



Draft Isles of Scilly Local Plan

Including Minerals and Waste

2015-2030

**DRAFT Duty to Co-operate
Statement of Common Ground**
Between the Council of the Isles of Scilly
and Cornwall Council



Council of the
ISLES OF SCILLY





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Contents

INTRODUCTION	3
Parties Involved	3
Signatories	4
Strategic Geography	5
Strategic Matters.....	9
Governance Arrangements.....	9
Timetable for agreement, review and update.....	10
Strategic Matters.....	11
Transport Issues	11
Strategic Waste Management	14
Strategic Management of Minerals.....	3
Compliance with the Duty to Co-operate	10
Appendix 1	12

List of Figures

Figure 1 The extent of the jurisdiction of the Council of the Isles of Scilly and strategic transport links with the Mainland	5
Figure 2: The extent of St Mary's Airport (A).....	6
Figure 3: The Extent of Tresco Airport (B).....	7
Figure 4: The extent of St Mary's Harbour (C).....	8
Figure 5 The jurisdiction of Cornwall Council in relation to its neighbouring authorities and strategic transport links with the Isles of Scilly	9
Figure 6 Extracts from the adopted Cornwall Plan, adopted 2016.....	12
Figure 7 One of the Identified Key Issues for the Islands, as set out in the draft Local Plan, 2015-2030	13
Figure 8 St Mary's Household Waste and recycling centre	15
Figure 9 Extract from the Local Validation Checklist 2019.....	Error! Bookmark not defined.
Figure 10 Extract from the Draft Isles of Scilly Local Plan 2015-2030 Monitoring Framework	1



INTRODUCTION

1. Under the 2019 National Planning Policy Framework (2019 NPPF)¹ strategic policy making authorities, such as local planning authorities, should produce, maintain and keep up to date a Statement of Common Ground (SCG) to highlight agreement on cross boundary strategic issues with neighbouring authorities and other relevant bodies.
2. Strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local plans (including minerals and waste plans), spatial development strategies, and marine plans.
3. This SCG sets out how the Council of the Isles of Scilly and Cornwall Council have actively and positively sought to comply with the duty to cooperate in preparation with the draft Isles of Scilly Local Plan 2015-2030 on strategic cross-boundary matters and mechanisms for ongoing cooperation. It has been drawn up following guidance set out by the Planning Advisory Service (PAS) issued in January 2019.²
4. A copy of this SCG will be published on the Authorities' websites and updated as necessary:

Authority	Webpage Link:
CIOS	http://www.scilly.gov.uk/planning-development/local-plan-review
CC	https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/evidence-base/

5. It is agreed, by both parties, that the main cross-boundary factor affecting the islands is the protection of transport connections. This is also directly related to the strategic management of waste for and the importation of minerals (aggregates and building materials) for the Isles of Scilly and as such these issues have all been set out below.

Parties Involved

6. This is an agreement between the **Council of the Isles of Scilly** and **Cornwall Council** in respect of Development Plan preparation. Section 110 of the Localism Act 2011 places a legal duty of Local Planning Authorities (LPA) and other

¹ NPPF 2019:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

² <https://www.local.gov.uk/pas/pas-topics/local-plans/statement-common-ground>



prescribed bodies to cooperate with each other on strategic planning matters insofar as they are relevant to their administrative areas throughout the preparation of their development plan documents. The NPPF reiterates this duty and requires an independent inspector to assess whether the development plan they are examining has been prepared in accordance with the duty to cooperate. Paragraph 35 requires authorities to demonstrate that plans are ‘sound’ *“based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground”*.

Signatories

7. The signatories give the public commitment that agreement has been reached.

Signed on behalf of the Council of the Isles of Scilly:

Cllr Dan Marcus, Lead Member for Planning, Council of the Isles of Scilly

Signed on behalf of Cornwall Council:

Cllr Bob Egerton, Portfolio Holder for Culture, Economy and Planning, Cornwall Council



Strategic Geography

Isles of Scilly

8. The Council of the Isles of Scilly has planning jurisdiction over all of the islands that make up the archipelago of the Isles of Scilly. The jurisdiction covers the marine environment down to mean low water. The map below shows the administrative boundary of the Council of the Isles of Scilly and the three strategic transport links that connect the islands to the mainland : a) St Mary's Airport, b) Tresco Heliport as the main air links and c) St Mary's Harbour and Quay for the only sea link to the islands:

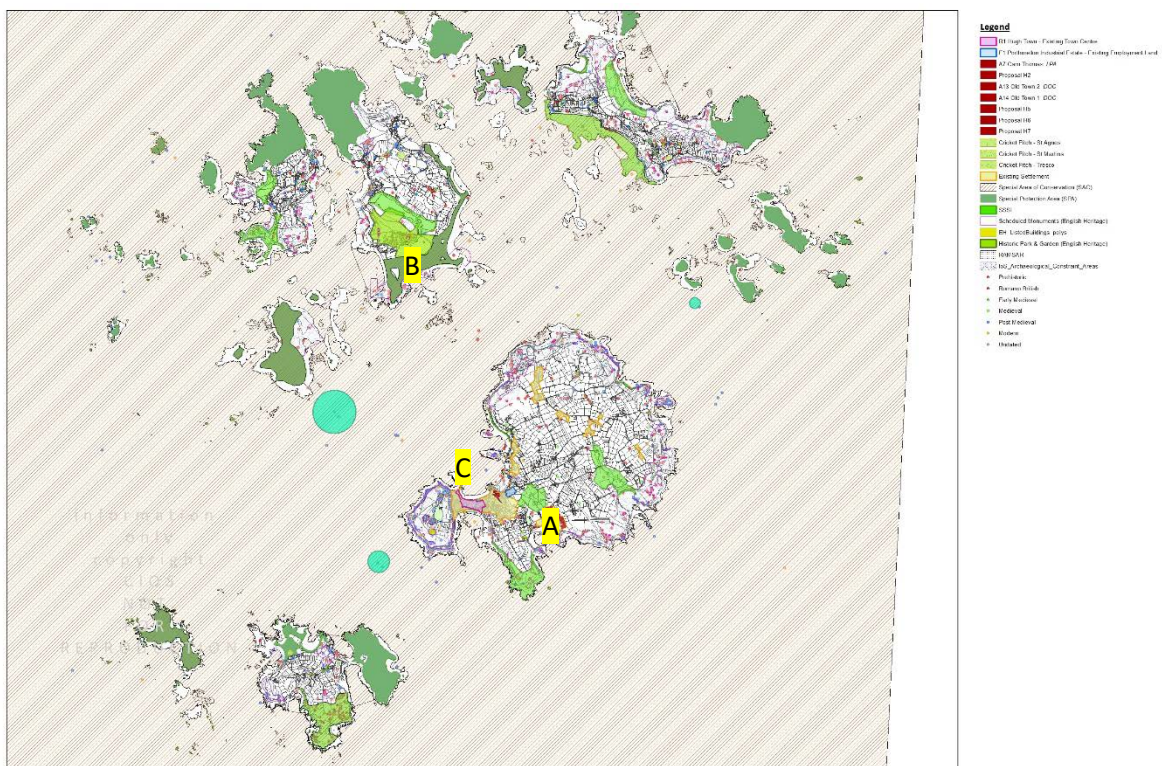


Figure 1 The extent of the jurisdiction of the Council of the Isles of Scilly and strategic transport links with the Mainland

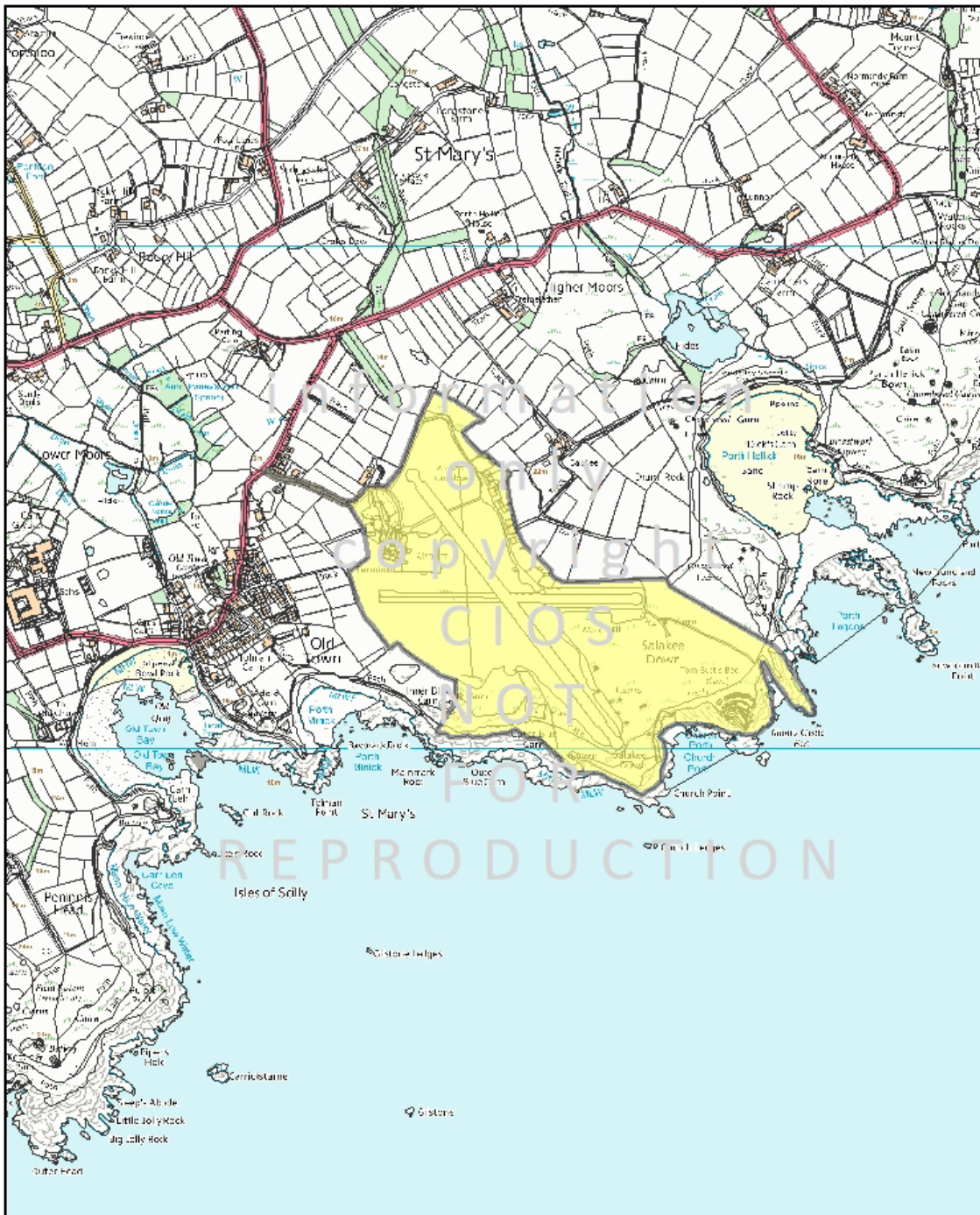


Figure 2: The extent of St Mary's Airport (A)

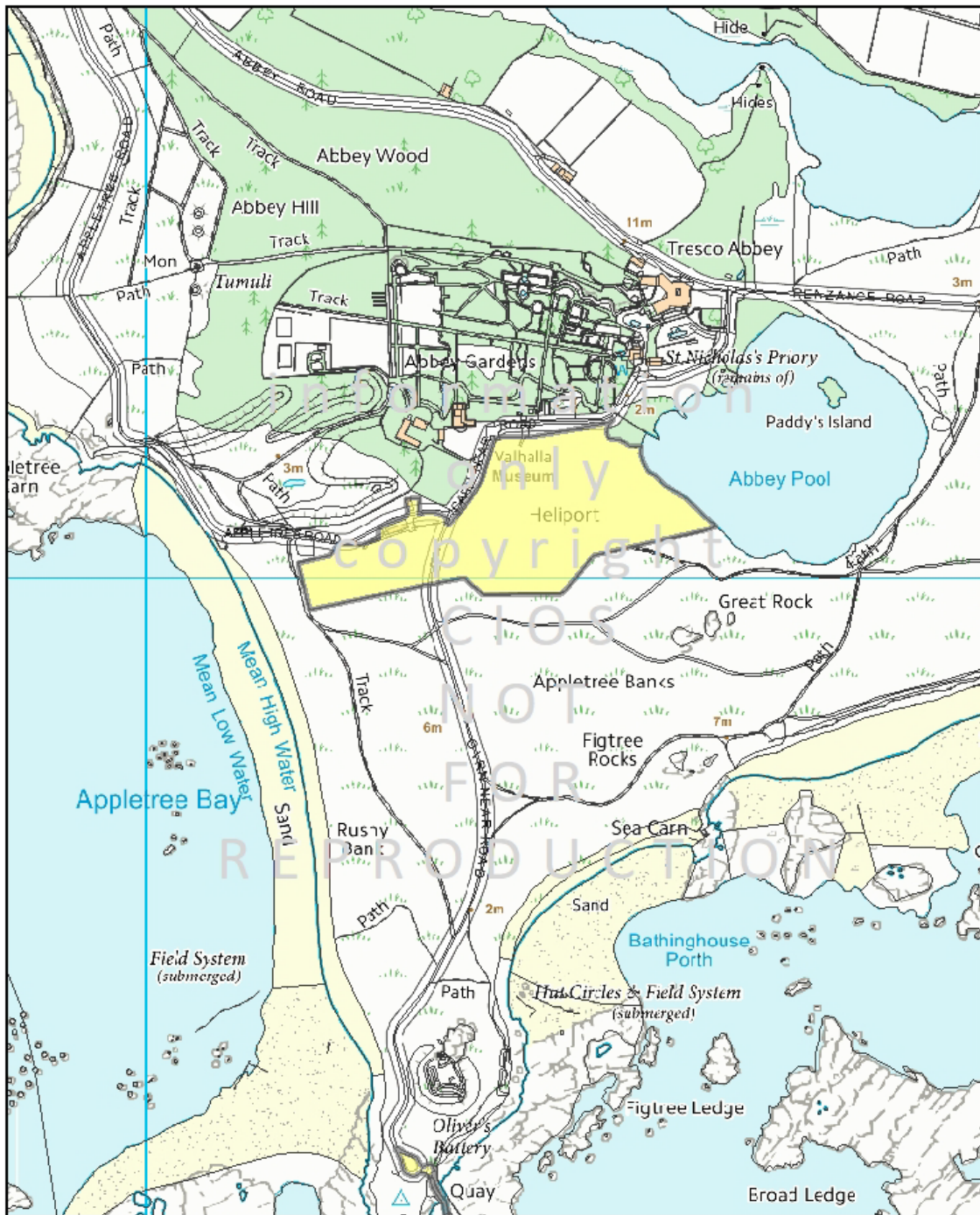


Figure 3: The Extent of Tresco Airport (B)

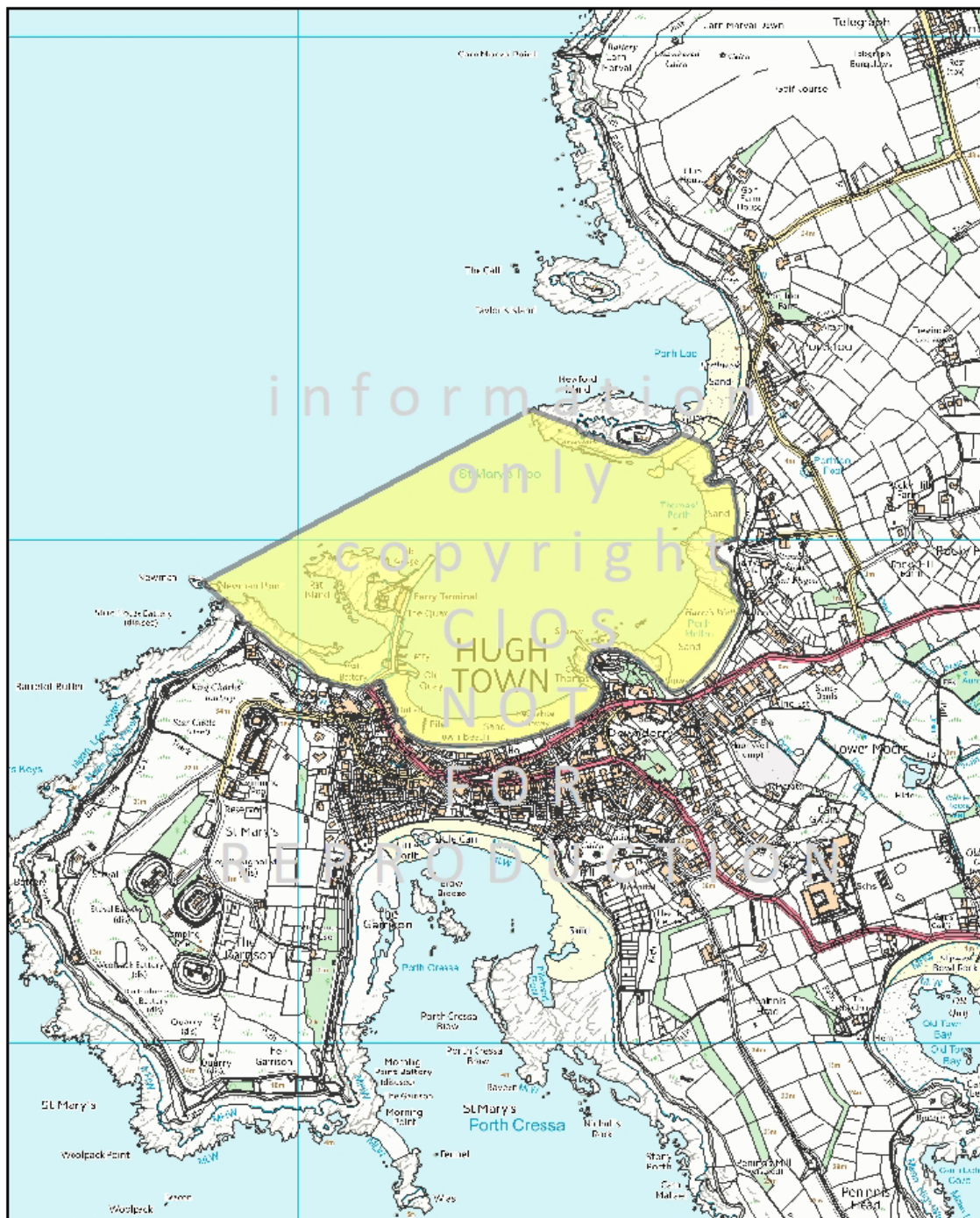


Figure 4: The extent of St Mary's Harbour (C)

Cornwall

9. The jurisdiction of Cornwall Council comprises the remainder of Cornwall with a boundary with Devon to the east and down to mean low water on its coast. Other authorities adjacent to Cornwall are Plymouth City Council, West Devon District Council and Torridge District Council as well as Devon County Council. Mainland Cornwall has 4 strategic transport links with the Isles of Scilly: a) Land's End Airport,



b) Cornwall Airport (Newquay) and the [under construction] c) Penzance Heliport for the air links and d) Penzance Quay as the only sea link with the islands:

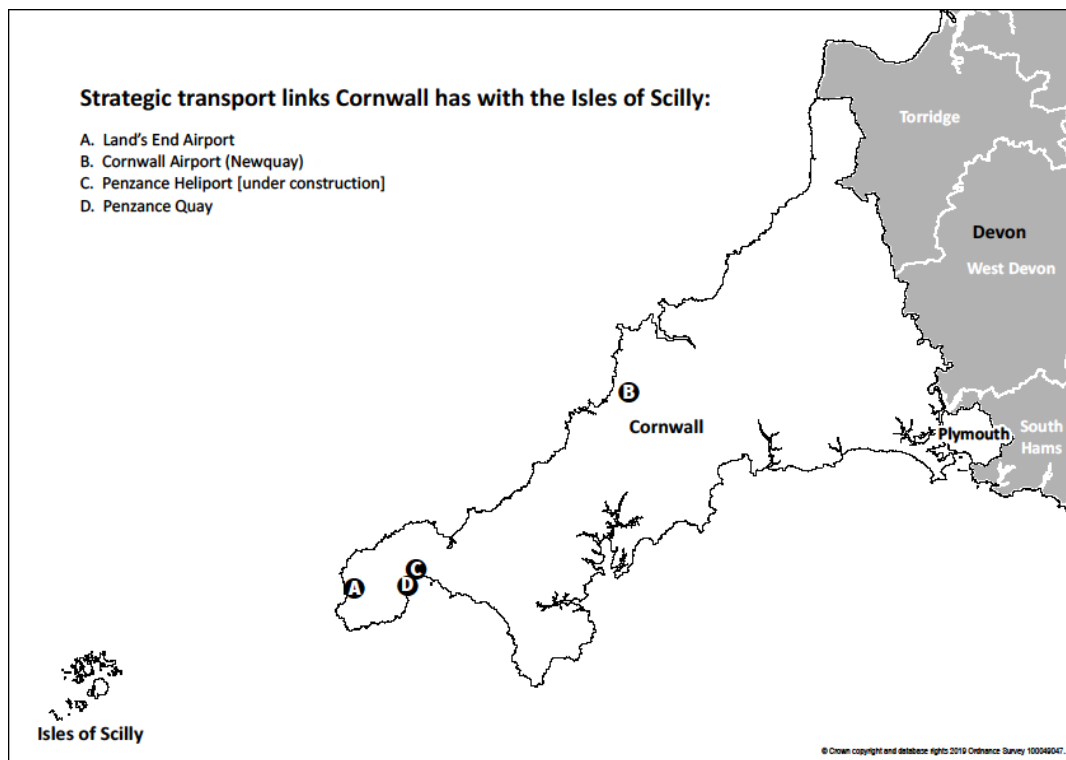


Figure 5 The jurisdiction of Cornwall Council in relation to its neighbouring authorities and strategic transport links with the Isles of Scilly

Strategic Matters

10. Both authorities agree that the strategic matters on which co-operation is required relate to:
 - Strategic Transport Issues
 - Strategic Waste Management Issues
 - Strategic Management of Minerals
11. The above issues are set out in more detail below. Other issues such as housing provision and the housing market area of the South West of Cornwall are not considered to be a matter on which either Council can co-operate given the isolation of the islands from Cornwall. It is not considered a viable or realistic option for Cornwall to take on the delivery of affordable homes for the Isles of Scilly or vice-versa.

Governance Arrangements

12. This SCG has been drawn up by the Council of the Isles of Scilly, during the course of the preparation and development of a new local plan for the islands. This has been amended through consultation with Cornwall Council and will be reviewed as



and when any of the strategic matters are affected by a significant policy or development proposal, either within Cornwall or on the Isles of Scilly. As is expected, engagement between the authorities has been constructive, active and ongoing, with a view to this continuing through the lifecycles of local plans in both jurisdictions.

Timetable for agreement, review and update

13. The Council of the Isles of Scilly and Cornwall Council regularly revise their local plan timetables, which are updated to include other development plan documents as necessary. Both the Council of the Isles of Scilly and Cornwall Council last updated their respective Local Development Schemes (LDS) in June 2019³ (Scilly) and December 2018 (Cornwall)⁴. It is considered that a review of the SCG will be carried out once the new Local Plan for the Isles of Scilly has been adopted by the Council. A review will also take place when revisions to either of the local plan timetables introduce or modify a development plan document that has implications for the strategic cross-boundary matters contained within this SCG.
14. Cornwall Council adopted its Local Plan: Strategic Policies document in November 2016. The Strategic Policies will be reviewed to assess whether they need updating by 2021 and then updated as necessary in line with the National Planning Policy Framework.

Council of the Isles of Scilly								
2018-2019	2019-2020				2020-2021			
Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Reg. 19 Public consultation	Submission and publication Reg. 20 and 22	Examination of Local Plan	Receipt of Inspectors Report	Adoption of Local Plan				
Set out Agreement of SCG under DTC				Trigger for Review SCG following adoption or if further DPD are added to the LDS which affect strategic issues.				

LPA	Present Plan Adoption	Proposed Plan Review Date	Target Reg. 18 Date	Target Reg. 19 Date	Target Submission Date
CiOS	2019/20: Q4	By Q4 2022	2023	2024	2025
CC	2016/17 Q3	By 2021/22 Q3	tbc	tbc	tbc

³ LDS8: <http://www.scilly.gov.uk/sites/default/files/planning-apps/LDS%208%20Local%20Plan%20Review%20Timetable%20Jun%202019.pdf>

⁴ <https://www.cornwall.gov.uk/environment-and-planning/planning/planning-policy/adopted-plans/local-development-scheme/>



Strategic Matters

Strategic Transport Issues

15. In 2011 the Council of the Isles of Scilly published a Strategic Transport Framework (STF) document following the approval of the Department for Transport (DfT) of the Route Partnership (RP). The RP project would have secured the long-term viability of a year-round lifeline link by sea with the mainland. On 31st March 2011, however the RP project was rejected by DfT. The STF was produced by consultants WPS during a time when transport connections for the islands were at their most unsecure, particularly with the rejection of the RP together with the withdrawal of helicopter services to the islands provided by British International Helicopters (BIH).
16. Both inter-island transport links and, most significantly, the transport links to the mainland are seen as a significantly important issue for the Isles of Scilly. The transport links are important from an economic perspective as well as ensuring the islands are socially sustainable and provide adequate access to the mainland for health and other social requirements for educational and employment purposes. From the perspective of Cornwall Council the connections to the Isles of Scilly are identified as a key tourism draw, where visitors to the Isles of Scilly often also take advantage of the services and tourism accommodation and facilities provided in west Cornwall.
17. Whilst both authorities seek to support and protect strategic transport links to and from the islands through the transport and planning policies below they have limited control as the transport providers and operators are private commercial companies and not publically maintained.

Connecting Cornwall 2030

18. Connecting Cornwall is Cornwall's Local Transport Plan for 2010-2030 and states:

We will seek to protect and improve the connectivity of Cornwall with the Isles of Scilly. This will be achieved by the Isles of Scilly sea link which is a combination of projects involving the upgrading of the harbours and vessels that together will secure the future of a sea service between Cornwall and the Isles of Scilly.

Cornwall Local Plan: Strategic Policies 2010-2030



19. Cornwall Council's Local Plan was adopted in November 2016 and sets out the importance of the transport links as well as policy measures to protect and improve them:

1.40 ...Cornwall has a significant economic and social relationship with the cities and towns of neighbouring authorities to the East and a key role in supporting its neighbours on the Isles of Scilly.

201 ... We will maintain our key transport network and associated infrastructure for walking; train; bus; car; cycle; air and sea transport as well as safeguarding future opportunities for delivering improvements and to maintain links with the Isles of Scilly and other parts of the UK.

Policy 27: Transport and accessibility ...For major developments to ensure a resilient and reliable transport system for people, goods and services, development proposals should:

1. Be consistent with and contribute to the delivery of Connecting Cornwall 2030, Cornwall's Local Transport Plan or any subsequent LTPs; and ...

6. Safeguard land for the delivery of strategic transport opportunities including land around existing facilities to allow for expansion and use for future sustainable modes of travel e.g. closed branch rail lines and links to the Isles of Scilly.

Figure 6 Extracts from the adopted Cornwall Plan, adopted 2016

Draft Isles of Scilly Local Plan 2015-2030

20. In order to safeguard transport connections to and from the islands, which are identified as an essential element for both the community and the economy, the emerging draft Isles of Scilly Local Plan makes various references to protecting transport infrastructure, including through its identified issues⁵ on transport and Policy SS10 (Travel and Transport).
21. In addition to the clear acknowledgment that transport is a significant issue for the islands, specifically the Local Plan supports initiatives that improve the reliability and resilience of the strategic transport connectivity by ensuring the operational effectiveness of St Mary's Quay, St Mary's Airport and Tresco Heliport. Given the location of the islands, efficient, reliable, year-round transport services connecting to

⁵ Page 28: http://www.scilly.gov.uk/sites/default/files/planning-apps/Final%20Draft%20Local%20Plan%202015%20-%202030%20FEB%202019_2.pdf



the mainland are paramount, providing the lifeline for businesses, visitors and residents.

Transport Supporting better access across the islands, in particular supporting sustainable and active transport solutions, by foot, bicycle or electric vehicles; and enabling people to access amenities such as schools, shops, employment and essential infrastructure through a range of transport options, maximising opportunities for all. New housing, employment and community development opportunities will need to promote active travel within and across island communities, as indicated in the spatial strategy section of the Local Plan. Strategic transport links to the mainland are fundamental to the future sustainability and viability of the islands, although improving such links are largely outside the scope of this Local Plan, it is critical that these are safeguarded.

Figure 7 One of the Identified Key Issues for the Islands, as set out in the draft Local Plan, 2015-2030

Meeting Transport Needs

22. Cornwall Council and the Council of the Isles of Scilly agree to support the maintenance and improvement of transport links between Cornwall and the Isles of Scilly, consistent with strategic policies, in both their plan making and planning decision-taking (subject to their other policies and other material planning considerations affecting each case):

Strategic Issue	Council of the Isles of Scilly	Cornwall Council
Protection of essential transport links between Cornwall and the Isles of Scilly	Making planning decisions in accordance with Draft Isles of Scilly Local Plan 2015-2030	Making planning decisions in accordance with Cornwall's Local Transport Plan for 2010-2030 and Cornwall Local Plan 2015-2030



Strategic Waste Management

23. Both the Council of the Isles of Scilly and Cornwall Council are Unitary Authorities and therefore each have waste planning responsibilities. The National Planning Policy for Waste (NPPW) 2014 requires local planning authorities to work towards a more sustainable and efficient approach to resource use and management. This includes the delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy.
24. There is a duty to ensure waste management is considered alongside other spatial planning concerns and recognising the positive contribution that waste management can make to the development of sustainable communities. In developing waste management policies there is a requirement to base these on a proportionate evidence base and working collaboratively with other planning authorities to collect and share data and information on waste arisings. This should take account of waste arisings across neighbouring waste planning authorities.
25. The proportionality issue of the evidence base is particularly pertinent when considering the very small scale of the islands, the level of anticipated development over the plan period and options for routes to waste management. Whilst there is a reliance on mainland contractors for onward movement of the islands' waste, there are currently no collaborative arrangements in place with Cornwall Council to combine waste collection and management. In the absence of a formal agreement between the Council of the Isles of Scilly and Cornwall Council for strategic waste management, there is an informal arrangement and continuing open dialogue to ensure that future collaborative working opportunities are not precluded. Both authorities will monitor the arrangement and share data openly.
26. Given the limited on-island solutions for managing waste, the shipping of waste for onward management (recovery, recycling and disposal) is another crucial reason for protecting the transport links between the islands and mainland Cornwall. Currently, all residential waste is disposed of at the 'energy from waste plant' at St Dennis in Cornwall. Additionally most recyclables are also sent to centres in Cornwall, further emphasising the strong links and interdependencies. Both authorities support the waste hierarchy, with this now embedded in the draft Isles of Scilly Local Plan and the adopted Cornwall Local Plan.

Draft Isles of Scilly Local Plan 2015-2030

27. The waste management elements of the draft Isles of Scilly Local Plan are set out within Section 2 (Sustainable Scilly) (see policy SS2), which includes the requirement to provide recycling storage in new developments. The remaining elements of waste management fall within Section 3 (Our Outstanding Environment), including regard to the waste hierarchy through Policy OE5. Waste and recycling is



addressed proportionately to the circumstances of the islands and to ensure that the management of waste is sensitively considered as part of development proposals and the waste hierarchy is embedded at the start of a development process.

28. The 2019 Infrastructure Capacity Assessment⁶ sets out the justification for not specifically planning for additional waste and recycling facilities on-island in the Draft Local Plan 2015-2030. The scale of development proposed in the plan, which is the development of 105 affordable homes over the plan period, given the level of investments into, and transformation of, the islands' main waste site on St Mary's since 2014, does not trigger the need for additional facilities to process waste for the islands. The existing site has capacity for all of the islands' current waste streams and whilst not all waste is diverted through St Mary's, the majority does pass through the weighbridge. The potential increase in waste as a result of 100-150 new homes, up to 2030 would not have a significant impact upon the waste management of the islands, as the development is seeking only to meet the needs of the existing community, not significant growth.

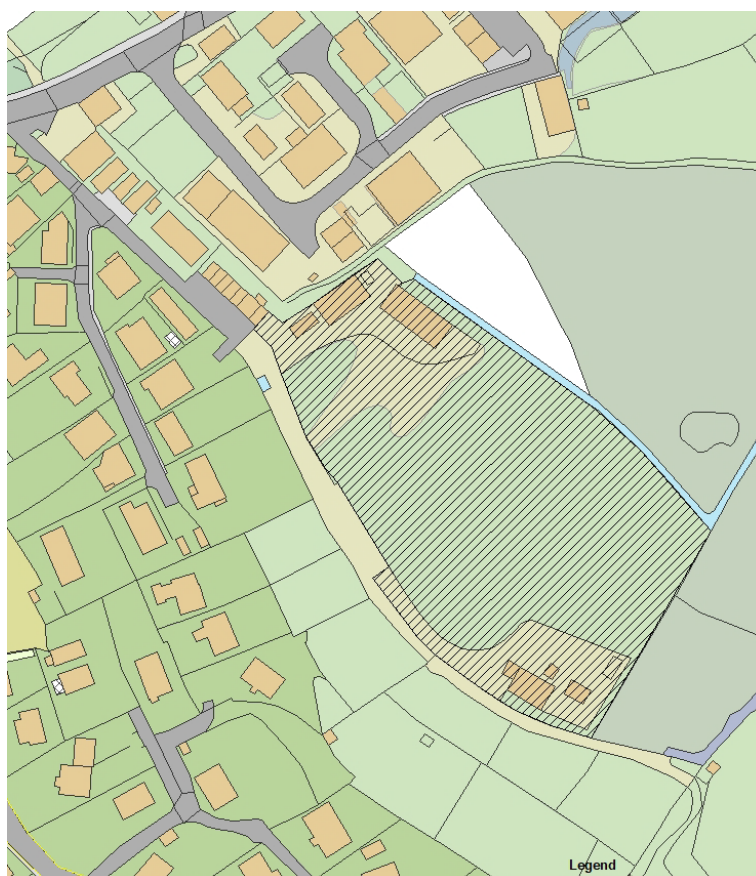
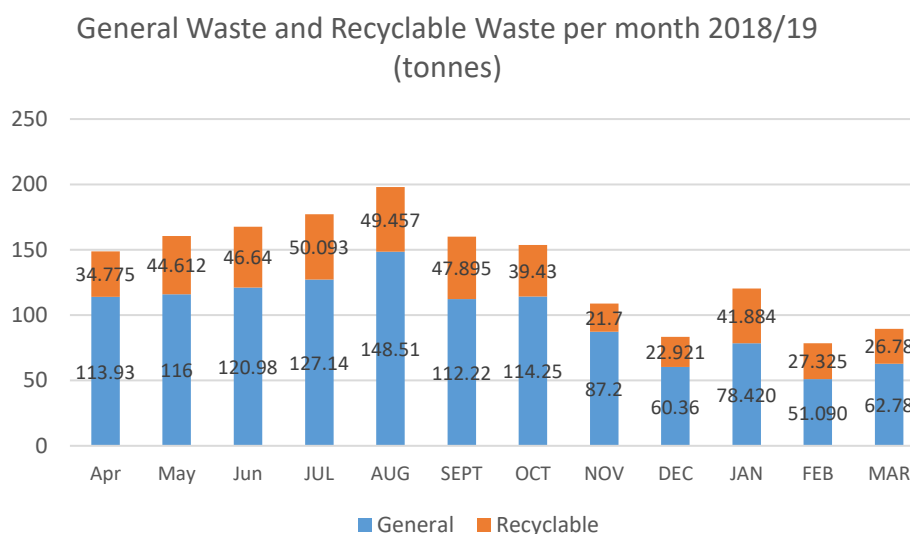


Figure 8 St Mary's Household Waste and recycling centre

⁶ <http://www.scilly.gov.uk/sites/default/files/planning-apps/Infrastructure%20Capacity%20Assessment%20Topic%20Paper%202018.pdf>



29. Waste generated by households and businesses is collected, weighed and containerised. Largely this is collected by the Council's waste collection team, but it does also include waste taken to the existing waste management site by commercial contractors and households. Green waste is diverted to a local composting facility on St Mary's, which is an open 'windrows' arrangement, used to generate compost for a local farm. Around 10 standard 20ft shipping containers of waste are sent to the mainland on a weekly basis, this includes dry mixed recycling of commercial and household waste. Current figures for the amounts of waste that are handled by the Waste Site on St Mary's are set out in the table below for the financial year 2018/2019. This table illustrates that in general waste increases during the peak visitor season (May through October), peaking in August. This suggests that the site can cope with significantly greater amounts of waste through the summer months, relative to that generated by the permanent residential population and businesses.
30. This data illustrates the islands' commitment to increase the diversion rates to recycling facilities. As of September 2018 the diversion rates hit 30% with a steady increase as household kerbside collecting of recyclable materials was rolled out across the islands during the final quarter of the year.





Waste Figures for the Porthmellon Household Waste and Recycling Centre F/Y 2018/19 (Tonnes)

	Apr	May	Jun	JUL	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR
FOR DISPOSAL												
Residual Collections + Off islands	89.54	96.02	111.21	113.42	134.52	94.4	83.52	60.16	50.8	63.260	41.420	48.31
Bulky waste (Civic amenity sites waste : Household)	24.39	19.59	9.77	13.72	13.23	16.62	21.79	26.98	9.56	14.920	9.670	12.43
Street Cleaning	0	0	0	0	0	0	4.42	0	0	0.000	0.000	0
Beach Cleaning	0	0	0	0	0.38	0.6	0	0	0	0.000	0.000	0.99
ASBESTOS	0	0.15	0	0	0	0	0.05	0.03	0	0.120	0.000	0.03
TOTAL	113.93	116	120.98	127.14	148.13	111.62	109.78	87.17	60.36	78.300	51.090	61.76
FOR RECYCLING / REUSE	Apr	May	Jun	JUL	AUG	SEPT	OCT	NOV	DEC	JAN	FEB	MAR
Dry Mixed Recycling	3.38	2.95	3.56	3.453	6.62	3.77	5.36	1.65	12.79	6.880	8.760	9.17
Mixed Glass	16.78	15.41	25.63	26.77	27.47	19.69	12.4	5.91	1.83	7.790	6.830	7.93
Mixed Cans	1.15	0.9	1.29	1	1.63	0.56	0.64	0.46	0.31	0.260	0.480	0.012
Green Garden	6.72	8.62	6.68	7.33	8.95	6.54	7.64	4.14	2.12	10.360	1.150	0
Wee Large	0	4.19	3.08	0.72	0	2.36	2.16	2.01	2.14	1.060	0.000	1.74
Wee Small	0	4.84	1.12	6.8	0	5.12	3.16	0.84	0.111	11.140	0.000	0
Wee Fridges & Freezers	0	1.39	1.04	0.86	0	2.68	0.76	0.64	1.36	1.720	0.000	1.64



Wee GDL	0	0	0	0	0.117	0					0.000	0
Scrap Metal	4.18	3.38	2.08	1	1.91	3.98	3.56	3.91	0.87	0.880	4.710	4.36
Mixed Tyres	0	0.31	0	0	0.1	0	0	0.03	0	0.080	0.080	0
Vegetable Oil	1.18	1.4	1.11	1.11	1.83	0.69	0.8	0.93	0.26	0.114	0.290	0
Clean Flat Glass (CLEAR GLASS)	0.16	0.27	0.05	0.05	0.07	1.38	0.13	0.03	0.21	0.050	1.250	0.49
Household DIY (RUBBLE)	0.09	0	0	0	0	0	0.55	0.37	0.17	0.150	2.490	0
Plasterboard	0	0	0	0	0	0	0	0.03	0	0.150	0.160	0
Batteries (WHEAL ALFRED)	0.02	0	0	0	0	0	0.02	0.00	0	0	0.000	0
Textiles	1.115	0.952	1	1	0.76	1.125	2.25	0.75	0.75	1.250	1.125	1.438
TOTAL	34.775	44.612	46.64	50.093	49.457	47.895	39.43	21.7	22.921	41.884	27.325	26.78
Percentage of Recycled Waste	23%	27.8%	27.8%	28.2%	25%	30%	26.4%	19.9%	27.5%	34.8%	34.8%	30%
TOTAL WASTE	148.705	160.372	167.62	177.233	197.587	159.515	149.21	108.87	83.281	120.184	78.415	88.54

Figure 9 2018/19 Waste materials taken through the Household Waste and Recycling Facility on St Mary's



31. Work is ongoing through the Council's wider remit as a Waste Authority, to find alternative on-island sustainable solutions to the management of waste. This includes potential energy recovery from waste initiatives such as the Organic and Thermal Treatment with Energy Recovery project (OTTER)⁷. Confirmation of part-funding through Growth Deal Funding of the Cornwall and Isles of Scilly Local Enterprise Partnership (CIOS LEP), has been confirmed, with Members approving the match-funding in June 2019 to test the pre-planning application stage to find the right solution for the island. The Council are currently looking at an options analysis to find in-vessel compositing and thermal treatment solutions that meet the particular circumstances of waste management for an island community.
32. Alternative approaches have previously been considered and anaerobic digestion and gasification has previously also gained part-funding by the CIOS LEP, although this as an option has now been discounted and funding withdrawn. This solution was found to be inappropriate for the scale of the communities on the Isles of Scilly and is no longer being considered. The Local Plan does not specifically allocate a site for future energy/waste solutions but does set out criteria based policies for both renewable energy and infrastructure to ensure that the right site could be supported for the best on-island solution for the management of waste.
33. In addition to future on-island solutions together with the existing waste site facility and waste management practices, the Local Planning Authority will also be monitoring the effectiveness of its planning policies. An emerging Local Validation checklist is being prepared which seeks to formally establish, as a validation requirement, the submission of Site Waste Management Plans (SWMPs), to understand how individual development projects manage waste. This is an essential element to monitoring sources of waste and means of waste management and disposal and to understand potential streams of construction, demolition and excavation waste and where these are being re-used on the islands.

Site Waste Management Plan	
Policy Justification	NPPF 2019: Paragraph 20, Local Plan Policy: 2005: Policy 6 2015-2030: Policy SS1, SS2, OE5

⁷ June 2019 Full Council (Agenda Item 11):

<http://committees.scilly.gov.uk/documents/g1125/Public%20reports%20pack%2018th-Jun-2019%2018.00%20FULL%20COUNCIL.pdf?T=10>



Description	A site waste management plan is a document that describes, in detail, the amount and type of waste from a construction project and how it will be reused, recycled or disposed of.
Required where:	A Site Waste Management Plan is needed for all types of proposed development and should demonstrate the efficient use of construction materials and methods so that waste is minimised and any waste that is produced can be re-used, recycled or recovered in other ways before disposal options are explored.
Links to guidance:	Guide to Site Waste Management Plans

Figure 10 Local Validation Requirement, Subject to Public Consultation September 2019

34.

35. The proposed monitoring framework, as set out in the draft Isles of Scilly Local Plan 2015-2030 relies on the submission of sufficiently detailed SWMPs to effectively understand the detailed movement of waste associated with new development proposals to understand impacts upon waste management facilities.

MI-OE5 Monitoring Indicator - Waste Management					
Monitoring Indicator	Target	Trigger for review	Data Source	Local Plan Aims	Links to SA objectives
No of approvals supported by SWMPs	No Target	No Trigger	AMR	1, 5, 6, 7	1, 4, 6, 7, 10a
No of refusals on the basis of unsatisfactory measures for dealing with waste management or unacceptable burden on existing waste management infrastructure	No Target	No Trigger	AMR	1, 5, 6, 7	1, 4, 6, 7, 10a
No of approvals supported by Sustainable Design Measures that include water/waste/energy-reduction measures	No Target	No Trigger	AMR	1, 5, 6, 7	1, 4, 6, 7, 10a

Figure 11 Extract from the Draft Isles of Scilly Local Plan 2015-2030 Monitoring Framework

Cornwall Local Plan: Strategic Policies 2010-2030

36. Cornwall's Local Plan Policy 19 on Strategic waste management principles requires "Proposals must show best solution having regard to the 'waste hierarchy'". To support this, Policy 13 requires "Sufficient and convenient space for storage for waste, recycling and compostables".

Meeting Waste Management Transport Needs

37. Both the Council of the Isles of Scilly and Cornwall Council support the maintenance and improvement of transport links. As such the management of waste over the plan period is supported, between Cornwall and the Isles of Scilly, although there are no specific strategic plans proposed.

Strategic Issue	Council of the Isles of Scilly	Cornwall Council
Protection of essential transport links between	Making planning decisions in accordance with Draft	Making planning decisions in accordance with Cornwall's



Cornwall and the Isles of Scilly in order to ensure the islands' waste management routes are safeguarded.

Isles of Scilly Local Plan
2015-2030

Local Transport Plan for 2010-
2030 and Cornwall Local Plan
2015-2030



Strategic Management of Minerals

38. Both the Council of the Isles of Scilly and Cornwall Council are Unitary Authorities and therefore have minerals planning responsibilities. Paragraph 203 of the NPPF requires local planning authorities to plan for a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.
39. At present there are no active quarries within the Isles of Scilly, and there is no specific requirement to construct out of locally sourced primary materials, although there will continue to be some demand for local stone even with modern construction methods. Local stone can be key characteristic of the vernacular of the islands in the built environment as well as stone bound hedges, which form an important aspect of the islands' distinctive landscape.
40. In order to ensure that the built tradition, character, distinctiveness and historic environment of the islands is conserved and enhanced, encouragement will be given to the use of locally sourced and sustainable materials with an emphasis on re-use of recycled and secondary materials. This is advocated in both Policies OE6 and OE7 and the requirements for Site Waste Management Plans. The policies establish an appropriate and proportionate approach in the context of the NPPF, which advocates a steady and adequate supply of aggregates. Given the scale of development anticipated over the plan period and its exceptional environmental quality it would be inappropriate to advocate aggregate extraction, on the Isles of Scilly.
41. In the absence of direct extraction on the Isles of Scilly, it is understood that materials will continue to be shipped to the islands through existing transport connections with Cornwall, regardless of the origin of the material. In comparison to the scale of development established in the Cornwall Council Local Plan, the quantity of minerals and materials travelling through mainland Cornwall destined for the islands, to fulfil its development needs, would not result in a significant or adverse impact to the quarries or communities of mainland Cornwall.
42. In 2019 the Isles of Scilly produced a Minerals Assessment Paper to set out the rationale for not seeking to plan for direct mineral extraction on the islands. This assessment concluded that there are constraining circumstances that justify taking this position, including:
- The highly constrained environment, in terms of Natural and Historic Designations;



- The sensitive nature of the position of legacy quarry sites, which would have a significant impact upon the tranquillity of the islands and therefore its community and economy;
- The poor quality of local minerals as quality building materials; and
- The small amount of development proposed in the plan.

43. In addition to the above issues the local plan does not advocate complete construction of buildings in local materials. The character of modern property has very much moved away from traditional granite construction on the basis of sufficient local supply and its problems as a building stone. Rather local granite is used primarily in the construction of boundary walls and used as a feature or finishing material for key details on buildings, such as quoins and window and door lintols for example. Other local materials are used but primarily crushed aggregates and recycled sources for surfacing tracks and lanes.
44. Legacy and historic quarry sites on St Mary's, have been disused for many years with the only operational site, at Pendrethen (approximately 4800m²), used for the processing of legacy quarried stone and inert construction and demolition waste for island construction projects. These sites are generally located in areas now close to residential properties or designated sites.
45. In 2019 the Council contacted individuals, businesses and organisations who are known to be involved in construction and development on the islands. A total of 17 surveys were sent out to understand the current picture of where building materials are sourced from, for island-based construction projects and whether there is a reliable source of recycled/reclaimed materials. A copy of the survey sent out is appended at appendix A. In total the response rate was 11% and the results have been included in appendix B.

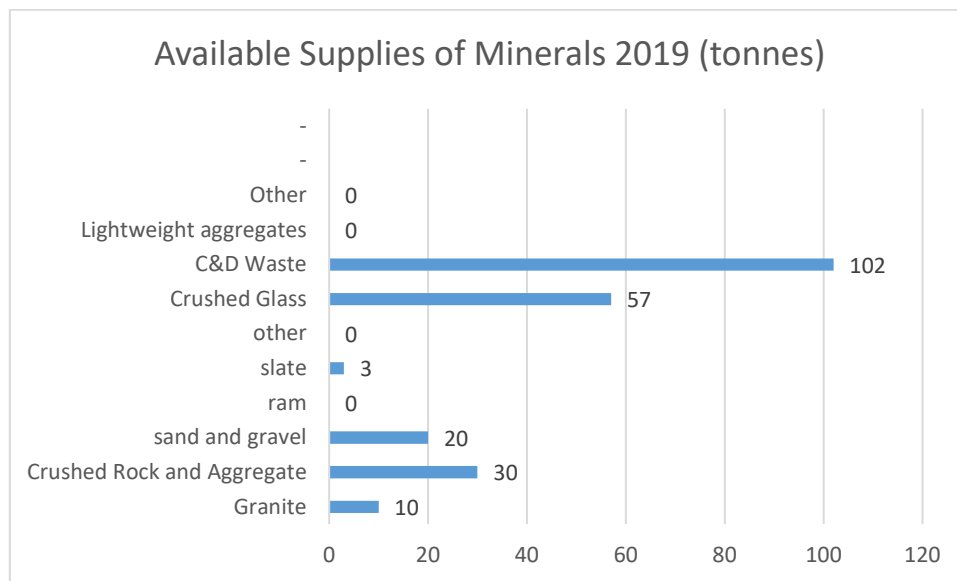


Figure 12 Survey results of known supplies of Minerals 2019

46. Whilst responses to this survey were limited it does demonstrate that in addition to recycled materials produced at the Pendrathen site, there are some sources of material already obtained locally including the 10 tonnes of granite and 30 tonnes of crushed rock and aggregate at Pendrathen. Sand and gravel aggregates are not available from local sources and rely on import supplies only. There is small supply of reclaimed slates, with an estimate of 3 tonnes, but these are also imported. Through the Council's recycling there is currently an estimated 57 tonnes of crushed glass, which is used as a non-structural aggregate in building projects. Finally, an estimate of 102 tonnes of crushed construction and demolition waste is available on the islands through existing retained supplies, including materials stored on the Carn Thomas Secondary School site, which was demolished in 2017.
47. Cornwall Council have established through their assessment of minerals, a supply large enough to meet development needs for a period of 150 years. In order to utilise this as a supply of minerals to support the approach of not seeking to re-establishing quarrying activities on the Isles of Scilly, both authorities have agreed a Memorandum of Understanding (MoU). This establishes that development on the islands could utilise the established minerals supplies of Cornwall over the plan period.

Draft Isles of Scilly Local Plan 2015-2030

48. The management of minerals on the Isles of Scilly is covered in section 3 (Our Outstanding Environment) of the Local Plan through specifically Policy OE6 (Minerals). This policy strongly advocates the use of both recycled and reclaimed traditional and natural materials before direct extraction. It is also a requirement of this policy to include a Site Waste Management Plan for any development proposal. The target for this policy is to seek to achieve 100% of local materials using



reclaimed/recycled local stone or new materials from Cornish/South-West locations. The trigger for reviewing this would be an increasing trend of materials coming from other parts of the UK and overseas.

49. Policy OE6 sets out the expectations with regard to the management of minerals over the plan period.

Policy OE6 Minerals

Support will be given to the supply of indigenous minerals to meet local construction needs on the islands, including traditional materials, through the use of recycled and secondary materials to restrict the requirement for any direct extraction. Site Waste Management Plans (SWMP) will be required to include measures to recycle and recover inert construction, demolition and excavation materials for reuse as an aggregate for building works, thereby also reducing transportation costs and carbon emissions.



Cornwall Local Plan: Strategic Policies 2010-2030

50. As the Isles of Scilly will be reliant on minerals from the south west, it is important to understand how Cornwall Council's Local Plan sets out safeguards for minerals. Its provisions are contained within Strategic Policies 17 and 18 and Minerals Safeguarding DPD Policy MS1:

Policy 17: Minerals - general principles

1. *Support will be given to maintain and grow a world class, thriving and sustainable minerals industry in Cornwall which meets local needs as well as exporting minerals, predominantly by rail and sea, to serve regional, national and international markets.*
2. *A sufficient supply of indigenous minerals will be maintained to achieve sustainable and economic growth, whilst encouraging the use of recycled and secondary materials, particularly secondary aggregates from china clay (kaolin) production, to minimise the requirement for new extraction.*
3. *New mineral development, (including extensions to existing sites) will be supported in the following areas:*
 - a. *China clay (kaolin) and secondary aggregate extraction in the St Austell (Hensbarrow) China Clay Area;*
 - b. *Primary aggregate extraction where it is outside the AONB designation; and*
 - c. *throughout Cornwall for:*
 - i. *Building, roofing, heritage and*
 - ii. *ornamental stone,*
 - iii. *Metal and industrial minerals,*
 - iv. *Primary aggregate development for particular grades of material not provided for by other permitted reserves.*
4. *Improved and more efficient working practices at existing minerals sites will be supported.*
5. *Mineral recycling and recovery facilities will be supported where they fall within well screened areas at currently operational quarries and landfill sites.*
6. *Mineral development should have no adverse impact on: slope stability, differential settlement of quarry backfilling, and mining subsidence.*
7. *All mineral development should enable progressive and effective reclamation at the earliest opportunity, taking into account aviation safety, for appropriate and beneficial afteruses that:*
 - i. *Contribute to and enhance the natural and local environment including, ecosystem services and networks,*
 - ii. *Conserve and enhance heritage assets and protect and enhance valued landscapes, geological conservation interests and soils; and*
 - iii. *Have the potential for wider community benefits.*



51.

Policy 18: Minerals safeguarding

- 1. Important mineral resources and reserves and existing, planned and potential bulk transport, storage, handling and processing facilities and sites shall be safeguarded from sterilisation by other forms of incompatible development.*
- 2. Mineral Safeguarding Areas will be identified for the following minerals resources and reserves;*
 - a) aggregates (both primary and secondary),*
 - b) china clay,*
 - c) building and ornamental stone (including roofing and heritage materials) and*
 - d) metals (including relevant shafts and adits),*
- 3. Mineral Safeguarding Areas will be identified for the following existing, planned and potential mineral infrastructure;*
 - a) key concrete batching and other products and roadstone coating,*
 - b) Storage, handling, processing and distribution of minerals,*
 - c) the bulk transport of minerals by rail, sea (ports) or haul roads.*

The Cornwall Minerals Safeguarding Development Plan will develop detailed policy and identify sites for safeguarding minerals, mineral resources and associated facilities for transport, storage, handling and processing for onward transport by rail or sea. Key sites used for the batching / manufacture of concrete products and coated materials will also be identified for safeguarding as well as sites for processing and the distribution of substitute recycled and secondary aggregate materials. Policy will also be developed to encourage prior extraction where appropriate

Policy: MS1

Mineral resources and infrastructure within Mineral Safeguarding Areas defined on the Policy Map shall be safeguarded from sterilisation.

Planning permission for non-mineral development will only be permitted within Mineral Safeguarding Areas where it can be demonstrated that;

- a) the proposed development would not conflict with mineral related use of the site or infrastructure; or*
- b) the applicant has demonstrated, to the satisfaction of the mineral planning authority, that the mineral resource or infrastructure is not of current or potential economic value or that the mineral resource is not of value for heritage uses; or*
- c) the mineral resource can be satisfactorily extracted prior to the development taking place; or*
- d) that the mineral resource or infrastructure will not be subject to unacceptable detrimental effects and the proposed development would not suffer unacceptable adverse impacts as a result of the mineral operations; or*
- e) there is overriding strategic need for the non-mineral development that outweighs the need to safeguard the minerals; or*
- f) the non-mineral development within the Mineral Safeguarding Area is exempt as set out in the exemption list in paragraph 81.*



Meeting Minerals Management Transport Needs

52. Both the Council of the Isles of Scilly and Cornwall Council support the maintenance and improvement of transport links. As such the management of minerals over the plan period is supported, between Cornwall and the Isles of Scilly, although there are no specific strategic plans proposed.

Strategic Issue	Council of the Isles of Scilly	Cornwall Council
Protection of essential transport links between Cornwall and the Isles of Scilly in order to ensure the islands' minerals routes are safeguarded.	Making planning decisions in accordance with Draft Isles of Scilly Local Plan 2015-2030. Monitoring Policy MI-OE5 and monitoring the source of minerals and materials for development proposals	Cornwall's Local Transport Plan for 2010-2030 and Cornwall Local Plan 2015-2030



Compliance with the Duty to Co-operate

53. The Council of the Isles of Scilly and Cornwall Council have engaged constructively and regularly with each other, throughout the preparation of the Isles of Scilly Local Plan 2015-2030. In accordance with statutory requirements and in recognition of the joint strategic issues which are faced by both authorities.
54. This Statement of Common Ground sets out the following as strategic issues that Cornwall Council and the Council of the Isles of Scilly are in agreement on, as signed up to above:

Strategic Issue	Council of the Isles of Scilly	Cornwall Council
Protection of essential transport links between Cornwall and the Isles of Scilly in relation to ensuring a sustainable future for the islands' communities.	Making planning decisions in accordance with Draft Isles of Scilly Local Plan 2015-2030	Cornwall's Local Transport Plan for 2010-2030 Cornwall Local Plan 2015-2030
Protection of essential transport links between Cornwall and the Isles of Scilly in order to ensure the islands' waste management routes are safeguarded.	Making planning decisions in accordance with Draft Isles of Scilly Local Plan 2015-2030	Cornwall's Local Transport Plan for 2010-2030 Cornwall Local Plan 2015-2030
Protection of essential transport links between Cornwall and the Isles of Scilly in order to ensure the islands' minerals routes are safeguarded.	Making planning decisions in accordance with Draft Isles of Scilly Local Plan 2015-2030. Monitoring Policy MI-OE5 and monitoring the source of minerals and materials for development proposals	Cornwall's Local Transport Plan for 2010-2030 Cornwall Local Plan 2015-2030



55. There are no other strategic issues identified that require the Council of the Isles of Scilly and Cornwall Council to co-operate on in relation to the Isles of Scilly Local Plan 2015-2030.
56. Appendix 1 of this document presents the various amendments proposed by both sides and an agreed position. Subject to the proposed amendments (as set out in Appendix 1) being made to the Isles of Scilly Local Plan 2015 – 2030 and the evidence on waste and minerals referred to herewith, Cornwall Council is satisfied that its representations to the Isles of Scilly Local Plan 2015-2030 have been addressed and there are no outstanding issues.
57. Appendix 2 is a Memorandum of Understanding (MoU) between Cornwall Council and the Council of the Isles of Scilly to enable the islands to make use of minerals supplies within Cornwall.



Appendix 1

58. Consultation Responses in connection with the evolution of the Isles of Scilly Local Plan can be viewed in the links in the table below.

Consultation	Cornwall Council Response	Council of the Isles of Scilly Response
<u>Local Plan Review – Scoping Report (Reg 18) 2015</u>		
Public Consultation on the commencement of the review of the 2005 Local Plan. The scoping report set out the 'issues' for the islands over the plan period.	We support the overall emphasis in the Scoping Report in reflecting the National Planning Policy Framework. In particular we also welcome the recognition at paragraphs 1.8 and 3.26 of the Duty to Co-operate between neighbouring planning authorities and the undertaking at paragraph 1.12 to continuous engagement with statutory consultees including Cornwall Council. Cornwall Council is committed to ongoing dialogue as both the Isle of Scilly Local Plan Review and the Cornwall Local Plan progress.	The respondent's comments are noted.
Transport	In particular, we support the inclusion of an Objective "to secure resilient, year-round transport services to Cornwall ..." and we will continue to engage with you on the land use implications.	The respondent's comments are noted.
Waste Management	We also welcome policy seeking to move the processing of waste up the waste hierarchy by providing policy for re-use and recycling as well as exploring the possibilities for energy recovery on the islands.	The respondent's comments are noted.



Draft Isles of Scilly Local Plan 2015 – 2030 (Reg 18) 2018

<p>Second round of public consultation of the issues and options for the draft local plan.</p>	<p>Duty to Co-operate</p> <p>Cornwall Council welcomes the opportunity to respond to the draft Local Plan for the Isles of Scilly and the acknowledgment of the Duty to Co-operate and the close working relationship between our two authorities, which we are keen to sustain.</p> <p>Para 12 refers to our comments on the 2015 Scoping consultation. We stand by these comments and are pleased to see the 2018 consultation draft reflects them.</p> <p>As the draft plan has advanced we provide a more detailed response below. If there are any aspects of our response which you would like clarification on please do not hesitate to contact us for clarification. Cornwall Council is committed to ongoing dialogue as the Isle of Scilly Local Plan Review and the Cornwall Local Plan (partial) Review (commencing this year) progress.</p>	<p>Noted</p>
<p>Transport</p>	<p>Strategic transport links to the mainland</p> <p>Policy 27 of the Cornwall Local Plan states major development proposals should "...Safeguard land for the delivery of strategic transport opportunities including land around existing facilities to allow for expansion and use for future sustainable modes of travel e.g. closed branch rail lines and links to the Isles of Scilly...." Also PP1</p> <p>Objective 3 for the West Penwith Community Network Area includes to "...Support in principle the long term future of ... the provision of air and sea routes to the Isles of Scilly...".</p> <p>The emerging Cornwall Site Allocations DPD is currently at examination. Para 3.11 of the draft DPD recognises the harbour at Penzance is of strategic importance, with the former providing the only freight and passenger ferry link to the Isles of Scilly. Para 3.22 highlights the economic function of the ferry link.</p>	<p>Revise Policy SS10 and paragraph 80 to strengthen its support for new infrastructure that will enhance the resilience of strategic transport links to the mainland.</p>



	<p>Strategic Aim 7 for Penzance and Newlyn includes “To maintain and improve the area’s strategic transport connections with the Isles of Scilly”. Para 3.30 specifically states that development must “maintain the efficient operation of the Penzance to Isles of Scilly ferry link.”</p> <p>We agree that the Vision should reflect the importance of movement between the islands and the mainland (para 65) including the statement at para 70/Vision on affordable, resilient and reliable travel throughout the year to be achieved through improvements. Particular support is given to Strategic Aim 2 and Strategic Aim 5: Objective 5 (para 71) on the basis that they foster strategic transport infrastructure.</p> <p>We agree that “Strategic transport links to the mainland are fundamental to the future sustainability and viability of the islands...” (IoS draft paras 60 and 140) and consider that the Local Plan should include a positive policy approach for infrastructure which will support strategic transport links to the mainland. Draft Policy SS10 is welcomed and we request that this is strengthened by explicit support for new infrastructure that will enhance the resilience of strategic transport links to the mainland. There is also an opportunity to make a more positive statement in the last sentence of para 80.</p>	
Waste Management	<p>Waste and energy</p> <p>We welcome the support that the draft Plan gives to the Smart Islands programme. Smart Islands will enable new methods that reduce the environmental impacts of waste disposal and generate energy from the waste, thereby improving energy resilience and help drive waste management up the waste hierarchy and support the proximity principle (ambitions of the National Planning Policy for Waste).</p> <p>We support the requirement of a Site Waste Management Plan through draft Policy SS2 and</p>	<p>Revise policies SS2 and OE6 accordingly</p>



	<p>suggest this is extended to include where buildings are to be demolished and rebuilt.</p> <p>Draft Policy OE6 requires development to “...include waste management solutions that have regard to the waste hierarchy...”. We recommend that the wording is strengthened. For example, Cornwall Local Plan Policy 19 states “Proposals must show best solution having regard to the ‘waste hierarchy...’.</p> <p>The preference for on-island construction waste management (where appropriate) at draft Policy OE6 is supported.</p> <p>We recommend a policy seeking the provision of recyclable waste storage in relevant new developments is included.</p> <p>Draft Policy SS8 is welcomed in its support for enhancing the resilience of the islands through renewable energy.</p>	
Minerals	<p>Minerals</p> <p>We welcome the support for the supply of indigenous materials through the use of recycled and secondary materials (according with NPPF para 143) and the requirement to recycle and recover construction / demolition / excavation (material) for reuse. The word “material” (or similar) appears to be missing from draft Policy OE7 however. We recommend “as an aggregate” is removed so that the policy can encompass the reuse of other materials e.g. building stone/quoins or roofing materials.</p>	Amend Policy OE7 accordingly



Pre-Submission Draft Isles of Scilly Local Plan 2015 – 2030 (Reg 19)

Page	Para	Policy	Sound/ Unsound	Reason	Comments	LPA Response	CC Response
38					Thank you for consulting Cornwall Council on the Pre-Submission Draft of the Isles of Scilly Local Plan. We thank you for taking previous consultation comments on board and support the direction of the plan including the Aims as they promote sustainable development and increased resilience of the Isles of Scilly. Resilience is to be fostered in particular by draft policies SS1-10, OE5-6, LC1, WC1 and WC5.	Noted	
	10				We concur that the Council of the Isles of Scilly has worked closely with Cornwall Council in fulfilling the Duty to Cooperate. There has been an ongoing relationship both during and between statutory consultation periods. Aim B4 of the adopted Cornwall Maritime Strategy recognises the importance of the relationship between mainland Cornwall and the Isles of Scilly as it seeks to “Continue to encourage and support cross-border integration and cooperation with the Isles of Scilly...”	Noted	
	12				Cornwall Council is continuing to contribute to the Statement of Common Ground. This focuses on transport, waste and minerals as areas of joint interest and is nearing completion. We request that our current comments are read alongside the completed Statement of Common Ground which includes the mainland Cornwall planning policy context. The issues raised here do not undermine the Statement of Common Ground but are additional points we wish to raise to enhance the emerging Local Plan, areas of the draft plan we particularly wish to endorse or supporting context.	Noted	
	5				For context we note that Cornwall Council's contributions have also influenced the plan preparation in addition to feedback from communities, businesses and visitors.	Noted	



	85				Aim 1 Objectives could be strengthened by stating that new development will be designed to ensure a net-gain for biodiversity (in line with para 118 of the NPPF). This may not be necessary should the Government successfully implement its plans to mandate biodiversity net-gain in developments as set out in the Spring Statement March 2019.	Accept - make changes	
	93				Cornwall Council endorses this paragraph. The year-round strategic transport links between mainland Cornwall and the Isles of Scilly are of the utmost importance to the islands' resilience for the benefit of resident and businesses. The use of the links by visitors helps to support the services. The adopted Cornwall Maritime Strategy supports the ferry link between mainland Cornwall and the Isles of Scilly though aim F1.	Noted	
	102				The intent of this paragraph is supported. However, it is noted that the pre-submission plan does not identify or safeguard sources of local materials to meet this objective.	Noted	
		SS2			Cornwall Council supports the intention of this draft policy in terms of using locally sourced materials, however we note that the pre-submission plan does not identify or safeguard sources of local materials to meet this policy aim.	Noted	
	116	SS3			Cornwall Council supports the re-use of traditional building materials as a sustainable approach (in accordance with NPPF paras 148 and 204).	Noted	
64	169	SS10 and WC5			We agree links from the mainland to the islands are essential for sustainable living and businesses including tourism. Use of the transportation links by tourists helps to maintain them. Cornwall Council strongly supports draft Policy SS10 which provides a consistent approach to the NPPF (paras 20 and 104) and Cornwall Local Plan Policy 27 which states major development proposals should "...Safeguard land for the delivery of strategic transport opportunities including land around existing facilities	Noted	



					to allow for expansion and use for future sustainable modes of travel e.g. closed branch rail lines and links to the Isles of Scilly....” Also Cornwall Local Plan’s PP1 Objective 3 for the West Penwith Community Network Area includes to “...Support in principle the long term future of ... the provision of air and sea routes to the Isles of Scilly...”.		
69	179				The natural environment is a key draw for tourists and we also support policies that protect and enhance the natural assets of the islands. Paragraph 179 could be strengthened by stating that opportunities for a net-gain for biodiversity will be encouraged (in line with NPPF para 118). This may not be necessary should the Government successfully implement its plans to mandate biodiversity net-gain in developments as set out in the Spring Statement March 2019.	Accept - make changes	
76	199-203	OE4			<p>Cornwall Council welcomes the inclusion of a policy on protecting Scilly’s dark night sky. This is consistent with para 180 of the NPPF and Cornwall Local Plan Policy 23. Discussions are underway with the International Dark-Sky Association on establishing a new international dark sky designation(s) for west Cornwall and the Isles of Scilly. As well as visual, wildlife and human health benefits, such status is expected to bring potential for extending the tourist season into the darker months (as encouraged by draft Policy WC5) and further support year-round strategic transport connections (as also supported by draft Policy SS10).</p> <p>Para 201 of the draft plan advises that guidance will be provided in the form of a Supplementary Planning Document. We recommend that this is developed with reference to the latest advice provided by the International Dark-Sky Association.</p>	Noted	



77	204 and 212	OE5			<p>We support the wording and aims of the draft policy, in particular the requirement for a Site Waste Management Plan and the strengthening in wording by adding “best practice” with regard to the waste hierarchy. We welcome the inclusion of provisions for the separation of recyclable waste as this encourages recycling rates.</p> <p>We recommend publishing proportionate evidence in support of Policy OE5 and statements in the supporting text. Such evidence could comprise a simple needs assessment looking at the amount of waste that each of the islands produce, the capacity of the existing facilities on the islands and the projected future demand over the plan period is needed. We acknowledge that a large part of the Isles of Scilly’s waste is exported and this should set out the level exported and what happens to it. We recommend the evidence references the National Planning Policy for Waste.</p> <p>We query the need for the following text in para 204 “It is challenging to work collaboratively with other planning authorises to combine waste collection and management practices” as we understand that there are already agreements in place with Cornwall Council /Suez to accept and manage the islands’ exported waste.</p>	Partially Accept and delete sentence as suggested. The LPA are working with Waste and Recycling colleagues to publish figures as suggested.	
80	214				It is not clear, from the evidence published to support the plan, whether mineral resources remain at the sites named in this paragraph or whether these sites have extant mineral planning permission.	Accept - amend paragraph to clarify that these sites are no longer active and do not have extant permission for extraction.	
80	215				It is noted that, since there are no active quarries, at present demand is satisfied by procuring stone and other building materials from the mainland or informal stockpiles on the islands.	Noted	



80	216				<p>The intent of this paragraph is supported. However, it is noted that the pre-submission plan does not identify or safeguard sources of local materials to meet this objective.</p> <p>Whilst it is recognised that the extraction of aggregate minerals is not appropriate, and given Cornwall's adequate land bank – which has the ability to address the islands' needs – the emerging Plan does not take into account the need for traditional building materials for local construction.</p>	Noted - further collaborative working to establish utilising Cornwall's land bank. For clarification there are no safeguarded minerals sources on the islands.	
81	217				<p>Cornwall Council supports the collection of data on the tonnages of usable material arising from construction, which will provide a valuable evidence base. We recommend that data collected on material available as construction and demolition waste should include re-used/recycled building stone as well as aggregate.</p> <p>The collection of data also does not negate the need for indigenous materials particularly for building materials such as roofing or walling stone, especially in order to maintain the character and identity of the islands.</p> <p>To avoid confusion, we recommend that the data collection requirement for site waste management plans is not called a local aggregate assessment as this is the term used in the NPPF for long term aggregate monitoring reports prepared by Mineral Planning Authorities.</p>	Accept - make changes to delete reference in paragraph 217 and monitoring to Local Aggregate Assessment.	
81		OE6			<p>We welcome the support for minerals to meet the construction needs of the islands including traditional materials; however whilst the use of reclaimed and recycled materials is encouraged, it is unlikely that this will be sufficient to satisfy the construction needs over the plan period. Materials may vary in appearance, lithology or texture and therefore may</p>	noted	



				<p>not be suitable. The Plan is not accompanied by evidence to assess supply and demand including past production and future requirements.</p> <p>It would appear that draft Policy OE6 is concerned with waste (re-use, recovery and recycling) rather than minerals. The Plan does not appear to address what happens where there is insufficient recycled or secondary materials for the development envisioned over the plan period. There will also be a need for traditional building materials to either restore or repair existing buildings but also to ensure that new development reflects the character of the islands.</p> <p>The second part of the policy is concerned with Site Waste Management Plans and we query the usefulness of including this within draft Policy OE6.</p>		
				<p>The NPPF states that planning policies should safeguard mineral resources by defining Mineral Safeguarding Areas, and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development.</p> <p>The pre-submission plan does not present any evidence to address the need for mineral safeguarding. It is noted in para 214 that mineral extraction has taken place at sites on St Mary's and therefore evidence could be provided to consider the future potential of these sites.</p> <p>There is an opportunity to ensure that the traditional character and identity of the islands is maintained by ensuring that materials are available to meet construction and restoration needs in the future. This could be achieved through the identification of old, dormant or relic quarries or those quarries with recent or extant planning permission which may be able to supply stone on a small scale and should be</p>	noted	



					<p>safeguarded from other forms of development. Cornwall Council's recently adopted Mineral Safeguarding DPD identifies 'heritage quarries' and a similar methodology for the identification of such sites on the islands could be used.</p>		
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