

Hampshire Minerals and Waste Management Plans - Scoping Report Responses

Respondent	Comment	Action Taken
<i>General</i>		
Hampshire & Isle of Wight Health Protection Unit	Good Reports. The human health and quality of life aspects are of interest: traffic, noise, nuisance, odour and air quality and proximity to homes schools etc...these are well covered.	Noted.
Eastleigh Borough Council	The document is well structured.	Noted
Hampshire & Isle of Wight Wildlife Trust	It is considered that these documents are not very user friendly and would be difficult for members of the public to use.	Noted
English Nature	On page 16 of the ISA Scoping Report relating to the Hampshire Minerals Plan it states that 'the Minerals Plan will contain the details of all the site allocated for mineral extraction and landfill during the plan period'. EN would be grateful for an explanation as to why 'landfill' is dealt with in the Minerals Plan rather than the Waste Management Plan.	This is set out on page 3 of the Scoping Reports.
<i>Scoping Reports</i>		
Environment Agency	WMP: Table 2.1 – Row 16 requires updating from Joint Interim Municipal Waste Management Strategy 2002 to the draft Joint Municipal Waste Management Strategy 2006.	Table 2.1. has been updated
	Paragraph 2.6 (WMP) and 2.5 (MP) – Wording should be changed to <u>ground or surface water quality</u> (in line with the changes in the IRF wording of the SE Plan).	Wording has been changed as suggested.
	Paragraph 2.21/2 (WMP) – If in the title it includes Water Quality, the EA suggest the inclusion of a paragraph about Water Quality. Suggested text – “ <i>Diffuse pollution from farmland, roads, car parks and industrial sites can enter rivers and cause water quality pollution which is detrimental to aquatic life</i> ”.	Suggested text has been selected.
	Paragraph 2.22 (WMP) and 2.20 (MP) – Source Protection Zones (SPZ's) protect public water supply sources and large potable abstractions. They do not protect the aquifer as a whole. The Environment Agency's Policy and Practice for the Protection of Groundwater (PPPG) outlines the concept of Major and non-Aquifers. Activities are controlled within SPZ's, on Major Aquifers, and to some extent Minor Aquifers, It is the PPPG that protects the quality of groundwater in the aquifer, not purely the SPZ's.	Noted. The paragraph has been amended to clarify this point.
	Waste Management Plan Objective 6 – Would be strengthened through consideration of including high quality restoration and aftercare considerations.	Restoration and aftercare considerations are associated with landfill which is dealt with in the Minerals Plan.
	ISA Objective A6, Output Indicator 7 – Suggest wording change to ground or surface water quality to align with the changes in the IRF wording of the SE Plan.	Wording has been changed as suggested.

	ISA Objective A11 (Appendix 3) – EA request the reconsideration of the bird strike ISA criteria. The criterion is marked with a double asterisk as only applying to mineral facilities. Bird strike is not considered to apply only to mineral sites as landfills can attract large/flocking birds.	Text has been amended to ‘Minerals and landfill development only’.
	Appendix 8 (WMP) – Section on Hydrogeology and Groundwater Risk: This is acceptable for waste sites, but it would be improved if comments on the Proforma in the Landfill section were taken on board in this section too.	Landfill sites are considered in the Minerals Plan and therefore the Proforma for mineral sites also considers landfill.
	Paragraph 2.24 (MP) – EA request that the text is extended within the paragraph to clearly include landfill sites as they can also attract large / flocking bird, particularly where these accept food water, therefore posing a risk of bird strike.	Paragraph has been amended to clarify this point.
	ISA Objective A7 (Appendix 3) third criteria – the criterion is marked with a single asterisk as only applying to waste facilities. However, co-location of facilities can also be applicable to mineral sites, this is acknowledged in Proposed Mineral Plan Objective 9, and paragraphs 3.21 and 3.22 of the Minerals Plan Scoping Report.	The asterisk has been removed.
	Appendix 7 (MP) – Non Hazardous: The categories don’t fully fit with understanding of Environment Agency Regulatory Guidance Note 3. *A* should include all SPZ 3s in line with section 3 of the position statement. The comments under the table are appropriate but could be improved by referencing RGN3/6, or the revised PPPG directly.	The categories have been revised to reflect RGN 3.
	<p>Mineral ISA Appraisal Proforma – It would be prudent to capture all relevant screening information directly into this table, as all of the information outlined below is needed to take a decision in line with the table outlined in the Hydrogeology and groundwater risk sections. Recorded information required at this stage should include:</p> <ul style="list-style-type: none"> • Major/Minor/Non Aquifer • Source Protection Zones. • Small abstractions/Private supplies of groundwater within 1 km. • Unsaturated zone estimate (depth to groundwater). • Groundwater flow direction. 	Aquifers and SPZ’s have been considered at this stage as the information is readily available and the assessment has been purely desk-based. Information on abstractions, unsaturated zones and groundwater flow can be recorded at a later stage for those sites that are considered suitable for further investigation.
	Table 3.2 – The incorporation of a legend with this table to better clarify the white/clear boxes within the compatibility test.	A legend has been added to the table.
	ISA Objective A2, last ISA indicator – EA request the addition of townscapes within the last ISA indicator as outlined below “Number of planning permission featuring enhancement of landscape <u>and townscape</u> in....”	The wording has been amended as suggested.

Appendix 3 – EA request the addition of a further criteria directly addressing flood risk.	A criteria addressing flood risk has been included.
ISA Objective A4, Output Indicator 19 – Further clarity on whose advice is being referred to here is required. That of the EHO’s at the Local Authorities, that of the EA, or both.	Text has been revised to read ‘advice of local Environmental Health Officer <u>or</u> the Environment Agency’.
ISA Objective A5 – Suggest new indicator to measure the mitigation of soil losses, i.e. particularly thinking about developments on brownfield sites which can support unique communities of invertebrates and other species that depend upon them such as Black Redstarts. Development proposals can incorporate ‘living roofs’, which can result in no net loss of such habitats. Suggested text for indicator: <i>“Number of planning permissions including mitigation measures for loss of soil types”.</i>	The suggested indicator has been added.
ISA Objective A12, final ISA indicator – EA request rewording of this indicator to more accurately reflect the ISA Objective, as unemployment is not the only index of deprivation; <i>“Number of planning permissions readily accessible to areas of deprivation”.</i>	The indicator has been amended as suggested.
The use of distance criteria for the first four bullets of the ecology and biodiversity criteria (*A*, B, C & D) is a useful approach. However science and legal requirements of the Habitats Regulations and of the Wildlife and Countryside Act 1981 (as amended), and the heavy implications of various plans and policies preclude heavy reliance on these simple distance criteria.	Noted.
The provisions of the Habitats Regulations apply to plans/projects likely to significantly effect Natura 2000 sites, irrespective of whether the permissions are located within or outwith the site.	Noted.
EA recognise that the criteria can be used for low impact activities such as covered transfer stations for non-hazardous waste, but they will not be safe to use in isolation for activities with a much higher potential for off-site impacts, e.g. landfill, minerals extraction, incinerators. The EA are not suggesting that the criteria is inappropriate but that further case by case examination is required in tandem with the criteria and suggest the following footnote to each of the first four criteria; <i>“In certain circumstances a site may be placed in this category even though it is beyond the distance stated above. When this happens we will describe the off-site impact(s) that we have identified and explain the basis of our concerns”.</i>	The footnote has been added as suggested.
It is possible that land within 250m of a European site could also meet criteria D or E. If criteria *A* is applied too rigidly, without discretion, then it is possible that opportunities for habitat enhancement may be missed, This is important as it is frequently the case that the greatest biodiversity gains are to be had by targeting them adjacent or near to existing biodiversity hot spots thereby increasing the total area available to biodiversity rather than siting effort elsewhere and creating numerous of small, isolated, unconnected pockets.	See paragraph 4.7 in the Scoping Reports.

	<p>Sea level rise has been correctly identified as a constraint for minerals and waste sites in coastal areas. Coastal squeeze is an issue itself. The low-tide mark is moving up the shore. Where fixed defences prevent landward migration of the high tide mark, ecologically important inter-tidal areas are being reduced in size.</p> <p>If acceptable opportunities to extract minerals from land immediately adjacent to the shore leading to the eventual creation of new areas of inter-tidal and foreshore habitats can be identified, this could help offset inter-tidal habitat losses caused by coastal squeeze. The EA would like discuss any possibilities further.</p>	Noted and included in text in Joint Baseline Report.
English Nature	<p>EN note that the ISA Criteria given at Appendix 3 (in relation to ISA Objective A1) differ from the revised criteria sent to EN by HCC on 19 October 2005. The revised criteria sent to us on 19 October 2005 included specific reference to Hampshire Biodiversity Action Plan species and nationally protected , scarce and rare species. The ISA Criteria included in Appendix 3 do not appear to relate to non-designated sites of nature conservation value; they only appear to relate to designated sites, to ‘Habitats and Species of principal Importance for Biodiversity’ and those sites which have <i>potential</i> to be of nature conservation value. EN are aware that the Criteria sent to them on 19 October were as a result of comments made by the EA; EN therefore recommend that HCC seek the views of the EA regarding the current proposed wording.</p>	The Environment Agency have been consulted with regard to the Scoping Reports and no comment was made with regard to the ISA criteria in relation to nature conservation.
	<p>EN recommend that it will be necessary to identify the location of ‘Habitats and Species of Principal Importance for Biodiversity’ to enable the use of the proposed ISA Indicators which relate to ISA Objective A1. EN suggest the Hampshire Biodiversity Information Centre (HBIC) could play a role in this.</p>	Noted.
	<p>Appendix 7 – In the section relating to ‘Ecology and Biodiversity’ EN query the difference in meaning in ‘E’ between ‘potential for nature conservation interest’ and ‘potential for nature conservation enhancement’.</p>	‘Potential for nature conservation interest’ is worded to identify those sites that are of nature conservation interest but are not designated. Potential for enhancement is recorded when known on the site proformas and will be examined in more detail when the preferred sites are identified.
	<p>As far as EN can ascertain, the synergies and conflicts between the Proposed Plan objective and the Draft ISA objectives have been correctly identified in Section 3. EN note that the Proposed Plan Objective7 (to protect internationally, nationally and locally designated sites, appropriately according to the level of designation, from the adverse impact of mineral and landfill developments / waste management developments) is considered generally compatible with the ISA Objectives.</p>	Noted.

	Section 4 – Next Steps (MP) EN are concerned that paragraph 4.14 states that ‘the Preferred Options document and ultimately the Minerals Plan, will need to find the <i>right balance</i> between the suitability of a site and the requirements of national and regional guidance and local policy’. EN stress that the suitability of a site (in the context of the Sustainability Appraisal) needs to be assessed in terms of integration of environmental, social and economic aspects.	Noted.
	EN note that paragraph 4.16 states that ‘it is felt that it would be better to undertaken the Appropriate Assessment at the Preferred Options stage. This is because any sites that are likely to have a significant impact on a European site should have been discounted during the Issues and Options stage’. Please note that Appropriate Assessment is only required in cases where it is considered that the development proposals will be likely to have a significant effect on the site, either along or in combination with other plans and projects. If all those sites likely to be significantly affected (either alone or in combination with other plan and projects) are removed at the Issues and Options stage, there would obviously be no need for an Appropriate Assessment to be undertaken at the Preferred Option stage.	The text on Appropriate Assessment has been updated following discussions with English Nature.
	Paragraph 2.13 on page 7 (WMP) – this paragraph appears to have been copied from the equivalent paragraph (2.12) in the Scoping Report relating to the Hampshire Minerals Plan. EN suggest it is amended to refer to ‘waste management’ rather than to ‘minerals development’ in line 5.	The paragraph has been amended.
Hampshire & Isle of Wight Wildlife Trust	The policy background just repeats part of the policy information in the joint baseline report and that by summarising these policies there is a danger that the details given within joint baseline report will get forgotten about.	The policy information is highlighted and filtered through into the appraisal criteria.
	Table 1.1 the DPD preparation process does not show clearly that the ISA will be written at the same time as the DPD. It is viewed that within the DPD process there needs to be another line between the production and examination lines which shows the consultation phase. If this was added in it would be easier to put stage B and C of the ISA process alongside the production stage of the DPD process making it easier and clear to understand.	The table has been altered as suggested.
	In Section 4 next steps it would be very helpful to put the site appraisals process, the site selection methodology and the ISA stage s alongside each other where they then can be viewed and compared to each other. Without them being along side each other it’s difficult to look at where the differences lie with the processes that each document will go through.	The ISA process and the DPD process are interlinking processes and this shown in Appendix 5.
	On the ISA appraisal factors under Ecology and Biodiversity there is no mention of consideration to the potential impacts on Natura 2000 sites only those within 250m of that site this therefore should be amended to read “on or within 250m”.	The text has been changed as suggested.

	<p>In using this appraisal system and grading the sites using a traffic light system it is suggested that this will indicate the significance of impact. Two concerns are that firstly that on not coding each impact....these traffic light dots will only highlight that there is an impact but won't say what that impact is. Secondly, by looking at the impacts site by site the cumulative impacts over all sites will not be picked up.</p>	The proforma sets out what the potential impacts could be but are categorised by the traffic light system. The cumulative impacts will be looked at later on the in the process when the preferred sites have been identified.
	<p>Section 4.16 discusses appropriate assessment. The Trust would like to point out that it is a legal requirement that an appropriate assessment would be required at every stage and not just at the preferred options stage should a site go through. Also no mention of appropriate assessments is given in the site selection methodology Appendix 4.</p>	The text on Appropriate Assessment has been updated following discussions with English Nature.
	<p>Appendix 3 – The proposed ISA Framework. The Trust us happy with these objectives and indicators. In terms of biodiversity The Trust would also like to see as a useful indicator not only the number of minerals and waste planning permissions resulting in adverse effects on designated sites but also the number of applications that are refused where they would result in adverse impacts to designated sites etc.</p>	An additional criteria has been included as suggested.
Eastleigh Borough Council	<p>Section 3, paragraph 3.18 – stated that the proposed plan objective 5 is incompatible yet uses a neutral/uncertain image in Table 3 for this.</p>	The wording has been amended.
Basingstoke & Deane Borough Council	<p>The absence of Local Plans / emerging Local Development Frameworks is noted from both the documents, and ask that it is ensured that these [documents] are key considerations in examining individual sites in detail.</p>	The Local Plans will be referenced during the further examination of sites to help determine their suitability.
	<p>Query the reference in Table 2.1 in both documents to the Hampshire County Structure Plan of February 2004, the date appears to be incorrect. It is suggested that this be corrected or deleted, together with the inclusion of relevant documents at the regional level.</p>	The date has been amended.
	<p>In terms of the next steps outlined for both documents, it is considered that this represents an appropriate way forward, and the Borough Council would request involvement with this in the future.</p>	Noted.
<i>Joint Baseline Report</i>		
Environment Agency	<p>Page 49/50 – Request that the table is updated from Joint Interim Municipal Waste Management Strategy to include the draft Joint Municipal Waste Management Strategy 2006.</p>	The table has been updated.
	<p>Page 4 – Waste Strategy 200 is authored by Department for the Environment, Food and Rural Affairs (Defra) not the Environment Agency.</p>	Page 4 has been amended.
	<p>Paragraph 8.5 – Bird strike is acknowledged as an issues in relation to landfill sites within this paragraph. Please refer to earlier comments regarding bird strike to ensure consistency through the document.</p>	The paragraph has been amended.

	<p>Request the following document are referenced:</p> <ul style="list-style-type: none"> • Environment Agency Regulatory Guidance Note 3: Groundwater Protection: Locational Aspects of Landfills in Planning Consultation Responses & Permitting Decisions. • Environment Agency Regulatory Guidance Note 6: Interpretation of the Engineering Requirements of Schedule 2 of the Landfill (England & Wales) Regulations 2002. • Environment Agency Policy and Practice for the Protection of Groundwater (shortly to be reissued (will include reference to RGN3 and 6 in it once reissued)). • The draft Groundwater Daughter Directive (links to WFD). • Brent Goose Strategy (Wildlife Trust, July 2002). 	<p>The Environment Agency documents are referenced in the 'Water' section and the rest are referenced in the Review of relevant Polices, Plans and Programmes.</p>
	<p>Page 9 – Bathing Water Quality Directive Section. There is a higher standard set by the EC which the EA try to meet, called the Guideline Standard. This is the standard the EA should be aiming for. Nationally the target by the EA is to have over 75% of beaches meeting this standard.</p>	<p>The target has been referenced.</p>
	<p>Page 60 – Possible sites may not be designated but it does not mean that the site is not rich in ecological value. The Environment Agency therefore recommends an additional statement be included: '<i>Judgements on site selection should not be carried out in the light of limited site specific survey information</i>'.</p>	<p>The suggested text has been added to Paragraph 1.9.</p>
	<p>The Environment Agency recommend replacing the word 'should' with MUST within the Ecology and Biodiversity sections of the main table of the Joint Baseline Report as outlined below:</p> <p>Page 18 - The identification of mineral and waste management sites MUST ensure that designated sites are adversely affected. Where impacts are inevitable, these MUST be minimised by suitable mitigation measures". The importance of non-designated sites for nature conservation MUST also be taken into consideration.</p> <p>Page 34 – Wildlife and Countryside Act. The Hampshire Minerals and Waste Management Plans will need to meet the objectives of the Act and the Factors used to appraise the potential sites MUST take this into consideration.</p> <p>Page 35 – Working with the grain of nature: A biodiversity strategy for England (Defra). Biodiversity MUST be taken into consideration when appraising potential sites. Biodiversity should not only be seen as a constraint but also an opportunity to create valuable future sites for wildlife and people alike.</p> <p>Page 36 – Countryside and Rights of Way Act. Hampshire Minerals and Waste Management Plans will need to meet the requirements of the Act and the factors used to appraise the potential sites MUST take access to the countryside, the protection of SSSIs and AONBs into consideration.</p> <p>Page 36 – Habitat Regulations. Hampshire Minerals and Waste Management Plans will need to meet the requirements of the regulations and the factors used to appraise the potential sites MUST take the regulations into consideration.</p> <p>Page 47 – Hampshire BAP. The Hampshire Minerals and Waste Management Plans should ensure that they take into consideration the protection of priority habitats and species. Potential impacts MUST be identified when appraising site.</p>	<p>The text has been amended as suggested.</p>

	Paragraph 6.22 – Relevant indicator – EA request a change in wording to ground or surface water quality to align with the changes in the IRF wording of the SE Plan.	The wording has been amended as suggested.
	Paragraph 6.9 – Refer to comments on 2.20, the Minerals Plan above.	The wording has been amended as suggested.
	Paragraph 6.21 – Major aquifers, depth to groundwater, type of geology and smaller abstractions (without modelled Source Protection Zones) are also a constraint for siting of landfills. The paragraph needs updating accordingly.	The paragraph has been updated.
	Paragraph 6.22 – Further clarity is required with reference to the Directive being cited within this paragraph.	The reference to the Directive has been clarified.
	Page 79 – Water: Issues and Constraints. Issues concerning Water Quality in Hampshire should include: <ul style="list-style-type: none"> • Sewage Works discharge their final effluent into rivers and the sea. With a reduction in water levels in the rivers, the dilution factors will reduce, creating a higher concentration of pollutants in our rivers. • The EA suggest an additional bullet point and explanation text relating to diffuse pollution from runoff from fields and roads. 	The issues have been included in the Water section.
English Nature	Page 3 – Full List of Policies, Plans and Programmes – suggest that reference is also made to: <ul style="list-style-type: none"> • ‘Planning for Biodiversity and Geological Conservation: A Guide to Good Practice’ dated March 2006. • ‘Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System’ 16 August 2005 (ODPM Circular 06/2005 Defra Circular -1/2005) • The Conservation (Natural Habitats, &c) Regulations 1994 (Statutory Instrument 1994 No 2716) commonly referred to as the ‘Habitats Regulations’. 	References have now been included. However, the Habitats Regulations were already referenced.
	Page 4 – please note the correct title of ‘Countryside and Rights of Way Act 2000’.	The title has been amended.
	Page 4 - EN note that the UK Biodiversity Action Plan and the Hampshire Biodiversity Action Plan are included; we recommend that ‘Conserving Nature for the Community – Hampshire County Council Corporate BAP’ (2005) is also included.	The Plan has been referenced.
	Pages 8 and 9 – please note that when considering the ‘implications for ISA of the Hampshire Minerals Plan and/or Hampshire Waste Management Plan’ in relation to the EC Directive on the Conservation of Wild Birds (page 8) and the EC Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (page 9) it is important to consider The Conservation (Natural Habitats, &c.) Regulations 1994 (Statutory Instrument 1994 No. 2716) commonly referred to as the ‘Habitats Regulations’. The Habitats Regulations involve assessment of proposals ‘in combination’ with other plans and projects.	Reference has been made to the Regulations within the ‘implications’ column.
	Page 18 – in section relating to PPS9 it is important to recognise that designated nature conservation sites include both statutory and non-statutory designations.	This is included in the review of PPS9.
	Page 18 – when considering impacts on nature conservation sites it is important to consider indirect impacts and cumulative impacts.	This has been highlighted in the review.

	Page 34 and 36 – in the sections relating to Wildlife and Countryside Act 1981 (as amended) and Countryside and Rights of Way Act 2000 it is worth noting that Hampshire County Council, Portsmouth City Council, Southampton City Council and the New Forest National Park Authority are Section 28G Authorities and therefore have a duty to take reasonable steps, consistent with the proper exercise of these authorities’ functions, to further the conservation and enhancement of SSSIs during the formulation of the Hampshire Minerals and Waste Development Framework.	The text has been amended to highlight this point.
	Page 59 – in paragraph 1.6, the 2 nd , 3 rd and 4 th bullet points are all sub-sections of the 1 st bullet point. We recommend that ‘Internationally Designated Sites’ should be a separate paragraph (as for ‘national’ sites in paragraph 1.7) and the reference to SPAs, SACs and Ramsar sites placed as three bullet points under the main ‘Internationally Designated Sites’ heading.	The format of the Biodiversity section has been amended as suggested.
	There is no need for an apostrophe in SAC’s.	The text has been amended accordingly.
	Page 60 – paragraph 1.11 – EN note that reference is made to HCC’s duties as a Section 28G Authority; reference should also be made to similar duties placed on the other relevant authorities (PCC, SCC and New Forest NPA).	The text has been amended to highlight this point.
	Page 60 – paragraph 1.13 – EN particularly welcome the last bullet point which relates to sites with the potential for nature conservation interest/enhancement.	Noted.
	Page 61 – paragraph 1.15 – EN particularly welcome this reference to identification of sites which enable enhancement of biodiversity.	Noted.
Hampshire & Isle of Wight Wildlife Trust	It is viewed by the Trust that each of the policies, plans and programmes have relevance to the HMWP’s and that by colour coding them this effectively grades them in terms of their significance. It is seen that colour coding therefore detracts from the real significance of these policies.	The colour coding has been removed.
	Map A.2 has missed all of the Special Areas of Conservation (SAC’s), only identifying the candidate SAC’s and has not identified the Ramsar sites. It is also viewed by the Trust that there is no mention as to what the neighbouring counties’ important biodiversity habitats and species are. Minerals and waste sites adjacent to the boundaries could impact upon these.	The map has been amended to include RAMSAR sites and all SACs. Reference is now made to the site of nature conservation interest adjacent to the county boundary, although they are not individually identified (see Paragraph 1.7).
	In 1.1 it is worth putting Hampshire into the national context by pointing out that Hampshire is one of the richest bio-diverse counties in England.	This point has been added to the text.
	Section 1.9 needs to mention the legal requirement of appropriate assessments for Natura 2000 sites again putting this into the right context and ensuring that the HMWP’s are aware of their legal obligations.	Section 1.9 now makes reference to Appropriate Assessment.

Section 1.10 mentions that data will be gathered but does not mention what data. This requires more detail.	The information to be collected will be gathered as part of the monitoring and is set out in Appendix 3.
Section 1.11 mentions the targets government have to meet. It would be useful to mention how HMWP's proposes to help with these targets (i.e. how it plans to conserve biodiversity).	See Paragraphs 1.11 to 1.13.
In 1.12 delete the words "needs to consider" and replace with "must take regard for" as the guidance in PPS9 is a statutory requirement.	The text has been altered as suggested.
1.13 change "should" with "must" as it is a legal requirement to protect these important habitats and species.	The text has been altered as suggested.
On relevant indicators it is recommended that this indicator be changed to state no adverse impact rather than just no impact.	The text has been altered as suggested.
It is also recommended that an additional section be added concerning water resources. Housing pressures will put greater pressure on water resources and minerals and waste sites need to ensure that they are not affecting the groundwater. Ancient woodlands and other bio-diverse habitats can be adversely affected by the lack of groundwater if this is not controlled.	The point is briefly mentioned in Paragraph 1.2 and also in the 'Water' section.
Under the section on Social considerations it would be worth mentioning that employment opportunities should be based around good transport links.	This point has been highlighted.
Under the section on soils there is no mention of soils and of policies to restrict it being brought from other counties...the issues of moving soils is that it can bring in invasive weed species. These species are highly invasive and difficult to control once they get established.	This point has been highlighted.
Under the section on water resources it would be worth mentioning the positive benefits of mineral sites being used as future reservoirs.	This point has been highlighted.
Under Climatic factors it is worth mentioning that the restoration of minerals and waste sites can play a part in creating large landscape areas which can aid the movement of flora and fauna species thus helping with the impacts of climate change on them i.e. with large landscape areas southern species can move towards the cooler northern climates if conditions are right.	The link between habitats and climate change is mentioned in the Biodiversity section.
Under light pollution section 10.3 the potential for light pollution in ecologically important sites/areas should be mentioned and be a consideration.	This point has been highlighted.
Against the objectives of the World Summit on Sustainable Development the HMWP states that "HMWP's should implement the sustainable development commitments agreed at the world summit where possible ". It is the view of the Trust that the objectives of the World Summit must be followed. And therefore the "should" needs to be changed to "must" and the reference to "where possible" removed. If the HMWP's cannot implement this then the onus must be on the plan to explain and justify why it cannot.	The wording has been altered as suggested.

	Through a number of the other policies there are also references that “HMWP should or will need to adhere to the requirements of the policy or plan objectives”, again the Trust would state that it is critical to change these to “must” therefore making the plan stronger.	The wording has been altered as suggested.
	For the Bern Convention on the Conservation of European Wildlife and Natural Habitats 1979 the Trust recommends deleting the wording “ <i>ensure that the conservation of wild flora and fauna and all natural habitats are considered in the sites appraisal process</i> ” and replace it with the wording “ <i>ensure that any adverse effects to the conservation of wild flora and fauna and all natural habitats is avoided</i> ”. This would make certain that these habitats and species are not just a consideration but are given the level of protection required. It is further suggested that the following additional wording be added “ <u>Restoration of minerals and waste sites can provide opportunities to contribute to the enhancement of these natural habitats and species</u> ”.	The wording has been altered as suggested.
	For the Ramsar Convention on Wetlands of International Importance, especially waterfowl habitat (1971) it is recommended that the wording under the implications to HMWP which says “ <i>ensure Ramsar sites are considered in the sites appraisal process</i> ” is deleted and changed to “ <i>ensure that any adverse effects to Ramsar sites are fully avoided</i> ”.	The wording has been altered as suggested.
	For the Bonn Convention on Conservation of migratory species (1977) it is recommended that the wording under the implications to HMWP which says “ <i>ensure that migratory species are considered in the sites appraisal</i> ” is deleted and changed to “ <i>ensure that any adverse effects to migratory species is avoided</i> ”.	The wording has been altered as suggested.
	For the Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EC) it is recommended that the wording under the implications to HMWP which says “ <i>ensure that the conservation of wild flora and fauna and all natural habitats are considered in the site appraisal process</i> ” is deleted and changed to “ <i>ensure that there is no adverse effects affecting the conservation of wild flora and fauna and all natural habitats</i> ”. It is further suggested that the following additional wording be added “ <u>Restoration of minerals and waste sites can also provide opportunities to Hampshire & Isle of Wight Wildlife Trust contribute to the enhancement of these natural habitats and species</u> ”.	The wording has been altered as suggested.
	For the policies on water it is recommended that the wording under implications to HMWP which says “ <i>is considered in the sites appraisal process</i> ” is deleted and changed to “ <i>Not adversely affected</i> ”.	The wording has been altered as suggested.
	For the Nitrates Directive (91/676/EEC) it is recommended that the wording under the implications to HMWP which says “ <i>it is considered in the sites appraisal process</i> ” is deleted and changed to “ <i>Not adversely affected</i> ”.	The wording has been altered as suggested.
	For PPS1 – Sustainable Development it is recommended that under implications to HMWP this needs to mention how the HMWP’s propose to deliver the objectives for sustainable development.	The implications column has altered to state the delivery of the objectives.
	For PPS9 – Biodiversity and Geological Conservation (2005) it is recommended that the wording under implications to HMWP which states “where impacts are inevitable these should be minimised by suitable mitigation measures” should be deleted and also in the next paragraph delete the wording “where necessary”. It is considered by the Trust that mitigation should not be considered as an option and should only ever be used as a last resort.	The text has been reworded.

	For PPG20- Coastal planning (1992) it is recommended that the wording “Biodiversity issues” also be added to the list of issues that HMWP’s will have to consider in the last paragraph.	The wording has been added as suggested.
	For the Wildlife and Countryside Act (1981) it is recommended that this is reworded to say “ <i>The Hampshire Minerals and Waste Management Plans have a legal obligation to meet the requirements of the Act. When appraising potential sites, the obligations under this act must be adhered to</i> ”.	The text has been reworded as suggested.
	For the Working with the grain of nature it is recommended that and the additional sentence is added that states “ <i>Minerals and waste sites also have the potential (particularly during the restoration stages) to enhance, opportunities for this should be thought about when developing the HMWP</i> ”.	The wording has been added as suggested.
	For the UK Biodiversity Action Plan (1994) it is recommended that and additional sentence is added that states “ <i>The HMWP provides opportunities for enhancing biodiversity and these should be sought particularly during the restoration stage</i> ”.	The wording has been added as suggested.

I:\Environment Grouping\Planning\Minerals and Waste\25 MRS\HMWDF\Minerals and Waste Development Framework\Sites Plans\Sites Plan ISA\Scoping Report\Scoping Report Responses_13_6_06.doc