Fosse Green Energy

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Preliminary Environmental Information Report

VOLUME

3

Appendix 12-C: Minerals Assessment Report

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Prepared for:

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1. Introduction

1.1 Purpose of this Appendix

1.1.1 This appendix of the Preliminary Environmental Information (PEI) Report comprises a Minerals Assessment Report ("this Report") prepared to address comments made by Lincolnshire County Council in the Secretary of State's **Scoping Opinion** on the Proposed Development (refer to **PEI Report Volume 1, Appendix 1-B**). Lincolnshire County Council is the Mineral Planning Authority and as such, it is responsible for mineral safeguarding, minerals consultation areas and minerals site allocations.

1.1.2 The Proposed Development is partially located within a Mineral Safeguarding Areas (MSA) for sand and gravel and limestone and lies in proximity to sand and gravel minerals sites at Whisby Quarry, Swinderby Airfield and Norton Bottoms Quarry as shown on **Figure 1** (Annex A of this Report).

1.2 Scoping Request

1.2.1 The Scoping Request accompanied by a **Scoping Report** (**PEI Report Volume 3, Appendix 1-A**) was submitted to the Planning Inspectorate on 20 June 2023, to formally request an Environmental Impact Assessment (EIA) Scoping Opinion for the installation of solar photovoltaic (PV) generating panels and on-site Battery Energy Storage System (BESS) and associated infrastructure on land approximately 9 kilometres (km) south-west of Lincoln.

1.2.2 Chapter 13: Socio Economics and Land Use of the Scoping Report (**PEI Report Volume 3, Appendix 1-A**) set out the scope and methodology for the Socio-Economics and Land Use assessment of the Proposed Development. Paragraph 13.7.1 of this chapter proposed that impacts to Minerals Safeguarding Areas were scoped out of the assessment on the basis that the Proposed Development is unlikely to have any impact on the mineral resource at Swinderby Airfield or Norton Bottoms Quarry since neither are located within the Site Boundary. Despite this, this Report has been prepared in response to comments made by Lincolnshire County Council as outlined in Section 1.3.

1.3 Minerals and Waste Planning Authority's Comments

1.3.1 Lincolnshire County Council submitted a formal consultation response to the EIA Scoping Report for the Proposed Development on 17 July 2023, and made the following comments in relation to minerals and waste (see **PEI Report Volume 3, Appendix 1-B: EIA Scoping Opinion**):

"When reviewing the submitted scoping report, it is noted that in Para 13.7 the impacts upon Minerals Safeguarding Areas have been scoped out. It appears that the consideration of safeguarding has been limited to potential

effects upon sites allocated in the Lincolnshire Minerals and Waste local Plan: Site Locations document (2017), namely MS04-LT: Swinderby Airfield, Witham St Hughes and MS05 LT Norton Bottoms Quarry Stapleford. The report fails to take account of Policy M11 of the Core Strategy and Development Management Polices document 2016.

The proposed development is partially located within a Mineral Safeguarding Area (MSA) for both Sand and Gravel and Limestone and is therefore subject to Policy M11 (Safeguarding of Mineral Resources) of the Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management Policies - adopted June 2016. The Core Strategy is available to download from the County Council's website: www.lincolnshire.gov.uk. Within a MSA, except for the exemptions set out in Policy M11, applications for non-minerals development should be accompanied by a Minerals Assessment.

A Minerals Assessment should provide an appropriate assessment of the mineral resource, its potential for use in the forthcoming development and an assessment of whether it is feasible and viable to extract the mineral resource ahead of development to prevent unnecessary sterilisation. Where prior extraction of some or all of the mineral can be undertaken, the assessment should also include an explanation of how this will be carried out as part of the overall scheme. The assessment should also assess the potential for proximal sterilisation of mineral resources in adjacent land. Where mineral resources would be sterilised by a proposal, Policy M11 sets out the tests that need to be met in order to enable planning permission to be granted.

The potential sterilisation of mineral resources should therefore be 'scoped in' to the EIA and addressed through a minerals assessment as part of the ES. We would expect this to be proportionate to the proposals. For developments of this nature there are generally differing impacts from the solar fields and the grid connections. In the first instance there is the potential to sterilise the mineral resource (on site and proximally) as a consequence of the significant land take proposed by the solar panel development. The proposed grid connection corridors, however, may require other factors to be taken into account where the connection options pass through the Mineral Safeguarding Areas. Whilst the final footprint of the grid connection may be limited, by dissecting the MSA it could introduce a constraint to the potential for any future extraction of the sand and gravel / Limestone resources in the surrounding land. The minerals assessment as part of the ES should therefore include consideration of this matter and it should be given due consideration when determining the final route/method of the grid connection".

1.3.2 The purpose of this Report is to address the comments from Lincolnshire County Council in the Scoping Opinion.

1.4 Report Structure

1.4.1 The remainder of this report is structured as follows:

a. Section 2 describes the Proposed Development and the need for the Proposed Development;

b. Section 3 sets out potentially safeguarded mineral resources within the Site Boundary and the location of minerals safeguarding areas and allocated minerals sites in relation to the Proposed Development;

c. Section 4 sets out relevant national and local planning policy;

d. Section 5 provides an assessment of the Proposed Development against planning policy; and

e. Section 6 sets out the report conclusions.

2. The Proposed Development

2.1 Description of the Proposed Development

2.1.1 The Proposed Development comprises the construction, operation and maintenance, and decommissioning of a solar PV electricity generating facility, with on-site BESS and other associated infrastructure, with a total capacity exceeding 50 megawatts (MW), along with an import and export connection to the national transmission network at the proposed Navenby substation.

2.1.2 The Proposed Development is located approximately 9km to the south and south-west of Lincoln City Centre, in proximity to the villages of Thorpe on the Hill, Witham St Hughes, Haddington, Thurlby, Navenby, and Bassingham. The Site comprises approximately 1,426 hectares (ha) of land and constitutes the 'Principal Site' (which includes the 'Solar PV Array Area' and 'Interconnecting Cable Corridors') and a 'Cable Corridor'. The Site is wholly located within North Kesteven District, Lincolnshire. The boundary of the Site is referred to as the 'Site Boundary'.

2.1.3 The operational life of the Proposed Development is 60 years and once decommissioned, the land will be returned to the landowners and will be available for its original use. In terms of cable decommissioning, currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities.

2.1.4 The Principal Site covers approximately 1,065ha and will comprise a series of Solar PV Array Areas and Interconnecting Cable Corridors containing ground-mounted solar PV panels, BESS, and associated infrastructure such as internal tracks, inverters, transformers, switchgear, and an Onsite Substation. The Interconnecting Cable Corridors comprise buried 33 kilovolt (kV) cables which will transport the electricity generated from the solar PV and stored in the BESS to the Onsite Substation, where it is gathered and the voltage is stepped up prior to transmission via the connecting cable. The proposed area for the Solar PV Array is shown on **PEI Report Volume 2, Figure 3-2A** and **Figure 3-2B**.

2.1.5 The Cable Corridor partly overlaps with the Principal Site and covers approximately 407ha; it is the area within which the 400kV connecting cables will be installed, linking the Onsite Substation to National Grid's proposed substation at Navenby, approximately 10km south-east of the Principal Site. The Grid Connection Cable will be installed using an open trench method (with discrete areas of horizontal directional drilling) requiring a 30m to 40m working width, with indicative cable trench dimensions being: 0.8–1.2m depth and 1.2–5m wide depending on the number of cable circuits within the trench.

2.1.6 A full description of the Proposed Development is set out in **PEI Report Volume 1, Chapter 3: The Proposed Development**.

2.2 Need for the Proposed Development

2.2.1 The Proposed Development will supply a significant amount of renewable electricity to the National Electricity Transmission System, thereby making a nationally significant contribution to meeting the urgent need for renewable energy generation.

2.2.2 As a low carbon generating station, the Overarching National Policy Statement for Energy (EN-1) (Ref 1) classifies the Proposed Development as a 'critical national priority' (CNP). NPS EN-1 states at paragraph 3.3.63 that *"Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible" and at paragraph 4.1.7 that "For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases".*

2.2.3 NPS EN-1 (Ref 1) also explains how this urgent need for CNP infrastructure (such as the Proposed Development) is to be weighed against residual impacts and tests in national or local policy in the determination of Development Consent Order (DCO) applications. At Paragraph 4.2.16 it states that: *"…the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances."* Paragraph 4.1.7 further reinforces the above, stating that: *"For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases".*

2.2.4 Given the above urgency with which new, large scale renewable energy generation projects are needed, Paragraphs 3.2.6 to 3.2.8 of NPS EN-1 (Ref 1) state that all applications for nationally significant energy infrastructure should be assessed on the basis that the need for such infrastructure has been demonstrated. They also state that substantial weight should be given to the contribution that proposals would make towards meeting the identified energy infrastructure need. It is the substantial weight that must be given to the urgent and nationally significant need for large scale renewable energy generation that is to be weighed against the impact on minerals in the MSA.

2.2.5 **PEI Report Volume 1, Chapter 4: Alternatives and Design Evolution** sets out the site selection process that has been undertaken to identify the area for the Proposed Development. This explored a range of possible alternatives, considering key environmental, planning and access constraints, and including liaison with landowners.

3. Potentially Safeguarded Mineral Resources Within and Near to the Site Boundary

3.1 Introduction

3.1.1 This section of the Report sets out the potentially safeguarded mineral resources in proximity to and within the Site Boundary, based on the following studies that are considered relevant:

a. British Geological Survey Lincolnshire: mineral resource information in support of national, regional and local planning (2002) (Ref 2);

b. British Geological Survey: Mineral Resource Information in Support of National, Regional and Local Planning – Lincolnshire, Mineral Resources – North Map (2002) (Ref 3);

c. British Geological Survey 1:50,000 geological map series, Sheet 114. Lincoln (1973) (Ref 4);

d. British Geological Survey: Mineral Safeguarding in England good practice advice (2011) (Ref 5);

e. Geological mapping and borehole records held on the British Geological Survey Geoindex website (Ref 6).

3.2 Superficial Geology

3.2.1 Geological information held on the British Geological Survey Geoindex website (Ref 6) shows that the majority of the Proposed Development is underlain by the following superficial deposits:

a. Alluvium – clay, silt sand and gravel. Sedimentary superficial deposit formed less than 11.8 thousand years ago during the Holocene epoch;

b. River Terrace Deposits – sand and gravel. Quaternary deposits of sand and gravel (undifferentiated), locally with lenses of silt, clay or peat; and

c. Trent Valley Formation – sand and gravel. Sedimentary superficial deposits of gravel and sand with subsidiary clay and silt, formed in the Mid Pleistocene to Holocene, between 780 thousand years ago to present.

3.2.2 The British Geological Survey Viewer (Ref 7) states Alluvium deposits are *"the unconsolidated detrital material deposited by a river, stream or other body of running water as a sorted or semi-sorted sediment in the bed of the stream or on its floodplain or delta, or as a cone or fan at the base of a mountain slope. Synonym: alluvial deposits. Normally soft to firm consolidated, compressible silty clay, but can contain layers of silt, sand, peat and basal gravel. A stronger, desiccated surface zone may be present."*

3.2.3 The British Geological Survey Minerals Resource Information (Ref 3) indicates that river terrace deposits are the only superficial deposits that lie within the Site Boundary. The Minerals Resource Information also indicates sites of active or inactive mineral workings of two mineral commodities: limestone and sand and gravel, which are located outside of the Site Boundary, see Section 3.6 of this Report.

3.2.4 As set out in the BGS Lexicon of Named Rock Units (Ref 8), the Trent Valley Formation outcrops in the modern Trent catchment and represents the *"fluvial terrace and alluvial deposits of the River Trent from its source to the Humber, and those of its tributaries excluding Soar [and Idle], and possibly others, pending review. The formation includes deposits of an older course via the Lincoln Gap. Mainly sand, gravel and mud; divided (in type area) into six principal "terrace" members (Eagle Moor, Etwall, Egginton Common, Beeston, Holme Pierrepont and Hemington members), plus Holocene alluvium (the Trent Member of Bowen, 1999) and with local named organic deposits."*

3.3 Bedrock Geology

3.3.1 The bedrock geology underlying the land within the Site Boundary comprises:

a. Lower Lincolnshire Limestone Member – Limestone of the Lincolnshire Limestone Formation, of the Inferior Oolite Group, formed between 168.2 and 170.9 million years ago during the Jurassic Period Dominated by low-energy calcilutite, and peloidal wackestone and packstone. Commonly includes sandy limestone or calcareous sandstone in basal part and contains substantial units of mudstone; underlain by

b. Grantham Formation and Northampton Formation – sandstone and ironstone (undifferentiated). A sedimentary bedrock formation of the Inferior Oolite Group, formed between 174.7 and 170.9 million years ago during the Jurassic period; underlain by

c. Whitby Mudstone Formation – Mudstones of the Lias Group formed between 174.7 and 184.2 million years ago in the Early Jurassic. Medium and dark grey fossiliferous mudstone and siltstone, laminated and bituminous in part, with thin siltstone or silty mudstone beds and rare fine-grained calcareous sandstone beds; underlain by

d. Charmouth Mudstone Formation – Mudstones of the Lias Group formed between 184.2 and 199.5 million years ago in the Early Jurassic. Dark grey laminated shales, and dark, pale and bluish grey mudstones with concretionary and tabular limestone beds; abundant argillaceous limestone, phosphatic or ironstone nodules in some areas; underlain by

e. Scunthorpe Mudstone Formation – Interbedded mudstones and limestones of the Lias Group formed between 199.5 and 205.7 million years ago in the Early Jurassic. Grey, variably calcareous and silty, blocky or fissile mudstone with thin beds of argillaceous limestone and calcareous siltstone.

3.3.2 The British Geological Survey Mineral Resources Information indicates that the Lincolnshire Limestone Formation (Inferior Oolite Group) is a major limestone resource and has been have been worked at several sites across Lincolnshire. The commodity has uses as building stone and crushed rock aggregates for constructional fill or sub-base roadstone material. The BGS Mineral Resources Information map shows two mineral working sites for Limestone comprising: one inactive mineral working site in Coleby within the vicinity of the northern boundary of the Proposed Development, and an active mineral working site, Longwood Quarry, although this is located approximately 4km east of the eastern Site Boundary.

3.4 Mineral resources

3.4.1 The British Geological Society Onshore Geoindex (Ref 6) holds records of a number of boreholes located within the Site, penetrating superficial deposits and bedrock within the MSA. These are listed in **Table 1** below.

Table 1: Borehole Locations

Borehole	Description (including potentially safeguarded mineral)	Thickness of potentially safeguarded mineral (m)
TF05NW10	Limestone (Limestone)	13.40
SK95NE6	Limestone and Blue Limestone (Limestone)	15.24
SK96SW3	Alluvium Clay (0.41m) over “Dirty” Sand and Gravel (0.46m), over Lower Lias Mudstone (5.94 (base not encountered)).	0.46
SK96SW25	“Orange, brown sand with some gravel” (Sand and Gravel), over	2.30
	“Grey impure limestone” (Limestone)	0.10
SK96SW16	“River Terrace Deposits - Clayey silt with some sand and pebbles, mainly light green-grey but becoming blue-grey towards the base” – (Sand and Gravel), over “Lower Lias – Mudstone, grey laminated with thin shelled bivalves” (1.1 m (base not encountered))	2.00–2.50
SK86SE7	“Slightly silty gravelly sand” (1m), over “silty sand” (1.2m), over “gravelly sand” (0.3 m) (Sand and Gravel)	2.50

3.4.2 The number of boreholes within safeguarded mineral within the Site Boundary is small but demonstrates a thickness of up to and 2.5m of sand and gravel which may potentially be workable. The thickness of overburden overlying the sand and gravel appears to be minimal. The boreholes also demonstrate up to at least 15m of limestone is present within the eastern section of the Site.

3.5 Mineral Safeguarding Areas

3.5.1 The Lincolnshire Minerals and Waste Local Plan (Ref 9) sets out the key principles to guide the future winning and working of minerals and the form of waste management development In the county up to 2031 (see Section 4 of this Report for relevant planning policy). Figure 1 of the Core Strategy and Development Management Policies shows MSAs, which are broad areas of deposits of sand and gravel, limestone and blown sand that are of current and future economic importance. Sand and gravel and limestone are the most significant minerals produced in Lincolnshire. **Figure 1: Mineral Safeguarding Areas of this Report** (Annex A) shows the Proposed Development overlaid on the MSAs as recorded within the Lincolnshire Minerals and Waste Local Plan.

3.5.2 The majority of the Proposed Development is not located in MSAs, however, parts of the Proposed Development are located in MSAs for sand and gravel and limestone, as follows:

a. Sections of the south western, northern and central parts of the Principal Site are located within the Sand and Gravel MSA. The area of the Principal Site within the MSA is approximately 230ha, and the area of the cable within the MSA is approximately 1.84ha. Note that the Cable Corridor is approximately 250m wide but the cable trench itself will be 1.2–5m wide; and

b. The eastern section of the Cable Corridor, where the Proposed Development connects to the substation at Navenby is located in a Limestone MSA. The area of the cable within the MSA is approximately 2.26ha. As above, the Cable Corridor is approximately 250m wide but the cable trench itself will be 1.2–5m wide.

3.6 Existing and Allocated Mineral Sites

3.6.1 There are three existing mineral sites which are outside but close to the Proposed Development, as shown on **Figure 2: Existing Minerals Sites and Site Allocations of this Report** (Annex A). The existing sites are as follows:

a. Whisby Quarry (and landfill) operated by Tarmac, is a quarry for sand and gravel. It is located to the west of Thorpe on the Hill and is approximately 375m from the Proposed Development at its closest point;

b. Swinderby Airfield, operated by Cemex UK Operations Ltd is a quarry for sand and gravel. The quarry is located to the west of Witham St Hughs and is approximately 300m from the Proposed Development at its closest point; and

c. Norton Bottoms Quarry, operated by Breedon Southern Ltd, is a quarry for sand and gravel. The quarry is located north of Stapleford, and is approximately 1,700m from the Proposed Development at its closest point.

3.6.2 The Lincolnshire Minerals and Waste Local Plan Site Allocations plan (Ref 10) identifies both Swinderby Airfield (reference MS04-LT), and Norton Bottoms Quarry (reference MS05-LT), for extension, subject to any proposals brought forward being in accordance with the development plan.

3.6.3 A quarry at Norton Disney to the north of Nortons Bottoms Quarry and to the west of the Proposed Development, operated by Cemex UK Operations Ltd, has ceased operation and been restored in line with an approved restoration plan.

4. Relevant Planning Policy

4.1 Overview

4.1.1 When determining a DCO application, the Secretary of State is required to have regard to any relevant National Policy Statements (NPS), as well as any Local Impact Report, any prescribed matters, and any other matters that the Secretary of State thinks are both important and relevant. Other national and local planning policies and guidance, including adopted and emerging Development Plan policies, have the potential to be considered by the Secretary of State to be other matters which are important and relevant. The following sections refer to planning policies in relation to minerals that could be considered important and relevant to the Secretary of State's decision.

4.1.2 The following Energy NPSs came into force on 17 January 2024:

a. Overarching NPS for Energy (EN-1) (Ref 1);

b. NPS for Renewable Energy Infrastructure (EN-3) (Ref 11); and

c. NPS for Electricity Networks Infrastructure (EN-5) (Ref 12).

4.1.3 The following other national and local planning policy documents may also be considered important and relevant to the Secretary of State's decision:

a. National Planning Policy Framework (NPPF) (Ref 13) as interpreted and explained in the associated Planning Practice Guidance (PPG) (Ref 13);

b. Lincolnshire County Council Development Plan consisting of:

i. Lincolnshire Minerals and Waste Local Plan Site Locations adopted December 2017 (Ref 14);

ii. Lincolnshire Minerals and Waste Local Plan including the Core Strategy & Development Management Policies Plan adopted in June 2016 (Ref 9); and

iii. Draft Lincolnshire Minerals and Waste Local Plan: Regulation 18 – Preferred Approach (July 2024) (Ref 15).

4.1.4 The relevant national and local policies are set out below.

4.2 Overarching National Policy Statement for Energy (EN-1)

4.2.1 NPS EN-1 (Ref 1) provides that *"Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place"* (paragraph 5.11.19). It also states that *"Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources"* (paragraph 5.11.28).

4.2.2 NPS EN-3 (Ref 11) and NPS EN-5 (Ref 12) do not contain additional policies about mineral safeguarding.

4.3 National Planning Policy Framework (2023)

4.3.1 The revised National Planning Policy Framework (NPPF) was published in December 2023 (Ref 13). The NPPF, together with the accompanying Planning Practice Guidance (PPG) (Ref 13), sets out the Government's planning policies for England for the particular purpose of making development plans and deciding applications under the Town and Country Planning Act 1990.

4.3.2 Under section 17 (Facilitating the Sustainable Use of Minerals), NPPF paragraph 215 states: *"It is essential that there is 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."*

4.3.3 NPPF paragraph 216 goes on to state: *"Planning policies should…c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation 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 where this should be avoided (whilst not creating a presumption that the resources defined will be worked); d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place…"*

4.3.4 NPPF Paragraph 218 also states: *"Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working."*

4.4 National Planning Practice Guidance

Minerals Planning Practice Guidance (2014)

4.4.1 The Minerals PPG (2014) (Ref 13) confirms that minerals 'make an essential contribution to the Country's prosperity and quality of life'. Section 3 of the Minerals PPG states that: *"Mineral planning authorities are encouraged to plan for minerals extraction using Ordnance Survey-based proposals maps and relevant evidence provided by the minerals industry and other appropriate bodies. … This approach will allow mineral planning authorities to highlight areas where mineral extraction is expected to take place, as well as managing potentially conflicting objective for use of land."*

4.4.2 Section 3 of the Minerals PPG advises Mineral Planning Authorities that they should plan for the steady and adequate supply of minerals in one or more of the following ways, specifically noting these are ordered by way of priority:

"1. Designating Specific Sites – where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;

2. Designating Preferred Areas, where are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or;

3. Designating Areas of search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply."

4.5 Lincolnshire Minerals and Waste Local Plan

4.5.1 The Proposed Development lies within the administrative areas of Lincolnshire County Council and North Kesteven District Council. The Lincolnshire Minerals and Waste Local Plan sets out policies in respect of minerals and comprises the following:

a. Core Strategy and Development Management Policies Plan (June 2016) (Ref 9); and

b. Site Locations (December 2017) (Ref 10).

4.5.2 Lincolnshire County Council is currently reviewing the Lincolnshire Minerals and Waste Local Plan and has recently published the Draft Lincolnshire Minerals and Waste Local Plan: Regulation 18 – Preferred Approach (July 2024) (Ref 15).

4.5.3 The Lincolnshire Minerals and Waste Local Plan and the emerging plan are considered below.

Core Strategy and Development Management Policies Plan (June 2016)

4.5.4 The Core Strategy (Ref 9) sets out the key principles to guide the future winning and working of minerals and the form of waste management development in the county up to 2031. It also sets out the development management policies against which planning applications for minerals and waste development are considered. The relevant policies are set out below.

4.5.5 Policy DM1 'Presumption in favour of sustainable development' of the Core Strategy makes clear that the Plan is based on the principle of delivering sustainable minerals and waste development in Lincolnshire. DM1 provides that "*When considering development proposals, the County Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework."*

4.5.6 Policy M11 'Safeguarding of Mineral Resources' seeks to protect a mineral resource for the long term for future generations. It states that:

"Sand and gravel, blown sand and limestone resources that are considered to be of current or future economic importance within the Minerals Safeguarding Areas shown on Figure 1, together with potential sources of dimension stone for use in building and restoration projects connected to Lincoln Cathedral / Lincoln Castle within the areas shown on Figure 2, and chalk resources included on Figure 3, will be protected from permanent sterilisation by other development.

Applications for non-minerals development in a Minerals Safeguarding Area must be accompanied by a Minerals Assessment. Planning permission will be granted for development within a Minerals Safeguarding Area provided that it would not sterilise mineral resources within the Mineral Safeguarding Areas or prevent future minerals extraction on neighbouring land. Where this is not the case, planning permission will be granted when:

- *The applicant can demonstrate to the Mineral Planning Authority that prior extraction of the mineral would be impracticable, and that the development could not reasonably be sited elsewhere; or*
- *The incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or*
- *There is an overriding need for the development to meet local economic needs, and the development could not reasonably be sited elsewhere; or*
- *The development is of a minor nature which would have a negligible impact with respect to sterilising the mineral resource; or*
- *The development is, or forms part of, an allocation in the Development Plan."*

4.5.7 Policy M12 'Safeguarding of Existing Mineral Sites and Associated Infrastructure' seeks to safeguard minerals sites from constraints imposed by nearby permissions for sensitive development, such as housing. Policy M12 states:

"Minerals sites (excluding dormant sites) and associated infrastructure that supports the supply of minerals in the County will be safeguarded against development that would unnecessarily sterilise the sites and infrastructure or prejudice or jeopardise their use by creating incompatible land uses nearby."

4.5.8 Both Policy M11 and Policy M12 include a number of exemptions, confirming that the policies do not apply to householder development, alterations to existing buildings and change of use of existing development, advertisement consent, listed building consent, reserved matters applications, prior notifications, certificates of lawfulness and applications for tree works.

Site Locations (December 2017)

4.5.9 The Site Locations document (Ref 10) includes specific proposals for the provision of land for mineral and waste development. Sites are allocated following a comprehensive process of site assessment and selection. The relevant policies are set out below.

4.5.10 Policy SL1 'Mineral Site Allocations' seeks to identify sufficient sites to meet the requirements for a steady and adequate supply of sand and gravel provision in accordance with the Core Strategy. It sets out that "*A steady and adequate supply of sand and gravel for aggregate purposes, in accordance with Policy M2 of the Core Strategy and Development Management Policies document, will be provided through… the continued provision of sand and*

gravel from the remaining permitted reserves …. Norton Bottoms Quarry …. Norton Disney Quarry … Swinderby Airfeld Quarry".

4.5.11 Policy SL2 'Safeguarding Mineral Allocations' seeks to ensure that sites allocated in Policy SL1 as extensions to existing quarries or new sand and gravel quarries will be safeguarded in order to meet the requirement for a steady and adequate supply of sand and gravel provision. It states that *"allocated sites, as set out in Policy SL1, including an area of 250 metres surrounding each site, will be safeguarded against development that would unnecessarily sterilise the sites or prejudice or jeopardise their use by creating incompatible land uses nearby."*

Draft Lincolnshire Minerals and Waste Local Plan: Regulation 18 – Preferred Approach (July 2024)

4.5.12 The Preferred Approach document (Ref 15) was published for public consultation on 30 July 2024. The Preferred Approach was informed by an earlier consultation on Issues and Options in July 2022, and it is anticipated that the new Plan will be adopted in winter 2026. It should be noted that given this is an emerging plan at an early stage, the draft policies in the Preferred Approach carry very little weight.

4.5.13 Draft Policy SM15 (currently Policy M11) 'Safeguarding of Mineral Resources' seeks to safeguard deposits of sand and gravel, blown sand and limestone that are of current or future economic importance. Draft Policy SM15 has been amended to remove the reference to stone for use in projects connected to Lincoln Cathedral/Lincoln Castle and remove the reference to chalk reserves. Criteria used to assess and determine applications and the requirement for Minerals Assessment has been updated, and the list of exemptions has been expanded. It states:

"Sand and gravel, blown sand and limestone resources that are considered to be of current or future economic importance within the Minerals Safeguarding Areas shown on the Policies Map, will be protected from permanent sterilisation by other development.

Planning permission will be granted for development within a Minerals Safeguarding Area provided that it would not sterilise mineral resources within the Minerals Safeguarding Areas or prevent future minerals extraction on neighbouring land. Where this cannot be demonstrated, the applicant must demonstrate to the Mineral Planning Authority that prior extraction of the mineral would be impractical, and in any case:

i. The development is of a temporary nature and will be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or

ii. There is an overriding need for the development and the development could not reasonably be sited elsewhere; or

iii. The development would have a negligible impact with respect to sterilising the mineral resource.

Applications for non-minerals development in a Minerals Safeguarding Area must be accompanied by a Minerals Resources Assessment, unless demonstrated by the applicant, to the satisfaction of the Mineral Planning Authority, that it is disproportionate to do so."*

4.5.14 Draft Policy SM16 'Safeguarding of Existing and Allocated Mineral Sites and Associated Minerals Infrastructure' seeks to safeguard minerals sites and their associated infrastructure in order that the supply of minerals is not interrupted. Draft Policy DM16 has been amended to clarify that the policy relates to both existing and allocated sites and associated infrastructure. In addition, the list of exemptions to the policy has been expanded. It states

"Existing and allocated mineral sites and associated mineral sites (excluding dormant sites) and associated infrastructure that supports the supply of minerals in the County will be safeguarded against development that would unnecessarily sterilise the sites and infrastructure or prejudice or jeopardise their use by creating incompatible land use nearby."

4.5.15 To provide a more practical and efficient approach to safeguarding mineral resources, both Draft Policy SM15 and Draft Policy SM16 include a wider number of exemptions. The policy does not apply to applications on land allocated in the Development Plan for proposed non-mineral development purposes, householder development, alterations to existing buildings and change of use of existing development, advertisement consent, listed building consent, reserved matters applications, prior notifications, certificates of lawfulness, applications for tree works and applications on land associated with existing agricultural, forestry, horticultural and equine related uses.

Lincolnshire Local Aggregate Assessment (reporting 2022 data) July 2023

4.5.16 The NPPF requires minerals planning authorities to plan for a steady and adequate supply of aggregates by providing an annual Local Aggregate Assessment (LAA). The latest Lincolnshire LAA (Ref 16) states that with a combination of current and allocated sites and planning applications to be determined, there should be sufficient sand and gravel resources to last beyond the Lincolnshire Minerals and Waste Local Plan period.

4.5.17 For limestone, the LAA (Ref 16) states that mineral reserves should last beyond the period of the Lincolnshire Minerals and Waste Local Plan, and therefore no sites are allocated in the Site Locations document (Ref 10).

5. Assessment of the Proposed Development Against Planning Policy

5.1.1 In determining an application for development consent, the Secretary of State must have regard to NPS EN-1 (Ref 1). In addition, the Secretary of State may consider local planning policies that they consider to be important and relevant. This section therefore presents an assessment of the Proposed Development against NPS EN-1 and the relevant policies of the Lincolnshire Minerals and Waste Local Plan (Ref 9).

5.2 Overarching National Policy Statement for Energy (EN-1)

5.2.1 With regards to mineral safeguarding, paragraph 5.11.19 of NPS EN-1 (Ref 1) states that applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place. Paragraph 5.11.21 (Ref 1) further adds that the decision maker should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources in the event that a proposed development has an impact on an MSA.

5.2.2 The Proposed Development is a temporary development, in operation for a period of 60 years before it is decommissioned and the land returned to its original use. Given the temporary nature of the Proposed Development, there will be no sterilisation of the mineral resource in the long term for future generations.

5.3 National Planning Policy Framework

5.3.1 The NPPF (Ref 13) provides that Local Planning Authorities should not permit development in Mineral Safeguarding Areas if it might constrain potential future use for mineral working. As set out above, the Proposed Development is a temporary development, in operation for a period of 60 years before it is decommissioned and the land restored to its original use. Therefore, the Proposed Development will not constrain the potential use of the land for mineral working.

5.4 Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management Policies (June 2016)

Policy DM1 – Presumption in favour of sustainable development

5.4.1 With regards to Policy DM1 (Ref 10), the presumption in favour of sustainable development is noted. Large-scale solar generation is essential to support the urgent decarbonisation of the UK's electricity sector. It is also important not only to reduce power-related carbon emissions, but also to provide a timely next step contribution to a future generation portfolio which is capable of supporting the electrification and therefore decarbonisation of transport, heat and industrial demand. There is an urgent need for low carbon generation, and NPS EN-1 (Ref 1) identifies solar as a critical national priority which should be progressed as quickly as possible. The need for the Proposed Development is summarised in Section 2.2 of this Report and set out in detail in **PEI Report Volume 1, Chapter 4: Alternatives and Design Evolution**.

Policy M11 – Safeguarding of Mineral Resources

5.4.2 Policy M11 (Ref 10) seeks to protect the sand and gravel and limestone resource in Lincolnshire from permanent sterilisation by incompatible development, such as housing. The Core Strategy and Development Management Policies Plan states at paragraph 5.81 that the main purpose of the MSA is to protect a mineral resource for the long term for future generations. Some development types are exempt from Policy M11, however this does not include an exemption for development types such as the Proposed Development.

5.4.3 The Proposed Development is a temporary development, in operation for a period of 60 years before it is decommissioned and the land restored to its original use. Given the temporary nature of the Proposed Development, there will be no sterilisation of the mineral resource, and the ability of future generations to extract the resource over the long term will not be compromised. This is further supported by the Lincolnshire LAA (Ref 16) which demonstrates that with a combination of current and allocated sites and planning applications to be determined, there should be sufficient sand and gravel and limestone resources to last beyond the Lincolnshire Minerals and Waste Local Plan period. For the connecting cables, whilst one option currently is to retain these in situ, should a future proposal to extract mineral in this area come forward they could be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, if required.

5.4.4 Policy M11 provides that applications for non-minerals development in a Minerals Safeguarding Area must be accompanied by a Minerals Assessment. Given the thrust of Policy M11 relates to permanent sterilisation by incompatible development, and the Proposed Development is temporary

as evidenced above, it is considered that a Minerals Assessment is not required.

5.4.5 Policy M11 also states that planning permission would be granted for development in a MSA provided it did not sterilise mineral resources for future extraction. The Proposed Development will temporarily sterilise mineral resources for the period that it is in operation. As such the criteria in Policy M11 are addressed below.

a. *Prior extraction of the mineral would be impracticable, and the development could not reasonably be sited elsewhere* – If prior extraction of the mineral were to be undertaken, this could delay the start of construction of the Proposed Development, depending on the amount of mineral that is required to be extracted. The urgent need for and the status of the Proposed Development as critical national priority is established in NPS EN-1. A site selection process has been undertaken, based on the point of connection being at the Navenby substation. Alternatives have been considered, however, the location of the Proposed Development takes into account a range of environmental, planning and access factors, including liaison with landowners. It is therefore considered that the Proposed Development could not be reasonably sited elsewhere.

b. *The incompatible development is of a temporary nature and can be completed and restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed* – The Proposed Development will be operational for a period of 60 years, therefore temporary in nature. Land in the Principal Site will be returned to its original use, and whilst currently it is anticipated that the connection cables will remain in situ, consideration could be given to their removal. Therefore the Proposed Development is temporary in nature and would be restored to a condition that does not inhibit extraction of the mineral resource. In terms of timescales, the Lincolnshire LAA (Ref 16) demonstrates that there should be sufficient sand and gravel and limestone resources to last beyond the Lincolnshire Minerals and Waste Local Plan period.

c. *There is an overriding need for the development to meet local economic needs, and the development could not reasonably be sited elsewhere* – The urgent need for low carbon generation is established in NPS EN-1 (Ref 1) which identifies solar as a critical national priority. Given that NPS EN-1 states that the need case for infrastructure that is critical national priority outweighs the residual effects, and there is a need for the use of renewable sources of electricity to decarbonise the electricity supply both locally and nationally, it is established that there is an overriding need for the Proposed Development. The point about siting the Proposed Development elsewhere is addressed in paragraph a above.

d. *The development is of a minor nature which would have a negligible impact with respect to sterilising the mineral resource* – Whilst the Proposed Development is not minor in nature, being a Nationally Significant Infrastructure Project, it has a negligible impact on the

mineral resource as it is operational for a temporary period and the land will be returned to its original use after 60 years.

e. *The development is, or forms part of, an allocation in the Development Plan* – The Proposed Development does not form part of the Development Plan, however, as noted above there is an urgent need for low carbon generation, established in NPS EN-1 (Ref 1).

5.4.6 The thrust of Draft Policy SM15 'Safeguarding of Mineral Resources' of the emerging Lincolnshire Minerals and Waste Local Plan (Ref 10) is the same as Policy M11. The amendments to the policy are noted, however they do not materially alter how the policy applies to the Proposed Development. Therefore, to avoid repetition, the points made above in relation to Policy M11, also apply to Draft Policy SM15.

5.4.7 In summary, the Proposed Development complies with Policy M11 as there would be no permanent above ground infrastructure within previously undisturbed land under either Principal Site or in the Cable Corridor. Given the large landbank of sand and gravel and limestone in Lincolnshire, this will not inhibit extraction within the timescale that the mineral is likely to be needed and will ultimately have a negligible impact on sterilising the mineral resource.

Policy M12 – Safeguarding of Existing Mineral Sites and Associated Infrastructure

5.4.8 Policy M12 (Ref 10) seeks to protect sites that are already in use for the production of minerals. There are three existing minerals sites, Whisby Quarry, Swinderby Airfield, and Norton Bottoms Quarry, located outside of the Site Boundary, shown on **Figure 2** of this Report (Annex A). Given the Proposed Development does not encroach into these sites and is located more than 300m from Whisby Quarry and Swinderby Airfield and 1,700m from Norton Bottoms Quarry, it would not unnecessarily sterilise them or prejudice or jeopardise their use by creating incompatible land uses, such as housing, nearby. Furthermore, the Proposed Development would not impact the ability of the sites to operate or extend in the future as anticipated by the Lincolnshire Minerals and Waste Local Plan.

5.4.9 The thrust of Draft Policy SM16 'Safeguarding of Existing and Allocated Mineral Sites and Associated Minerals Infrastructure' of the emerging Lincolnshire Minerals and Waste Local Plan (Ref 9) is the same as Policy M12. The amendments to the policy are noted, however they do not materially alter how the policy applies to the Proposed Development. Therefore, to avoid repetition, the points made above in relation to Policy M12, also apply to Draft Policy SM16.

Policy SL1 – Mineral Site Allocations

5.4.10 Policy SL1 (Ref 9) establishes that the supply of sand and gravel will be provided through continued provision at a number of allocated sites, including Whisby Quarry, Norton Bottoms Quarry and Swinderby Airfield, as well as through future extension of both these sites. As demonstrated above,

the Proposed Development will not impact the ability of the sites at Whisby Quarry, Norton Bottoms Quarry and Swinderby Airfield to operate or extend in the future as anticipated by the Lincolnshire Minerals and Waste Local Plan.

Policy SL2 – Safeguarding Mineral Allocations

5.4.11 Policy SL2 Ref 9() seeks to safeguard allocated sites, included an area of 250m surrounding each site, against development that would unnecessarily sterilise the sites or prejudice or jeopardise their use by creating incompatible land uses nearby. There are a number of exemptions to the policy, which do not include development, such as the Proposed Development. However, the Proposed Development does not encroach into the safeguarding areas for Whisby Quarry, Norton Bottoms Quarry and Swinderby Airfield, as shown on **Figure 2** of this Report (Annex A), therefore it would not sterilise the sites or prejudice or jeopardise their use.

5.5 Response to Comments Made in the Scoping Opinion

5.5.1 The purpose of this Report is to address the comments made by Lincolnshire County Council in the Scoping Opinion (**PEI Report Volume 3, Appendix 1-B**). **Table 2** sets out how the comments have been addressed. These are also reflected within **PEI Report Volume 3, Appendix 1-C: EIA Scoping Opinion Responses**.

Table 2: How comments made by Lincolnshire County Council in the Scoping Opinion have been addressed

Lincolnshire County Council Comment	How the comment has been addressed
The Scoping Report does not take account of Policy M11	Section 5.5 of this Report takes account of Policy M11.
Applications for non-minerals development should be accompanied by a Minerals Assessment	Policy M11 relates to permanent sterilisation by incompatible development. As the Proposed Development is temporary and the land would be restored, it is considered that a Minerals Assessment is not required.
The potential sterilisation of mineral resources should therefore be 'scoped in' to the Environmental Impact Assessment and addressed through a minerals assessment as part of the Environmental Statement.	This point is not addressed in this Report, however, **Appendix 1-C** of the PEI Report sets out that an assessment of MSAs will be considered as part of the assessment of Development Land within the Socio-Economic and Land Use assessment at Environmental Statement stage.

6. Conclusion

6.1.1 There is an urgent need for low carbon generation, and NPS EN-1 (Ref 1) identifies solar development as a critical national priority which should be progressed as quickly as possible.

6.1.2 The Proposed Development is partially located within MSAs for sand and gravel and limestone and is located close to sand and gravel minerals sites at Whisby Quarry, Swinderby Airfield and Norton Bottoms Quarry (see **Figure 1** of this Report (Annex A)).

6.1.3 This Report sets out an assessment of the Proposed Development against planning policy. The Proposed Development is a temporary development, in operation for a period of 60 years before it is decommissioned and the land returned to its original use. Given the temporary nature of the Proposed Development, there will be no sterilisation of the mineral resource, and the ability of future generations to extract the resource over the long term will not be compromised. Furthermore, given the large landbank of sand and gravel and limestone in Lincolnshire, the Proposed Development will not inhibit extraction within the timescale that the mineral is likely to be needed and will ultimately have a negligible impact on sterilising the mineral resource. In conclusion, it is considered that the Proposed Development satisfies Policies M11, M12, SL1 and SL2 of the Lincolnshire Minerals and Waste Local Plan (Ref 9 and paragraphs 5.11.19 and 5.11.28 of NPS EN-1 (Ref 1), as demonstrated in Section 5 of this Report.

6.1.4 This Report addresses the comments made by Lincolnshire County Council in the Scoping Opinion, and a commitment has been made to undertake an assessment of MSAs as part of the Socio-Economic and Land Use assessment in the Environmental Statement, that will be submitted with the DCO application.

7. References

Ref 1 Department for Energy Security and Net Zero (2023) Overarching National Policy Statement for Energy (EN-1). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf

Ref 2 Harrison, D.J.; Henney, P.J.; Cameron, D.G.; Steadman, E.J.; Hobbs, S.F.; Evans, D.J.; Lott, G.K.; Bartlett, E.L.; Highley, D.E.. (2002) Lincolnshire: mineral resource information in support of national, regional and local planning. Mineral Resources Series. British Geological Survey.

Ref 3 British Geological Survey: Mineral Resource Information in Support of National, Regional and Local Planning – Lincolnshire, Mineral Resources - North Map (2002).

Ref 4 BGS 1:50,000 geological map series, Sheet 114. Lincoln (1973)

Ref 5 British Geological Survey (2011). British Geological Survey: Mineral Safeguarding in England good practice advice.

Ref 6 British Geological Survey (2020). GeoIndex Onshore.

Ref 7 British Geological Survey. BGS Openviewer [Online

Ref 8 British Geological Survey (2024) The BGS Lexicon of Named Rock Units", [Accessed 3 September 2024].

Ref 9 Lincolnshire Country Council (2016) Lincolnshire Minerals and Waste Local Plan. Available at: https://www.lincolnshire.gov.uk/downloads/file/2361/core-strategy-and-development-management-policies

Ref 10 Lincolnshire Minerals and Waste Local Plan Site Locations (2017). Available at: https://lincolnshire.moderngov.co.uk/documents/s20604/Appendix%20C%20-%20Site%20Location%20computer.pdf

Ref 11 Department for Energy Security and Net Zero (2023) NPS for Renewable Energy Infrastructure (EN-3). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/37048/1940-nps-renewable-energy-en3.pdf

Ref 12 Department for Energy Security and Net Zero (2023) NPS for Electricity Networks Infrastructure (EN-5). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47858/1942-national-policy-statement-electricity-networks.pdf

Ref 13 National Planning Policy Framework (March 2012, updated December 2023). Available at: https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf

Ref 14 Department of Communities and Local Government (2014, updated August 2022) National Planning Practice Guidance. Available online: https://www.gov.uk/government/collections/planning-practice-guidance

Ref 15 Lincolnshire County Council (2024) Draft Lincolnshire Minerals and Waste Local Plan: Regulation 18 – Preferred Approach. Available at: https://lincolnshire.moderngov.co.uk/documents/s63234/Lincolnshire%20Minerals%20and%20Waste%20Local%20Plan.pdf

Ref 16 Lincolnshire County Council (2022) Lincolnshire Local Aggregate Assessment (reporting 2022 data). Available at: https://www.lincolnshire.gov.uk/downloads/file/8051/local-aggregate-assessment-2022

Annex A Minerals Assessment Report Figures

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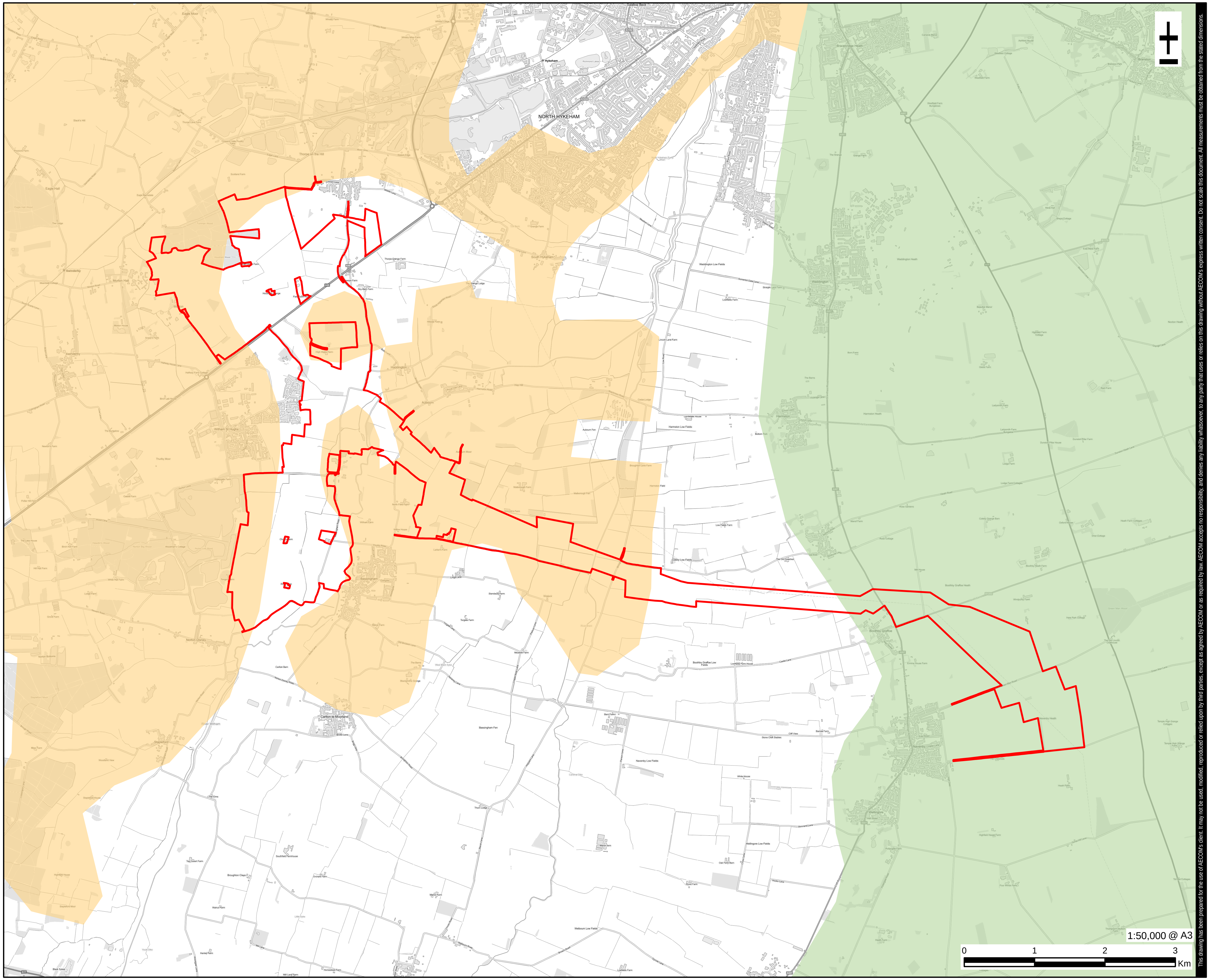

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LEGEND

- Site Boundary
- Limestone Mineral Safeguarding Area
- Sand and Gravel Minerals Safeguarding Area

NOTES

Mineral Constraint data digitised from Lincolnshire County Council

ISSUE PURPOSE

Mineral Safeguarding Assessment Figure

PROJECT NUMBER

60700987

FIGURE TITLE

Mineral Safeguarding Areas

FIGURE NUMBER

Figure 1

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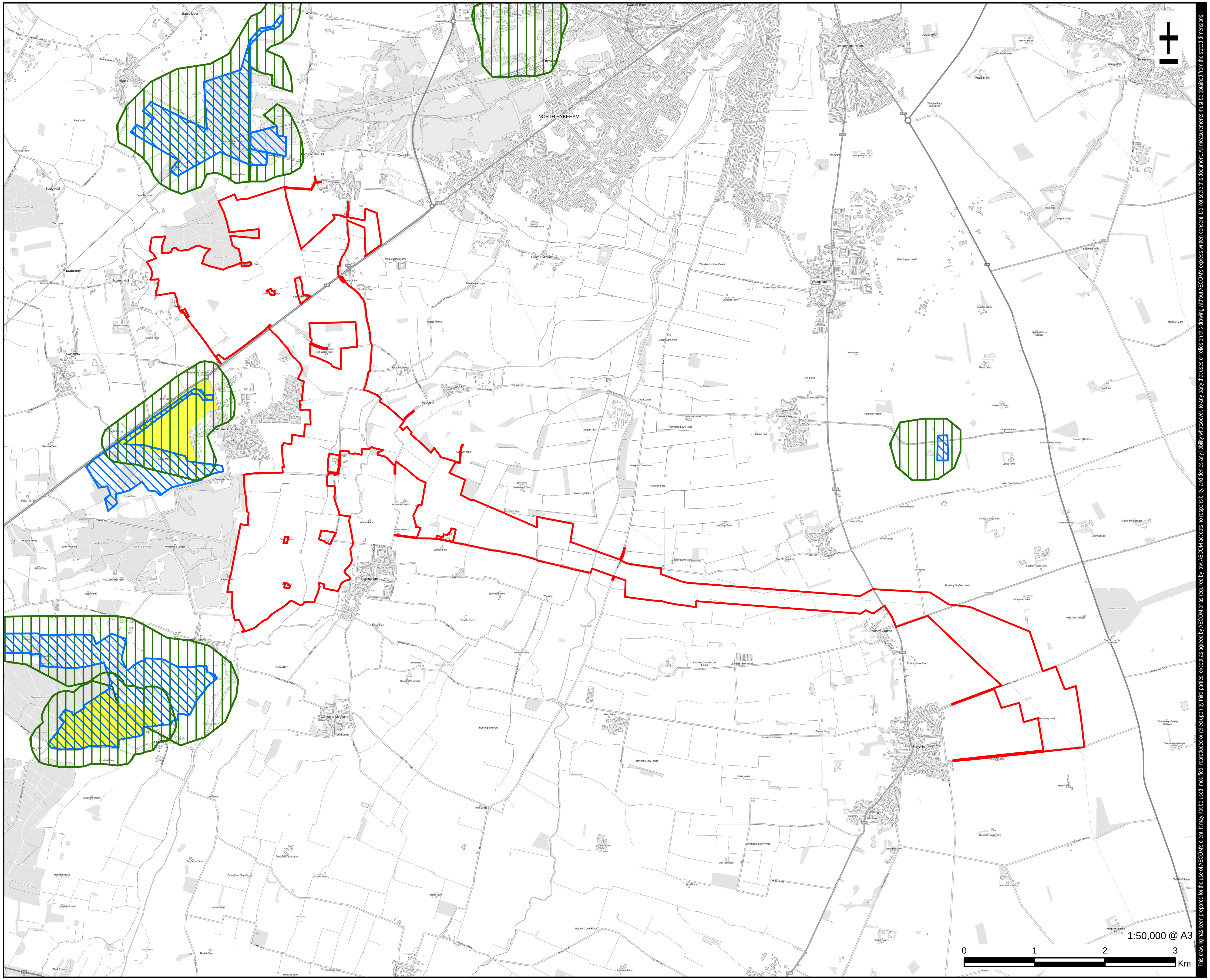

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LEGEND

- Site Boundary
- Allocated Minerals Site
- Existing Minerals Site
- Site Specific Minerals Safeguarding Site

NOTES

Mineral Constraint data digitised from Lincolnshire County Council

ISSUE PURPOSE

Mineral Safeguarding Assessment Figure

PROJECT NUMBER

60700987

FIGURE TITLE

Existing Minerals Sites and Site Allocations

FIGURE NUMBER

Figure 2