Selections noted. Vision 2 sets the scene with regards to the character of Hertfordshire being the starting point and drawing on the local distinctiveness of the county, before the consideration of any mineral extraction. The aim of the Minerals Local Plan is to ensure sufficient mineral reserves are identified which is the following paragraph. The emphasis on this vision is the character of the county. This comment makes it apparent that a balance has to be made between the provision of minerals and the need to protect the environment, both of which are requirements within the NPPF.
MLPIC185	2	Codicote Parish Council (Lorraine Ellis)	Not driving towards sustainable development, doesn't meet the needs of communities and is not a shared vision. It is not clear, concise, realistic and measureable. Vision does not include villages.	See General Statement for rural and urban terms.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC199	2	CPRE Hertfordshire (Steve Baker)	It is not a NPPF requirement to express overall aims of Plan as a 'Vision', and the HCC 'corporate' plan is not relevant to the Plan's function as a statutory DPD. The wording does not adequately address the fundamental necessity of protection of the people living in the County, and of the environment, from harm, while meeting the expectations of national policy to supply minerals. In any amended wording, the word 'towns' in first paragraph of the Vision, should be changed to 'settlements' to reflect the equal contribution of distinct villages and hamlets to the character of the County.	<p>The council has a statutory function as the Minerals Planning Authority to produce a Minerals Local Plan. Alongside this the council has a corporate plan which sets out the key priorities for the county and how the council intends to deliver its vision for Hertfordshire, the County of Opportunity. Whilst this is produced as a separate function of council policy, the council in the work that it does need to ensure that there is no indirect impact upon residents being able to thrive and have healthy lives, make active contribution to local areas and impact on Hertfordshire's economy.</p> <p>See General Statement for rural and urban terms.</p>
MLPIC215	2	D K Symes Associates (D K Symes)	<p>Positive</p> <p>Current trends</p> <p>Locally distinctive</p> <p>Clear</p> <p>Concise</p> <p>Realistic</p> <p>Measurable</p> <p>Translates to policy</p> <p>Community needs</p>	Selections noted. No response necessary.
MLPIC251	2	Buckinghamshire County Council (Emily Hodgson)	No comment	No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC287	2	HCC Ecology (Martin Hicks)	<p>Positive Sustainable Locally distinctive 20 year vision</p> <p>In respect of the rural character, former mineral extraction sites can significantly modify the local or traditional landscape character, and often degrade the rural nature of the environment. The selection of new sites and the restoration of these and existing sites will need to have due regard to their existing and future nature and management requirements, if this vision is to be met.</p> <p>As above, there can be conflicts between the demands of outdoor recreation and improved biodiversity due to disturbance associated with the former. Furthermore, ecological interest may be dependent upon some form of ongoing management – such as appropriate grazing - which is not so readily delivered as a new footpath with a sign.</p>	<p>Selections noted. See representation MLPIC287 under issue 1.</p>
MLPIC294	2	HCC Landscape (Jennifer Clarke)	<p>The Vision could look beyond the plan period and be more aspirational and descriptive and demonstrate that it will contribute to the strategic vision for landscape across the County, as set out in relevant landscape strategies (ie. Green Infrastructure plans).</p> <p>The "rural" character of Hertfordshire is too specific - It should say "the distinct character" of Hertfordshire to respect other important landscapes such as per-urban & industrial.</p> <p>Green Belt is referenced as a feature of Hertfordshire's rural character - Green Belt is a</p>	<p>See General Statement for time period.</p> <p>As with the corporate aims, there is a need to be joined up in the approach to delivering the strategic vision for landscape and therefore reference should be made within the vision.</p> <p>The principal character of the county has been used in the term 'rural'. Whilst it is understood that there are other landscapes to protect, 'distinct character' does not indicate what these are. Vision 2</p>

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			<p>strategic area on a map to prevent urban sprawl and is NOT designated with regard to the character or quality of the landscape.</p> <p>The "sustainable and beneficial" uses of materials need clarifying - what are they and what will they mitigate the impacts of? NPPF para 143 can give guidance for clarifying the nature of impacts (positive/negative or acceptable/unacceptable etc)</p> <p>The Vision should reference the "effects of climate change" rather than improving "Climate Change"</p> <p>High quality restoration should be "started" as early as possible, and "carried out for the long term", not "carried out as early as possible".</p> <p>There should not be a distinction between the landscape and natural environment - Landscape includes aspect of the natural environment. The vision should be worded "...to conserve and enhance the character and quality of Hertfordshire's landscapes".</p>	<p>is more explicit by stating that the rural character is the predominant character and therefore vision 1 should align with this.</p> <p>See General Statement regarding Green Belt.</p> <p>Agree that it is the effects of climate change that need to be considered.</p> <p>See General Statement for restoration.</p> <p>See General Statement regarding natural environment.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC299	2	Bedford Borough Council (Natalie Chillcott)	Positive Sustainable Locally distinctive 20 year vision Clear Realistic Measurable Translates to policy Shared Community needs Prevents sterilisation Citizen focussed Acts with integrity Getting things right	Selections noted. No response necessary.
MLPIC320	2	East Herts District Council (Jenny Pierce)	<p>Vision 2 goes beyond the scope of a minerals local plan and makes commitments that may prejudice the ability of Local Planning Authorities to plan effectively. For example, paragraph 1 of the vision states that green belt will be maintained but Green Belt may need to be released in order to accommodate the housing needs of boroughs and districts. This statement is therefore pre-empting and possibly constraining the efficacy of LPA plan-making.</p> <p>The third paragraph states that the transportation of minerals will be by sustainable transport measures. Is this fully achievable in the 20 year timeframe proposed?</p> <p>The first sentence of the final paragraph is unclear.</p>	<p>See General Statement for time period.</p> <p>This is a clearer time frame for which the Local Planning Authority can accept that the vision for minerals planning will be up until. It is acknowledged that there is a difference in time scale between the Minerals Local Plan and the District Local Plan within which decisions are made about the release of Green Belt land for other development purposes. The county council has a duty to cooperate with district councils with regard to local plan making and will seek a way forward in terms of the appropriate level of reserves being identified alongside the recognition of delivering housing sites.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				<p>See General Statement regarding Green Belt.</p> <p>See General Statement regarding sustainable transport.</p> <p>The tense of the first sentence of the final paragraph does not assist its understanding. The means of expressing the sustainable use of minerals is described in the fourth paragraph but this is not explicit. Reference to this paragraph describing sustainable in terms of mineral extraction needs to be added.</p>
MLPIC332	2	Welwyn Hatfield Borough Council (Sue Tiley)	<p>The opening paragraph sets out a view of Hertfordshire which would seem to relate more to a development strategy than one relating to a minerals plan. If this opening paragraph refers to a vision for the county set out in the Hertfordshire Spatial Framework this could provide an important link between the two documents otherwise it is not clear why this is relevant. The final sentence in the first vision perhaps explains the relationship more clearly.</p> <p>It is not clear what is intended by the sentence ""prior extraction in cooperation with interested parties will be expected before other development takes place on land".</p>	<p>Vision 2 sets the scene with regards to the character of Hertfordshire being the starting point and drawing on the local distinctiveness of the county, before the consideration of any mineral extraction. The aim of the Minerals Local Plan is to ensure sufficient mineral reserves are identified which is the following paragraph. The emphasis on this vision is the character of the county. This comment makes it apparent that a balance has to be made between the provision of minerals and the need to protect the environment, both of which are requirements within the NPPF.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				<p>The sentence regarding prior extraction refers to the need to engage in discussions with local planning authorities, landowners and mineral operators and their agents to ensure that where there is a potential need for mineral bearing land to be developed for non-mineral development, sterilisation does not occur. Further investigations may be needed to establish the level and quality of the reserve and a phased approach to the delivery of other forms of development may be a desired outcome to ensure that mineral sterilisation does not occur but at the same time the delivery of housing can also take place in the future.</p>
MLPIC343	2	Chilterns Conservation Board (Lucy Murfett)	<p>Add reference to Chilterns AONB in the vision eg “Mineral extraction will respect the rural character of Hertfordshire with its Area of Outstanding Natural Beauty, large expanse of Green Belt...”</p> <p>The vision should introduce a sequential approach by avoiding or reducing harm, before you consider mitigating it, by adding wording as follows: “The sustainable and beneficial use of materials will seek to avoid, reduce and mitigate against impacts”</p>	<p>See General Statement regarding specific designations.</p> <p>Mitigation should be carried out only after there are efforts to avoid impacts and reduce them where possible. All impacts of mineral extraction cannot be avoided and there needs to be recognition that they need to be dealt with if they arise. They could however be reduced in the first place and therefore the term ‘minimised’ would be appropriate. The term ‘seek to’ does not give any certainty that this will happen and therefore is not</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				considered appropriate.
<p>Issue 3 Which style of vision to you prefer? (Please select one answer)</p> <p><input type="checkbox"/> Version 1 <input type="checkbox"/> Version 2</p> <p>General Statement: There was an almost even split of responses to each vision, with a slight preference for vision 1 which comprised 13 votes to 10 votes for vision 2.</p>				
MLPIC2	3	Trustees of the Brocket Estate (Stuart Gray)	Prefers "Version 2"	Selection noted. No response necessary.
MLPIC14	3	Herts and Middx Wildlife Trust (Matt Dodds)	Version 1 - makes it clearer that the MLP will deliver net gains in biodiversity and the natural environment, particularly regarding restoration and subsequent management.	Comment noted. No response necessary.
MLPIC21	3	North Hertfordshire & Stevenage Green Party (Karen Harmel)	Version 1 is preferred. The Vision needs re-wording, and it not complete, but at least Vision 1 applied to the current day (or from 2018 forward).	Comment noted. The consultation responses have identified some improvements.
MLPIC34	3	Hertsmere Borough Council (Richard Blackburn)	Prefers "Version 2"	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC45	3	Wheathampstead Parish Council (Julia Warren)	Prefers "Version 1"	Selection noted. No response necessary.
MLPIC57	3	Bovingdon Brickworks Ltd. (Les Cook)	Prefers "Version 2"	Selection noted. No response necessary.
MLPIC65	3	Three Rivers District Council (Martin Wells)	Vision 1 - due to comments stated in MLPIC65 - Issue 1.	Vision 2 is mostly preferred by other consultees. Ensure all elements of vision 1 are included in vision 2.
MLPIC85	3	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Prefers "Version 2"	Selection noted. No response necessary.
MLPIC92	3	Historic England (Kayleigh Wood)	Version 2 - Whilst both Visions are considered acceptable in terms of how they cover the Historic Environment, it is considered that Vision 2 goes one step further in terms of protection, which is particularly welcomed.	Selection noted.
MLPIC114	3	Central Bedfordshire Council (Natalie Chillcott)	Version 2 - The two versions are very similar to each other and as such it is difficult to select a preference, although Vision 2 offers the benefit of using a number of small paragraphs which helps the reader understand the discrete elements of the Vision.	Selection noted. The ease of reading is welcomed and could be used for either vision.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC131	3	Hertfordshire County Council - Highways (Manjinder Sehmi)	Version 2 - Although both options refer to the transport of materials by sustainable transport methods, Option 2 expands further to state that Infrastructure will be protected to enable this to continue.	Selection noted. Vision 2 is specific to the protection of the railheads for transporting minerals. It is this infrastructure that the Minerals Local Plan can protect and not the wider transport infrastructure.
MLPIC138	3	Stevenage Borough Council (Richard Javes)	Version 1 - We support the general principles outlined in the consultation document. We consider that Version 1 better sets out the vision that the Hertfordshire LPAs share.	Selection noted.
MLPIC144	3	Highways England (Jenny Volp)	Whilst they have a similar approach to sustainable transport, Draft Vision 2 identifies the need to conserve mineral supplies for future generations and may therefore reduce the long term impact on the SRN and be more favourable to Highways England. However the overall impact to the SRN should be considered and in some instances Vision 1 may result in less or shorter trips on the SRN, depending on the alternative source of materials required.	Selection noted.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC147	3	On behalf of Gascoyne Cecil Estate Ltd (Gordon Wood)	Version 1 - Neither Vision seems to confront the possible scenario of a much developed outer London fringe over the next 20 years or so. Vision 1 is favoured but with qualification. Demand for a "steady and adequate supply of sand and gravel" does not seem to be consistent with the need to provide housing schools and infrastructure throughout the same period. Perhaps Vision 1 should read "...demand appropriate to the needs of local and regional development will be met by the opening up of Windfall sites local to the developments taking place"	Selection noted. The Minerals Local Plan needs to be provided in accordance with the NPPF which sets out the requirement to plan for a steady and adequate supply of sand and gravel. Alongside this there is the recognition that there will be an increase in housing provision over the plan period and infrastructure to support this. As a result the need for sand and gravel is elevated due to this increased demand for development. The Minerals Local Plan will establish the appropriate amount of mineral provision to plan for based on the best available data at the time of plan production. It is intended that the Plan will include a policy relating to windfall sites.
MLPIC150	3	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Version 1	Selection noted.
MLPIC161	3	Transport for London (Andrew Hiley)	Version 1 - visions mention 'strategic transport routes connecting with London' and version 1 specifically states 'This will be achieved through sustainable transport options including the sustainable importation of non-indigenous rock. Infrastructure will be protected to enable this to continue.'	Selection noted.

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MLPIC166	3	Mineral Products Association (David Payne)	Version 1 - Version 2 reads more like a Vision of where the County wants to be in 2040, whereas Vision 1, although reading more 'positively' in terms of planning for provision of minerals, is more a series of statements and does not appear as coherent.	Selection noted.
MLPIC178	3	Tarmac (Mike Pendock)	Version 1 - Version 1 is preferred as it required continuous adoption of the Vision 'throughout the Plan period' not merely as an aspirational goal as is set out in Vision 2. With regards to high quality restoration (last sentence of Vision 1) it is proposed that reference is made to providing development platforms as part of consideration to allow sustainable reuse of previously worked land. For example, "Opportunities for improving previously worked land to meet future development, outdoor recreation, improved biodiversity, improved agricultural land and water management will be delivered."	Selection noted. The aim of the Minerals Local Plan is not directly to 'meet future development'. The outcomes of some restoration projects may assist this delivery, although restoration schemes are not determined on the basis of any future development activity taking place on previously worked land.
MLPIC185	3	Codicote Parish Council (Lorraine Ellis)	Neither - What about the impact on communities, enforcement and monitoring?	Enforcement and monitoring is an integral part of mineral planning. It is intended to include a policy relating to this within the Minerals Local Plan. Impact on communities is an objective flowing from the vision and policies will consider the extraction of minerals in relation to impacts upon communities. Conditions are attached to planning permissions to ensure that impacts are minimised and monitored. Enforcement action can take place if conditions are not adhered to by

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				mineral operators.
MLPIC199	3	CPRE Hertfordshire (Steve Baker)	Neither wording provides an adequate balance between the exploitation of minerals in line with Government policy and protection of the County's communities and the environment from harm.	Comment noted. The Minerals Local Plan will include policies alongside the vision and objectives to ensure there is a balance between the need for minerals and protection of communities and the natural environment.
MLPIC210	3	RSPB (Mark Nowers)	Version 1 - The minerals industry is uniquely placed to help halt and reverse the massive - and ongoing - decline in biodiversity. Mineral site restoration has the potential to deliver 100% of the habitat creation targets for nine priority habitats. This habitat creation needs to be carried out at a landscape-scale (ideally, providing contiguous blocks of habitat covering 200ha), in order for these habitats to be viable in the long-term, both ecologically and financially. Providing a net-gain in biodiversity, in this context, means that the development will result in more priority habitat (and habitat of a higher quality) than was present before the development began. Providing a net-gain in biodiversity is also a requirement of the NPPF (paras. 9 and 109). The RSPB welcomes that the draft vision identifies "conserving and enhancing" as central components of the Plan, particularly as the real legacy is what the mineral development leaves behind.	Selection noted. See General Statement for restoration.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>Paragraph 109 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural environment by "...establishing coherent ecological networks" and as such the Vision should be much clearer in delivering strategic restoration objectives, including the landscape-scale creation of priority habitats. Suggested additional wording for the Vision is as follows:</p> <ol style="list-style-type: none"> 1. A restoration-led approach to the location, operation and restoration of minerals development will have resulted in the delivery of strategic restoration objectives. 2. Minerals development will have made a significant contribution to delivering a net-gain in biodiversity - and establishing a coherent and resilient ecological network - primarily through the landscape-scale creation of priority habitat. 	
MLPIC215	3	D K Symes Associates (D K Symes)	Version 2 - Recognise that minerals are only a temporary land use. Maintaining a steady supply to meet local and wider needs is not reflected in vision. Misleading that alternative transport to lorry is realistic option.	Selection noted. Reference is made in paragraph two of vision 2 to a steady and adequate supply to meet wider and national supply obligations.
MLPIC230	3	North Herts District Council (David Hill)	Vision 1 appears to be more focused and seemingly guided by economic factors, whereas Vision 2 is more concerned with place. A combination of the two might be a good way forward.	Improvements will be made to either vision taken forward.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC241	3	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	We would expect the vision to reflect guidance set out in the National Planning Policy Framework in the preparation of a Minerals Local Plan. This should include giving great weight to the benefits of mineral extraction as well as setting out policies to encourage the prior extraction of minerals if it is necessary for non-mineral development to take place. If we were asked to indicate a preference it would be for vision 1 which we read as being slightly more positive.	Selection noted.
MLPIC251	3	Buckinghamshire County Council (Emily Hodgson)	No preference	Comment noted.
MLPIC268	3	Natural England (Gordon Wyatt)	No particular preference	Comment noted.
MLPIC287	3	HCC Ecology (Martin Hicks)	Version 1 - more succinct and less ambitious in respect of the claim to preserve rural character, which I consider is less credible as described given that many other factors will continue to degrade this without any mineral activities.	Selection noted.
MLPIC299	3	Bedford Borough Council (Natalie Chillcott)	Version 2 - The two versions are very similar to each other and as such it is difficult to select a preference, although Vision 2 offers the benefit of using a number of small paragraphs which helps the reader understand the discrete elements of the Vision.	Selection noted.
MLPIC315	3	Environment Agency (Kai Mitchell)	Vision 2 - Worded more favourably in terms of maximising and delivering environmental benefits	Selection noted.

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MLPIC332	3	Welwyn Hatfield Borough Council (Sue Tiley)	<p>The Council supports the inclusion of a vision. Both visions seem to contain the same aspirations.</p> <p>Whichever vision is selected should also include a reference to not prejudicing other types of development, which need to come forward to help meet the needs of Hertfordshire.</p>	<p>Selection noted.</p> <p>The needs of Hertfordshire are set out in the visions where there is reference to providing a steady and adequate supply of sand and gravel to meet wider and national supply obligations required under the NPPF. Prior extraction is mentioned within the visions which means that other developments can take place. The demand for sand and gravel is emphasised in the increased level of housing provision being planned for within District Local Plans, with infrastructure required to support it.</p>

Table 2: Objectives – Issues 4-5

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 4 Would meeting all of the objectives ensure that the visions presented in Chapter 4 are achieved? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>General Statement:</p> <p>The response to this Issue was split with 11 responses agreeing and 12 responses disagreeing. The main concern of the consultation is to ensure that all aspects of the reworded vision are incorporated into the list of objectives. Ideally, this should not require an increase in the number of objectives, nor the significant lengthening of individual objectives. There were requests for additional detail to be included in a number of objectives, however it is considered that this detail can be reflected in the policies and supporting text. Potential merges of objectives were suggested and may be incorporated when reviewed against the new vision, provided no detail is lost, and some minor amendments to terminology will be considered.</p>				
MLPIC3	4	Trustees of the Brocket Estate (Stuart Gray)	Yes	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC15	4	Herts and Middx Wildlife Trust (Matt Dodds)	No - Greater clarity is required to demonstrate how biodiversity will be enhanced by restoration. A mechanism for measuring biodiversity, quantitatively, before and after extraction, should be specified. The Biodiversity Impact Assessment Calculator is the most effective system to do this.	It is considered that this is not an issue for the objectives of the Minerals Local Plan, but for the relevant policy and supporting text. These will be written following the initial consultation period and will be published for as part of a draft Minerals Local Plan for further public consultation.
MLPIC22	4	North Hertfordshire & Stevenage Green Party (Karen Harmel)	No, it looks as if the Objective were written first and the Visions written to accommodate them. Given that one is incomplete it follows that the other is also incomplete. The Objectives ignore most of the Sustainability Report headings of landscape, natural habitats, species and geological features, and these items need to be appropriately and adequately covered. Both Vision statement and Objectives need to be re-written. The HCC Objectives also don't mention the protection of water resources from pollution or over-abstraction: trying to avoid flooding in susceptible areas: and improvement in health for individuals or communities.	The vision is the overarching statement of intent from which the specific objectives flow. The protection of the natural environment is within Objectives 5 and 7 as an all-encompassing term which includes the aspects listed in the respondent's comment and which will be assessed as part of the sustainability appraisal of the Plan. Reference to water management is required as this is mentioned within the vision.
MLPIC35	4	Hertsmere Borough Council (Richard Blackburn)	Yes	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC46	4	Wheathampstead Parish Council (Julia Warren)	No - Obj 2 and Obj 4 may undermine the vision if machinery and process 'non-indigenous aggregates' is added to existing mineral extraction sites. Great weight needs to be given to the protection of Green Belts and identify the harm caused by traffic movements of quarry vehicles on rural roads.	The infrastructure to support non-indigenous aggregates is reference to the safeguarding of railheads that import hard rock which Hertfordshire does not contain, but which is required as a building material. There will be a requirement for some processing of this aggregate, however the wording of the objective needs to be reconsidered to ensure that there is no reliance on the county for there to be any machinery and processing facilities specifically for non-indigenous aggregates that are not to be used in construction within the county.
MLPIC58	4	Bovingdon Brickworks Ltd. (Les Cook)	Yes	Selection noted. No response necessary.
MLPIC66	4	Three Rivers District Council (Martin Wells)	Yes - meeting all the objectives would ensure that the vision presented is achieved. The nine objectives satisfactorily reflect both visions.	Selection noted. No response necessary.
MLPIC78	4	Hampshire County Council (Rob Sellen)	Both visions reflect an aspiration to provide minerals on a regional and national scale, yet the objectives do not allude to how this can be achieved.	Objective 2 could be expanded to include the need to meet wider and national supply obligations above and beyond the supply to Hertfordshire.
MLPIC86	4	SLR Consulting Ltd on behalf of Brett	No - objective 8 should be first objective and have reference to supporting the local	The order of the objective needs to be reconsidered in light of the format of

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		Aggregates Ltd (Chris Lowden)	<p>economy. Refer to maintaining landbanks. Expand reference to prior extraction to safeguarding areas to prevent other development taking place close to allocated or permitted mineral extraction sites.</p> <p>Objective 2- not clear that MASS requires MPAs which have adequate resources of aggregates to make an appropriate contribution to national as well as local supply.</p> <p>Objective 7 - unsure how timely extraction will assist in contributing to natural environment and cultural heritage. More related to supporting the local economy and ensuring there is not over capacity.</p>	<p>the vision.</p> <p>Landbank calculations are dealt with in the Local Aggregate Assessment that is mentioned in Objective 2. The objective states that the requirements of the LAA need to be met and therefore it is not considered that there is a need to refer to landbanks. Objective 2 could be expanded to include the need to meet wider and national supply obligations above and beyond the supply to Hertfordshire. There needs to be clarification regarding timely mineral extraction in respect of restoration which is the context of this term. The objective could be simplified to refer to progressive and timely restoration.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC93	4	Historic England (Kayleigh Wood)	No - Historic England acknowledges and welcomes the consideration of the Historic Environment in Objective 5 and Objective 7. Objective 5 should be altered slightly to ensure that it not only seeks to mitigate adverse impacts on the Historic Environment but also seeks to improve the Historic Environment in accordance with the wider vision of the plan. This can be done by revealing and better understanding existing assets or increasing significance through improvements to setting, as examples. In Objective 7, 'cultural heritage' should be changed to the 'Historic Environment' as Historic Environment is an all-encompassing term which takes into account the tangible physical assets and the intangible elements of heritage such as cultural heritage, sense of time depth, etc.	The emphasis in the objective is on protection against harm to the historic environment. There could be scope to include improvements in Objective 7 where the term 'historic environment' could be used in place of 'cultural heritage'.
MLPIC115	4	Central Bedfordshire Council (Natalie Chillcott)	Yes	Selection noted. No response necessary.
MLPIC151	4	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	No - vision doesn't reference Climate Change. The objective should identify the need to provide a steady and adequate supply of minerals through the plan period.	The reference to climate change is within the vision and also within Objective 6. A steady and adequate supply of mineral is referenced in Objective 8.

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MLPIC162	4	Transport for London (Andrew Hiley)	Minimising additional lorry movements will reduce potential impacts on TfL Road Network and other roads for example on cycle safety. Supports objective 4. Suggest adding 'and wharves' to objective 4 to make it consistent with Policy 13 (Railheads and Wharves).	Support noted. The county does not have any wharves to bring in marine-dredged aggregate, although there is the potential to use the canals within the county. It is agreed that the title of the policy needs to be reflected in the objective, once the policy is formed.
MLPIC167	4	Mineral Products Association (David Payne)	No - Objective 2 focuses on 'local' economic growth while the Visions refer to wider and national supply. Obj 2 should therefore refer to 'local and wider'.	It is agreed that the wording in the vision needs to be carried through to the objective as there is a need to plan for wider and national needs as well as local needs.
MLPIC179	4	Tarmac (Mike Pendock)	No - it does not include restoration to facilitate development (employment, housing) as a potentially beneficially after-use.	Restoration of mineral sites does not necessarily facilitate further development such as employment or housing. Whilst this may be developed at a later date, the process of restoration is considered at planning application stage. This will be considered on a site by site basis.
MLPIC186	4	Codicote Parish Council (Lorraine Ellis)	No - The vision needs to address Objectives more Objective 4 - yes if near infrastructure Objective 7 & 9 are very important	Comments noted.
MLPIC211	4	RSPB (Mark Nowers)	No - The RSPB supports the comments made by the Hertfordshire and Middlesex Wildlife Trust (MLPIC15 Issue 4) that greater clarity is required to demonstrate exactly how	It is considered that this is not an issue for the objectives of the Minerals Local Plan, but for the relevant policy and supporting text. These will be

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			biodiversity will be enhanced by restoration schemes	written following the initial consultation period and will be published for as part of a draft Minerals Local Plan for further public consultation.
MLPIC216	4	D K Symes Associates (D K Symes)	Yes - meeting objectives ensures visions are achieved. Needs to be referenced that the Plan will be reviewed every 5 years so it is a rolling 15 year plan.	The objective of plan making is to have an up to date Plan. This will be referenced within the introduction of the Minerals Local Plan.
MLPIC242	4	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	Yes the draft objectives are supportive of the vision and generally accord with available guidance.	Selection noted. No response necessary.
MLPIC252	4	Buckinghamshire County Council (Emily Hodgson)	Yes - meeting objectives ensures visions are achieved.	Selection noted. No response necessary.
MLPIC269	4	Natural England (Gordon Wyatt)	Yes	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC288	4	HCC Ecology (Martin Hicks)	<p>No - It is not true to say that biodiversity will be enhanced by enhancing amenity value of land. Access to nature may be improved, but in turn that nature will be influenced by the access itself. The issue relates to increased access and amenity (Obj 9) conflicting with some aspects of natural environment (Objs 7 and 9) or also its management. Sensitive birds and mammals are affected by increasing levels of disturbance whilst increased access, invariably associated with dogs, can also have a negative impact on some forms of grazing management. Unless these issues are addressed, the full biodiversity potential of some sites will not be achieved.</p> <p>Furthermore, the ability to manage restored sites will in some situations be dependent on land managers wholly outside of the extraction industry – such as local farmers, assuming they too still exist in the local area.</p>	<p>A similar issue is raised in representations MLPIC15 and 211 (Issue 5).</p> <p>The Minerals Local Plan will deal with a number of mineral extraction sites over the plan period, each with a specific restoration scheme which will be dealt with on a case by case basis. As a whole the Plan should have objectives to improve both public access and enhance biodiversity. Objective 9 should be reworded to be specifically about the amenity value. Rather than creating a separate objective it is suggested that biodiversity should be dealt with in Objective 7.</p>
MLPIC300	4	Bedford Borough Council (Natalie Chillcott)	Yes	Selection noted. No response necessary.
MLPIC316	4	Environment Agency (Kai Mitchell)	Yes - we believe that if all the objectives were met this would ensure that the overarching vision would be achieved	Selection noted. No response necessary.
Issue 5				

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Having developed the list of objectives in accordance with the available guidance, and having taken account of feedback from a public consultation event, do you think the county council has developed the correct set of objectives? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>General Statement: There was a majority that agreed that the council has developed the correct set of objectives, with 16 votes to 8 disagreeing.</p>				
MLPIC3	5	Trustees of the Brocket Estate (Stuart Gray)	Yes	Selection noted. No response necessary.
MLPIC15	5	Herts and Middx Wildlife Trust (Matt Dodds)	<p>No - Objective 9 may be contradictory as increasing public access to sites can result in declines in biodiversity. It is possible to improve the amenity value of land and to increase its biodiversity, but only by carefully managing access. Suggested splitting Objective 9 into two objectives.</p> <p>9. To increase public access to the countryside through enhancing the amenity value of land when restoring extraction sites</p> <p>10. To ensure restoration schemes improve the biodiversity of the site</p>	<p>A similar issue is raised in representations MLPIC211 and 288 (Issue 4). The Minerals Local Plan will deal with a number of mineral extraction sites over the plan period, each with a specific restoration scheme which will be dealt with on a case by case basis. As a whole the Plan should have objectives to improve both public access and enhance biodiversity.</p> <p>Objective 9 should be reworded to be specifically about the amenity value. Rather than creating a separate objective it is suggested that biodiversity should be dealt with in Objective 7.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC22	5	North Hertfordshire & Stevenage Green Party (Karen Harmel)	<p>The Objectives ignore most of the 10 Sustainability Report Headlines issues to do with protection of landscape, natural habitats, species and geological features, hence the approx. 200 nature sites in Hertfordshire are not sufficiently protected. Environmental factors are insufficiently separated and named in the Objectives. They also don't mention quality/quantity of water or flooding or people's health and are therefore incomplete. The wording in regard to environmental factors is weak e.g. "to encourage" "to mitigate against" "to address" which will allow a partial or ineffective response.</p>	<p>The protection of the natural environment is within Objectives 5 and 7 as an all-encompassing term which includes the aspects listed in the respondent's comment and which will be assessed as part of the sustainability appraisal of the Plan. Reference to water management is required as this is mentioned within the vision.</p> <p>A beneficial after-use, improved natural environment and increased public access to the countryside all contribute towards an improvement in people's health.</p> <p>The terminology will be reconsidered with regards to ensuring where possible that there are definite positive statements rather than wording that allows only a partial fulfilment to the objective.</p>
MLPIC35	5	Hertsmere Borough Council (Richard Blackburn)	Council has developed correct set of objectives.	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC46	5	Wheathampstead Parish Council (Julia Warren)	<p>No - The processing of secondary and recycled aggregates needs to be managed in a way that does not cause significant harm to the Green Belt quality of life. Objective 1 - not necessary to support the processing of recycled aggregates at quarrying sites. Objective 2, second part from safeguarding..to.. infrastructure, not necessarily. Proposed additional objective is added to protect existing Green Belt countryside.</p>	<p>Objective 1 refers to the use of secondary and recycled aggregates. Whilst it does not refer to its processing for use in construction, this process will be managed by way of conditions on any planning permission for a permanent processing facility. Where there are temporary concrete crushing facilities, these are moveable and covered by Environment Agency licencing. This process can occur on Green Belt designated land. The temporary nature of some facilities will not remain in situ for a long period of time and the permanent facilities will be regulated by planning conditions. The location of secondary and recycled facilities need not be at quarry sites. Each application will be dealt with on a case by case basis regarding its appropriateness at its proposed location.</p> <p>There is a requirement within the NPPF to safeguard railheads and wharves and as such the latter part of Objective 2 refers to this.</p> <p>The infrastructure to support non-indigenous aggregates is reference to the safeguarding of railheads that</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				import hard rock which Hertfordshire does not contain, but which is required as a building material. There will be a requirement for some processing of this aggregate, however the wording of the objective needs to be reconsidered to ensure that there is no reliance on the county for there to be any machinery and processing facilities specifically for non-indigenous aggregates that are not to be used in construction within the county.
MLPIC58	5	Bovingdon Brickworks Ltd. (Les Cook)	Yes - the county council has developed the correct set of objectives	Selection noted. No response necessary.
MLPIC66	5	Three Rivers District Council (Martin Wells)	Yes - developed the correct set of objectives. The objectives satisfactorily cover the requirements of minerals planning in the county for the next plan period and are sufficient to be used as a mechanism to monitor the delivery of the plan.	Comment noted.
MLPIC86	5	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Yes	Selection noted. No response necessary.
MLPIC93	5	Historic England (Kayleigh Wood)	Yes	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC115	5	Central Bedfordshire Council (Natalie Chillcott)	Yes - Obj 3: Chalk should be included in the objective. Obj 6: In light of draft vision 1 which states... "seek to improve...climate change..." could obj 6 be amended so that it "addresses and minimises the impacts..."?	There is no requirement in the NPPF to plan for chalk for this reason this is omitted from Objective 3. The suggested addition of the words 'and minimises' is agreed as a positive addition to Objective 6.
MLPIC132	5	Hertfordshire County Council - Highways (Manjinder Sehmi)	Objectives 4 and 5 (Page 4) cover sustainable transport and delivery of minerals, whilst protecting people, the environment from harm and mitigating against adverse cumulative impacts. The Highway Authority supports these objectives. Objective 8 refers to steady and adequate supply of minerals. This needs to be considered in conjunction with planned urban growth without unnecessary long transport distances.	Comment noted. The site selection methodology will consider transport infrastructure and access to sites. Comments will be sought from highway colleagues regarding the appropriateness of the transport network when identifying suitable mineral extraction sites. Planned growth will be an aspect to consider in line with District Local Plans and any key planned infrastructure developments.
MLPIC139	5	Stevenage Borough Council (Richard Javes)	No - We support the principles that underpin the nine draft objectives that are proposed, but we question whether it might not be possible to reduce that number to a shorter list that is more manageable.	The need to ensure that a number of different aspects are considered has resulted in the list of nine objectives with comments to subdivide objectives and therefore increasing the number. It is considered that this number is manageable.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC151	5	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Yes - correct set of objectives.	Selection noted. No response necessary.
MLPIC167	5	Mineral Products Association (David Payne)	Yes - Objectives 3 and 8, addressing long-term safeguarding and conservation of resources, could be combined. Reference to 'steady and adequate supply' may better sit in Objective 2 rather than 8?	The suggestion of combining Objectives 3 and 8 is similar to rep MLPIC321 for issue 5. It is agreed that this could be an improvement providing clarity to the objectives. If combining Objective 8 with 3, the remaining text of providing a steady and adequate supply of minerals needs to be slotted into another objective due to this being important text from the NPPF. Objective 2 could accommodate this.
MLPIC179	5	Tarmac (Mike Pendock)	No - under Objective 7 a reference should be added under after use to include opportunities for meeting housing and economic growth for Hertfordshire as potential beneficial after-uses.	Restoration of mineral sites does not necessarily facilitate further development such as employment or housing. Whilst this may be developed at a later date, the process of restoration is considered at planning application stage. This will be considered on a site by site basis.
MLPIC186	5	Codicote Parish Council (Lorraine Ellis)	Yes - providing there are more of the comments from MLPIC185 - Issues 1-3	Comment noted.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC200	5	CPRE Hertfordshire (Steve Baker)	<p>No. Objective 2 – the word ‘sites’ should be changed to ‘defined areas’ to reflect NPPF paragraph 145.</p> <p>Objective 5 – the word ‘against’ after ‘mitigate’ is superfluous.</p> <p>Objective 6 – the objective should be to mitigate the impact that mineral-related development would otherwise have on climate change.</p> <p>Objective 7 – add at the end of the first sentence ‘consistent with the adopted Development Plan’ to ensure the after-use is appropriate. This objective should also include the restoration of land after working as soon as possible in accordance with NPPF paragraph 143.</p>	<p>There is the need to identify specific sites and preferred areas and therefore Objective 2 should be reworded to state ‘sites/areas’.</p> <p>The wording of Objective 5 flows with the inclusion of ‘mitigating against’.</p> <p>The term minimise is suggested as an addition.</p> <p>Restoration of mineral sites does not necessarily facilitate further development such as employment or housing. Whilst this may be developed at a later date, the process of restoration is considered at planning application stage. This will be considered on a site by site basis. It is agreed that restoration in a timely way needs to be included.</p>
MLPIC211	5	RSPB (Mark Nowers)	<p>No - The RSPB supports the aspirations of the objectives, particularly 5, 6 and 7, but there is little that highlights the importance of landscape-scale restoration, which would accord with the MPA's obligations under paragraph 109 of the NPPF. To that end, we would suggest that wording an Objective as below, could capture, more concisely, a number of these aspirations:</p> <p>"Implementing a strategic, landscape-scale, restoration-led approach, which maximizes</p>	<p>The suggested wording incorporates issues set out in a number of existing objectives. Whilst the suggestion could provide positive clarity it is not considered that there is a need for an additional objective. These changes will be considered alongside other suggested amendments when re-wording the objectives in line with the vision.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>benefits for biodiversity, recreation opportunities and climate change adaptation through reclamation of mineral workings."</p> <p>As per HWMT comments (MLPIC15 - Issue 5), we question the wording of Objective 9. Improving access will not lead to improved biodiversity. Whilst we welcome and support the value of connecting people with nature, amenity access must be managed sensitively in order that biodiversity is not unduly impacted.</p>	<p>A similar issue is raised in representations MLPIC15 and 288 (Issue 4). Objective 9 should be reworded to be specifically about the amenity value. Rather than creating a separate objective it is suggested that biodiversity should be dealt with in Objective 7.</p>
MLPIC216	5	D K Symes Associates (D K Symes)	Yes - correct set of objectives.	Selection noted. No response necessary.
MLPIC231	5	North Herts District Council (David Hill)	The chosen objectives seem sensible and appear to cover all relevant aspects of the plan.	Selection noted. No response necessary.
MLPIC238	5	Turnberry Planning Ltd on behalf of Hertfordshire University (Stephanie Gray)	Concerned vision and objectives do not robustly consider the impact of mineral extraction on neighbouring land uses especially nationally and internationally sensitive sites. Suggest an additional objective ' Objective 10: Ensure that Mineral Development assesses and addresses the impacts it will have on neighbouring sites and land uses.'	The impact of mineral extraction will be assessed on a case by case basis using the policies within the Minerals Local Plan and the relevant District Local Plan. There is not considered a need to add a further objective as the issues that would affect any neighbouring use are already covered.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC242	5	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	Yes the draft objectives are supportive of the vision and generally accord with available guidance.	Selection noted. No response necessary.
MLPIC248	5	Veolia Environmental Services (Nick Hollands)	Veolia supports the general principle of safeguarding sites and infrastructure, including railheads and wharves.	Comment noted.
MLPIC252	5	Buckinghamshire County Council (Emily Hodgson)	Yes - correct set of objectives.	Selection noted. No response necessary.
MLPIC269	5	Natural England (Gordon Wyatt)	Yes	Selection noted. No response necessary.
MLPIC288	5	HCC Ecology (Martin Hicks)	Whilst the Objectives are broadly sound in seeking to deliver the outcomes, some of them will generate conflicts. Some recognition of which objectives may need to take precedence – where justified – may be required if the objectives are to be met. Furthermore, many sites will remain in private ownership and this may also create reasonable expectations that will not in all cases necessarily deliver the objectives – such as restoration to ‘agriculture’ compared to the natural environment.	The ordering of the objectives will be considered in line with the vision. Restoration schemes will be considered as part of any planning application for mineral extraction.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC295	5	HCC Landscape (Jennifer Clarke)	<p>No - There should be an objective for the delivery of temporary or permanent landscape mitigation measures/enhancements in advance of, and during, the operational stage of any development.</p> <p>Measures that are characteristic of the local landscape character e.g. woodland, hedgerows etc. should be encouraged.</p> <p>Permanent measures that are not characteristic of the local landscape should be avoided.</p> <p>Temporary measures that are not characteristic of the local landscape may be deemed acceptable in the short term where they deliver benefits such as visual screening. For example bunds, should be limited in height with shallow sloping sides and seeded/covered to help blend with its landscape setting.</p>	<p>Bunds and any other temporary landscape feature that is not deemed to be appropriate in the long term will be dealt with as part of any planning application. In addition restoration schemes will be dealt with and sites will enter a period of after-use once restoration is complete and will be monitored for a set period of time to ensure restoration planting schemes etc have established.</p> <p>It is not considered that there is a need for a further objective related to landscape.</p>
MLPIC300	5	Bedford Borough Council (Natalie Chillcott)	<p>Yes -</p> <p>Obj 3: Chalk should be included in the objective.</p> <p>Obj 6: In light of draft vision 1 which states... “seek to improve...climate change...” could obj 6 be amended so that it “addresses and minimises the impacts...”?</p>	<p>There is no requirement in the NPPF to plan for chalk for this reason this is omitted from Objective 3.</p> <p>The suggested addition of the words ‘and minimises’ is agreed as a positive addition to Objective 6.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC311	5	HCC - Natural, Historic and Built Environment (Alison Tinniswood)	Obj7 – we would suggest that the wording should read ‘the natural, built and historic environments’, as per Obj5 (the term ‘historic environment’ is widely used elsewhere in the document, and in the draft sustainability appraisal headline objectives, on p65).	As per rep MLPIC93 for issue 4 and in line with Objective 5 it is agreed that ‘natural, built and historic environment’ should be used.
MLPIC316	5	Environment Agency (Kai Mitchell)	Yes - we are happy with the objectives that have been proposed.	Selection noted. No response necessary.
MLPIC321	5	East Herts District Council (Jenny Pierce)	<p>Objectives 3, 5 and 8 are very similar. Objective 8 could be reworked into Objective 3:</p> <p>Obj 3. To conserve sand, gravel and clay resources for current and future generations, which includes the safeguarding of resources for future use, extracting minerals prior to other development taking place and using minerals in construction in the land from which they are extracted.</p> <p>Objective 5 could then be: Obj 5. To ensure that where mineral extraction and restoration of sites occurs, that people, the natural, built and historic environments are protected from harm, and adverse cumulative impacts are mitigated against.</p>	<p>The suggestion of combining Objectives 3 and 8 is similar to rep MLPIC167 for Issue 5. It is agreed that this could be an improvement providing clarity to the objectives.</p> <p>If combining Objective 8 with 3, the remaining text of providing a steady and adequate supply of minerals needs to be slotted into another objective due to this being important text from the NPPF. Objective 2 could accommodate this.</p> <p>Objective 5: The text regarding sustainable delivery will be reassessed in light of other changes to objectives.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>Similarly, Objectives 7 and 9 are also very similar and could be combined: Obj 7. To ensure timely mineral extraction and high quality and progressive restoration to achieve a beneficial after use with increased public access to the countryside, greater amenity value of land and the enhancement of biodiversity through landscaping and planting.</p>	<p>Objectives 7 and 9: The need to maintain all aspects of the two objectives is important including landscape improvements and positive contribution to the natural, built and historic environment, to accommodate rep MLPIC311 for Issue 5.</p>
MLPIC333	5	Welwyn Hatfield Borough Council (Sue Tiley)	<p>The draft objectives would seem to be sensible although objective 8 would be clarified by the addition of “where viable” following “extracting minerals”.</p>	<p>The objective is clear that prior extraction should occur to ensure sustainability of the use of the resource otherwise there is a conflict with the sustainable use of the mineral. However on an operational level, duty to cooperate meetings will be held with interested parties as stated within the vision and further information will be sought to establish the reserve and consider this in light of development proposals in District Local Plans.</p>
MLPIC345	5	Chilterns Conservation Board (Lucy Murfett)	<p>Add reference to the national designated Chilterns AONB in objective 5. Add text stating “When formulating plan policy or considering proposals for minerals</p>	<p>The statutory duty is understood with regards to the AONB, as there are statutory duties to protect other designated sites. It is intended that there will be a policy within the</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			development in the Chilterns Area of Outstanding Natural Beauty (AONB) the County Council has a statutory duty under section 85 of the Countryside and Rights and Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of that area”.	Minerals Local Plan to ensure the protection of designated sites. The objective is to protect and enhance the environment which is already written into Objective 5 and therefore it is not considered that there is a need to add further text.

Table 3: Plan Length – Issue 6

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 6 How long should the duration of the Minerals Local Plan be? (Please select one answer)</p> <ul style="list-style-type: none"> <input type="checkbox"/> 15yrs with the identification of an additional 7yrs’ sand and gravel supply <input type="checkbox"/> 25yrs with the identification of an additional 7yrs’ sand and gravel supply <input type="checkbox"/> An alternative length <p>General Statement:</p> <p>There was overwhelming support for the use of a 15 year Plan with only two suggestions to use another Plan length. Therefore, it is proposed that the Plan period be 2016-2031. The period of the existing Minerals Local Plan will end in 2016 and the first version of the emerging Plan will be published, in the form of the Draft Minerals Local Plan, in the same year.</p> <p>Along with this support for a 15-year plan, the majority of responses provided backing to identify a 22-year supply of sand and gravel in the Plan so that a 7-year landbank can be maintained at all times up to the end of the Plan, as is required by the NPPF. Sufficient sites for 22 years’ worth of sand and gravel supply will therefore be included in the draft Minerals Local Plan, which will be published for consultation in autumn 2016.</p> <p>An alternative to identifying a 22-year supply at the outset of the Plan was to review the plan and identify sand and gravel extraction for the latter stages of the Plan period at a later date, perhaps undertaking an early review of the Plan after 5 years. It is considered more appropriate to identify the full 22-year supply at the outset of the Plan to ensure the stipulation of the NPPF to maintain a 7-year landbank at all times can be met, and provide more certainty to Local Planning Authorities over the long term designation of land-use.</p>				
MLPIC4	6	Trustees of the Brocket Estate (Stuart Gray)	15 year plan. Any longer period would fail to allow consideration of changing demand/supply and local/national pressures	Selection noted. The Plan will be monitored continually and if a review of the Plan is deemed necessary to consider changes to demand/supply

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				and local/national pressures, it could happen before the end of the initially-planned Plan period.
MLPIC23	6	North Hertfordshire & Stevenage Green Party (Karen Harmel)	The plan should be 15 years with the identification of an additional 7 years' sand and gravel supply. The plan should be as short as possible to allow for early corrections in direction/content if needed. National Policy dictates that the minimum time is preferably 15 years (but it could be less, down to 7 years landbank) however 15 years seems a good compromise length.	It is not considered that Local Plans should be as short as possible. The NPPF (para 157) states that plans should "be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date". The Plan will be monitored continually and if a review of the Plan is deemed necessary to keep it up to date, this could happen before the end of the initially-planned Plan period.
MLPIC36	6	Hertsmere Borough Council (Richard Blackburn)	15 years with additional 7 years for sand and gravel supply. Planning to at least 2036 would link with evidence on housing/employment development needs in SW Herts.	See General Statement
MLPIC47	6	Wheathampstead Parish Council (Julia Warren)	15 years with the identification of an additional 7 years sand and gravel supply.	See General Statement
MLPIC59	6	Bovingdon Brickworks Ltd. (Les Cook)	An alternative length should be used - 18 years (18+7) would provide continuity with the 25 years for brick clay.	Whilst this suggestion is a clear compromise between the preferable Plan-length stated in the NPPF (para 157), the required landbank for sand and gravel (para 145), and the levels

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				of permitted reserves for clay (para 146), it is considered important to plan in line with the 15-year period preferred by the NPPF.
MLPIC67	6	Three Rivers District Council (Martin Wells)	15 years with the identification of an additional 7 years sand and gravel supply is sufficient as stated within para 157 of the NPPF. There may be a need to review the plan before the end of its 25 year period due to the statutory requirement for local plans to be kept up-to-date at least annually.	See General Statement The Plan will be monitored continually and if a review of the Plan is deemed necessary to consider changes to demand/supply and local/national pressures, it could happen before the end of the initially-planned Plan period.
MLPIC87	6	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	15 year plan. Would be consistent with other plans in the region e.g. Essex and Cambs. Any longer may make the plan inflexible and unable to accommodate changes. Minimum 7 year landbank for sand and gravel should be provided at the end of the plan period.	See General Statement It is considered that a 15 year plan would provide consistency with other plans in the region and provide certainty to Local Planning Authorities.
MLPIC94	6	Historic England (Kayleigh Wood)	No comments.	No response necessary.
MLPIC116	6	Central Bedfordshire Council (Natalie Chillcott)	An alternative length. 15 years, without an additional 7 years for sand and gravel supply. The NPPF requires a 7 year landbank to be maintained, and future reviews of the Plan could identify additional sites, if necessary.	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC140	6	Stevenage Borough Council (Richard Javes)	The Borough Council has no preference for one end-date over another, except that it should run to at least 2031 [the end-date of most local plans in the county]. Close co-ordination will be necessary with district councils to ensure that any provisions of the MLP that post-date the end-date of local plans do not create future conflicts over competing claims for land (e.g. a good long-term housing site versus a sand and gravel site).	See General Statement The Plan will undergo further stages of Consultation in the preparation of the Plan and Duty to Cooperate meetings between the county council and the Hertfordshire's 10 district and borough councils will remain ongoing in order to mitigate conflict where possible.
MLPIC168	6	Mineral Products Association (David Payne)	15 Years plus additional 7 years' sand & gravel supply - we strongly back the intention to plan for provision for maintenance of a sand and gravel landbank of at least 7 years throughout the plan period.	See General Statement
MLPIC180	6	Tarmac (Mike Pendock)	15 years with additional 7 years' for sand and gravel supply - we support the intention to plan for provision for maintenance of a sand and gravel landbank of at least 7 years throughout the plan period.	See General Statement
MLPIC187	6	Codicote Parish Council (Lorraine Ellis)	15 years with additional 7 years' sand and gravel supply - Not chalk extraction as well?	See General Statement. Because the chalk extracted in Hertfordshire is extracted for agricultural use rather than as an aggregate in cement production, the Minerals Local Plan does not need to provide a stock of permitted reserves

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				for the mineral (NPPF para 146). Therefore, there is no reason to incorporate the issue of chalk supply as a determining factor in the length of the Plan period.
MLPIC201	6	CPRE Hertfordshire (Steve Baker)	An alternative length, The timescale should be 15 years but with an enforced commitment to review and updating to ensure that there is always a minimum of 7 years supply available. NPPF paragraph 17 does not mean that a longer Plan period is necessary, and a longer period would result in inconsistency with other elements of the Development Plan, and in particular the district Local Plans, an important issue when dealing with the extraction of minerals in advance of development, and 'safeguarding'.	See General Statement The Plan will be continually monitored and if a review of the Plan is deemed necessary, it could happen before the end of the initially-planned Plan period. It is considered that a 15 year Plan period would provide certainty for Local Planning Authorities that have adopted similar-length Local Plans.
MLPIC217	6	D K Symes Associates (D K Symes)	15 years with additional 7 years' sand and gravel supply	See General Statement
MLPIC232	6	North Herts District Council (David Hill)	A 15 year plan timeframe would meet with national guidance and so would appear to be the most appropriate approach.	See General Statement
MLPIC243	6	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	The MLP period should be for a minimum of 15 years with regular reviews to ensure that a minimum of a 7 year landbank is available throughout the plan period and beyond.	The Plan will be continually monitored and if a review of the Plan is deemed necessary, it could happen before the end of the initially-planned Plan period.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC253	6	Buckinghamshire County Council (Emily Hodgson)	15 year plan period with an early review after 5 years to ensure policies are kept up to date. Circumstances nationally and locally can change very rapidly and a longer plan period may be unwise.	The Plan will be continually monitored and if a review of the Plan is deemed necessary, it could happen before the end of the initially-planned Plan period.
MLPIC270	6	Natural England (Gordon Wyatt)	No preference	No response necessary.
MLPIC280	6	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	15 years with the identification of an additional 7yrs sand and gravel supply	See General Statement
MLPIC289	6	HCC Ecology (Martin Hicks)	15 years with the identification of additional 7 years' sand and gravel supply - would appear consistent with Government guidance	See General Statement
MLPIC301	6	Bedford Borough Council (Natalie Chillcott)	An alternative length. 15 years, without an additional 7 years for sand and gravel supply. The NPPF requires a 7 year landbank to be maintained, and future reviews of the Plan could identify additional sites, if necessary.	See General Statement
MLPIC322	6	East Herts District Council (Jenny Pierce)	25 years with identification of additional 7 years' worth of sand and gravel - the longer plan period offers more certainty for Local Planning Authorities, particularly in light of the NPPF requirements to plan proactively for beyond emerging Plan periods	It is considered important to plan in line with the preferable 15-year period stated in the NPPF to provide consistency with other Minerals Local Plans in the East of England. The landbank should provide certainty of mineral supply beyond the plan period and would allow proactive planning beyond 2031.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC334	6	Welwyn Hatfield Borough Council (Sue Tiley)	<p>Clearly for the longer timeframe the County Council will need to be able to identify sufficient capacity for 32 years in order to ensure an additional 7 years supply as a landbank. It is understood that the current preferred mineral site in Hatfield Aerodrome has a thirty year supply so it would appear this would not be an issue. However the requirement for a longer time period appears to relate to the need for 25 years supply of brick and clay which are in short supply and therefore may not be achievable.</p> <p>As a general principle the plan should provide as much certainty as possible and avoid needlessly sterilising land over the longer term.</p>	<p>See General Statement</p> <p>It is considered that a 15 year Plan period would provide certainty for Local Planning Authorities that have adopted similar-length Local Plans.</p>

Table 4: Quantity of Sand and Gravel – Issue 7

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 7</p> <p>What quantity of sand and gravel should the county council plan for each year? (Please select one answer)</p> <ul style="list-style-type: none"> <input type="checkbox"/> 1.39million tonnes, as specified by the East of England Aggregate Working Party apportionment figure <input type="checkbox"/> 1.12million tonnes, based on the 10-year average sales figures <input type="checkbox"/> An alternative quantity <p>General Statement:</p> <p>Approximately two-thirds of responses supported the use of the East of England Aggregate Working Party (EEAWP) apportionment figure of 1.39 million tonnes per year as the figure on which to plan for a steady and adequate supply of sand and gravel supply so this is what the Minerals Local Plan will use.</p> <p>The NPPF (para 145) states that Local Aggregate Assessments should be based on a rolling average of 10-year sales data and other relevant local information. The relevant local information will need to be presented during the development of the Plan in order to provide robust justification for the use of a figure other than the 10-year average sales figure in the Plan. However, when considering the growth agenda promoted by Government, the housing currently being planned for in Local Planning Authority Local Plans and the relatively low output of housing and infrastructure during the past decade of recession, the 10-year average sales figure is unlikely to provide any flexibility should demand increase at all.</p> <p>The NPPF (para 145) also states that minerals planning authorities should participate in the operation of an Aggregate Working Party and take advice of that Party into account when preparing their Local Aggregate Assessment. Member-counties of the EEAWP have agreed as a group to use apportionment figures as they are considered a more realistic estimate of future minerals demand for the East of England so the use of the apportionment figure will provide consistency with neighbouring Plans.</p>				

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC5	7	Trustees of the Brocket Estate (Stuart Gray)	1.39 million tonnes per year. Increasing housing pressures should guide policymaking to an objective figure rather than historic average	See General Statement
MLPIC24	7	North Hertfordshire & Stevenage Green Party (Karen Harmel)	1.12mt based on the 10 year average sales. This figure is based on the LAA, based on a 10 year rolling average sales which are real (as possible) figures NOT estimates. These figures have remained relatively constant over the last few years and real sales have been consistently below the EEAWP apportionment every year from 2004-2013. There is no justification for increasing the amount to be extracted. The LAA report describes the figures as "inaccurate, inconsistent and incomplete" which means that extrapolating them will compound any errors. Encouragement of increased recycling and re-use will also reduce reliance on the primary extracted material, and also encouragement towards re-development of brownfield sites as the demolition waste can be re-used on site. Due to Hertfordshire's plans for house building the system needs to remain flexible, which can be done by safeguarding sites. The principle of Demand Management should be applied. It is against Green Party policy (particularly IN207 and TR020) to exploit natural resources based on	<p>See General Statement</p> <p>Using <i>real</i> average-sale figures would not provide flexibility to the Plan should demand increase at all. The extraction sites in Hertfordshire are already experiencing an upturn in demand as illustrated by the current operational practice to transport mineral off-site as soon as it is extracted, without the need to stockpile significant amounts of material on site before transportation.</p> <p>The apportionment figure includes a portion of secondary and recycled aggregate and so the supply of non-primary aggregates is incorporated into the figure. This would not be the case if the Plan was based on the 10-year average sales figure.</p> <p>Mineral operators require time to assemble machinery, facilities, a workforce and transportation prior to</p>

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			a projected or anticipated need. Mineral extraction should be kept to the current 10 year predicted annual sales level unless real demand increases.	extraction. Restricting extraction until a demand exists would therefore delay the very construction projects demanding the material.
MLPIC37	7	Hertsmere Borough Council (Richard Blackburn)	1.39 million tonnes pa of sand and gravel. Alternative depends on better information and/or accurate forecasting of development.	See General Statement
MLPIC48	7	Wheathampstead Parish Council (Julia Warren)	An alternative quantity should be used - We should guestimate at what point the extraction of sand and gravel becomes an unsustainable use of valuable land within the county. Extraction of sand and gravel cannot continue indefinitely and the county council should plan for the decrease in extraction at sites in Hertfordshire.	<p>The NPPF (para 142) states that “Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs”. With the projected increase in demand for minerals, the Minerals Local Plan is obligated to identify sufficient quantities of mineral within the county for use as construction material to be used in the housing and infrastructure developments planned within adopted and emerging Local Plans.</p> <p>The Plan will attempt to protect the mineral resources by planning for an appropriate quantity of extraction and safeguarding reserves not to be</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				sterilised by non-minerals development.
MLPIC60	7	Bovingdon Brickworks Ltd. (Les Cook)	1.39 million tonnes per year as specified by the AWP apportionment figure should be used.	See General Statement
MLPIC68	7	Three Rivers District Council (Martin Wells)	1.39 million tonnes apportionment is appropriate. Agree with the LAA that the last 10 years sales figures do not show a true picture of the demand for sand and gravel due to the recession.	See General Statement
MLPIC88	7	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	1.39 mtpa. Minimum 7 year landbank will dictate the release of reserves avoiding over supply (unless landbank is tied up in one site). Cambs and Essex have adopted sub-regional apportionment. 10 year average is skewed by recession. Ref NPPF 174 - 10 year average would focus on low economic activity. Planned growth in document and LAA and important to ensure sufficient and suitable reserves are identified.	See General Statement
MLPIC95	7	Historic England (Kayleigh Wood)	No comments.	No response necessary.
MLPIC117	7	Central Bedfordshire Council (Natalie Chillcott)	1.12 million tonnes. It is widely accepted that apportionment figures over estimate future demand. The NPPF requires a 7 year landbank to be maintained, and future reviews of the Plan could identify additional sites, if necessary. The Shared Service	The East of England AWP has agreed, as a whole, to plan for minerals supply using the apportionment figures rather than 10-year average sales. Rather than overestimating future demand, it is

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			recommends that Hertfordshire CC take account of discussions with the AWP.	considered that the apportionment figures will provide more flexibility to meet the demand for minerals should the 10-year average sales figures significantly underestimate future demand.
MLPIC126	7	Cambridgeshire County Council (Ann Barnes)	1.39 million tonnes - this is a more realistic assessment of likely call on reserves for the reasons stated in the text.	See General Statement
MLPIC148	7	On behalf of Gascoyne Cecil Estate Ltd (Gordon Wood)	1.39 million tonnes. Clearly the past seven years has seen a depressed construction market which is presently recovering. Future demand could exceed current forecasts. To improve and maintain the landbank provision throughout the plan period supply needs to be matched to demand. Flexibility will help.	See General Statement It is considered that the 10-year average has been skewed by the period of recession.
MLPIC152	7	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	1.12 - Although a higher apportionment figure is always promoted this would be contrary to NPPF. Hopes the production of LAA and identification of 3yr trends would prompt a Local Plan review if the apportionment figure became out dated.	The NPPF (para 145) states that the LAA should be based on a rolling average of 10 years sales data and other relevant local information. The use of the apportionment figure incorporates local information including the expected demand for minerals when taking account of the housing being planned in LPA Local Plans and the obligation to provide aggregate for construction to areas outside of Hertfordshire. The sub-regional apportionment was approved

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				<p>by the East of England Aggregate Working Party based on the Managed Aggregate Supply System (MASS) which was in operation at the time and now forms part of the NPPG (para 060)</p> <p>The LAA will be produced annually and takes account of supply and sales figures and will be a key piece of evidence that identifies whether the Minerals Local Plan requires a review.</p>
MLPIC169	7	Mineral Products Association (David Payne)	<p>1.39 million tonnes - The NPPF and Planning Practice Guidance make it clear that the Plan should make provision based on the LAA which should be based on 10-year average of sales and other relevant local information. The LAA takes local information into account and makes it clear that it is anticipated that demand will increase given the growth agenda in the East of England, and that the 3 year average of sales indicates that the 10 year average of sales would represent too low a figure on which to base future provision. Advice of the AWP is rightly given weight in this decision to plan for 1.39mt per annum. Further work will need to be taken to support this approach as the interpretation of 'relevant local information' needs to be robust</p>	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			in order to justify deviation from using the 10-year average sales.	
MLPIC181	7	Tarmac (Mike Pendock)	1.39 million tonnes - The LAA makes it clear that it is anticipated that demand will increase given the growth agenda in the East of England, and that the 3 year average of sales indicates that the 10 year average of sales would represent too low a figure on which to base future provision. The advice of the AWP is rightly given weight in deciding to plan for provision at an average rate of 1.39 mt per annum. In setting out and explaining future provision, the plan should not just look back at historic patterns of supply but also examine likely future patterns of demand for infrastructure and housing being planned by each district authority in the County	See General Statement
MLPIC188	7	Codicote Parish Council (Lorraine Ellis)	Concur with objective 7	Comment noted.
MLPIC197	7	Northamptonshire County Council (Laura Burton)	Unless adequate justification can be provided local plans should be compliant with the NPPF i.e. provision should be based on 10yr average sales.	See General Statement
MLPIC202	7	CPRE Hertfordshire (Steve Baker)	An alternative quantity, the appropriate quantity should be based on the scale of development set out in adopted district Local	It is considered impossible to calculate an accurate figure for mineral demand across the Plan

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>Plans and statutory infrastructure plans. Plans at an early draft stage with controversial large scale housing targets should not be used as a basis for assumptions in the Plan.</p> <p>The quantity of sand and gravel extraction should also reflect the reality of the recession, not attempt to compensate for it. The Regional Apportionment figure is excessive in this respect, but the 10-year average will be too low because the length and depth of the recession should be treated as exceptional, and unlikely to be repeated during the Plan period.</p>	<p>period based on the contents of adopted Local Plans and infrastructure plans. Only four of the Hertfordshire LPAs have an adopted Local Plan, with the other six LPAs at different stages of the Local Plan production process.</p> <p>The Hertfordshire LAA does take account of housing projections (from adopted Plans as well as other sources) and also contains an overview of the major development schemes detailed within the Local Enterprise Partnership Strategic Economic Plan that the LPAs are considering for planning permission. However, there is no certainty that these projects will ever be developed and a prediction for the quantity of mineral required for any one project would require large assumptions.</p> <p>It is agreed that the 10-year average has been skewed by the period of recession, but it is considered that the apportionment figure would provide the necessary flexibility to meet increases in demand in line with the Government's agenda for growth.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC218	7	D K Symes Associates (D K Symes)	1.39 mtpa. Increased demand on minerals in Herts due to proximity to GLA. Additional pressure on provision should be acknowledged.	See General Statement
MLPIC244	7	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	The County Council should use the EEAWP Apportionment figure. The 10 year average is based on a historic data and does not take into account the pick-up in construction activity as the economy moves out of recession.	See General Statement
MLPIC254	7	Buckinghamshire County Council (Emily Hodgson)	1.12 million tonnes. That method is given primary emphasis in the NPPF.	See General Statement
MLPIC271	7	Natural England (Gordon Wyatt)	1.39 million tonnes - Natural England supports the council's rationale in selecting the higher figure.	See General Statement
MLPIC281	7	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	1.39 million tonnes - Long term plans having apportionment based on historical sales figures does not provide sufficient flexibility to respond to short term economic cycles. It also ensure shortages during periods of growth and oversupply in periods of decline. Whilst a strategic plan should provide for long term provision, 15 years is barely adequate, an actual figures should be reviewed annually as a reflection of the current market conditions and how these relate to the strategic average.	See General Statement The Hertfordshire LAA will continue to be produced annually and takes account of supply and sales figures. It will be a key piece of evidence that identifies whether the Minerals Local Plan requires a review.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC302	7	Bedford Borough Council (Natalie Chillcott)	1.12 million tonnes - It is widely accepted that apportionment figures over estimate future demand. The NPPF requires a 7 year landbank to be maintained, and future reviews of the Plan could identify additional sites, if necessary. The Shared Service recommends that Hertfordshire CC take account of discussions with the AWP.	The East of England AWP has agreed, as a whole, to plan for minerals supply using the apportionment figures rather than 10-year average sales. Rather than overestimating future demand, it is considered that the apportionment figures will provide more flexibility to meet the demand for minerals should the 10-year average sales figures significantly underestimate future demand.
MLPIC323	7	East Herts District Council (Jenny Pierce)	1.39 million tonnes - However, this period extends only to 2020 and will therefore need to be reviewed, forcing a review of the Hertfordshire MLP, regardless of whichever period is planned for.	<p>Whilst the National and Regional Guidelines for Aggregates Provision in England is for the period 2005-2020, the sub-regional apportionment was approved by the East of England Aggregate Working Party based on the Managed Aggregate Supply System (MASS) which was in operation at the time, now forms part of the NPPG (para 060) and will remain so until a time when the NPPG is changed.</p> <p>The Hertfordshire LAA will be produced annually and will take account of supply and sales figures. It will be a key piece of evidence that</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				identifies whether the Minerals Local Plan requires a review at any stage or the plan period.
MLPIC335	7	Welwyn Hatfield Borough Council (Sue Tiley)	County Council should as a general principle avoid allocating land which is unlikely to be needed over the plan period and which might be required to meet other needs. However the average sales figure over the last 10 years is unlikely to reflect future demand if house building rates increase which seems highly likely. It may be that a figure between the two estimates is the most appropriate.	<p>The Plan will allocate sufficient sites to meet the requirements of the county. It is not the Plan's intention to allocate sites beyond these needs.</p> <p>It is agreed that the 10-year average has been skewed by the period of recession, but it is considered that the apportionment figure would provide the necessary flexibility to meet increases in demand in line with the Government's agenda for growth.</p>

A summary of the representations received regarding the site selection methodology for sand and gravel (Issues 8-11) and the HCC responses to these representations are included within the separate Cabinet Panel report: "Implementation of the Site Selection Methodology and to undertake the Call for Sites for the Minerals Local Plan review" – February 2016

Table 5: Sterilisation and Windfall Sites – Issues 12-14

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 12 How should the Minerals Local Plan support the prevention of mineral sterilisation? (Please select one answer)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Include a policy that identifies the Minerals Safeguarding Areas and Minerals Consultation Areas and sets the thresholds for non-mineral proposals in these areas which the county council wishes to be consulted on <input type="checkbox"/> Include a policy on minerals sterilisation which encourages the prior extraction of minerals before non-mineral developments <input type="checkbox"/> Include a policy that combines the identification of Minerals Safeguarding Areas and Minerals Consultation Areas with the encouragement of prior extraction to avoid the sterilisation of minerals by non-minerals development. <input type="checkbox"/> Include two separate policies. One policy identifying the Minerals Safeguarding Areas and Minerals Consultation Areas and the thresholds for non-minerals proposals which ensure consultation with the county council, and one policy encouraging the prior extraction of minerals to prevent the sterilisation of minerals buy non-mineral developments <input type="checkbox"/> Deal with proposals on a site-by-site bases as a windfall site <p>General Statement:</p> <p>Generally the representations received suggest that the draft Plan should contain two separate policies for Minerals Safeguarding Areas and Minerals Consultation Areas and mineral sterilisation.</p> <p>It may be appropriate to have more than one policy within the review of the MLP for MSA & MCAs and a policy for mineral sterilisation in which prior extraction would be encouraged. It is suggested to have two separate policies to ensure that the relevant policies and criteria can be easily applied. Both policies would need to be in line with paragraph 143 of the NPPF.</p> <p>The adopted MLP contains Policy 5: Mineral Sterilisation which encourages prior extraction and it is considered that whilst the detailed wording from the policy will be reviewed the general aim of the policy will remain.</p>				

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>As part of the review of the MLP, it is intended that the existing Minerals Consultation Area SPD is also reviewed and could be incorporated into the suggested policies within the MLP.</p> <p>It is proposed that windfall sites (sites which become available which were not specifically allocated within the plan) will be dealt with on a site by site basis if and when planning applications come forward and determined against the policies contained within the MLP and on the merits of the application.</p>				
MLPIC7	12	Trustees of the Brocket Estate (Stuart Gray)	Sterilisation Policy encouraging prior extraction	See General Statement.
MLPIC26	12	North Hertfordshire & Stevenage Green Party (Karen Harmel)	Deal with proposals on a site-by-site basis as windfall site. Any policy set up in advance for all local authorities could force mineral extraction on site, even if there are good reasons for not going ahead. A case-by-case method has maximum sensitivity and flexibility. It also agrees with the way HCC want to treat large windfall sites. There should be a protocol set up to decide if extraction is the right option for any sites; consulting with an approved list of partners and independent competent planning inspectorates.	See General Statement. Policies within local plans set out the criteria by which individual planning applications can be assessed. The necessary consultation processes will be undertaken during both the preparation of Minerals Local Plan and individual planning applications.
MLPIC39	12	Hertsmere Borough Council (Richard Blackburn)	Should include one policy for MSA, MCA and thresholds for non-mineral proposals and another policy for prior extraction	See General Statement
MLPIC50	12	Wheathampstead Parish Council (Julia Warren)	The MLP should support prevention of mineral sterilisation by including a policy that identifies the Minerals Safeguarding Areas and Mineral Consultation Areas and sets the	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			thresholds for non-mineral proposals in these areas which the county council wishes to be consulted on AND include a policy on minerals sterilisation which encourages the prior extraction of minerals before non-mineral development.	
MLPIC70	12	Three Rivers District Council (Martin Wells)	Should include a policy on minerals sterilisation which encourages the prior extraction of minerals before non-mineral developments. Existing policy 5 is noted in the adopted MLP. A new policy would be supported provided any temporary extraction sites would not result in an adverse cumulative impact.	It is proposed to include a policy on mineral sterilisation in the review of the MLP. Policy 5 of the adopted MLP will be reviewed. Any sites which come forward for mineral extraction would still be subject to other policy considerations contained within the development management policies.
MLPIC79	12	Hampshire County Council (Rob Sellen)	Useful to encourage that the MPA should be consulted at the earliest opportunity, at pre-application, before an application is submitted to facilitate the recovery of minerals prior to development.	Engagement is encouraged at the earliest opportunity through the current Mineral Consultation Areas SPD. HCC also continues to have regular Duty to Cooperate discussions and would provide comments to district/borough council during local plan preparation for potential sites allocations where mineral maybe an issue. HCC would also continue to seek to be consulted on any subsequent planning application.
MLPIC90	12	SLR Consulting Ltd on behalf of Brett	Include 2 separate policies. One or two policies as splitting the 2 aspects allows for	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Aggregates Ltd (Chris Lowden)	greater clarity. Application of policies for MSAs and MCAs needs to be clear.	
MLPIC97	12	Historic England (Kayleigh Wood)	No preferred option selected. The council should consider how the local plan might address the issue of identifying and safeguarding minerals for conservation purposes. Whilst it is appreciated that there is not much building stone resource in Hertfordshire (and not much across the East of England), chalk (as clunch) and brick clay can contribute towards the repair of old buildings and the sourcing of appropriate materials for new build in historic locations. It is considered that the document should explore this issue.	Minerals Safeguarding Areas and Minerals Consultation Areas is covered by Issue 10 of the consultation document. It is proposed to include safeguarding areas within the MLP. In addition, it is proposed that the clay and chalk resources in the county will be safeguarded. Some of the bricks produced by Bovingdon Brickworks and the flint extracted with the chalk at Codicote Quarry are known to be used in restoration and conservation projects.
MLPIC111	12	Ptarmigan C/O Barton Willmore (Claire Brindley)	Include a policy that encourages prior extraction before non-mineral developments. Balance needs to be struck between not unnecessarily constraining strategic growth and preventing sterilisation. Policy should not be a mandatory requirement due to use of secondary and recycled aggregates. Prior extract if quality of mineral, practicable, financially and environmentally feasible. Site selection should be conscious of the most sustainable areas which may be used for planned growth adjacent to settlements.	Paragraph 143 of the NPPF states that in preparing Local Plans, local planning authorities should set out policies to encourage the prior extraction of minerals, where <u>practicable and environmentally feasible</u> , if it is necessary for non-mineral development to take place' (emphasis added). It is intended that the MLP will include a criteria based policy for prior extraction. In cases where prior extraction is not viable, or

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				<p>practicable/feasible to extract mineral prior to other non-mineral development, it would be expected that this is proven within a supporting document such as mineral resource assessment report for the Mineral Planning Authority to consider. The MLP will also encourage the use of secondary and recycled aggregates to reduce the reliance on land won minerals. The proposed site selection methodology includes criteria for assessing the proximity of allocated residential or built development.</p>
MLPIC119	12	Central Bedfordshire Council (Natalie Chillcott)	Include policy that combines the identification of MSAs and MCAs with the encouragement of prior extraction before non-mineral developments.	See General Statement
MLPIC128	12	Cambridgeshire County Council (Ann Barnes)	As long as MSAs and MCAs are identified, thresholds are set for consultation when a site falls within a MCA, and prior extraction is encouraged, it could be either through one or two policies. It may depend if the MSA area has the same geographic area as the MCA. These matters should be addressed through a clear policy rather than an ad hoc approach as windfall sites come forward.	See General Statement
MLPIC142	12	Stevenage Borough Council (Richard	Include two separate policies.	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Javes)		
MLPIC154	12	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Include 2 separate policies.	See General Statement
MLPIC171	12	Mineral Products Association (David Payne)	Include two separate policies - No strong opinion on whether there should be one or two policies but issues that must be addressed in policy are the identification of MSAS/MCAs, clear application of the safeguarding process, and encouragement of prior extraction where non-minerals development in a MSA is permitted. 2 policies could make the safeguarding process and the encouragement of prior extraction clearer in development management terms Prior extraction can allow for phasing of minerals and housing development and need not mean full extraction of the deposit in order that non-minerals development remains viable.	See General Statement It is intended that the MLP will include a criteria based policy for prior extraction and sterilisation. In cases where prior extraction is not viable, or practicable/feasible to extract mineral prior to other non-mineral development or partial mineral extraction provided a better opportunity, it would be expected that this is proven within a supporting document such as mineral resource assessment report.
MLPIC182	12	Tarmac (Mike Pendock)	Include two separate policies - Whilst they are complimentary, they have separate aims. Any minerals released by prior extraction should be treated as a windfall. An early proactive approach to prior extraction should be adopted as otherwise opportunities will be lost. This will also enable an integrated approach to planning of the phasing of the	See General Statement and response to MLPIC171 Issue 12. Engagement is encouraged at the earliest opportunity through the current Mineral Consultation Areas SPD. HCC also continues to have regular Duty to Cooperate discussions

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			<p>mineral and built development to take place. We also believe that a policy on minerals sterilisation should take a practical approach and that partial extraction of the deposit may be the best outcome. For example on sites with high water tables or that have particularly deep deposits it may be sensible to only work to a depth that creates a landform suitable for the intended non mineral use.</p>	<p>and would provide comments to district/borough council during local plan preparation for potential sites allocations where mineral maybe an issue. HCC would also continue to seek to be consulted on any subsequent planning application.</p>
MLPIC204	12	CPRE Hertfordshire (Steve Baker)	<p>The MLP should include two separate policies for identifying the Minerals Safeguarding Areas and Minerals Consultation Areas and one policy encouraging the prior extraction of minerals to prevent the sterilisation. There would still need to be separate policies for MSAs and MCAs which are identified for different purposes, with MSA's only likely to cover parts of the MCA's.</p>	<p>See General Statement</p>
MLPIC220	12	D K Symes Associates (D K Symes)	<p>Include 2 separate policies. Greater clarity needed between windfall site and minerals available for prior extraction.</p>	<p>See General Statement Prior extraction would be encouraged on non-mineral development sites where extraction would meet the criteria of DM policies and where the opportunity exists to prevent sterilisation. This process would be linked with the Mineral Safeguarding and Mineral Consultation Areas.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC234	12	North Herts District Council (David Hill)	Prior extraction of minerals should be encouraged where appropriate and the local plan should define minerals consultation areas and sterilisation areas in accordance with national guidance.	The MLP will encourage prior extraction where appropriate and define MSA and MCAs in line with paragraph 143 to 'define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas'.
MLPIC246	12	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	The MLP should include a policy that combines the identification of Minerals Safeguarding Areas and Mineral Consultation Areas with encouragement of prior extraction to avoid the sterilisation of minerals by non-minerals development. This should be qualified by NPPF guidance which says prior extraction where practical and environmentally feasible.	See General Statement
MLPIC256	12	Buckinghamshire County Council (Emily Hodgson)	Include 2 separate policies for MSAs and MCAs.	See General Statement
MLPIC273	12	Natural England (Gordon Wyatt)	No preference - Natural England considers that both Safeguarding Areas and a policy on	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			sterilisation are necessary; but has no preference between the third option (combined policy) and the fourth option (two separate policies).	
MLPIC283	12	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	Consultee selected ALL 5 OPTIONS	Selection noted. See General Statement
MLPIC291	12	HCC Ecology (Martin Hicks)	Not sure where Objective 7 fits in	Objective 7 links to many of the topic areas with regards to timely mineral extraction and high quality and progressive restoration to achieve beneficial after use. This objective may be subject to change following the initial consultation.
MLPIC304	12	Bedford Borough Council (Natalie Chillcott)	Include a policy that combines MSA/MCAs with the encouragement of prior extraction	See General Statement
MLPIC325	12	East Herts District Council (Jenny Pierce)	Include 2 separate policies - officers rely on clear policies and thresholds, so two policies, and a process of consulting with the Minerals Team, should clearly set out considerations for the issue of sterilisation.	See General Statement
MLPIC337	12	Welwyn Hatfield Borough Council (Sue Tiley)	The council has no view on whether to split or combine policies regarding Mineral Safeguarding Areas and Mineral Consultation Areas in the MLP as the impact is similar.	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 13 Should the Minerals Local Plan continue to use the formal consultation process introduced in the Mineral Consultation Areas in Hertfordshire Supplementary Planning Document? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> Yes – but amendments are required for the excluded categories <input type="checkbox"/> No – the county council should be consulted on all proposals for non-minerals development in Minerals Consultation area</p>				
MLPIC7	13	Trustees of the Brocket Estate (Stuart Gray)	Yes - with amendments to the excluded categories	Selection noted. No response necessary.
MLPIC26	13	North Hertfordshire & Stevenage Green Party (Karen Harmel)	Yes - The Minerals Local Plan should continue to use the formal consultation process introduced in the Minerals Consultation Areas in Hertfordshire SPD.	Selection noted. No response necessary.
MLPIC39	13	Hertsmere Borough Council (Richard Blackburn)	Yes - Continue to use the consultation process in the MCA SPD	Selection noted. No response necessary.
MLPIC50	13	Wheathampstead Parish Council (Julia Warren)	Yes - The MLP should continue to use the formal consultation procedure	Selection noted. No response necessary.
MLPIC70	13	Three Rivers District Council (Martin Wells)	Yes - should use the formal consultation process in the MCA SPD. Consultation requirements in section 5 of the SPD are relevant and support its continued use. Types	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			of exempt planning applications are also still relevant and continued application of these thresholds would be supported.	
MLPIC79	13	Hampshire County Council (Rob Sellen)	Worth considering to exclude developments which fall outside of the excluded from consultation list e.g. greenfield proposals within MSA which fail to exceed a reasonable threshold eg 3 or 5 ha. This may help to exclude minor developments which yield a small resource economically unviable and unattractive to industry and in line with para 9.11 to protect significant resources.	HCC will consider whether it is appropriate to include criteria for considering developments not within MCAs but with MSA for larger greenfield development over a certain threshold. This will be subject to further consultation.
MLPIC90	13	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Yes - use formal consultation process for MCAs. Criterion (iv) - consideration needs to be given to long standing allocations in District Plans that may not have fully considered mineral sterilisation in sufficient detail especially where plans pre-date NPPF.	It is expected that sites allocated within more recent district local plans will have been subject to consultation with the Mineral Planning Authority during plan preparation and therefore any mineral sterilisation issues that need taking into account would have been highlighted at an earlier stage to allow for phasing and timing to be considered. However, HCC also continues to have regular Duty to Cooperate discussions and would provide comments to district/borough council where necessary for larger sites coming forward and would continue to seek to be consulted on any subsequent

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				planning application.
MLPIC97	13	Historic England (Kayleigh Wood)	No comments.	No respond necessary.
MLPIC111	13	Ptarmigan C/O Barton Willmore (Claire Brindley)	Yes - should use the formal consultation process in the MCA SPD but amendments required. 'Broad locations for development' and other area designations specified in Local Plans should also be excluded where there is a clear intent that future long term residential development may take place.	The Mineral Planning Authority engages with Local Planning Authorities during local plan preparation to provide comments to district/borough councils for potential sites allocations/broad locations where mineral sterilisation maybe an issue and would need to be fully considered as part of the development approach. This ensures where broad locations with mineral sterilisation issues are identified, consideration for the prior extraction of minerals can be considered at an early stage. Only general comments are provided for broad locations as there is no defined site outline and therefore it is still considered necessary for the MPA to be consulted when specific sites are identified.
MLPIC119	13	Central Bedfordshire Council (Natalie Chillcott)	Yes	Selection noted. No response necessary.
MLPIC154	13	Cemex UK Operations Ltd (Kirsten Hannaford-	Yes - but amendments are required for the excluded categories	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Hill)		
MLPIC171	13	Mineral Products Association (David Payne)	Yes but amendments are required - ii) 'infilling is rather imprecise and not required if (i) applies iv) given that MSAs were not previously delineated, and many District Councils did not consider minerals safeguarding properly, including when allocating sites within their development plans, it is important that prior extraction applies to existing local plan allocations (as in 9.23) and that safeguarding is properly taken into account in all new/emerging local plans. This criterion would need to be re-visited - particularly given the proposal to address 'windfall' sites in the following section.	The terminology may be reviewed as part of the review of the SPD, although it is considered that infilling (a specific built-development term) can occur on land that has not previously been built on so ii) remains valid. See response to MLPIC90 Issue 13.
MLPIC182	13	Tarmac (Mike Pendock)	Yes - (iv) given that MSA's were not previously delineated, and many District Councils did not consider minerals safeguarding properly, including when allocating sites in their development plans it is important that prior extraction applies to existing local plan allocations (as in 9.23) and that safeguarding is properly taken into account in all new/ emerging local plans.	See response to MLPIC90 Issue 13.
MLPIC189	13	Codicote Parish Council (Lorraine Ellis)	Yes	Selection noted. No response necessary.
MLPIC220	13	D K Symes	Yes - continue to use the consultation	Selection noted. No response

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Associates (D K Symes)	process in the MCA SPD. Provided it works effectively. Consultation is only a first stage, if criteria can be used to rule out prior extraction this can be done at consultation stage.	necessary.
MLPIC234	13	North Herts District Council (David Hill)	Continuing to use the existing consultation procedure would seem sensible.	Selection noted. No response necessary.
MLPIC246	13	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	No - the county council should be consulted on all proposals for development in Minerals Consultation Areas.	It is not considered practical or reasonable for the MPA to be consulted on all development as this would include small household extensions which would not have significant mineral sterilisation issues. The purpose of MSA and MCA is to protect known areas of mineral resources from unnecessary sterilisation.
MLPIC256	13	Buckinghamshire County Council (Emily Hodgson)	Yes - use formal consultation procedure	Selection noted. No response necessary.
MLPIC273	13	Natural England (Gordon Wyatt)	Yes	Selection noted. No response necessary.
MLPIC283	13	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	Yes	Selection noted. No response necessary.
MLPIC291	13	HCC Ecology (Martin Hicks)	Not sure where Objective 7 fits in	Objective 7 links to many of the topic areas with regards to timely mineral extraction and high quality and

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				progressive restoration to achieve beneficial after use. This objective may be subject to change following the initial consultation.
MLPIC304	13	Bedford Borough Council (Natalie Chillcott)	Yes	Selection noted. No response necessary.
MLPIC325	13	East Herts District Council (Jenny Pierce)	On the matter of developments that do not require consultation with the Minerals Team, this assumes that the local plan has been prepared in accordance with the Minerals Local Plan and in consultation with the Minerals Team.	The Minerals Local Plan forms part of the development plan and therefore it is anticipated that the district/borough councils are in accordance with the MLP. Engagement is encouraged at the earliest opportunity through the plan preparation and in addition through consultation stages. HCC also continues to have regular Duty to Cooperate discussions and would provide comments to district/borough council during local plan preparation for potential sites allocations where mineral maybe an issue. HCC would also continue to seek to be consulted on any subsequent planning application.
MLPIC337	13	Welwyn Hatfield Borough Council (Sue Tiley)	Yes - agree that the Plan should continue to use the formal consultation procedure	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 14 How should the Minerals Local Plan cover the topic of windfall sites? (Please select one answer)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Incorporate windfall sites into a policy related to mineral extraction applications for sites outside of Specific Site and Preferred Areas <input type="checkbox"/> Include a policy specifically about the use of windfall sites for mineral extraction, promoting a phased approach to development to allow the gradual extraction of minerals in sync with the non-mineral development <p>General Statement:</p> <p>The issue of how to incorporate windfall sites into the Plan received a varied response to the consultation. Generally, the favoured option would be to incorporate windfall sites into a policy related to mineral extraction applications outside of Specific Sites and Preferred Areas.</p> <p>Windfall sites are sites which become available but are not specifically allocated within the plan. It is therefore not possible to plan the timing of when these sites would come forward. It is suggested that windfall sites be dealt with on a site by site basis if and when planning applications come forward and determined against the policies contained within the MLP and on the merits of the application. For that reason, it is proposed to strengthen the wording of Minerals Policy 4: Applications outside Preferred Areas from the adopted Minerals Local Plan, in addition to proposing policies for mineral sterilisation and Mineral Safeguarding Areas and Mineral Consultation Areas. Policies can encourage the progressive restoration and phasing within the sites to ensure that sites are restored at the earliest opportunity, in addition to encouraging the consideration of a phased approach to prior extraction where sites would be used for non-mineral development.</p>				
MLPIC7	14	Trustees of the Brocket Estate (Stuart Gray)	Specific windfall site policy	Selection noted. See General Statement
MLPIC26	14	North Hertfordshire & Stevenage Green	The Minerals Local Plan should incorporate windfall sites into a policy related to mineral	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Party (Karen Harmel)	extraction applications for sites outside of Specific Sites and Preferred Areas. The sites should be considered on a case-by-case basis, according to an agreed protocol and agreed weighting/scoring system.	
MLPIC39	14	Hertsmere Borough Council (Richard Blackburn)	Include policy about use of windfall sites for mineral extraction, provided windfall is related to phasing of planned sites which should have priority.	See General Statement
MLPIC50	14	Wheathampstead Parish Council (Julia Warren)	The MLP should cover windfall sites by including a policy specifically about the use of windfall sites for mineral extraction, promoting a phased approach to development to allow the gradual extraction of minerals in sync with the non-mineral development.	See General Statement
MLPIC70	14	Three Rivers District Council (Martin Wells)	Incorporate windfall sites into a single policy that covers windfall sites and other sites that fall outside of specific sites/preferred areas would be sufficient.	Selection noted. See General Statement
MLPIC90	14	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Incorporate windfall sites into a policy for sites outside of specific sites and preferred areas.	Selection noted. See General Statement
MLPIC97	14	Historic England (Kayleigh Wood)	No comments.	No response necessary.
MLPIC119	14	Central Bedfordshire Council (Natalie Chillcott)	Incorporate windfall site into a policy related to mineral extraction applications for sites outside of Specific Sites and Preferred Areas.	Selection noted. See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC134	14	Hertfordshire County Council - Highways (Manjinder Sehmi)	Detailed discussion required at a later date.	No response necessary.
MLPIC149	14	On behalf of Gascoyne Cecil Estate Ltd (Gordon Wood)	<p>A “Windfall” is something unexpected which benefits those receiving it. “Windfall” and “Sterilisation” are not the same thing. Sterilisation may occur for a variety of sometimes commercial reasons on a known site or Preferred Site which then has the effect of reducing supply from sites which have been through the consultation process sometimes throughout the period of several local mineral plans.</p> <p>Policy for Windfall sites on a site specific basis is not possible but it is the view that a distinct policy for “Windfall Sites” is required which allows future such sites to be introduced into the planning system without the confusion of being mixed in with known sites. It is not clear how the county council intends to deal with applications from competing sites where Windfall sites are in competition with known sites.</p>	See General Response Mineral extraction as a windfall site may come forward in order to prevent mineral sterilisation. It is acknowledged that sterilisation may occur for a number of reasons, including non-mineral development and at existing mineral sites where reserves are too small to be worked as a standalone site in the future. It may be appropriate for policy wording to include criteria for dealing with competing sites.
MLPIC154	14	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Incorporate windfall sites into a policy related to mineral extraction applications for sites outside of Specific Sites and Preferred Areas	Selection noted. No response necessary.
MLPIC171	14	Mineral Products Association (David	Include policy specifically about the use of windfall sites for mineral extraction -	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Payne)	Safeguarding and prior extraction policies (Issue 12) will apply. A policy on windfall should be concerning the contribution to supply from prior extraction. There is also a need for a policy related to sites for mineral extraction coming forward that are outside of Specific Sites and Preferred Areas but not 'windfall' sites/supplies.	
MLPIC182	14	Tarmac (Mike Pendock)	Include a policy specifically about the use of windfall sites for mineral extraction - The two policies are not mutually exclusive and consideration should be given to their separate applications. Para 9.24 is of potential concern. The decision of whether to extract the mineral or to sterilise the resource by non-mineral development should be considered in the one policy so that the balance of needs can be weighed and / or overriding need for the development shown.	See General Statement
MLPIC204	14	CPRE Hertfordshire (Steve Baker)	The MLP should incorporate windfall sites into a policy related to mineral extraction applications for sites outside of Specific Sites and Preferred Areas	Selection noted. See General Statement
MLPIC220	14	D K Symes Associates (D K Symes)	Incorporate windfall sites into a policy for sites outside of specific sites and preferred areas. Unclear definition of windfall sites. If prior extraction - cover this by a policy. Caution needed as insisting on prior	See General Statement It is also proposed that it may be appropriate for the MLP to include two policies, one for MSA & MCAs and a second policy for mineral sterilisation

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			extraction may result in non-mineral development not taking place, then nobody wins. Windfall is site where minerals have to be excavated as integral part of the development (reservoirs, marinas, fishing lakes). Should be policy for mineral sites outside of preferred areas.	in which prior extraction would be encouraged on sites for non-mineral development to prevent sterilisation. It is recognised that these policies are related to similar issues. However supporting text can be incorporated to provide clear guidance as to the aim and context of the policy. It is proposed that separate policies are included for reservoirs and borrow pits, however this is still subject to further consultation.
MLPIC246	14	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	Incorporate windfall sites into a policy related to mineral extraction applications for sites outside of Specific Sites and Preferred Areas. Policy needs to be clear as to what constitutes a windfall site (agricultural reservoir etc) and what is meant by extraction prior to development (in mineral safeguarding areas).	See General Statement and response to MLPIC220 Issue 14.
MLPIC256	14	Buckinghamshire County Council (Emily Hodgson)	Include a policy specifically about the use of windfall sites, promoting a phased approach	See General Statement
MLPIC273	14	Natural England (Gordon Wyatt)	No specific preferences	No response necessary.
MLPIC283	14	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	Include a policy specifically about the use of windfall sites for mineral extraction	Selection noted. See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC291	14	HCC Ecology (Martin Hicks)	Not sure where Objective 7 fits in	Objective 7 links to many of the topic areas with regards to timely mineral extraction and high quality and progressive restoration to achieve beneficial after use. This objective may be subject to change following the initial consultation.
MLPIC304	14	Bedford borough Council (Natalie Chillcott)	Incorporate windfall sites into a policy related to mineral extraction applications outside of Specific Sites and Preferred Areas	Selection noted. See General Statement
MLPIC325	14	East Herts District Council (Jenny Pierce)	A policy should be included that requires a phased approach to extraction alongside development in order to ensure mineral resources are worked where possible and not sterilised. Material extracted can be utilised on-site if necessary.	See General Statement The opportunistic extraction of sand and gravel for use of site would need to be considered on a site by site basis.

Table 6: Minerals Safeguarding Areas and Mineral Consultation Areas Site Selection – Issue 15

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 15 Is the proposed selection procedure for Minerals Safeguarding Areas and Minerals Consultation Areas appropriate? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>General Statement:</p> <p>The proposed selection methodology for Minerals Safeguarding Areas and Minerals Consultation Areas, which follows national guidance closely, was considered an appropriate methodology to use. The NPPF (para 143) states that local planning authorities should define Minerals Safeguarding Areas and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be ever worked.</p> <p>The methodology will use British Geological Survey (BGS) digital resource information to outline the extent of Safeguarding Areas for sand and gravel, clay and chalk resources around the county which will be included and consulted on as part of the draft Minerals Local Plan in autumn 2016.</p>				
MLPIC8	15	Trustees of the Brocket Estate (Stuart Gray)	Yes	See General Statement
MLPIC27	15	North Hertfordshire & Stevenage Green Party (Karen Harmel)	Yes - The safeguarding of MSAs is a legal requirement from the NPPF. The methodology is that recommended by BGS. Consultation on MSAs will lead to site-specific decisions, the width of buffer needed and which sites to exclude. It is assumed that	See General Statement. The process of identifying buffer zones around resources for consultation purposes with non-minerals development will be determined in the ongoing work with

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			an EIA will be part of the site analysis, and that this environment assessment will not be rendered meaningless by an inappropriate scoring system. It is important that this site-specific consultation asks the right questions for the environment.	consultants. Specific developments are required to submit an EIA alongside a planning application. Such developments include most minerals workings. Should a non-mineral development be proposed within a safeguarded area, preferred area, area of search or a specific site, the planning application for that development should discuss the potential effects on the mineral resource. HCC would be a statutory consultee in such a situation and would be able to request that the application include a mineral assessment.
MLPIC40	15	Hertsmere Borough Council (Richard Blackburn)	Yes - Appropriate election procedure for MSAs and MCAs	See General Statement
MLPIC51	15	Wheathampstead Parish Council (Julia Warren)	Yes - the proposed selection procedure for MSA and MCA is appropriate.	See General Statement
MLPIC61	15	Bovingdon Brickworks Ltd. (Les Cook)	Yes - the proposed selection procedure for MSA and MCA is appropriate.	See General Statement
MLPIC71	15	Three Rivers District Council (Martin Wells)	Yes - selection procedure for MSA and MCAs is appropriate and robust. Acknowledge the district is predominantly within the sand and gravel belt identified as a MCA in the MCA	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			SPD.	
MLPIC80	15	Hampshire County Council (Rob Sellen)	Questions if existing, planned and potential mineral processing sites e.g. concrete batching plants and aggregate recycling facilities should be safeguarded and included in MCAs due to the role in which secondary aggregates contribute to the supply of minerals. Also refers to chapter 13 - secondary and recycled aggregates.	This is the current intention as identified as a requirement within paragraph 143 of the NPPF to safeguard 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. Agree that secondary and recycled aggregates play an important part in contributing to the supply of minerals. Such sites are safeguarded under waste policy 5 of the Waste Core Strategy and Development Management Policies document.
MLPIC81	15	Hampshire County Council (Rob Sellen)	Para 10.7 refers to areas excluded from coverage of MSA. Suggests it may be appropriate to review EA historic landfill data to restrict the MPA being consulted on non-minerals developments unnecessarily and needless further exploratory work of the proposed site.	The use of the Environment Agency historic landfill data (particularly since the mineral resource maps were produced) may be useful to highlight the areas that have previously been worked and therefore would assist with fewer consultations and unnecessary further exploratory work.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC91	15	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Yes - selection procedure for MSA and MCAs is appropriate. Care needs to be given to determining the viability of a mineral resource.	See General Statement. Viability is an aspect of the site selection process that will be refined.
MLPIC98	15	Historic England (Kayleigh Wood)	No comments.	No response necessary
MLPIC112	15	Ptarmigan C/O Barton Willmore (Claire Brindley)	No - MSA & MCA selection procedure is not appropriate. Strategic value of the site for other development and economic viability of mineral deposits should be material factors to avoid conflict of MSAs with strategic growth. Suggest encouraging a policy of best practice to commercially evaluate the viability for using resources. Surrey, Wiltshire & Swindon's MLP policies emphasise important non-mineral development should not be compromised.	Mineral resources are finite and can only be dug where they are found. There may be a conflict of interest with land being proposed through the District Local Plan process for other development. Plans gain more weight as they progress through the Local Plan process. Designated land and policies within an adopted District Local Plan will be a material consideration as having been through the Local Plan process and considered to be a deliverable development. The county council would wish to see mineral extracted prior to other development on mineral bearing land. Economic viability of extracting minerals will be a consideration that is taken into account. The details of economic viability will be established as part of the site selection process. Where minerals development is not

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				considered likely to occur, a balance is required between minerals development and non-minerals development.
MLPIC120	15	Central Bedfordshire Council (Natalie Chillcott)	Yes - Safeguarding should be included in the Mineral Local Plan, and referenced in District Plans. This would be quicker, more consistent and would reduce the risk of mineral sterilisation.	See General Statement. Agree that sign posting and inclusion of the MSAs and MCAs in District Local Plans would ensure mineral is not sterilised. This is referenced in paragraph 9.7 of the Initial Consultation document.
MLPIC129	15	Cambridgeshire County Council (Ann Barnes)	If there is a policy on MSA in the Herts MLP, there should be no need to have corresponding policies in district Local Plans as the MLP is part of the overarching Development Plan for all developments.	See General Statement. Sign posting and inclusion of the MSAs and MCAs in District Local Plans would ensure mineral is not sterilised.
MLPIC135	15	Hertfordshire County Council - Highways (Manjinder Sehmi)	Yes - The proposed selection procedure is considered appropriate.	See General Statement
MLPIC155	15	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Yes - selection for MSA and MCAs is appropriate. Advise speaking with Leicestershire County Council regarding a recent planning decision on housing in a MSA as this could influence policy formation.	Selection noted. A key issue in regards to this decision is the inclusion of a MSA/MCA policy without a published supporting map. Seek further information regarding the decision on housing in Leicestershire in a MSA.
MLPIC172	15	Mineral Products Association (David Payne)	Yes - The MPA attended the consultation event and commend the County Council on its organisation and the approach taken to	See General Statement

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			preparing the plan.	
MLPIC183	15	Tarmac (Mike Pendock)	Yes	See General Statement
MLPIC205	15	CPRE Hertfordshire (Steve Baker)	The wording implies that MSA's and MCA's will cover the same areas, and would appear to be inconsistent with the approach described in Chapter 9. Only parts of the areas within which minerals exist will need to be categorised as MCA's within which the County Council would need to be consulted when a relevant application is submitted to the district council, and smaller areas within those MCA's protected from future development by MSA designation.	MCAs will be based on MSAs where the District Councils will need to consult the Mineral Planning Authority for any proposals for non-minerals development not included on the excluded development list. Chapter 9 is concerned with the approach to ensuring that mineral sterilisation is prevented. The remaining economically viable resource that needs to be protected from sterilisation needs to be established to then realise the consultation areas around this. Selecting the safeguarding area and potentially having excluded development set out could reduce the need to be consulted by the District Councils.
MLPIC213	15	RSPB (Mark Nowers)	No - The RSPB is of the view that it would be sensible and pragmatic to include a presumption against extraction to international and national statutory protected sites for conservation (SPAs, SACs, Ramsar, SSSIs, NNRs). This would reflect the high	Nationally and internationally designated sites for conservation are afforded protection. Designated sites are afforded the same level of protection regardless of the type of land use or development being

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			level of legal protection these sites have and would be consistent with the NPPF (paras. 14 and 119).The RSPB is of the view that these should be entwined in Item 4 of the MSA Selection procedure.	proposed i.e. mineral or non-mineral development. These sites may not come forward for any type of development. The protection of these sites is a material consideration as part of the determination of planning applications. These could be considered as part of the MSA if areas are excluded from showing potential mineral resource.
MLPIC221	15	D K Symes Associates (D K Symes)	Yes - selection for MSA and MCAs is appropriate.	See General Statement
MLPIC247	15	Savills on behalf of Ware Park Estate Trustees (Martin Ott)	Yes the selection procedure is appropriate. Reference to NPPF guidance on extraction prior to development where practical and environmentally feasible is appropriate here.	See General Statement NPPF states in paragraph 143: ' <i>In preparing Local Plans, local planning authorities should: set out policies to encourage the prior extraction of minerals where practicable and environmentally feasible, if it is necessary for non-mineral development to take place</i> '. This will be dealt with under the policies of the Draft Plan.
MLPIC257	15	Buckinghamshire County Council (Emily Hodgson)	Yes - selection procedure for MSAs and MCAs is appropriate	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC274	15	Natural England (Gordon Wyatt)	Yes	See General Statement
MLPIC284	15	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	Yes	See General Statement
MLPIC291	15	HCC Ecology (Martin Hicks)	Not sure where Objective 7 fits in	Issue 15: Minerals Safeguarding Areas and Minerals Consultation Areas Site Selection included Plan Objective 7. This was with regard to timely mineral extraction. Prior extraction is potentially required should there be the need to extract the mineral prior to other non-mineral development being implemented.
MLPIC305	15	Bedford Borough Council (Natalie Chillcott)	Yes - Safeguarding should be included in the Mineral Local Plan, and referenced in District Plans. This would be quicker, more consistent and would reduce the risk of mineral sterilisation.	See General Statement. Agree that sign posting and inclusion of the MSAs and MCAs in District Local Plans would ensure mineral is not sterilised. This is referenced in paragraph 9.7 of the Initial Consultation document.
MLPIC326	15	East Herts District Council (Jenny Pierce)	Yes - However, it is noted that the MSA and MCA areas will not be defined until the summer of 2016. Therefore it will be necessary to work with local planning authorities to ensure the appropriate policy cover is provided in emerging local plans that	A clear definition of MSAs and MCAs will be included within the MLP. In addition sign posting and inclusion of the MSAs and MCAs in District Local Plans would ensure mineral is not sterilised. The council will continue

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>will be published for pre-submission or examination prior to the adoption of the Minerals Local Plan.</p> <p>It is also recommended that the County Council are clear in their definition of MSAs and MCAs to avoid confusion and the misuse of the policy.</p>	<p>with Duty to Cooperate meetings and other meetings as necessary during plan production.</p>
MLPIC338	15	Welwyn Hatfield Borough Council (Sue Tiley)	<p>MSAs are a new concept and it is important that these areas do not sterilise other development. It is not clear from the supporting document if the definition of these areas would result in the whole of the sand and gravel belt falling within such an area. The methodology set out in the supporting document seems to imply that it would relate to where the known resource is and not include any assessment of constraints. If this area is drawn too extensively it could prevent the ability of LPAs to plan to meet future needs for housing. It is noted that Planning Policy Guidance on minerals does make provision for prior extraction of minerals where practicable if it is necessary for non-mineral development to take place. It is considered that duty to cooperate discussions on the extent of the safeguarded areas should be held prior to the draft plan development.</p>	<p>MSAs are not a new concept but have not previously been identified by the Hertfordshire MLP. The purpose of these areas is to safeguard mineral resource from unnecessary sterilisation, not to prevent other forms of development coming forward. In line with the NPPG the MSA would cover areas of known mineral deposits.</p> <p>Mineral resources are finite and can only be dug where they are found. There may be a conflict of interest with land being proposed through the District Local Plan process for other development.</p> <p>However it is intended that policies are established which encourage prior extraction and sterilisation. In cases where prior extraction is not viable or practicable/feasible prior to other non-mineral development, or partial</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				<p>mineral extraction provided a better opportunity, it would be expected that this is proven within a supporting document such as mineral resource assessment report for the Local Planning Authority and Mineral Planning Authority to consider.</p> <p>The county council would wish to see mineral extracted prior to other development on mineral bearing land. Economic viability of extracting minerals will be a consideration that is taken into account. The details of economic viability will be established as part of the site selection process. Where minerals development is not considered likely to occur, a balance is required between minerals development and non-minerals development.</p> <p>The council would seek views of district and borough councils as well as other stakeholders when identifying MSAs and MCAs and would continue to hold discussion with the districts during plan production.</p>

Table 7: Clay – Issue 16

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 16 How should the Minerals Local Plan encourage and support the extraction of brick clay so that the county can meet the requirement of national policy to have 25 years' worth of permitted reserves? (Please select all that apply)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Identify Minerals Safeguarding Areas and Minerals Consultation Areas to safeguard clay resources from sterilisation by non-minerals development <input type="checkbox"/> Identify Preferred Areas where the county council would ideally like clay extraction to occur <input type="checkbox"/> Include a policy that provides general support to planning applications that propose to extract brick clay <p>General Statement: The consultation received equal support for the three suggested options to encourage the extraction of brick clay. It is proposed that the MLP will identify MSA and MCAs based on the available BGS information to safeguard clay resources. It is also intended the MLP will include a policy for clay. However, it is not considered suitable to assess the clay resources with a similar site selection methodology to sand and gravel in order to identify preferred areas due to difficulties for land ownership and the availability of data. It is considered that identifying MSA and MCA and including a policy within the plan meets the council's requirements for the provision of clay.</p>				
MLPIC9	16	Trustees of the Brocket Estate (Stuart Gray)	Identify Preferred Areas Include policy to support extraction	See General Statement
MLPIC28	16	North Hertfordshire & Stevenage Green Party (Karen Harmel)	The MLP should identify MSAs and MCAs to safeguard clay resources from sterilisation by non-mineral development. There is only one brick clay works in Hertfordshire which has 11 years'	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			worth of clay, with a potential for 18.7 years (29.7 years in total, from the LAA Report 2014). Not much more is likely to be needed. Designation of MSAs and MCAs is the preferred option as it does less environmental harm, doesn't depend on the questionable "call for sites" and doesn't generate a blanket general support policy that then may have to be overcome.	
MLPIC52	16	Wheathampstead Parish Council (Julia Warren)	The MLP should encourage and support the extraction of brick clay by identifying Minerals Safeguarding Areas and Minerals Consultation areas to safeguard clay resources from sterilisation by non –mineral development AND identify Preferred Areas where the county council would ideally like clay extraction to occur.	See General Statement
MLPIC62	16	Bovingdon Brickworks Ltd. (Les Cook)	The MLP should encourage and support the extraction of brick clay by identifying Preferred Areas where the county council would ideally like clay extraction to occur AND include a policy that provides general support to planning applications that propose to extract brick clay.	See General Statement
MLPIC72	16	Three Rivers District Council (Martin Wells)	Do not have a view about the requirement for clay extraction in the county. The current clay working does not impact on any adjoining settlements in Three Rivers District Council.	No response necessary.
MLPIC99	16	Historic England (Kayleigh Wood)	No comments.	No response necessary.
MLPIC121	16	Central Bedfordshire Council (Natalie Chillcott)	Identify MSA/MCAs Identify Preferred Areas Include policy to support extraction	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC156	16	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Identify MSA/MCAs Include policy to support extraction	See General Statement
MLPIC173	16	Mineral Products Association (David Payne)	Identify Preferred Areas - Given the likely limited demand for material and sites, identifying Preferred Areas may be appropriate.	See General Statement
MLPIC206	16	CPRE Hertfordshire (Steve Baker)	The MLP should include a policy that provides general support to planning applications that propose to extract brick clay. Such support should be conditional on the proposal meeting appropriate criteria to ensure that extraction avoids sensitive locations and avoids harm to communities and the environment.	See General Statement
MLPIC222	16	D K Symes Associates (D K Symes)	Include policy that provides support to extract brick clay.	See General Statement
MLPIC258	16	Buckinghamshire County Council (Emily Hodgson)	Identify MSAs and MCAs to safeguard clay resources	See General Statement
MLPIC267	16	Dacorum Borough Council (Francis Whittaker)	Dacorum's comments focus on Chapter 11: Clay due to clay being the principal mineral working in the borough. Notes that the MLP and the Clay Topic Paper state the need to ensure a 25-year supply of brick clay and Bovington brickworks would contribute towards this aim. Support the continued working of clays in this location (subject to environmental controls and restoration measures being in place) and the local jobs the Brickworks provides. With regards to Issue 16, we have no strong views over the suggested options as they affect the rest of the County. It is likely that each has its role to play in ensuring supply is	It is recognised that the main clay resource area which supports the current brickworks in the county falls within the Dacorum Borough. It is proposed that the MLP will identify MSA and MCAs based on the available BGS information to safeguard clay resources from sterilisation by non-minerals development. It is intended that the MCA for clay will follow a similar consultation procedure to MCAs for sand and gravel. The MPA should be consulted on applications within this area to provide

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>secured/maintained dependent on circumstances. Main concern is that any MSAs, MCAs and Preferred Areas defined under Options a and b should be designated sensibly so as not to affect other forms of necessary development in the County coming forward. The districts are having to face the challenge of accommodating significant future growth in housing and associated infrastructure in the County, and this approach should not sterilise opportunities for necessary development. Notes the methodology applied to MSA/MCA for sand and gravel resources in Chapter 10 and we assume a similar general approach would be applied to clay workings. Option c (support for applications to extract clay) seems a reasonable approach given the importance of brick clay, but it is essential that this does not override the need for environmental controls and restoration measures in each case. We are pleased to see this point is highlighted in para. 11.14 of the MLP. Support the principle of identifying a MSA/MCA for the Bovingdon brickworks under Option a. This would seem a prudent approach given its important role. The works fall a reasonable distance from the south western edge of the village so would not immediately interfere with any future development options should we consider this route in looking at future housing growth. Should you seek to identify a MSA/MCA then we would like the opportunity to comment on the boundary(ies) at the appropriate stage.</p>	<p>comment on sterilisation issues, however it is recognised that there is competing pressure for growth and the MSA/MCAs do not create the presumption that all minerals will be worked. The council would seek views of Dacorum Borough Council and other stakeholders when identifying MSAs and MCAs and would continue to hold discussion with the districts during plan production. It is also intended the MLP will include a policy for clay. However applications for brick clay extraction would still be subject to assessment against the other policies contained within the MLP for environmental measures and restoration. It is not considered suitable to assess the clay resources with a similar site selection methodology to sand and gravel in order to identify preferred areas due to difficulties for land ownership and the availability of data.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC275	16	Natural England (Gordon Wyatt)	Identify MSA/MCAs Identify Preferred Areas	See General Statement
MLPIC306	16	Bedford Borough Council (Natalie Chillcott)	Identify MSA/MCAs Identify Preferred Areas Include policy to support extraction	See General Statement
MLPIC327	16	East Herts District Council (Jenny Pierce)	Identify MSA/MCAs Identify Preferred Areas Include policy to support extraction The MLP should safeguard resources to avoid sterilisation, should identify PAs and should have a policy approach which provides general support for applications that do not conflict with other policy provisions of the MLP and local plans.	See General Statement

Table 8: Chalk – Issues 17-18

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 17 Should the Minerals Local Plan support the safeguarding of chalk resources by identifying Minerals Safeguarding Areas and Minerals Consultation areas? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>General Statement:</p> <p>The NPPF (para 146) states that minerals planning authorities should plan for a steady and adequate supply of industrial minerals by providing a stock of permitted reserves of at least 15 years for chalk to maintain existing plants. There are no operational cement works in Hertfordshire and as such there is no obligation to safeguard chalk resources in the Plan. However, though the representations were fairly fragmented, they contained support for the protection of the mineral and it is considered appropriate to protect chalk reserves for future generations by designating Minerals Safeguarding Areas and Minerals Consultation Areas to prevent the unnecessary sterilisation of minerals by non-minerals development. The safeguarded areas would be based on BGS digital resource information and consulted on in the draft Minerals Local Plan in autumn 2016.</p>				
MLPIC10	17	Trustees of the Brocket Estate (Stuart Gray)	Yes	See General Statement
MLPIC29	17	North Hertfordshire & Stevenage Green Party (Karen Harmel)	As chalk is only used agriculturally, HCC is not obliged to maintain a supply in the present day. However, future generations might want to extract more chalk. The industry should be supported by modest	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			safeguarding and reserves should not be needlessly sterilised.	
MLPIC53	17	Wheathampstead Parish Council (Julia Warren)	Yes - 12.9 'on the other hand, to provide further support to the chalk industry, the MLP could include a policy that looks to safeguard the three sites for the continued extraction beyond their current planning permission cessation dates.'	Selection noted. It is considered that the comment submitted related to the safeguarding of existing facilities is more relevant to Issue 18. See General Statement for Issue 18.
MLPIC73	17	Three Rivers District Council (Martin Wells)	Do not have a view on safeguarding chalk resources. Any chalk reserves in Three Rivers District would be in the Chilterns AONB which would not be a viable location for mineral extraction.	Suitable sites will be determined by implementing the 7-step MSA/MCA site selection methodology proposed in Chapter 10 of the consultation document which follows national guidance.
MLPIC100	17	Historic England (Kayleigh Wood)	No comments.	No response necessary.
MLPIC122	17	Central Bedfordshire Council (Natalie Chillcott)	No	See General Statement
MLPIC157	17	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	No - should not support the safeguarding of chalk resources with MSA/MCAs	See General Statement
MLPIC174	17	Mineral Products Association (David Payne)	No - Likely to be excessive to apply safeguarding for a widespread resource with limited likely demand for new sites	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC190	17	Codicote Parish Council (Lorraine Ellis)	Yes - It should specify the periods for extraction for each year, particularly relating to chalk in Codicote. There are 3 alternative sites in the County with better infrastructure	See General Statement
MLPIC207	17	CPRE Hertfordshire (Steve Baker)	No	See General Statement
MLPIC223	17	D K Symes Associates (D K Symes)	No - should not support the safeguarding of chalk resources with MSA/MCAs	See General Statement
MLPIC259	17	Buckinghamshire County Council (Emily Hodgson)	Yes - should support safeguarding of chalk with MSAs and MCAs	See General Statement
MLPIC276	17	Natural England (Gordon Wyatt)	Yes	See General Statement
MLPIC307	17	Bedford Borough Council (Natalie Chillcott)	No	See General Statement

Issue 18

How should the Minerals Local Plan support the extraction of chalk resources?

(Please select one answer)

- It shouldn't – current extraction levels are appropriate for the use of chalk in the county
- It should include policy to support the safeguarding of active extraction sites
- It should keep the existing non-energy mineral policy which would only grant permission to chalk extraction if the need for minerals cannot be met by existing reserves
- It should include policy to encourage new, small-scale extraction operations.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>General Statement:</p> <p>There was a consensus in the representations that support should be included for the extraction of chalk in the draft Minerals Local Plan, and that the existing policy should be reviewed to ensure there is sufficient detail to determine such applications. Although there was a mixed response regarding the method to do support extraction, it may be appropriate to promote continuing levels of extraction by including a chalk policy that safeguards the existing extraction operations and looks to provide flexibility by supporting new extraction operations where it can be shown that demand cannot be met by the current supply, and that the need can be clearly demonstrated to outweigh all adverse effects of the proposals.</p>				
MLPIC10	18	Trustees of the Brocket Estate (Stuart Gray)	Keep the existing non-energy mineral policy	See General Statement
MLPIC29	18	North Hertfordshire & Stevenage Green Party (Karen Harmel)	The MLP should include policy to support the safeguarding of active extraction sites. There is no national policy requirement to maintain a landbank. Safeguarding active sites (of which there are 3 in Hertfordshire) is preferred as it retains flexibility and discretion via the planning application process should any site want to expand - therefore supporting the industry.	See General Statement
MLPIC53	18	Wheathampstead Parish Council (Julia Warren)	The MLP shouldn't support the extraction of chalk. Current extraction levels are appropriate for the use of chalk in the county. It is not reasonable to extend planning permission beyond cessation dates. It is at odds with policy objectives to restore sites for amenity and wildlife. It creates long term harm for communities and Green Belt.	See General Statement. An extension to an existing planning permission would be determined through the submission of a planning application.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC73	18	Three Rivers District Council (Martin Wells)	Do not have a view about the requirement for chalk extraction. There is no requirement in the NPPF to maintain a permitted landbank for this as the county does not have a cement works to maintain. Any chalk reserves in Three Rivers District would be in the Chilterns AONB which would not be a viable location for mineral extraction.	See General Statement. Should there be a demonstrated need for additional chalk extraction sites, the suitability of sites will be assessed against the Development Management policies which would cover AONB.
MLPIC100	18	Historic England (Kayleigh Wood)	No comments.	Noted.
MLPIC122	18	Central Bedfordshire Council (Natalie Chillcott)	Consultee selected two options: The MLP should include policy to support the safeguarding of active extraction sites. Keep the existing non-energy mineral policy which would only grant permission to chalk extraction if the need for minerals cannot be met by existing reserves	See General Statement
MLPIC157	18	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Should include policy to support the safeguarding of active extraction sites	See General Statement
MLPIC174	18	Mineral Products Association (David Payne)	It should include policy to support the safeguarding of existing sites	See General Statement
MLPIC190	18	Codicote Parish Council (Lorraine Ellis)	If should include policy to support the safeguarding of active extraction sites.	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC207	18	CPRE Hertfordshire (Steve Baker)	Keep the existing non-energy mineral policy which would only grant permission to chalk extraction if the need for minerals cannot be met by existing reserves	See General Statement
MLPIC223	18	D K Symes Associates (D K Symes)	Only grant permission to extract chalk if need cannot be met by existing reserves	See General Statement
MLPIC259	18	Buckinghamshire County Council (Emily Hodgson)	Keep the existing non-energy mineral policy, only grant permission if the need for minerals cannot be met by existing reserves	See General Statement
MLPIC276	18	Natural England (Gordon Wyatt)	Keep the existing non-energy mineral policy	See General Statement
MLPIC307	18	Bedford Borough Council (Natalie Chillcott)	Consultee selected multiple options: Include Policy to support the safeguarding of existing sites. Keep the existing non-energy policy.	See General Statement
MLPIC328	18	East Herts District Council (Jenny Pierce)	Chalk is an important mineral for the agricultural industry. As a large proportion of East Herts is farmed, it is important that the viability of the industry is protected. East Herts Council supports an approach which ensures long term supplies of this mineral are maintained. However, this should not come at a cost to the environment. Hertfordshire has some of the rarest chalkstream environments in the world and it is important that any future extraction (of chalk and other minerals) does not harm these environments.	See General Statement Should there be a demonstrated need for additional chalk extraction sites, applications will be determined against Development Management policies which would seek to minimise impacts and improve the natural, built and historic environment.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC339	18	Welwyn Hatfield Borough Council (Sue Tiley)	WHBC considers that it would be excessive to safeguard large areas for chalk extraction given the low levels of extraction that currently take place and should restrict chalk extraction to situations where it cannot be met by existing reserves.	See General Statement

Table 9: Secondary and Recycled Aggregate – Issues 19-20

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>Issue 19 How should the Minerals Local Plan support the production of secondary and recycled aggregate for use as an alternative to primary, land-won minerals? (Please select one answer)</p> <ul style="list-style-type: none"> <input type="checkbox"/> It should not provide any support <input type="checkbox"/> Maintain the same stance as the existing Minerals Local Plan and provide support to the installation of secondary and recycled aggregate processing facilities in appropriate locations <input type="checkbox"/> Encourage the provision of secondary and recycled aggregates but refer applicants to the Waste Local Plan for further information and guiding policy <input type="checkbox"/> Strengthen policy and text to compliment the Waste Local Plan by encouraging the installation of secondary and recycled aggregate facilities to produce alternative materials <input type="checkbox"/> Identify sites that may currently be being used to produce secondary and recycled aggregates as well as strengthening policy and text to encourage the installation of secondary and recycled aggregate facilities <p>General Statement:</p> <p>Overall the responses to the consultation gave an overwhelming backing for the Plan to continue to support the production of secondary and recycled aggregates for use as an alternative to primary, land-won minerals, although there was a varied response to how this should be put forward within the Minerals Local Plan.</p> <p>Existing sites for waste management facilities, sites with planning permission and sites on which planning permission is subsequently granted for waste management will be safeguarded under Policy 5 of the Waste Local Plan. It is proposed to strengthen the current policy wording and supporting text of the adopted Minerals Local Plan for secondary and recycled aggregate. This would provide clear reference as to the overlap with the Waste Local Plan and highlight the importance of encouraging the use of secondary and recycled aggregates to reduce the reliance on land won material.</p>	

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Any planning application for secondary and recycled aggregates would be determined against the policies contained within the Minerals Local Plan and Waste Local Plan and on the merits of the application.</p> <p>In regards to whether the Minerals Local Plan identifies sites for secondary and recycled aggregates, it is proposed further work will be undertaken to determine any requirements and the way forward for the draft Local Plan as there are overlaps with the Waste Local Plan.</p>				
MLPIC11	19	Trustees of the Brocket Estate (Stuart Gray)	Identify existing sites	See General Statement
MLPIC30	19	North Hertfordshire & Stevenage Green Party (Karen Harmel)	The MLP should identify sites that may currently be being used to produce secondary and recycled aggregates as well as strengthening policy and text. Minerals are a finite resource and it is important to secure their long-term conservation. The WLP aims to CD&E waste sent to landfill and this is an identified area of overlap between WLP and MLP, and a chance to increase coherence between the two plans. At present there are 9 sites in Hertfordshire with planning permission to recycle CD&E waste. Recycling reduces dependence on the primary material, and reduces landfill. The MLP should help enable supply of secondary and recycled aggregate in the strongest possible way, with the proviso that scrutiny of planning applications is not compromised, and objections are not downgraded. The principle	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			of recycling is endorsed in Green Party policy.	
MLPIC41	19	Hertsmere Borough Council (Richard Blackburn)	Keep the existing policy and provide support to installation of secondary and recycled aggregate facilities in appropriate locations.	See General Statement
MLPIC54	19	Wheathampstead Parish Council (Julia Warren)	HCC should seek specific locations where secondary aggregate can be recycled so that it does not result in the significant harm identified in para 13.10. This is a critical issue for communities located close to existing extraction sites and the benefits of processing secondary and recycled aggregate must be balanced against the harm caused. Any application must be judged against existing county and district development plan policies and ensure for public consultation.	See General Statement
MLPIC74	19	Three Rivers District Council (Martin Wells)	Strengthen policy and text to compliment the WLP by encouraging the installation of secondary and recycled aggregate facilities to produce alternative materials - Whilst none of the 9 sites in the LAA fall within Three Rivers district, they support the provision and production of these aggregates. Proposals for new facilities should take account of neighbouring land uses and not adversely affect them. Enforceable conditions should be used.	See General Statement
MLPIC101	19	Historic England (Kayleigh Wood)	No comments.	No response necessary.
MLPIC105	19	SLR Consulting Ltd	Strengthen policy and text to compliment the	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		on behalf of Brett Aggregates Ltd (Chris Lowden)	WLP by encouraging the installation of secondary and recycled aggregate facilities to produce alternative materials.	
MLPIC113	19	Ptarmigan C/O Barton Willmore (Claire Brindley)	Maintain same stance as existing MLP to support installation of secondary and recycled aggregates processing facilities. Should support in preference to extraction of primary materials and provide suitable locations which do not impact on residential amenity.	See General Statement
MLPIC123	19	Central Bedfordshire Council (Natalie Chillcott)	Maintain same stance as existing MLP to support installation of secondary and recycled aggregates processing facilities in appropriate locations	See General Statement
MLPIC143	19	Stevenage Borough Council (Richard Javes)	The Borough Council strongly supports the MLP being proactive in its promotion of secondary and recycled aggregates. Measures that support sustainable construction are to be welcomed. It may be desirable to 'push at the envelope' in terms of what has traditionally been considered acceptable in policy terms to ensure that secondary and recycled aggregates are promoted to the fullest extent.	See General Statement
MLPIC175	19	Mineral Products Association (David Payne)	Strengthen policy and text to compliment the Waste Local Plan - the Plan should provide strong support for provision of secondary and recycled aggregate so as to be in the spirit of the NPPF, and as far as practicable taking account of the contribution that secondary	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			and recycled materials would make to supply.	
MLPIC191	19	Codicote Parish Council (Lorraine Ellis)	It should not provide any support - only if the road is suitable. Strict controls on materials and vehicle movements.	See General Statement
MLPIC196	19	Tarmac (Mike Pendock)	Strengthen policy and text to compliment the Waste Local Plan - the Plan should provide strong support for provision of secondary and recycled aggregate so as to be in the spirit of the NPPF, and as far as practicable taking account of the contribution that secondary and recycled materials would make to supply	See General Statement
MLPIC208	19	CPRE Hertfordshire (Steve Baker)	Option 1 conflicts with the NPPF which requires support for secondary aggregate production and use of recycled aggregate. Support should be through the MLP, not the WLP, but complement policies to encourage Recycling of waste materials in the Waste Local Plan. The call for sites should include inviting potential sites for secondary and recycled aggregate production, for 'sieving' as for primary minerals sites.	See General Statement The WLP includes policies for waste prevention and reduction and encourages recycling through the implementation of the waste hierarchy. It is proposed to undertake further work to establish the best approach to secondary and recycled aggregate. The purpose of the call for sites is to implement the site selection methodology to identify specific sites, preferred areas and/or areas of search for primary land won material, i.e. sand and gravel.
MLPIC224	19	D K Symes	Encourage provision of secondary and	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Associates (D K Symes)	recycled aggregates but refer applicants to WLP for information and guiding policy	
MLPIC235	19	North Herts District Council (David Hill)	Use of secondary and recycled aggregates should be encouraged in line with the Waste Local Plan.	See General Statement
MLPIC249	19	Veolia Environmental Services (Nick Hollands)	Veolia supports recognition of the contribution that secondary aggregates make to the supply chain and to the safeguarding of primary reserves, indeed Veolia is highly active in this sector and foresee ongoing evolution in terms of site requirements, processes and distribution networks that will by necessity also require a flexible and supportive approach through the Local Plan's provisions, objectives and policies.	The MLP will encourage the use of secondary and recycled aggregates to reduce the reliance on land won minerals.
MLPIC260	19	Buckinghamshire County Council (Emily Hodgson)	Identify sites being used to produce recycled aggregates and strengthen policy and text. Secondary aggregates are materials not normally used as aggregates but by-products of industrial process, such as Incinerator Bottom Ash, Pulverised Fuel Ash, and Colliery Spoil.	See General Statement
MLPIC277	19	Natural England (Gordon Wyatt)	Identify Sites that may currently being used to produce secondary and recycled aggregates	See General Statement
MLPIC285	19	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	Identify Sites that may currently being used to produce secondary and recycled aggregates	See General Statement
MLPIC308	19	Bedford Borough	Maintain same stance as existing MLP,	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Council (Natalie Chillcott)	provide support to the installation of secondary and recycled aggregate processing facilities in appropriate locations	
MLPIC329	19	East Herts District Council (Jenny Pierce)	<p>Links between the MLP and WLP need to be explained in both documents and effort should be made to ensure secondary and recycled aggregate is worked in an efficient way, in appropriate locations. The WLP does not currently provide enough certainty as to the type of operation that would be appropriate on any of its allocated sites - if this was made clearer, it could prevent unneighbourly development occurring in inappropriate locations.</p> <p>The MLP could produce a set of criteria to guide sites for re-processing aggregate in the future, such as sites that are not in close proximity to existing and future residential or sensitive uses. Mapping these would be a useful exercise to inform future applications of similar operations. If identifying current sites, only those with a permanent approved operation should be listed.</p>	<p>See General Statement</p> <p>Reference will be made to the adopted Waste Local Plan within the MLP. Both documents form part of the development plan and should be considered alongside the district/borough Local Plan.</p> <p>In regards to changes to the adopted WLP, this cannot be carried out until such time as the plan is reviewed.</p> <p>Adopted policies 7 and 8 of the MLP provide criteria for assessing planning applications for recycled and secondary aggregate sites.</p>
MLPIC340	19	Welwyn Hatfield Borough Council (Sue Tiley)	WHBC supports the principle of the production of secondary and recycled aggregates and would welcome discussion on the implications of the different options for the borough.	The MLP will encourage the use of secondary and recycled aggregates to reduce the reliance on land won minerals. HCC will continue to hold regular Duty to Co-operate discussions with district/borough

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				councils.
<p>Issue 20 Should the Minerals Local Plan encourage the installation of secondary and recycled aggregate facilities on existing minerals sites rather than at new sites? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>General Statement:</p> <p>A mixed response was received to this issue as part of the consultation. Adopted policies 7 and 8 of the MLP provide criteria for assessing planning applications for recycled and secondary aggregate sites located both on mineral sites and in other appropriate locations. Mineral Policy 8, in particular, includes criteria for ensuring proposals do not prejudice the long-term beneficial restoration of a mineral site and that facilities are located appropriately. It is therefore proposed that, whilst the detailed wording from the policies will be reviewed at a later stage in plan production, the general aim of the policy will remain and the policy wording will be strengthened to continue to cover both scenarios. Any planning application for secondary and recycled aggregates or extensions to existing sites will be determined against the policies contained within the MLP & WLP and on the merits of the application if and when a planning application were to come forward.</p>				
MLPIC11	20	Trustees of the Brocket Estate (Stuart Gray)	Selected "Yes" - no explanation	Selection noted. No response necessary.
MLPIC30	20	North Hertfordshire & Stevenage Green Party (Karen Harmel)	Yes - but with a proviso that planning applications for expansion are still scrutinised and rejected if the environmental cost is unacceptable. Green Party policy states that it is desirable to structure industry so that there is end-to-end care for secondary and	See General Statement The MLP will encourage the use of secondary and recycled aggregates to reduce the reliance on land won minerals.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			raw materials. Recycling facilities at primary extraction sites obey this principle. Also, only one site is used instead of two. Extensions to the site should only take place after the normal planning assessment and careful consideration covering the need for the material, environment impact including increased use of transport and cumulative impact.	
MLPIC41	20	Hertsmere Borough Council (Richard Blackburn)	Secondary and recycled facilities on existing mineral sites is a question of suitability of location, length of time and approach to restoration	See General Statement
MLPIC54	20	Wheathampstead Parish Council (Julia Warren)	The MLP should not encourage installation of secondary and recycled aggregates facilities on existing minerals sites rather than new sites for the reasons provided for Issue 19.	See General Statement
MLPIC74	20	Three Rivers District Council (Martin Wells)	Yes - support the installation of secondary and recycled aggregate facilities on existing mineral sites due to potential for less impact upon immediate surrounding land uses. Facilities should be time limited to that of a quarry working. Support this approach in existing minerals policy 8.	See General Statement
MLPIC101	20	Historic England (Kayleigh Wood)	No comments.	No response necessary.
MLPIC105	20	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris	No - should not encourage installation of secondary and recycled aggregate facilities on existing mineral sites rather than new	Selection noted. See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
		Lowden)	sites.	
MLPIC123	20	Central Bedfordshire Council (Natalie Chillcott)	It may be appropriate for temporary secondary/recycled aggregate facilities to be sited on existing mineral sites, but it may be more appropriate for new, permanent, secondary and recycled aggregate facilities to be located on other sites, (rather than on an existing mineral site which could jeopardise the long term restoration of the mineral sites).	See General Statement
MLPIC175	20	Mineral Products Association (David Payne)	No - It should be flexible in order to allow appropriate facilities on standalone sites as well as on or co-located with existing minerals and waste sites.	See General Statement
MLPIC191	20	Codicote Parish Council (Lorraine Ellis)	No - The road structure needs to be appropriate. 'Greenbelt'. Codicote chalk quarry is not a suitable location near village houses. Infrastructure, noise and dust cannot take it. Other sites are more appropriate near good infrastructure, rail and motorways.	See General Statement
MLPIC196	20	Tarmac (Mike Pendock)	Yes - Co-location of such operations at mineral sites has many advantages and is preferable particularly where these sites also are inert landfills. The policy should be flexible enough to allow standalone operations where the environmental criteria in respect of noise, dust and traffic can be met. Such a consideration needs to include potential for conflict with any committed/allocated residential land.	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC208	20	CPRE Hertfordshire (Steve Baker)	No - could be on both existing and new sites, but limited in duration to the period of mineral extraction from a minerals site, and in the case of existing sites, subject to them having existing on-site mineral processing plant, and in all cases, meeting criteria to prevent and mitigate harm to sensitive land uses and the environment.	See General Statement
MLPIC224	20	D K Symes Associates (D K Symes)	Yes - encourage secondary and recycled aggregate facilities on existing mineral sites	Selection noted. No response necessary.
MLPIC260	20	Buckinghamshire County Council (Emily Hodgson)	Merit in encouraging recycled aggregates production facilities at both existing mineral sites and new sites.	See General Statement
MLPIC277	20	Natural England (Gordon Wyatt)	Yes	Selection noted. No response necessary.
MLPIC285	20	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	No - Secondary and recycled aggregate facilities should be encouraged at any site proposed which can meet the environmental impact requirements, whether this is a new or existing site	See General Statement
MLPIC308	20	Bedford Borough Council (Natalie Chillcott)	It may be appropriate for temporary secondary/recycled aggregate facilities to be sited on existing mineral sites, but it may be more appropriate for new, permanent, secondary and recycled aggregate facilities to be located on other sites, (rather than on an existing mineral site which could jeopardise the long term restoration of the mineral sites).	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC329	20	East Herts District Council (Jenny Pierce)	The sharing of sites is preferable however where this is not possible, a case-by-case approach could be guided by some high-level principles set out in the MLP	See General Statement

Table 10: Policies used to Determine Applications – Issues 21-23

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 21 Does the list of strategic policy headings cover all the topics that should be included in the Minerals Local Plan? (Please select one answer)</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> The list is too extensive and could be streamlined <input type="checkbox"/> The list missed certain topics relevant to Hertfordshire. </p> <p>General Statement:</p> <p>There was a general consensus that the list of strategic policy headings contained the necessary topics related to minerals planning. It was not always clear to consultees where a particular topic would be included within policy so the policy headings will be reviewed to ensure clarity in the draft Minerals Local Plan.</p> <p>There was some confusion regarding the difference between Strategic Policies and Development Management policies. This may have been due to the two lists being separated in the Initial Consultation document. A decision will be made regarding whether or not to keep Strategic and Development Management policies separate in the draft Plan. This decision will be based on the layout and clarity of the document together with policy considerations.</p> <p>Specific policy wording will be included and consulted on as part of the draft Minerals Local Plan in autumn 2016.</p>				
MLPIC12	21	Trustees of the Brocket Estate (Stuart Gray)	Yes	See General Statement
MLPIC17	21	Herts and Middx Wildlife Trust (Matt Dodds)	Yes	See General Statement

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC31	21	North Hertfordshire & Stevenage Green Party (Karen Harmel)	<p>The list of strategic policy headings missed certain topics relevant to Hertfordshire - The Vision and Objectives are incomplete, so the Policy list is also incomplete. Climate change is the only environmental factor to have its own heading. Other environmental concerns (including Greenbelt, natural environment, heritage environment, human health, outdoor recreation, improved biodiversity, improved land and water management) are not mentioned in these policy headings. Unless the factors stand alone, they risk forming only a small percentage of the overall environmental impact of any planning application assessment. Objective 6 (climate change) wording is weak and obscure. The wording needs to be more specific e.g. use of fossil fuels in transport which produce greenhouse gases, and how this will be reduced. Hertfordshire and Central England show a long-term warming trend with lower than average rainfall, which may exacerbate any water stress. The second half of Objective 6 may or may not refer to flooding. The importance of safeguarding against flooding, or helping with flooding, is not specifically mentioned.</p>	<p>The strategic policy headings were included to set out the aims and major issues which would form part of the Plan. The environmental topics mentioned in the representation are a major focus of the Plan, and are currently included in the draft list of Development Management policies.</p> <p>National guidance states that plans should contain a limited suite of essential policies that prevent repetition of national policy. It is anticipated that the environmental-based policies will be criteria-based policies covering a number of issues. Policies will be drafted with significant input from the Development Management staff to give them sufficient detail when determining planning applications.</p> <p>Comment regarding Objective 6 is noted. The objectives will be reviewed with regards to incorporating flooding.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC42	21	Hertsmere Borough Council (Richard Blackburn)	Yes - Policy headings covers all topics provided it is handled succinctly.	See General Statement
MLPIC55	21	Wheathampstead Parish Council (Julia Warren)	It should include a policy on restoration and mitigation identifying timescales for restoration and the expectations of mineral companies to achieve high quality and timely restoration. Greater weight should be given to the identification of significant harm caused by mineral extraction and processing, particularly in relation to population, housing development, wildlife and amenity.	<p>The issue of restoration is a key element of the Plan and is included in the draft list of Development Management policies.</p> <p>Mitigating harm caused by mineral extraction and processing will form a key part of the Plan. Development Management policies will seek to ensure that the impact on the immediate and surrounding area is taken into account and will be assessed on a site-by-site basis.</p>
MLPIC75	21	Three Rivers District Council (Martin Wells)	List of strategic policy headings is too extensive and could be streamlined - Support the areas the policies cover. Policy 1 and 3 could be combined as they share objectives 1, 2, 3 & 8.	Whilst the theme of sustainability is common to both Policy 1 and 3, the intention is that the two policies will have different aims. Policy 1 will aim to ensure that any proposed development will improve on the three principles of sustainable development promoted in paragraph 7 of the NPPF (economic, social and environmental), whereas Policy 3 will aim to ensure that Hertfordshire's mineral reserves are used in a sustainable manner.

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				<p>This will include taking account of: the need for mineral extraction using the findings of the annual Local Aggregate Assessment; the status of the Hertfordshire landbank; timescales of extraction; and the use of secondary and recycled aggregate instead of finite mineral reserves. Therefore it is proposed to include the two separate policies in the draft Plan.</p>
MLPIC102	21	Historic England (Kayleigh Wood)	<p>The list missed certain topics relevant to Hertfordshire - Whilst it is appreciated that the Historic Environment could fall under a number of the topic headings it is considered that there should be a policy for the Historic Environment in its own right, to ensure the topic is given early and adequate consideration in mineral proposals, in accordance with the NPPF. Paragraph 156 of the NPPF highlights the need to include strategic policies that cover the Historic Environment and paragraph 126 expresses the need for a positive strategy towards the Historic Environment.</p>	<p>The draft Plan will be developed in general conformity with the NPPF and will ensure that the Historic Environment is given adequate consideration. It is proposed to group historic environment within a Development Management policy along with heritage, setting and archaeology. This is considered sensible to prevent the list of policies being unnecessarily long.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC106	21	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Yes - list of strategic policy headings cover all topics.	See General Statement
MLPIC108	21	Aylesbury Vale District Council (David Broadley)	Strategic policies: unclear how they relate to strategic policy matters in NPPF para 156, especially landscape and heritage.	<p>From the list of priorities mentioned in the NPPF (para 156), it is considered that the combined list of strategic and Development Management policies relates to the provision of minerals, climate change mitigation, natural and environmental environment and landscape. The other priorities fall outside of the scope of the MLP.</p> <p>Whilst landscape and heritage are listed as strategic priorities in NPPF para 156, they are considered Development Management issues in the MLP and as such, were included in the list of DM policies.</p>
MLPIC108	21	Aylesbury Vale District Council (David Broadley)	Neighbourhood Plans: designations within these may override policies in MLP where they cover the same topic e.g. landscape, heritage and development in countryside. Neighbourhood Plans can also be located in adjacent council areas.	Neighbourhood plans should not include minerals policy as this is the sole responsibility of the Mineral Planning Authority. The potential overlap of topics such as landscape and heritage should not be in direct conflict with the Plan as neighbourhood plans should support

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				the strategic development needs set out in Local Plans (NPPF para 016) rather than replace it.
MLPIC124	21	Central Bedfordshire Council (Natalie Chillcott)	Yes	See General Statement
MLPIC136	21	Hertfordshire County Council - Highways (Manjinder Sehmi)	<p>As mentioned above for objectives 4 and 5, the Highway Authority is fully supportive of sustainable transportation, although road haulage is likely to remain the predominant mode of transport for minerals and waste for the foreseeable future.</p> <p>For Minerals development that generate significant amount of movement, 'Transport Assessments' would be required in support of planning applications. It should provide information on the consideration given to the sustainable transport of minerals including impacts on highway safety and congestion. In addition, Both Site and Construction Management Plan would be required to set out developers' mechanisms to control traffic movements within the locality and the issues such as lorry routing, hours of movement and considerate driving. This will help minimise the environmental impacts of transporting minerals.</p>	Transport Assessments will be a requirement of the Development Management policies for developments that generate a significant amount of movement. A decision will be taken on a site-by-site basis as to what the transport assessment should contain and what other plans might be required in addition.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC158	21	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Yes - strategic policy headings cover all topics	See General Statement
MLPIC176	21	Mineral Products Association (David Payne)	Yes - There may be some duplication eg. Policies 8 and 9 both address Safeguarding and Sterilisation	The overriding response to Issue 12 was to include two separate policies on this subject, one to identify the extent of MSA and MCAs and the thresholds for consultation with the County Council, and one policy to encourage the prior extraction of minerals as part of non-minerals developments.
MLPIC184	21	Tarmac (Mike Pendock)	Yes - If not already covered, Policy 8 should include other added value and ancillary facilities to mineral extraction	Secondary and recycled aggregate plants at mineral sites are granted separate planning permissions under the Development Plan taking account of both the Minerals Local Plan and the Waste Local Plan and, once approved, are safeguarded under Policy 5: Safeguarding of Sites in the Waste Core Strategy and Development Management Policies document (adopted Nov 2012). Additionally, in compliance with NPPF para 143, the MLP will safeguard any existing, planned and potential concrete batching plants, the manufacture of coated materials,

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				<p>other concrete products, and the handling, processing and distribution of substitute, recycled and secondary aggregate material.</p>
MLPIC192	21	Codicote Parish Council (Lorraine Ellis)	<p>The list missed certain topics - Hertfordshire's roads are full. More focus is needed on sustainable transport.</p>	<p>Whilst the Plan aims to promote sustainable transport, it is accepted that the predominant method for the transportation of minerals will be by road. Opportunities to use alternative, non-road methods of transportation are paradoxically limited by the intention to use minerals close to their source, to reduce transportation distances, as rail or water transportation is economically and logistically unfeasible for short distances.</p> <p>The site selection methodology will incorporate the use of sustainable transportation by identifying sites for extraction that have good transportation links. Additionally, the Development Management policies will safeguard the existing sustainable transportation infrastructure to enable the use of rail and water transportation should the opportunity arise now or in the future.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC209	21	CPRE Hertfordshire (Steve Baker)	The list missed certain topics relevant to Hertfordshire. Environmental Criteria should be a separate 'topic' – not part of 'local amenities'. Meeting HCC's 'Corporate' Vision and Objectives is not an appropriate Minerals Planning criterion.	It is considered that environmental criteria will be covered by a variety of policies and that there is no need for an additional policy specifically for "Environmental Criteria". The titles of all the policies will be reviewed before publication of the draft Plan to ensure clarity.
MLPIC214	21	RSPB (Mark Nowers)	Yes	See General Statement
MLPIC225	21	D K Symes Associates (D K Symes)	Yes - strategic policy headings cover all topics	See General Statement
MLPIC250	21	Veolia Environmental Services (Nick Hollands)	Veolia supports the general principle of safeguarding sites and infrastructure, including railheads and wharves. However, in order to provide flexibility, for operators and developers to adapt to changing economics and circumstances, Veolia consider that policies should not be prescriptive and should ensure that criteria are included that enable the merits of site release to be assessed as exceptions to safeguarding objectives and policies. Such provisions are already included for example within the adopted Minerals Local Plan (eg Policy 10 dealing with the safeguarding of Railheads and Wharves). Veolia would not support any tightening of policy beyond that currently adopted.	Minerals Policy 10 in the existing Minerals Local Plan safeguards the existing railhead and wharves unless they can be satisfactorily relocated, the use of the site is no longer viable, or if replacement facilities are developed in appropriate locations. It is proposed to maintain similar policy wording in the draft Plan.

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MLPIC261	21	Buckinghamshire County Council (Emily Hodgson)	Yes - strategic policy headings cover all topics	See General Statement
MLPIC278	21	Natural England (Gordon Wyatt)	Yes	See General Statement
MLPIC286	21	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	The list is too extensive and could be streamlined - Significant effort would be required to address and assess all the topics identified at this strategic level - this would be uneconomic for the operator and the council. Many of the topics could be left to the application stage when there is a greater degree of certainty that the proposal might come to fruition. A shorter list would be more efficient.	The list of strategic policies is considered a necessary review of the high-level principle of a development which developers would have to review prior to an application being submitted. It is unlikely that any application would be submitted without considering the relevant strategic issues from this list.
MLPIC309	21	Bedford Borough Council (Natalie Chillcott)	Yes	See General Statement
MLPIC317	21	Environment Agency (Kai Mitchell)	Yes - We believe that the list of strategic policy headings covers all the relevant topics for the minerals local plan	See General Statement
MLPIC341	21	Welwyn Hatfield Borough Council (Sue Tiley)	WHBC considers that there should be a strategic policy which sets out the requirements for different types of mineral, including sand and gravel, in the county and what the strategy is for delivering that. It is not clear from the list whether this will be covered.	The requirements for the quantities of different minerals will be set out in Policy and supporting text.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 22 Does the list of development management policy headings cover all the topics that should be included in the Minerals Local Plan? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> The list is too extensive and could be streamlined <input type="checkbox"/> The list missed certain topics relevant to Hertfordshire.</p> <p>General Statement: There was a general consensus from representations to the consultation and from Development Management input that the list of Development Management policy headings contained the necessary topics related to minerals planning. It was not always clear to consultees where a particular topic would be included within policy so the policy headings will be reviewed to ensure clarity in the draft Minerals Local Plan.</p> <p>A decision will be made regarding whether or not to keep Development Management policies separate from Strategic policies in the draft Plan. This decision will be based on the layout and clarity of the document together with policy considerations.</p> <p>Specific policy wording will be included and consulted on as part of the draft Minerals Local Plan in autumn 2016.</p>				
MLPIC12	22	Trustees of the Brocket Estate (Stuart Gray)	Yes	See General Statement

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MLPIC17	22	Herts and Middx Wildlife Trust (Matt Dodds)	Yes - However, net impacts must be quantified in an objective way to a nationally accepted standard. The Biodiversity Impact Assessment Calculator is the most appropriate mechanism of achieving this (see MLPIC15 - issue 4). It should be explicitly referred to in the text.	It is considered a mechanism that is a nationally accepted standard would be beneficial to objectively measure impacts of biodiversity and support the aspiration to provide net gains where possible. This could be included in the supporting text within the draft Plan.
MLPIC20	22	Individual (Ian Hardy)	The list missed certain topics - No explicit mention of rights of way contained within the document paragraphs (14.12-14.15, or 14.16-14.17). There is only one reference made to rights of way within the document and this is for Policy heading 24 in Table 6. "Rights of way" are not mentioned as a topic or an issue. The consultee is keen to see this policy developed.	It is intended that criteria will be included within the Development Management policies referring to Rights of Way to encourage improved and enhanced access into the countryside. The text within the Initial Consultation was included merely as an introduction to some of the requirements of the Plan.
MLPIC31	22	North Hertfordshire & Stevenage Green Party (Karen Harmel)	The list of development management policy headings missed certain topics relevant to Hertfordshire - The list highlights the inadequacy of the Objectives. 9 headline topics from the LUC SA 2015 Report are squeezed into Objective 5. This is a cover-all, this trivialises the topics because they are only 1/9th of an Objective each, whereas corporate/NPPF directives have whole Objectives to themselves. There is a risk that environmental factors won't be viewed with	Should the objectives be amended following this stage of consultation, the policies will be reviewed to ensure they match the new set of objectives. It is considered that environmental factors will form a vital component of the draft Plan and whilst they are not specifically covered by the titles of the draft list of policies, they will be contained within the Development

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			the correct level of importance. This is against Green Party policy for the countryside. The 9 topics are the same as the headline SA Objectives in the LUC SA Report 2015, detailed in the next section (Issue 24, Response MLPIC 32).	Management policies in the draft Plan.
MLPIC42	22	Hertsmere Borough Council (Richard Blackburn)	DM policy headings are too exhaustive. Grouping of policies would help.	Comment noted.
MLPIC55	22	Wheathampstead Parish Council (Julia Warren)	Yes - the list of development management policy headings cover all the topics.	See General Statement
MLPIC75	22	Three Rivers District Council (Martin Wells)	List of development management policy headings is too extensive and could be streamlined. Support the areas the policies cover. Policy 26 and 27 could be combined as they share objective 7.	Whilst the issues of Policy 26 (Restoration) and Policy 27 (After-care and After-use) are closely linked, the policies have differing aims which it is considered sensible to separate. Draft Policy 26 will aim to ensure that sites used for extraction do not become derelict following the end of extraction whereas Policy 27 aims to promote sustainable land-use following the restoration of the land.

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MLPIC102	22	Historic England (Kayleigh Wood)	Yes - Historic England welcome the inclusion of Policy 19 on Heritage and Setting	Noted - retain policies.
MLPIC106	22	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Yes - list of development management policy headings cover all topics.	See General Statement
MLPIC108	22	Aylesbury Vale District Council (David Broadley)	Development and strategic policy headings: we support headings to cover impacts on natural environment. Plan should make it clear any impacts on allocated sites or planning applications consider the impacts on neighbouring districts.	Comment noted. Policies related to the natural environment will be retained. The Development Management Cumulative Impact policy will ensure that the impact on the immediate and surrounding area is taken into account.
MLPIC108	22	Aylesbury Vale District Council (David Broadley)	DM policies: question which topic area impacts such as a noise, light, dust and other pollutants will be taken into account, possibly Policy 22, although requires more clarity. Question the difference between water resources and reservoirs.	Draft Policy 22: General Environmental and Amenity Protection is proposed to contain reference to impacts from noise, light, dust and other pollutants. Draft Policy 15: Water Reservoirs, will seek to ensure that development does not leave water supply more vulnerable to the increased impacts of climate change whereas draft Policy 18: Water Resources will take account of the potential impacts by development to the water environment.

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MLPIC124	22	Central Bedfordshire Council (Natalie Chillcott)	Yes	See General Statement
MLPIC130	22	Cambridgeshire County Council (Ann Barnes)	Policy 15 could be broadened to cover all incidental mineral extraction (not just reservoirs); this could pick up fish farms and marinas for example. Is airport safeguarding an issue in Hertfordshire e.g. the need for bird management plans? Could biodiversity also include Geodiversity if there are geological interests in the County? Is a policy on ancillary development useful e.g. limiting ancillary developments to the life of the quarry?	It is anticipated that the policy on Water Reservoirs will cover all developments causing incidental mineral extraction but with an emphasis on ensuring that sustainable water supplies are not affected by the increased impacts of climate change.
MLPIC136	22	Hertfordshire County Council - Highways (Manjinder Sehmi)	Yes - The minerals development policy headings related to "Transport" to be included in the MLP.	Comment noted. Transport policies to be retained.
MLPIC158	22	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Yes - development management policy headings cover all topics. Suggest adding depots/ancillary infrastructure to Policy 13.	Rail heads and associated infrastructure at the site will be safeguarded under Policy 13, as instructed by the NPPF (para 143), to ensure that infrastructure for sustainable transport of minerals by rail is available should there be a demand for it. Additional activities that may have permission from LPAs will not be included in the MLP.

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MLPIC176	22	Mineral Products Association (David Payne)	Yes	See General Statement
MLPIC184	22	Tarmac (Mike Pendock)	Yes	See General Statement
MLPIC192	22	Codicote Parish Council (Lorraine Ellis)	The list missed certain topics - Hertfordshire's roads are full. More focus is needed on sustainable transport.	<p>Whilst the Plan aims to have a focus on sustainable transport, it is accepted that the predominant method for the transportation of minerals will be by road. Opportunities to use alternative, non-road methods of transportation are paradoxically limited by the intention to use minerals close to their source to reduce transportation distances.</p> <p>The site selection methodology will incorporate the use of sustainable transportation by identifying sites for extraction that have good transportation links. Additionally, Development Management policy will safeguard the existing sustainable transportation infrastructure to enable the use of rail and water transportation should the opportunity arise now or in the future.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC209	22	CPRE Hertfordshire (Steve Baker)	<p>The list missed certain topics relevant to Hertfordshire. MSA's and MCA's will need to have separate policy statements. There will need to be a policy or policies setting out appropriate criteria to avoid and mitigate environmental harm. In particular there are no policy headings for preventing noise, dust, air quality or visual (separate from 'landscape') impacts. The proposed policy (17) on Cumulative Impact should follow the other policies dealing with specific impacts that will then be considered cumulatively and in combination with impacts of other development.</p>	<p>As the extent of MCAs will be based on the identified MSAs, it is considered sensible to designate the two types of areas in the same policy rather than referencing back to the MSA policy when setting out the MCAs.</p> <p>Issues of noise, dust, air quality and visual impacts will be incorporated into draft Policy 22: General Environmental and Amenity Protection, though the title of the policy will be reviewed to ensure clarity in the draft Plan.</p> <p>The Cumulative Impact policy will ensure that the impact on the immediate and surrounding area is taken into account and will be considered in relation to: Natural and Historic Environment, human health, aviation safety, general amenity and community, multiple sites and multiple impacts to ensure that cumulative impacts from collective impacts of an individual development or the effects of a number of developments will not be significant.</p>

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MLPIC214	22	RSPB (Mark Nowers)	Yes - Please see our response to Issue 3 (MLPIC210) with regards to the strategic approach to strategic, biodiversity-driven restoration objectives.	Comment noted. Response in Table 1, Issue 3, Comment ID: MLPIC214.
MLPIC225	22	D K Symes Associates (D K Symes)	Yes - development management policy headings cover all topics.	See General Statement
MLPIC240	22	Turnberry Planning Ltd on behalf of Hertfordshire University (Stephanie Gray)	Development management policies should require applicants to fully assess and mitigate their impact on environmentally sensitive issues on neighbouring land uses, such as Bayfordbury Observatory. Should not consider applications where impact cannot be mitigated using precautionary principle where appropriate.	The Development Management policy on Cumulative Impact will ensure that the impact on the immediate and surrounding area is taken into account. This will be implemented by DM officers on a site-by-site basis and the existence of a sensitive receptor such as the Bayfordbury observatory would be taken into consideration.
MLPIC261	22	Buckinghamshire County Council (Emily Hodgson)	Yes - development management policy headings cover all topics	See General Statement
MLPIC264	22	Stansted Airport (Keeley Briggs)	The list missed certain topics - The safeguarded area for Stansted Airport extends into Hertfordshire and there is an obligation on Local Authorities to consult safeguarded airports on planning applications for developments which have the potential to impact the safe operation of aircraft or which may prejudice the airport's future development. For Hertfordshire this means	As part of the aerodrome safeguarding procedure (ODPM Circular 1/200316) local planning authorities are required to consult aerodrome operators on proposed developments. It is not considered that the Plan requires a specific Development Management policy relating to Aerodrome Safeguarding in

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			consulting the airport on any proposals within 13km of the aerodrome that have the potential to attract birds. Stansted Airport would encourage the development of a specific development policy relating to Aerodrome Safeguarding.	addition to this requirement. However, the DM policy on Cumulative Impact will ensure that the impact on the immediate and surrounding area is taken into account. It is intended that the list of criteria to be considered within the policy will include impact on aviation safety. This would also relate to the areas of Hertfordshire in the London Luton Aerodrome Safeguarding Area.
MLPIC265	22	Public Health (HCC) (Bethan Clemence)	Keen to ensure legacy of mineral extraction sites is planned with health and wellbeing in mind and restoration to improve green infrastructure for recreation and physical activity.	The Development Management policy on After-use and After-care in the draft Plan will encourage restoration schemes to promote health and wellbeing by considering: the improvement and increase of public access to the countryside and recreation, the creation or enhancement of water bodies for wildlife, sport and recreation, and the promotion of sustainable transport such as cycling.
MLPIC278	22	Natural England (Gordon Wyatt)	Yes	See General Statement
MLPIC286	22	TerraConsult (South) Ltd on behalf of Water Hall (England Ltd) (Tim Slaven)	The list is too extensive and could be streamlined - Significant effort would be required to address and assess all the topics identified at this strategic level - this would be	This comment matches the consultee's response to, and seems more suited to, Issue 21 regarding the list of strategic policies, which the

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>uneconomic for the operator and the council. Many of the topics could be left to the application stage when there is a greater degree of certainty that the proposal might come to fruition. a shorter list would be more efficient.</p>	<p>County Council has responded to in the relevant section of this table. The list of Development Management policies will be assessed at the application stage and operators will be required to overcome the criteria of all these policies in order to be granted planning permission.</p>
MLPIC292	22	HCC Ecology (Martin Hicks)	<p>Paragraphs 14.12 – 14.15 recognise that the natural environment is the main receptor for the impact of minerals extraction, as this will be directly damaged by the works themselves. Impacts can be addressed by means of appropriate restoration and aftercare to provide net gains. In Table 6, Policies 26 and 27 should also include Objectives 5 and 9, as in many cases these will be directly relevant to restoration and subsequent site management.</p>	<p>Comment noted. Once the objectives have been amended following this process of consultation, the objectives will be assigned to the relevant policies which will be drafted and included in the Draft Plan, currently scheduled for consultation in Autumn 2016.</p>
MLPIC298	22	HCC Landscape (Jennifer Clarke)	<p>In addition to the delivery of landscape and visual enhancements at restoration, there should also be objectives for the delivery of temporary or permanent landscape mitigation measures/enhancements in advance of, and during the operational stage of any development. Fully support reference to valued landscapes, the determination of value should be based upon best practice guidance.</p>	<p>It is considered that the delivery of temporary or permanent landscape mitigation measures in advance of, and during operational stages of a development would be taken on a site-by-site basis and would usually be detailed in a phasing plan for the extraction works.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC309	22	Bedford Borough Council (Natalie Chillcott)	Yes	See General Statement
MLPIC313	22	HCC - Natural, Historic and Built Environment (Alison Tinniswood)	We would welcome the inclusion of a statement specifically relating to Historic Environment, in line with those relating to Natural Environment, Transport, and Climate Change (p60-61).	Historic Environment will be included in the Heritage and Setting DM policy within the draft Plan. The text within the Initial Consultation was merely an introduction to some of the requirements of the Plan.
MLPIC330	22	East Herts District Council (Jenny Pierce)	If the Objectives are refined then Table 6 will need to be amended.	See General Statement
MLPIC341	22	Welwyn Hatfield Borough Council (Sue Tiley)	WHBC considers that the list of DM Policies should be expanded to cover the same issues used for the selection of sites for example the inclusion of proximity of allocated residential or built development and associate noise and dust impacts. It is not clear if these are all covered in this list.	<p>It is considered that the contents of the DM policies will closely match the list of criteria in the Site Selection Methodology. Rather than duplicating the site selection list, the list of DM policies will have fewer headings but incorporate more detailed requirements that are required at the planning application stage. The two lists perform different roles and as such should be drawn up to perform these roles specifically.</p> <p>It is anticipated that the policy entitled General Environmental and Amenity Protection will contain reference to impacts from noise, light, dust and</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				other pollutants, though the title of the policy will be reviewed to ensure clarity in the draft Plan.
MLPIC346	22	Chilterns Conservation Board (Lucy Murfett)	The text 'highlight the importance of valued landscapes' does not give enough weight to AONBs or reflect the clear government policy in the NPPF about the status of AONBs (para 115) and that major developments in AONB should be refused unless there are exceptional circumstances (para 116).	Whilst it is recognised that AONBs are a designated area, they are not considered an absolute constraint to mineral extraction. If an area/site is located partly within this designation there may be the potential to alter the boundary or reduce the size to exclude the designation from the 'specific' site area rather than discounting the whole site. There may be an opportunity for positive effects on the ecological designation which could be demonstrated to be in the public interest and a reason to not refuse a major development (NPPF para 116). Any judgements would be recorded as appropriate.
<p>Issue 23 Referring back to Section 4: Objectives, does the draft list of policy headings meet the objectives which will be included in the Minerals Local Plan? (Please select one answer)</p> <p><input type="checkbox"/> Yes</p>				

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<input type="checkbox"/> No General Statement: There was a general consensus that the draft list of policy headings meets the draft objectives. Following revisions to the draft objectives taking account of the representations received from this consultation, the policy headings will be reviewed to ensure clarity in the draft Plan and policy wording will be drafted with an aim to ensure the list of policies continues to meet the objectives.				
MLPIC12	23	Trustees of the Brocket Estate (Stuart Gray)	Yes	See General Comment
MLPIC17	23	Herts and Middx Wildlife Trust (Matt Dodds)	Yes	See General Comment
MLPIC31	23	North Hertfordshire & Stevenage Green Party (Karen Harmel)	No - The Objectives need to be expanded and firmed up to properly reflect environmental protection.	It is considered that the draft objectives already reflect environmental protection, with all nine objectives referring to the environment or sustainability. The objectives are a framework that will run through the development of, and the final adopted version of, the Minerals Local Plan. In addition to the MLP objectives, the MLP will be produced in line with the Sustainability Appraisal objectives which are currently weighed in favour of an environmental focus and will be sufficient to reflect the requirements of environmental protection.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC42	23	Hertsmere Borough Council (Richard Blackburn)	Yes - Policy headings meets objectives.	See General Comment
MLPIC55	23	Wheathampstead Parish Council (Julia Warren)	Yes - the draft list of policy headings meet the objectives which will be included in the MLP.	See General Comment
MLPIC75	23	Three Rivers District Council (Martin Wells)	Yes - draft list of strategic and DM policy headings meets the objectives.	See General Comment
MLPIC102	23	Historic England (Kayleigh Wood)	Historic England welcome the inclusion of Policy 19 on Heritage and Setting	Noted - retain policy.
MLPIC106	23	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Yes - policy headings meet the objectives.	See General Comment
MLPIC124	23	Central Bedfordshire Council (Natalie Chillcott)	Yes	See General Comment
MLPIC158	23	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Yes - Policy headings meets objectives.	See General Comment
MLPIC163	23	Transport for London (Andrew Hiley)	Determining applications in terms of Policies 12 (Sustainable Transport) and 13 (Railheads and Wharves) is supported.	Noted - retain policies.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC176	23	Mineral Products Association (David Payne)	Yes	See General Comment
MLPIC192	23	Codicote Parish Council (Lorraine Ellis)	No - Not enough focus on restoration plan and the commitment to the timeline, see our comments (in MLPIC 195 - Issue 25) with relation to chalk in Codicote.	Policy 26: Restoration and Policy 27: After-care and After-use will ensure that restoration is an aspect of any planning application that must be incorporated sufficiently in order to be granted permission. There will be a requirement to produce a restoration and aftercare plan for the site covering a minimum of 5 years with the proposals for after-care being consistent with the landscape character of the area.
MLPIC209	23	CPRE Hertfordshire (Steve Baker)	No - Objective 5 to protect people and the environment from harm is not met by the draft list of policies.	It is anticipated that the policy wording for General Environment and Amenity Protection will meet the needs of Objective 5 to protect people and the environment from harm.
MLPIC214	23	RSPB (Mark Nowers)	Yes	See General Comment
MLPIC225	23	D K Symes Associates (D K Symes)	Yes - Policy headings meets objectives.	See General Comment
MLPIC261	23	Buckinghamshire County Council (Emily Hodgson)	Yes - Policy headings meets objectives.	See General Comment

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC278	23	Natural England (Gordon Wyatt)	Yes	See General Comment
MLPIC309	23	Bedford Borough Council (Natalie Chillcott)	Yes	See General Comment
MLPIC341	23	Welwyn Hatfield Borough Council (Sue Tiley)	This will depend on the wording of the policies	Comment noted. The wording will be drafted and reviewed taking account of the objectives.

Table 11: Sustainability Appraisal – Issue 24

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 24 Are the headline objectives of the Sustainability Appraisal appropriate as a framework to determine the sustainability of the Minerals Local Plan? (Please select one answer)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>General Statement:</p> <p>Of the small number of comments submitted on this issue, there was overwhelming support that the headline objectives of the Sustainability Appraisal (SA) are appropriate as a framework to determine the sustainability of the Minerals Local Plan (MLP).</p> <p>Given that there were some suggestions for additions to the list of SA objectives with reasoning provided, there will be further consideration of these with the external consultants carrying out the SA of the MLP. In addition there were some technical responses received in relation to conducting the SA and Habitats Regulations Assessment which will also be provided to the consultants and further consideration of these to ensure that the most up to date information, Acts and guidance are referred to so that the SA and HRA process is carried out effectively and sustainability is considered appropriately.</p> <p>Comments were received relating to the suggestion that air quality should be included as an SA objective. Air quality is not specifically referenced in the list of SA objectives but it would be considered during the appraisal under sub-objectives 5.1 (in relation to greenhouse gas emissions) and 9.1 (human health and amenity). The objectives will be underpinned by a detailed set of assumptions which will highlight the more detailed information to be taken into account in the appraisals and this will include air quality (see paragraph 5.9 to 5.11 of the SA Scoping Report). The issue will also feature in the commentary to accompany each appraisal. The SA objectives will be revisited to determine whether specific reference to air quality in the objectives would be beneficial.</p>				

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC13	24	Trustees of the Brocket Estate (Stuart Gray)	Yes - The convenience of sites adjacent to existing reserves could be given careful consideration, where existing infrastructure could reduce the impact of further extraction on adjoining land.	New extraction sites adjacent to existing ones and extensions to existing sites may be put forward during Call for Sites and/or could be identified through the site selection process. All such sites will be sieved against the criteria in the site selection methodology. The use of existing infrastructure and continuation of extraction in a particular area may have environmental, economic and social benefits.
MLPIC18	24	Herts and Middx Wildlife Trust (Matt Dodds)	No - NPPF states that development should conserve and enhance biodiversity, resulting in net gains, rather than just seek to protect and enhance designated sites or priority species and habitats. The first headline objective should state: 1. To conserve and enhance biodiversity and geological features leading to net gains in species and habitats, with particular attention to those requiring conservation action under the UK Biodiversity Action Plan (UK BAP) and Biodiversity 2020. The mechanism to determine if enhancements can be achieved should be the Biodiversity Impact Assessment Calculator. This should be explicitly referenced in the text to avoid confusion and	Paragraph 152 of the NPPF states that ' <i>Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.</i> ' In pursuing sustainable development the NPPF in paragraph 9 refers to 'moving from a net loss of bio-diversity to achieving net gains for nature'. All biodiversity is included. The SA objective distinguishes what is meant by the term biodiversity using the terms species and natural habitats. There is specific reference to the UK

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>dispute later. There is confusion over the terminology for Local Wildlife sites - no other term should be used.</p>	<p>Biodiversity Action Plan and Biodiversity 2020 which reinforces the importance of the biodiversity requiring conservation action. Will consider addition of reference to net gains in the over-arching objective 1, although this is included in sub-objective 1.2 and therefore will still feature heavily in the appraisal.</p> <p>Where applicable the SA and MLP should refer to Local Wildlife Sites.</p> <p>Reference to the Biodiversity Impact Assessment Calculator will be included within supporting text of the MLP as an example of a tool that can be used to determine if enhancements can be achieved. This would only be appropriate for use at a later stage when specific sites are to be developed. The Calculator is not an appropriate tool for the strategic appraisal of sites and will not be used in the SA.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC32	24	North Hertfordshire & Stevenage Green Party (Karen Harmel)	<p>The wording of key sustainability issues identified in the LUC SA Report 2015 has been weakened from "preventing harm" to "mitigating against excess harm, and trying to redress harm done". The Consultee has enclosed a table comparing SA headline objectives to the MLP objectives to show where wording needs to be strengthened. This is summarised below:</p> <p>SA Objective 1 compared to HCC Objective 5. SA Objective 2 and 3 compared to HCC Objective 7. SA Objective 4 no comparison made to HCC Objectives. SA Objective 5 compared to HCC Objective 6. SA Objective 6 no comparison made to HCC Objectives. SA Objective 7 compared to HCC Objectives 1, 3 and 4. SA Objective 8 compared to HCC Objectives 2 and 8. SA Objectives 9 compared to HCC Objective 9. Water is not mentioned in the MLP Objectives although it was discussed at the meeting in March 2015 but dropped from the final MLP draft. Loss of water from abstraction, pollution and climate change are our main threats, and need to be properly protected against.</p>	<p>The key sustainability issues as listed in Table 4.1 of the SA scoping report June 2015, have been drawn up from baseline data including the SEA Directive requirements. These are the significant sustainability issues relevant to Hertfordshire and the implications for the Minerals Local Plan have been translated into SA objectives.</p> <p>The SA objectives have been worded 'to protect, conserve and enhance', 'minimise effects' and 'avoid risk'. It is not considered that there is any less protection afforded to the issues set out in the SA objectives than previously.</p> <p>Reference to water management is required within the Plan objectives as it is mentioned in the vision. This is dealt with under issue number 4 of the MLP Initial Consultation document</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC43	24	Hertsmere Borough Council (Richard Blackburn)	Yes - Appropriate headline objectives of SA.	Selection noted. No response necessary.
MLPIC56	24	Wheathampstead Parish Council (Julia Warren)	Yes - But maximising economic benefits should have regard to environmental and social factors	Selection noted. It is acknowledged that the economic SA objective could in turn have indirect effects on the environmental and social dimensions of sustainable development. The environmental and social SA objectives are considered sufficiently robust to ensure sustainable development is achieved in all three dimensions.
MLPIC76	24	Three Rivers District Council (Martin Wells)	Yes - headline objectives of the SA are appropriate to determine sustainability.	Selection noted. No response necessary.
MLPIC103	24	Historic England (Kayleigh Wood)	Yes - Historic England welcomes draft sustainability appraisal headline Objective 2 which covers the Historic Environment and look forward to being consulted on the relevant stages of the development of the full report. Attached in the response is a link to Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment, Historic England, for guidance on how to ensure adequate consideration of the Historic Environment is covered within Sustainability Appraisals.	Selection noted. The web link will be forwarded onto consultants carrying out the SA/SEA/HRA work to ensure the historic environment is covered adequately.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC107	24	SLR Consulting Ltd on behalf of Brett Aggregates Ltd (Chris Lowden)	Yes - headline objectives of the SA are appropriate to determine sustainability.	Selection noted. No response necessary.
MLPIC125	24	Central Bedfordshire Council (Natalie Chillcott)	Yes - headline objectives of the SA are appropriate to determine sustainability.	Selection noted. No response necessary.
MLPIC137	24	Hertfordshire County Council - Highways (Manjinder Sehmi)	No - Consideration needs to be given to sustainable transportation of minerals and waste.	Sustainable transport is included in SA sub-objective 5.1 (under headline objective 5 'To minimise the effects of climate change and reduce emissions of greenhouse gases') (environmental) and will be considered in the appraisal. The Minerals Local Plan will include a policy which covers sustainable transport.
MLPIC159	24	Cemex UK Operations Ltd (Kirsten Hannaford-Hill)	Yes - headline objectives of the SA are appropriate to determine sustainability.	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC164	24	Transport for London (Andrew Hiley)	Encouragement of sustainable transport links to SA objective 9 (social) in terms of road safety and air pollution. Would also benefit people in London. Suggest the link is emphasised.	Sustainable transport is included in SA sub-objective 5.1 (under headline objective 5 'To minimise the effects of climate change and reduce emissions of greenhouse gases') (environmental) and will be considered in the appraisal. It is acknowledged that transport can have impacts in terms of road safety and air pollution (social). SA sub-objective 9.1 will be revisited to determine whether it is suitable to make more specific reference to the impacts of transport in the wording of this objective to link to air quality and road safety, or whether this is more appropriate in the assumptions that will underpin the assessment. Sustainable transport is also covered in Plan objective 4 and this will feature as a policy in the Minerals Local Plan.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC177	24	Mineral Products Association (David Payne)	Yes - The balance is clearly heavily towards environmental objectives. In undertaking appraisal and using its outcome to develop the Plan, appropriate weight needs to be given to the economic benefits and necessity of providing for a steady and adequate supply of minerals, reflecting the NPPF.	Each of the three aspects of sustainability: environmental, economic and social are dealt with on equal terms. However, there are numerous different aspects within the environment that need to be appraised, as a result these are listed separately. The means of maximising the economic benefits of mineral extraction is by way of maintaining a steady and adequate supply of minerals which is a requirement within national policy. Therefore the overall SA objective captures the economic requirement.
MLPIC194	24	Codicote Parish Council (Lorraine Ellis)	Yes - Objectives are fine providing they are monitored, controlled and enforced	Selection noted. The Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment will be carried out at all stages of plan production to ensure sustainability is considered throughout.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC226	24	D K Symes Associates (D K Symes)	No - SA objectives are not appropriate. In terms of SA objective 6, sand and gravel extraction is defined as 'water compatible' and can result in an improvement/reduction to flood risk through restoration design.	The NPPG lists sand and gravel extraction as water compatible and are potentially suitable for all flood zones. The Environment Agency has standing advice that needs to be referred to dependent upon the flood risk where applicable. The flood risk will be considered in sieve 3 of the site selection methodology. Extraction should not increase flood risk elsewhere and needs to be designed, worked and restored appropriately. 'Directing development away from areas at highest risk' is not required due to water compatibility of extraction. A Strategic Flood Risk Assessment will be produced to support the plan and policies on flood risk and wording will be inserted into a policy. This SA objective will be underpinned by a detailed set of assumptions which will highlight the more detailed nuances associated with mineral extraction to be considered in the appraisal and the potential benefits outlined in the comment will be considered. These will be reflected in the commentary accompanying each appraisal.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				Headline objective 6 will be revisited to determine whether it would benefit from revised wording to make this clearer.
MLPIC236	24	North Herts District Council (David Hill)	The headline objectives from the SA/SEA appear to meet the SEA Directive and provide a sound basis for assessment of the plan, however, the sub-objectives will also be important, to ensure all relevant issues are covered.	Comment noted. The sub-objectives are additional components of the main SA objectives which will be considered when assessing the MLP at each stage of its production.
MLPIC262	24	Buckinghamshire County Council (Emily Hodgson)	SA objectives are appropriate. Should include objectives for air quality and restoration and afteruse of mineral sites.	See General Statement for air quality. Restoration and after-use are covered in SA sub-objectives 1.2, 6.2, and 9.3. The Plan objectives will also cover restoration and after-use of mineral sites.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC266	24	Public Health (HCC) (Bethan Clemence)	Background information submitted regarding the Public Health responsibilities. Support SA social objective, although underlying detail could be improved with reference to the relevant indicators in the national Public Health Outcomes Framework. Plans and policies reviewed by SA should include Herts Public Health Strategy and Herts Air Quality Strategy (which requires the need to measure, monitor and reduce Particulate Matter PM2.5. Baseline data needs to pick up on PM2.5. MLP should be more specific in its requirements around Air Quality and PM2.5 and demonstrate consideration of health inequalities - direct impact on health, mental health and wellbeing; - impact on social, economic and environmental living conditions that would indirectly affect health; - affect individual's ability to improve own health and wellbeing.	The Public Health Strategy and Herts Air Quality Strategy were not included in the review of other plans and policies undertaken for and presented in the SA Scoping Report. Consultants will be made aware of these documents to ensure that they are referred to when conducting the sustainability appraisal of the document. PM2.5 will also be reflected in the SA. See General Statement for air quality. It is anticipated that air quality will be included within a policy in the Minerals Local Plan.
MLPIC279	24	Natural England (Gordon Wyatt)	Yes - headline objectives of the SA are appropriate to determine sustainability.	Selection noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC293	24	HCC Ecology (Martin Hicks)	<p>No - The BAP has technically been succeeded by the UK Post-2010 Biodiversity Framework 2012 which may be better referred to along with the aim of maintaining and enhancing Priority Habitats and Species. Suggest:</p> <p>"To protect, conserve and enhance natural habitats, species and geological features including those identified in s41 of the NERC Act 2006, consistent with the UK Post-2010 Biodiversity Framework, Biodiversity 2020 and the Local nature Partnership aims."</p>	<p>The SA is required to use valid and up to date information to assess potential impacts on natural habitats, species and geological features which includes technical work. This comment will be forwarded to the external consultants carrying out the SA to ensure the correct information is being used where applicable.</p> <p>The Local Nature Partnership will be consulted at each stage in the production of the Minerals Local Plan to provide comments on the acceptability of the options within the Minerals Local Plan in relation to LNP aims.</p> <p>The rewording of SA objective 1 will be considered with the consultants, although a succinct objective would be preferred where possible, with references to documents made explicit within the SA report itself.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC293	24	HCC Ecology (Martin Hicks)	<p>The SA omits any reference to the statutory need for a Habitats Regulations Assessment (HRA). It is vital that it is properly referenced and explained in this document.</p> <p>Technical details were provided regarding the HRA, including: the need to use up to date guidance with clear process, an explanation regarding the 500m threshold around European sites regarding noise, vibration and light pollution; the need to consider the effects of ammonia in terms of nitrogen deposition on and around European sites; the need to explain the influence and evaluate air pollution emissions on local roads in the vicinity of existing or proposed mineral extraction sites; the need to explain the outcomes of screening; & further explanation of in-combination' effects.</p>	The comments refer specifically to the SA scoping report and the HRA, not the SA objectives. The comments will be forwarded to the external consultants carrying out the SA and HRA for further consideration. A Habitats Regulations Assessment scoping report has been prepared and was on consultation alongside the Minerals Local Plan Initial Consultation document.
MLPIC310	24	Bedford Borough Council (Natalie Chillcott)	Yes - headline objectives of the SA are appropriate to determine sustainability.	Selection noted. No response necessary.
MLPIC319	24	Environment Agency (Kai Mitchell)	Yes - We are pleased to see the inclusion of points 1, 4 and 6 and the inclusion of GP3 within the relevant plans, policies and programs.	Comment noted.

Table 12: Additional Comments – Issue 25

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
<p>Issue 25 If you have any additional comments relevant to the development of the Minerals Local Plan that are not covered by Issues 1-24, please provide them below</p> <p>General Statement:</p> <p>The majority of responses to Issue 25 re-iterated points made earlier in the response form, gave examples of guidance to consider during the development of the Plan or related to the site selection methodology or the content of policies. The comments had therefore already been responded to within other chapters, although the suggested guidance documents have been noted and will be reviewed as policies and supporting text are drafted.</p>				
MLPIC1	25	Health & Safety Executive (John Moran)	Have no comments to make at this stage, due to no sites being identified.	Comment noted. No response necessary.
MLPIC33	25	North Hertfordshire & Stevenage Green Party (Karen Harmel)	<ol style="list-style-type: none"> 1. The language used in the MLP is sometimes difficult to understand and should be written in plain English throughout examples "sustainable transport" or "planning positively". 2. The test Vision and Objectives are used throughout the document as if they have been accepted, but they need to be expanded and definitions need to be firmed up. 3. The MLP is to provide for sand and gravel in the face of the predicted growth. This is 	It is recognised that minerals planning documents are technical in their nature and, as such, are produced with the intention of using clear, plain English to prevent potential misunderstandings where possible. A glossary was published alongside the consultation documents on the county council's consultation portal and this will be included within the main consultation documents from now on, starting with the Draft Minerals Local

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>against Green Party policy for Demand Management.</p> <p>4. Site selection depends on an initial "call for sites" from owner/operators which is against Green Party policy, commercial interests should not be allowed to influence planning decisions.</p> <p>5. Ecological constraints has been downgraded in importance from Sieve 2 to Sieve 3. Wording has been weakened and the scoring systems is trivialised for ecological protection.</p> <p>6. There is no specific protection for the approx. 200 Hertfordshire nature sites.</p>	<p>Plan.</p> <p>The draft Vision, Objectives and definitions within them will be reviewed taking account of feedback from this consultation.</p> <p>The NPPF (para 145) states that MPAs should plan for a steady and adequate supply of aggregates. The Plan for Hertfordshire must take into account, among other things, the amount of housing being planned for in LPA Local Plans and the resultant demand for construction material.</p> <p>Economic viability is a key issue when identifying sites for potential mineral extraction. If omitted from the site selection methodology, the Plan could base aggregate supply for the period of the Plan on identified mineral reserves that have no possibility of ever being extracted. The Plan would therefore have failed to ensure a steady and adequate supply of aggregate for the county and would need to be reviewed.</p>

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				<p>Sieves 1 and 2 will be used to rule out absolute constraints and to ensure economic viability of a site is considered. Although ecological designations are high level constraints to mineral development, they are not considered absolute constraints so are considered appropriate to include in Sieve 3. Detailed consideration of ecological designations will be undertaken in Sieve 3 which can score sites a 'red', depending on the circumstances of the site. This would then be used in the overall evaluation of the site.</p> <p>The site selection methodology takes account of International and National ecological designations. It also takes account of locally designated sites (of local importance) including Local Nature Reserves, Sites of Special Scientific Importance and, following this consultation, Local Wildlife Sites which total roughly 1900 sites across Hertfordshire.</p>
MLPIC44	25	Oxfordshire County Council (Peter Day)	Oxfordshire CC has no comments to make on the emerging Hertfordshire Minerals Local plan at this stage.	Comment noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC63	25	Aldenham Parish Council (Paula Paley)	Aldenham Parish Council discussed this consultation on 21.9.15 and has decided not to comment.	Comment noted. No response necessary.
MLPIC64	25	St Albans City & District Council (Chris Briggs)	District Council supports the approach so far set out in the consultation document. Only some matters pertain directly to the district council. They look forward to commenting further when draft policies and mineral areas emerge and to both authorities continuing to support each other's Plan-making processes.	Comment noted. No response necessary.
MLPIC77	25	Hampshire County Council (Rob Sellen)	Hampshire CC also provides marine-won aggregates to Hertfordshire based on 2009 data	Comment noted. No response necessary.
MLPIC82	25	Hertfordshire County Council - Property (Ailsa Davis)	No comments.	Noted.
MLPIC84	25	Amec Foster Wheeler on behalf of National Grid (Julian Austin)	No comments.	Noted.
MLPIC104	25	Historic England (Kayleigh Wood)	To ensure the Historic Environment is adequately covered within the Minerals Local Plan, see our guidance, Mineral Extraction and the Historic Environment, Historic England.	Comment noted. These guidance documents will be reviewed when finalising policies, wording and definitions for subsequent stages of consultation.
MLPIC109	25	Aylesbury Vale District Council (David Broadley)	Duty to Cooperate: expect this to be referred to in the document and mechanisms should be in place to meet this duty including cross boundary effects of development and neighbouring districts.	The requirements of DtC will be referred to in the draft Plan, which will be the first policy-containing document produced for consultation in this review process.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
				<p>In addition, mechanisms are already in place to meet the duty. The adopted Statement of Community Involvement sets out how interested parties will be engaged in the review process. A Duty to Cooperate Protocol document, which is set to be issued publically, has been developed to set out how DtC will be undertaken throughout the review of the Plan. A Duty to Cooperate Statement of Evidence will be updated throughout the review of the Plan and will be made publically available to show how the duty has been met.</p>
MLPIC145	25	Highways England (Jenny Volp)	<p>I would recommend that the Hertfordshire MLP also emphasises the need to minimise the number of employee car trips to sites, through the encouragement of more sustainable transport methods. The NPPF states that all developments that generate significant amounts of movement, should be supported by a Transport Statement or Transport Assessment. I recommend that the sites identified which have the potential for a material impact on the SRN should be subject to a Transport Assessment. If mitigation measures are also</p>	<p>Numerous aspects of the Plan-making process will consider travel miles. Criterion 7 and 8 of sieve 3 in the draft Site Selection Methodology aim to identify sites that can incorporate sustainable levels of transport. The adopted MLP will contain policies related to transport, (eg. aiming to promote sustainable transport and mitigate the effect on the highways network). This will take account transportation and staff journeys. At the application stage, applications will</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>identified this should be stated in the Plan so that prospective developers are given advance warning that these may be required, and that these could potentially be attached as condition to any grant of planning permission.</p>	<p>be assessed against the Local Transport Plan and LPA Local Plans so it is considered unnecessary to include employee car trips in the MLP policy wording.</p> <p>Transport Assessments will be a requirement in Development Management Policy for developments that generate significant amount of movement. It is anticipated that sites within the adopted Minerals Local Plan will have detailed mitigation measures identified on a site-by-site basis that will be necessary to address at the planning application stage.</p>
MLPIC160	25	High Speed Two (HS2) Limited (James Fox)	<p>Area safeguarded by the Safeguarding Directions for the HS2 railway line project should be taken into account when preparing a Local Plan. It should be represented on the policies map in accordance with Regulation 9 of the Town and Country Planning (Local Planning) England Regulations 2012 as amended.</p>	<p>Noted - no action at present. Safeguarding of the HS2 line will be included in the Draft Plan.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC195	25	Codicote Parish Council (Lorraine Ellis)	<p>We would refer you to a meeting with Hertfordshire County Council Development Control and Codicote Parish Council on 17.4.13 where CPC asked for clarification on the improved restoration enforcement plan at Codicote Quarry and dates quoted for restoration in the Development Control report.</p> <p>The answer from HCC Development Control and in their report dated 27.3.13 6.31 page 18</p> <p>"The County Council has approved a restoration scheme that anticipates that the site will be restored in or around 2025" "The current planning permissions in respect of the winning and working of chalk allows for the subsequent restoration of the quarry no later than 2042"</p> <p>Codicote PC would wish to see the restoration earlier especially as the licence ends in 2022.</p> <p>At this meeting we asked for reassurance that the restoration plan and the Codicote Landscape Arable Valley Plan Report, which was commissioned by NHDC, is taken into account, we are still awaiting for reassurance on this.</p> <p>Also Brian Owen, HCC, agreed to contact NHDC Planning Dept re the restoration of a</p>	<p>Comment noted. It is considered that this relates to an existing site and is not related to the contents of the MLP. As such, no response is necessary but the comment has been passed onto the relevant case officer who will respond as appropriate.</p>

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			<p>piece of Codicote Quarry land which is a small triangle to the south of the site that was given retrospective planning permission in 2012 for 5years after Travellers appealed to the Planning inspectorate. (in the Minerals Local Plan 2002-2016 map no.5 dated September 2002). This should be restored in 2 years' time and not given further retrospective planning permission as has happened on another site on behalf of Travellers.</p> <p>This is GREENBELT land. A response from Brian Owen is still awaited. Codicote Parish Council strongly support the bringing forward the restoration plan on the whole site. But more urgently the land that has already been encroached upon, this issue needs to be rectified at the end of the 5 year period (2017).</p>	
MLPIC227	25	Ware Town Council (Jill Rowlinson)	Ware Town Council does not consider there are any suitable sites within the boundaries of Ware for further extraction.	Suitability of sites will be determined by implementing the three-sieve site selection methodology. There will be future opportunities to make representations regarding specific sites in subsequent stages of consultation.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
MLPIC228	25	Marine Management Organisation (Susan Davidson)	The MMO is committed to working with local authorities in the development of their local plans and the marine plans produced by the MMO. We have reviewed the minerals plan and do not have any comments as the local authority boundary lies outside the South marine plan area. We would however, suggest that the local authority considers that aggregate extraction, for the purposes of development on land, has a direct impact on the marine environment.	Comment noted. No response necessary.
MLPIC229	25	Greater London Authority (Peter Heath)	Given that your plan is at the Issues and Options stage it is at a very early phase in its development. At this point it is difficult to say anything substantial about the Plan other than to state that it appears you have identified the relevant issues and put forward reasonable options. The Mayor looks forward to seeing the next stage in your plan's development, at which point your plan will have matured further, and it will be possible to offer a more substantial response to your proposed policy approach. Oxfordshire County Council has recently finished consultation on its Core Strategy Minerals and Waste Plan (Part 1) and you may find it helpful to look at the range of issues set out in their plan and how they have set out their policy response to the issues their Plan	Comment noted. No response necessary.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			identified.	
MLPIC237	25	Turnberry Planning Ltd on behalf of Hertfordshire University (Stephanie Gray)	<p>Object to Initial Consultation document. Concerned that vulnerable sites such as the University's observatory campus at Bayfordbury are not afforded sufficient protection in the draft screening methodology. Concern regarding mineral working in close proximity to the observatory. Objected to Water Hall Quarry application and defended its position at a recent appeal relating to detrimental effects of dust and particulate matter. MLP should align with that decision where weight was afforded to potential impact on observatory. Background information provided regarding the important function of Bayfordbury Observatory as one of the UK's leading astronomical observatories with atmospheric remote sensing and sensitive optical instrumentation which can be damaged by dust. Nationally and internationally significant work is undertaken which depends upon existing air quality to be maintained. The draft MLP does not seek to protect the observatory's characteristic setting from future mineral working and risks jeopardising the facility. Location is key to its success unaffected by nearby airborne pollution sources, recognised</p>	The issues raised would be dealt with via Development Management policies which will be drafted for the next stage of Plan production.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			by NASA. Further development proposals at Water Hall Quarry are rigorously assessed through specific policies within the MLP.	
MLPIC297	25	HCC Landscape (Jennifer Clarke)	The European Landscape Convention establishes that landscape policy should promote the protection, management and planning of all landscapes, including protected landscapes and 'everyday' ordinary landscapes. In Hertfordshire local landscape policy is underpinned by the landscape county/local landscape character assessments, the AONB (a national designation), and local landscape designations (reflected in local plans). Plus the Green Infrastructure Plans. Landscape assessment should also take account of landscape value and sensitivity, the ability of the landscape to accommodate minerals development without causing unacceptable harm to the character and quality of the landscape.	Comment noted. These will be reviewed when drafting policies, wording and definitions for subsequent stages of consultation.
MLPIC314	25	HCC - Natural, Historic and Built Environment (Alison Tinniswood)	Our brief comments are in accordance with Historic England's recently issued Good Practice Advice Note 1 (<i>The Historic Environment in Local Plans</i> , March 2015). I note that further advice is available in <i>Mineral Extraction and Archaeology: A Practice Guide</i> English Heritage on behalf of the Minerals Historic Environment Forum, 2008	Comment noted. These will be reviewed when drafting policies, wording and definitions for subsequent stages of consultation.

Comment ID.	Issue No.	Name of Consultee	Summary of Representation	HCC Response
			(though this predates the NPPF and is currently under revision.	
MLPIC331	25	East Herts District Council (Jenny Pierce)	Given the timeframes involved, it is anticipated that the East Herts District Plan will be examined and adopted prior to the finalisation of the Minerals Local Plan. The next few months will be a crucial time in finalising the East Herts District Plan and it is important that the policies in the District Plan reflect emerging Minerals Local Plan policies. It is therefore requested that further Duty to Cooperate meetings take place at officer level to ensure alignment between the two Plans.	DtC will continue to be an important, ongoing consideration throughout the review, and beyond the adoption, of the Minerals Local Plan. Officer level DtC meetings between the county council and the ten district/borough councils in Hertfordshire are scheduled to occur roughly every six months. However, should there be a need/request for more frequent meetings, this can be arranged.
MLPIC342	25	Welwyn Hatfield Borough Council (Sue Tiley)	Duty to Co-operate is important with respect to balancing the aims of the MLP with the needs of Local Authorities to provide housing and employment allocations in their Local Plans. Continuing regular meetings are therefore welcomed	DtC will continue to be an important, ongoing consideration throughout the review, and beyond the adoption, of the Minerals Local Plan. Officer level DtC meetings between the county council and the ten district/borough councils in Hertfordshire are scheduled to occur roughly every six months. Should there be a need/request for more frequent meetings, these are arranged.
MLPIC347	25	Chilterns Conservation Board (Lucy Murfett)	As a protected landscape of equal planning status to National Parks, great weight should be given to conserving the landscape and	AONBs are included in Criterion 3: Landscape Designations in Sieve 3 of the Site Selection Methodology which

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			<p>scenic beauty of Areas of Outstanding Natural Beauty (NPPF para 115). The MLP consultation documents contain only two references to the AONB. More weight should be given to the Chilterns AONB to reflect your statutory duty under section 85 of the Countryside and Rights of Way Act 2000: It would also help the Herts Minerals Local Plan comply with the National Planning Policy Framework: Para 110 NPPF: "In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework." Para 115 NPPF: "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty." Para 116 NPPF: "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be</p>	<p>forms part of the detailed assessment of sites as part of the Plan-making process. Whilst it is recognised that the Chilterns AONB is a designated area, it is not considered an absolute constraint to mineral extraction. If an area/site is located partly within this designation there may be the potential to alter the boundary or reduce the size to exclude the designation from the 'specific' site area rather than discounting the whole site. Any judgements would be recorded as appropriate.</p>

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			<p>demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> -the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; -the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and -any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated." 	