



BUBBENHALL PARISH COUNCIL

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Planning and Development,
Communities Group,
Warwickshire County Council,
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1st December 2015

Dear Sir or Madam,

Consultation Response from Bubbenhall Parish Council to the Draft Warwickshire Minerals Plan (2017 – 2032)

Thank you for the opportunity to comment on the draft Warwickshire Minerals Plan (2017 – 2032). The Parish Council submits the following comments for consideration:

General

- We feel the decision to follow a written consultation format, given the complex subject matter, has put off many residents from responding even though the draft plan has the potential to have a huge impact on where they live. More informal forms of consultation such as public meetings in affected areas, focus groups etc would have enabled a greater number of people to make an informed response.

Policy Context

- Whilst the National Planning Policy Framework does contain key policies for the sustainable use of minerals it also recognises the need to protect the Green Belt.
- The NPPF recognises that mineral extraction may be appropriate in the Green Belt. However it goes on to say in relation to such developments that “....they preserve the openness of the green belt and do not conflict with the purposes of including land in Green Belt”. This vital constraint on mineral extraction in areas of Green Belt is ignored in the Policy Context section of this draft plan.
- Neighbourhood Plans also help to provide the policy context at a local level. However whilst there is some discussion on District and Borough Local Plans the ‘Policy Context’ section completely ignores the rights and powers under the Localism Act that allow local communities to shape new developments by coming together to produce neighbourhood plans.

Key Issues for Minerals in the County

- Following what appears to be a ‘best practice’ methodology paragraph 5.1 concludes that the 15 year plan requirement for local aggregates is 10.3 million tonnes.
- Surprisingly paragraph 5.2 with no sound evidence or justification increases this figure by 10% to 11.6 million tonnes. The reason given is “to address any concerns”. Who has expressed concerns? This additional 10% is not evidence based and must be removed. When this is removed and a return is made to the 10.3 million tonnes figure then some of the marginal preferred sites can be held as reserves for the future.

Key Issue 10

- The key issue on flooding ignores the fact that an extraction site next to a river is liable to flood. Drainage and/or removal of flood water from the site may cause silt deposits to pollute the local river and dramatically alter its natural flow and damage the habitat for wildlife. If some form of flood protection measure is built to protect the extraction site then the risk of flooding elsewhere downriver is made worse.
- Also the impact that future landfill material will have on the drainage of water from a site into a river needs to be assessed so that the risk of flooding is no worse than it is at the moment.

Other Issues to be Included

- The following issues need to be addressed in the plan:
 - Impact on local communities
 - Safeguarding adjacent land
 - Importation of waste material

Vision and Objectives

- The vision as written lacks cohesion and is nothing more than a list of aspirations. This leaves the reader feeling distinctly underwhelmed.
- Specifically there is no mention in the vision about protecting the openness and purposes of the Green Belt as defined by the NPPF.
- An objective related to the above comment needs to be developed.

Spatial Strategy and Preferred Options

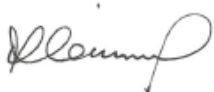
- The Parish Council does not agree with Spatial Strategy because the rationale for the proposed sand and gravel site at Coney Grey Farm on the Green Belt is not evidence based. This proposal is a classic example of a site that has been included because of opportunity rather than an evidenced need.

Policy S6 Coney Grey Farm

- The development cuts across the requirements of the NPPF requirements for n terms the Green Belt. Squeezed in between the Middlemarch Industrial Estate and the Prologic Business Park the proposed site will do little to protect the openness of the Green Belt between Ryton, Bubbenhall and Coventry.
- The proposed site is immediately in front of properties in Ryton and lies less than a quarter of a mile from the village of Bubbenhall. The noise, dust, additional traffic, damage to highways, loss of wildlife habitat, loss of a popular public right of way, increased risk of flooding and the visual impact from Bubbenhall will have a significant impact on local communities and the environment. None of these seem to have been taken into consideration.
- Also part of the proposed site floods on a regular basis due to the high water table and the River Avon overflowing its banks. Again this has not been accounted for.

I hope you find these comments constructive and useful.

Yours Faithfully



J Fleming (Mrs)
Clerk to Bubbenhall Parish Council

