

STATEMENT BY SOMERSET COUNTY COUNCIL

September 2014




MATTER 14: IMPLEMENTATION AND MONITORING

Background Documents referred to within Statement

- Somerset Minerals Plan (Doc Ref SD1)
- Annual Monitoring Report 2012/13 (Doc Ref SD20a)
- Annual Monitoring Report 2011/12 (Doc Ref SD20b)
- Somerset Local Aggregate Assessment 2013 (Doc Ref SD23a)
- Somerset Local Aggregate Assessment 2014 (Doc Ref SD23b)
- Schedule of Proposed Changes (Doc Ref SD6b)
- Schedule of Proposed Changes (Doc Ref SD6c)
- Minerals Topic Paper 3: Peat (Doc Ref SD8c)
- Minerals Topic Paper 5: Reclamation (Doc Ref SD8e)
- Minerals Topic Paper 5: Reclamation Annex (Doc Ref SD8f)

Document Control Sheet

	<u>Position</u>	<u>Name</u>	<u>Date</u>
Prepared by:	Senior Planning Policy Officer	Guy Robinson	27/08/2014
Approved by:	Service Manager: Planning Policy		04/09/2014

For the forthcoming Hearing, the Inspector has requested that Somerset County Council briefly summarise their position on each discussion topic. The following is a brief summary of Somerset County Council's response to Matter 14: Implementation and Monitoring, examining the **Issue: Whether the implementation and monitoring arrangements are fit for purpose.**

1. Is the Plan's approach to monitoring practicable?

SCC Response

- 1.1. Somerset County Council acknowledges the importance of Plan monitoring in chapter 25 of the **Somerset Minerals Plan (Doc Ref SD1)**.
- 1.2. Key documents for monitoring the Plan include Somerset County Council's Annual Monitoring Report (recent examples being the **Annual Monitoring Report 2012/13 – Doc Ref SD20a** and the **Annual Monitoring Report 2011/12 – Doc Ref SD20b**) and also the **Somerset Local Aggregate Assessment 2013 and 2014 (Doc Refs SD23a and SD23b, respectively)**.
- 1.3. Furthermore updates to certain Minerals Topic Papers provide an additional mechanism for keeping the County Council's evidence base up-to-date; for example updates to **Minerals Topic Paper 5: Reclamation** and its **Annex (Doc Refs SD8e and SD8f respectively)**.
- 1.4. The following paragraphs help to demonstrate the practicable approach taken in devising the indicators listed in chapter 25, which have been informed by feedback through consultation.
- 1.5. The contextual indicators on page 114 of the Minerals Plan require basic population data on Somerset, the state of our economy (as monitored via our colleagues in the Economy & Planning group), the sales of crushed rock (as monitored via the Local Aggregate Assessment) and the number of planning applications received, determined and granted (for which information is provided by our colleagues in Planning Control).

**Somerset Minerals Plan Examination
Hearing Sessions: September 2014
Statement by Somerset County Council**

- 1.6. Regarding monitoring indicator 1, Somerset County Council's statement on Recycled and Secondary Aggregates highlights that historically there have been challenges to data collection in recycling and secondary aggregates in Somerset, which are being met by sustained work and sustained dialogue with industry. It is therefore considered that this is a practicable indicator.
- 1.7. Monitoring indicator 2 has a clear mechanism for delivery, linked with delivery of the annual survey undertaken on behalf of the South West Aggregates Working Party (SW AWP) and the Somerset Local Aggregate Assessment (Somerset LAA).
- 1.8. Monitoring indicators 3, 4, 5, 7, 9, and 13 all follow the same pattern – helping to monitor policy usage informed by data gathered by colleagues in Somerset County Council's Planning Control department.
- 1.9. Monitoring indicator 6 on building stone types again is straight forward to deliver informed by data gathered by Planning Control.
- 1.10. Monitoring indicator 8 is split into two parts – peat sales and peat reserves. It is noted that there are challenges to collating accurate data on peat sales and peat reserves; however, the 2012 data-point for peat reserves provides a solid foundation on the latter (see **Minerals Topic Paper 3: Peat – Doc Ref SD8c**), and data on peat sales are available in particular from the Office for National Statistics. Somerset County Council's peat correspondence on data 2010 to 2013 (Doc Ref TD46) reflects the sources of data on peat.
- 1.11. Monitoring indicator 10 refers to the amount of land restored for appropriate priority habitat creation. Relevant data are sourced from planning applications and measured in GIS if not already given within an application. Areas would also be available where Habitat Evaluation Procedure has been applied.
- 1.12. Monitoring indicator 11 is identified via the County Council's approach to safeguarding, which will capture any examples of land where mineral resource is sterilised e.g. where an exceptional case for sterilisation has been made which Somerset County Council has accepted.
- 1.13. Monitoring indicator 12 focuses on biodiversity, split into a) impact of mineral development on habitats; and b) the local ecological networks (in particular for the Mendip Hills). Areas of suitable habitat available to selected populations of priority species lost or gained through mineral development would be calculated using the Habitat Evaluation Procedure. To date over 20 projects & plans have successfully used this Procedure. The ecological networks are modelled using Forest Research's BEETLE model and changes of habitat can be input into the base map in GIS and the network remodelled using the amended data. The model also outputs areas for components of the habitat network and changes in these areas can easily be reported. Thus the second part of the indicator – on the local ecological networks – remains a live project being carried out by Somerset County Council's ecologist working with the Somerset Wildlife Trust. In effect it will be monitored via future updates to the **Minerals Topic Paper 5: Reclamation Annex (Doc Refs SD8f)**.
- 1.14. Monitoring indicator 14 and 15 are both straight forward to address as part of standard monitoring operations.

2. Does it provide for co-operation and participation and are appropriate participants involved?

SCC Response

- 2.1. Yes, the monitoring indicators provide for co-operation and participation, and appropriate participants are involved in supplying relevant information. Examples are shown in the following paragraphs of this statement, as well as a commitment to co-operate in paragraph 25.5 of the Minerals Plan chapter on implementation and monitoring.
- 2.2. The County Council's collaborative approach to the identified contextual indicators is outlined in paragraph 1.4 above.
- 2.3. The SW AWP would participate indirectly in the delivery of contextual indicator c2 (b) and monitoring indicators 1 and 2 and indeed in any indicator where the Local Aggregate Assessment (LAA) is cited as a source of information, informed by data supplied by the minerals industry.
- 2.4. Linked with this, it is noted that the baseline for c2 (b) should be updated from 10.05 million tonnes (2011) to 9.98 million tonnes (2013) informed by the Somerset Local Aggregate Assessment 2014. This change is integrated within the **Schedule of Proposed Changes, v2 (Doc Ref SD6c – Change No. 129)**.
- 2.5. Furthermore, in the recently adopted Somerset LAA 2014 we state that for 2013 recycled aggregate sales were 105,770 tonnes and secondary aggregate sales were 2943 tonnes. Therefore the combined new total for 2013 i.e. a new baseline for indicator 1, would be 108,713 tonnes. This is shown as Change No. 130 in the **Schedule of Proposed Changes, v2 (Doc Ref SD6c)**.
- 2.6. Similarly indicator 2 (a) and (b) should be updated to reflect the latest data from the Somerset LAA 2014 – changing a) from 451 million tonnes (2012) to 425 million tonnes (2013), and b) from 41.72 years to over 40 years (see Change No. 131 in Doc Ref SD6c).
- 2.7. The peat industry and the Office for National Statistics (ONS) contribute data that enable the County Council to deliver monitoring indicator 8. As stated above, Somerset County Council's peat correspondence on data 2010 to 2013 (Doc Ref TD46) reflects the sources of data on peat.
- 2.8. Somerset's District Planning Authorities would participate in delivery of monitoring indicator 11.
- 2.9. The Somerset Wildlife Trust would be involved in work on local ecological networks linked with monitoring indicator 12.
- 2.10. The Environment Agency and District Planning Authorities would participate in monitoring indicator 14.
- 2.11. Somerset County Council as Highways Authority would participate in monitoring indicators 15 and 16.

3. Does it provide flexibility and what contingency measures are in place in the event of non-deliverability?

SCC Response

- 3.1. Yes, the indicators do provide a flexible framework to monitor what is happening “on the ground”.
- 3.2. Paragraph 25.18 of the **Minerals Plan (Doc Ref SD1)** makes clear what will happen in the event that either a) the Plan is entirely appropriate and fit for purpose but is undermined by its policies not being properly applied, or b) individual policies are demonstrably not effective.
- 3.3. If the Plan’s approach to monitoring itself is not shown to deliverable, then clearly the County Council may wish to pursue a revised approach in its Annual Monitoring Reports if this can be achieved without significant conflict with the Plan. Any such revision to an agreed monitoring approach would need to be fully explained in the associated Monitoring Report. If that is inadequate and the monitoring approach needs to be significantly revised, then it may be appropriate to consider a focused review of the Plan.

4. Are suitable arrangements in place for reviews at appropriate times?

SCC Response

- 4.1. The Plan makes clear that a review may be appropriate, in particular if there is any substantial change in national planning policy on peat (see paragraph 8.26 in the pre-submission **Minerals Plan (Doc Ref SD1)** and proposed change number 50 in the **Schedule of Proposed Changes – Doc Ref SD6b**) and if it becomes apparent that extraction of any minerals which are not covered in detail in this plan become viable and applications are forthcoming (see paragraph 12.3).
- 4.2. Scope for reviewing the Minerals Plan in response to monitoring is also covered in paragraph 25.7, 25.8 and 25.18 of the Plan.

END