

BOLTED Submission Matter 14A



Matter 14A: Implementation and Monitoring

1. The Birds Edge and District Opposition to Large Turbines and Environment Destruction (BOLT(ED)) –is a local action group formed after a public meeting in November 2016 with the remit to oppose the inclusion of site ME1965a in the Kirklees Local Plan. BOLT(ED) has already submitted representations in relation to this issue and trust that the Inspector has these representations (including appendices and DVD) and will take them in to consideration. However, BOLT(ED) wishes to make the following additional comments in relation to the specific Questions raised by the Inspector. BOLT(ED) also wish to speak at the hearing in relation to Matter 14A.

Issue: Whether the implementation and monitoring arrangements for the minerals and waste sections of the Plan will be effective

Question a) Is approach practicable

2. Historically KMC has a poor record of monitoring issues regarding mineral extraction. The following table shows the number of entries for mineral extraction that KMC have made in their Annual Monitoring Plan since 2004.

Year	Minerals Comments in Report
2015/16	Nothing reported re minerals
2014/15	Unable to locate report
2013/14	Nothing reported re minerals
2012/13	Nothing reported re minerals
2011/12	Unable to locate report
2010/11	Nothing reported re minerals
2009/10	Crushed rock production data only
2008/09	Crushed rock production data only
2007/08	Crushed rock production data only
2006/07	Nothing reported re minerals
2005/06	Nothing reported re minerals
2004/05	Nothing reported re minerals

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3. We are therefore concerned that KMC will not take the issue of monitoring the minerals indicators set in the plan seriously.
4. We are also concerned that there appears to be no independent means to assess production and that all figures rely solely on operators providing the data.
5. We are disappointed that KMC have not set target for RSAs. We consider that this is a missed opportunity and given the time span of the plan should be addressed.
6. We suggest a possible target for RSA be set using the national and regional guidelines for aggregates provision in England 2005-2020 as detailed in the WYLAA. This would then be set at 31% of aggregate requirement.
7. We are concerned that KMC wish to see a positive trend in the amount of aggregate produced per annum. What is the basis for this? The NPPF makes it clear that all minerals are a finite resource and they should be conserved for future use.
8. We are concerned that the Minerals safeguarding target do not take account of the KMC policy that the whole of the District is a MSA. In particular we find it difficult to understand why no target has been set for prior extraction of minerals before any type of development takes place.

Question b)

9. We note that the only people involved are the Council, Developers and Operators. There appears to be no role for local elected councillors, liaison group members or interested members of the public.