

WEST DEEPING PARISH COUNCIL

A Living Community

Strategic Representation to the Examination of the Lincolnshire Minerals and Waste Local Plan

Communities should not be expected to bear the cumulative burden of successive generations of mineral extraction without strategic consideration of their long-term health, wellbeing and sustainability.

This representation respectfully submits that strategic planning should consider not only the impacts of an individual mineral proposal, but also the cumulative effect of successive generations of mineral extraction upon an established rural community.

How to Read this Representation

This representation has been prepared on behalf of West Deeping Parish Council as the democratically elected body representing the interests of the parish and its residents.

It should be read alongside the Proposed Submission Version of the Lincolnshire Minerals and Waste Local Plan (*Local Plan*) and the accompanying Examination evidence.

Unlike many individual representations, this document does not focus upon a single planning discipline or a single technical objection. Rather, it considers the cumulative effect of successive mineral extraction upon an established rural community and the strategic planning questions that arise from that experience.

The representation has therefore been structured thematically.

Each chapter examines a particular aspect of the strategic planning process before bringing those themes together in considering whether the cumulative implications for the community were sufficiently understood at the plan-making stage.

The Parish Council recognises that detailed technical assessments properly form part of subsequent planning applications. The purpose of this representation is not to duplicate those assessments, nor to determine how any future development might be designed or mitigated.

Instead, it respectfully considers what should properly be understood before land is identified for mineral extraction within a strategic development plan.

Throughout the report, one central proposition is explored:

Communities should not be expected to bear the cumulative burden of successive generations of mineral extraction without strategic consideration of their long-term health, wellbeing and sustainability.

Introduction

West Deeping is an established rural community situated within the Welland Valley of South Lincolnshire.

For approximately seventy years¹, the village has lived alongside successive phases of mineral extraction. During that time, mineral workings have progressively altered large parts of the surrounding landscape, with more than half of the parish² having been affected by quarrying and subsequent restoration.

The proposed allocation of Site SG17 would have extended mineral extraction around the village for approximately a further forty years. Although the Proposed Submission Version of the Lincolnshire Minerals and Waste Local Plan no longer allocates SG17, the preparation of the Plan has generated an extensive body of evidence concerning the effects of long-term mineral extraction upon the community. A second, larger site, SG11, was considered alongside SG17 during preparation of the Plan; as the evidence base confirms, SG11 has no independent highway access and was not regarded as feasible in isolation from SG17, and the two sites are therefore considered together at points throughout this representation.

West Deeping Parish Council welcomes the Council's decision not to allocate Site SG17 within the Proposed Submission Version of the Local Plan. Accordingly, this representation is not concerned with seeking a different allocation outcome.

Rather, it respectfully invites the Examination to consider whether the strategic planning issues repeatedly identified by the Parish Council, residents, statutory consultees and other participants throughout the preparation of the Plan were sufficiently understood at the plan-making stage, or whether numerous fundamental planning considerations affecting the long-term health, wellbeing and sustainability of the community were instead deferred to the planning application stage.

The Parish Council fully recognises that detailed technical assessment properly forms part of the subsequent planning application process. However, the preparation of a Local Plan requires sufficient strategic understanding to determine whether a site is appropriate for allocation in the first place. Where numerous fundamental planning considerations are repeatedly deferred, a legitimate planning question arises as to

¹ Lincolnshire Minerals and Waste Local Plan Evidence Base – Historic mapping and quarry history (or previous Site Assessment documentation referring to existing mineral workings around West Deeping).

² West Deeping Parish Council Regulation 18 Representation

whether the strategic assessment was sufficiently comprehensive before allocation was contemplated.

This representation therefore examines those strategic questions by considering the cumulative effect of successive mineral extraction upon the health, wellbeing, quality of life and long-term sustainability of West Deeping as a living rural community.

The Council's decision not to allocate SG17 is welcomed. Nevertheless, the Parish Council respectfully submits that the Examination provides an important opportunity to ensure that the permanent planning record accurately reflects the wider strategic issues identified throughout the preparation of the Plan. Those issues extend beyond the suitability of a single mineral site. They concern the role of strategic planning in understanding the cumulative implications of successive generations of mineral extraction for the long-term health, wellbeing and sustainability of an established rural community.

Chapter 1

The Purpose of this Representation

Strategic planning is not simply about identifying land capable of accommodating development. It is about understanding whether development is appropriate in a particular place before that land is allocated.

1.1

This representation has been prepared by West Deeping Council in its capacity as the democratically elected authority representing the residents of the parish.

Throughout the preparation of the Lincolnshire Minerals and Waste Local Plan, the Parish Council has participated constructively at every stage of consultation. It has consistently sought to assist the plan-making process by drawing attention to matters affecting the long-term health, wellbeing and sustainability of the community, supported by local knowledge and evidence gathered over many years.

1.2

The Parish Council welcomes the decision not to allocate Site SG17 within the Proposed Submission Version of the Local Plan and does not seek to revisit that outcome.

Instead, this representation focuses upon the strategic planning questions that emerged during the preparation of the Plan and which, in the Parish Council's submission, remain relevant to the Examination.

1.3

Whilst detailed technical matters are often resolved during the determination of planning applications, strategic planning requires sufficient understanding of the principal opportunities and constraints affecting a site before allocation is contemplated.

Where numerous fundamental considerations are repeatedly deferred to subsequent planning applications, it is appropriate to consider whether the strategic assessment has provided a sufficiently robust basis upon which allocation decisions can properly be made.

1.4

The Parish Council considers that this question is particularly important in the context of West Deeping.

Unlike many proposed mineral allocations, SG17 would not have affected an isolated rural location. It would have extended industrial mineral extraction around an established village that has already experienced approximately seventy years of quarrying, with more than half of the having been excavated during that period.

The strategic question is therefore not simply whether one additional mineral development might be capable of mitigation. It is whether strategic planning has sufficiently understood the cumulative implications of extending mineral extraction around the same community for a further generation.

1.5

The chapters that follow examine those themes collectively in considering whether established communities should be expected to bear the cumulative burden of successive generations of mineral extraction without strategic consideration of their long-term health, wellbeing and sustainability.

The eventual decision not to allocate Site SG17 does not, of itself, demonstrate that the strategic planning concerns repeatedly identified throughout the preparation of the Plan were resolved. Rather, it demonstrates that the allocation was ultimately withdrawn before those questions required determination. This representation therefore invites the Examination not to revisit the allocation decision itself, but to consider whether the strategic understanding of the site had become sufficiently developed before allocation was contemplated, and to ensure that the planning principles emerging from that process are properly reflected within the Examination Record.

PART I

The Living Community

Chapter 2

West Deeping – An Established Rural Community

Planning affects places, but its ultimate purpose is to serve the communities who live within them.

2.1 A Living Community

West Deeping is not simply a settlement identified within a Minerals Local Plan.

It is a village whose residents have built their homes, raised families and lived alongside mineral extraction for approximately seventy years. Throughout that period the community has demonstrated resilience and adaptability. The Parish Council submits that such resilience should not be mistaken for an unlimited capacity to absorb successive generations of mineral extraction.

Although modest in size, West Deeping possesses all the characteristics of a thriving rural community. It is home to families, businesses, farmers, commuters, retired residents, a church, a pub, community organisations and recreational spaces. The village is not simply a collection of individual properties, but a settled and interconnected community whose identity has developed over many generations.

For many residents, West Deeping is not simply where they live; it is where successive generations of their families have lived, worked and contributed to the life of the village. That continuity forms an important part of the community's identity and should itself be recognised within strategic planning.

Throughout the preparation of the Local Plan, the Parish Council has consistently sought to represent the interests of the whole community rather than those of any individual landowner or interest group. Its representations have therefore focused upon the long-term sustainability of West Deeping as a living rural community.

In fulfilling that role, the Parish Council is concerned not only with the interests of today's residents but also with those of future generations who will inherit both the benefits and the consequences of the strategic planning decisions taken today.

2.2 More Than Individual Properties

The effects of mineral development are often assessed by reference to individual receptors such as particular dwellings, roads or designated sites.

Whilst such assessments are essential, they do not always capture the experience of the community as a whole.

Residents experience the village collectively. Neighbours support one another, families grow up together and residents share the everyday life of an established rural community. Community organisations depend upon participation from across the parish. The character and cohesion of the village therefore derive not simply from individual buildings but from the relationships between people, places and the shared environment in which daily life takes place.

Strategic planning should therefore recognise that the effects of major mineral development may extend beyond individual technical assessments to influence the wellbeing and long-term sustainability of the community itself.

2.3 A Community Shaped by Quarrying

Mineral extraction has formed part of the history of West Deeping for approximately seventy years³.

Successive phases of quarrying have altered large areas of the parish landscape. During that period, residents have experienced changing landscapes, heavy goods vehicle movements, industrial activity, restoration schemes and continuing uncertainty associated with successive mineral proposals.

The Parish Council fully acknowledges the important contribution that mineral extraction makes to the local and national economy. This representation is not opposed to mineral development as a matter of principle.

However, West Deeping presents an unusual planning context. **More than half of the parish⁴ has already been excavated during successive phases of mineral**

³ West Deeping Parish Council Regulation 18 Representation

⁴ West Deeping Parish Council Regulation 18 Representation

extraction. The proposed allocation of SG17 would have extended that experience for approximately a further forty years.

The strategic planning question is therefore not simply whether one additional quarry might be capable of mitigation. It is whether strategic planning should continue to extend industrial mineral extraction around the same community after seven decades of previous quarrying without first understanding the cumulative implications for the community's long-term health, wellbeing and sustainability.

2.4 The Importance of Time

One of the distinctive features of minerals planning is that developments often extend over many years and, in some cases, several decades.

For many communities this represents a single generation.

For West Deeping it represents several.

Children born when quarrying first commenced have become grandparents whilst mineral extraction has continued around the parish. Families have lived with successive phases of extraction throughout much of their lives. The cumulative experience of the community therefore extends far beyond the lifespan of any individual planning permission.

Strategic planning should recognise not only the duration of individual mineral developments but also the cumulative effect of successive developments upon communities that have already accommodated mineral extraction over many decades.

2.5 The Planning Question

The purpose of this representation is not to argue that every mineral proposal affecting an established community should necessarily be refused.

Rather, it respectfully invites the Examination to consider a broader strategic question.

Should communities be expected to bear the cumulative burden of successive generations of mineral extraction without strategic consideration of their long-term health, wellbeing and sustainability?

The Parish Council respectfully submits that this question lies at the heart of the preparation of the Lincolnshire Minerals and Waste Local Plan and provides the context for the chapters that follow.

Strategic Planning Question

Should strategic minerals planning seek to understand the characteristics, function and long-term sustainability of an established rural community before determining that land is suitable for mineral allocation?

Chapter 3

Health, Wellbeing and Quality of Life

The success of planning is measured not only by the development it enables, but by the quality of the places in which people live.

Health and wellbeing are legitimate planning considerations that should be understood strategically before land is allocated, particularly where a community has already experienced decades of industrial mineral activity.

3.1 Health as a Strategic Planning Consideration

The planning system has long recognised that the purpose of development planning extends beyond land use alone. Sustainable development requires consideration of the environmental, health and wellbeing, economic and social consequences of planning decisions, including their implications for the health and wellbeing of existing communities⁵.

For communities affected by mineral extraction, health and wellbeing cannot be viewed solely through the lens of compliance with individual technical standards. Whilst matters such as air quality, noise and traffic are commonly assessed through separate technical reports, the experience of residents is cumulative. It is the combined effect of those influences over time that shapes how a community experiences mineral development.

The Parish Council submits that strategic planning should therefore seek to understand not only individual environmental effects but also their combined influence upon the health, wellbeing and quality of life of an established rural community.

⁵ National Planning Policy Framework, Chapter 8 ("Promoting healthy and safe communities"), together with Planning Practice Guidance: Health and Wellbeing.

3.2 The Experience of West Deeping

Since the 1930s, successive generations of residents have lived alongside open cast mining, heavy goods vehicle movements, industrial activity, changing landscapes and the uncertainty associated with successive mineral proposals.

For many residents, the proposed allocation of Site SG17 was not perceived as an isolated development proposal. Rather, it represented the continuation of industrial mineral extraction around the village for approximately a further forty years.

This long-term perspective is important. Whilst technical assessments frequently consider the effects of an individual proposal, communities experience the cumulative consequences of successive proposals over many decades.

The Parish Council therefore respectfully submits that the history of mineral extraction at West Deeping forms an important part of the strategic planning context within which any further allocation should be considered.

3.3 Health Beyond Technical Assessment

Throughout the preparation of the Local Plan, repeatedly expressed concerns regarding the potential implications of mineral extraction for their health and wellbeing.

Residents identified a wide range of concerns including:

- prolonged exposure to industrial activity;
- potential long-term health implications associated with prolonged mineral extraction, including airborne particulate matter and respirable silica leading to silicosis and health issues;
- cumulative health burden of continuing quarrying adjacent to an established community
- operational noise and vibration;
- heavy goods vehicle movements;
- disturbance to sleep and daily life;
- stress and anxiety arising from prolonged uncertainty;
- reduced enjoyment of homes, gardens and public spaces;
- impacts upon walking, cycling and outdoor recreation;
- the health and wellbeing of children, older residents and more vulnerable members of the community.

The Parish Council recognises that detailed assessment of many of these matters properly forms part of any subsequent planning application.

However, their repeated identification throughout the preparation of the Local Plan demonstrates that **health and wellbeing were not peripheral issues. They formed a central element of the community's response to the proposed allocation.**

The preparation of the Local Plan was supported by extensive technical assessments addressing matters such as ecology, landscape, heritage, health and wellbeing, and the natural environment. The Parish Council welcomes the importance attached to those subjects. It nevertheless respectfully submits that comparatively less strategic attention appears to have been given to the long-term implications for the health, wellbeing and sustainability of the community itself.

3.4 A Living Community Experiences Combined Effects

One of the recurring themes emerging from consultation was that residents do not experience planning impacts individually.

A resident does not experience only dust. Or only noise. Or only traffic.

Rather, they experience all of these together whilst continuing to live, work and raise families within the community.

The evidence suggests that this distinction is important. Technical assessments necessarily examine individual disciplines. Communities experience the cumulative interaction of those disciplines over time.

Strategic planning should therefore seek to understand the combined effect of environmental and health influences upon the community as a whole, rather than considering each issue only in isolation.

3.5 The Long-Term Nature of Mineral Development

Mineral developments differ from many other forms of development because they often extend over prolonged periods.

The proposed allocation of SG17 would have represented approximately a further forty years of mineral extraction surrounding West Deeping.

When viewed alongside the preceding seventy years of quarrying already experienced by the community, the strategic question extends beyond the effects of a single mineral site.

It becomes a question of whether the continuation of industrial mineral activity around the same community for well over a century has implications for the long-term health, wellbeing and sustainability of that community.

This representation concludes that this is a strategic planning question which should be understood before land is allocated for mineral extraction.

3.6 Quality of Life

The Parish Council recognises that quality of life is not easily measured through technical assessment alone.

It is reflected in residents' ability to enjoy their homes, spend time outdoors, use public rights of way, participate in community life and experience the tranquillity and rural character that form an important part of West Deeping's identity.

The preparation of the Local Plan generated numerous representations describing these aspects of village life and expressing concern regarding the cumulative effect of further mineral development.

Whilst individual planning applications may ultimately demonstrate compliance with technical standards, the Parish Council considers that strategic planning should also recognise the broader importance of maintaining the long-term quality of life of established rural communities.

3.7 A Question of Sustainability

The purpose of this chapter is not to suggest that mineral development and healthy communities are necessarily incompatible.

Rather, it respectfully asks whether the cumulative implications for the health, wellbeing and quality of life of West Deeping were sufficiently understood at the strategic planning stage before Site SG17 was identified for allocation.

This question is particularly important where a community has already experienced successive generations of mineral extraction and where further development would extend that experience for several decades into the future.

Strategic Planning Question

Should strategic minerals planning recognise the long-term health, wellbeing and quality of life of established rural communities as fundamental considerations before determining that land is suitable for mineral allocation?

Chapter 4

The Cumulative Burden of Successive Mineral Extraction

Strategic planning should consider not only the cumulative impacts of development, but also the cumulative burden placed upon communities that have accommodated successive generations of mineral extraction.

4.1 Looking Beyond Individual Developments

Mineral planning applications are ordinarily assessed by considering the likely effects of the individual proposal before the decision-maker. That approach is entirely appropriate where development is considered in isolation.

West Deeping, however, presents a different planning context.

The proposed allocation of Site SG17 did not arise within a landscape unaffected by mineral extraction. Rather, it formed part of a long history of successive quarrying around the parish extending over approximately seventy years.

It is submitted that this history is itself a material strategic consideration. It does not suggest that communities should never accommodate mineral development. Rather, it **respectfully submits that there comes a point at which the cumulative burden experienced by one community becomes a legitimate strategic planning consideration in its own right.**

4.2 Successive Generations of Quarrying

For approximately seven decades, West Deeping has experienced the effects of mineral extraction.

During that period:

- extensive areas of the parish have been quarried and restored;
- industrial activity has become a recurring feature of the surrounding landscape;
- residents have experienced successive planning applications and restoration schemes;
- generations of families have lived alongside quarrying throughout much of their lives.

The proposed allocation of SG17 would have extended that experience for approximately a further forty years.

The strategic issue is therefore not simply the duration of one mineral development.

It is the continuation of industrial mineral extraction affecting the same community over a period approaching, and potentially exceeding, a century.

4.3 A Community's Experience Cannot Be Reset

One recurring theme throughout the consultation process was that previous quarrying cannot simply be disregarded because individual planning permissions have expired or restoration has been completed.

Each successive phase of mineral extraction forms part of the lived experience of the community.

Residents do not experience each proposal in isolation. This cumulative experience cannot simply be reset at the conclusion of each planning permission. Whilst individual sites may be restored, the community continues to experience the long-term consequences of successive phases of mineral extraction and the uncertainty associated with future proposals.

They experience the continuation of a process that has shaped the parish over many decades.

The Parish Council considers that strategic planning should recognise this cumulative history when considering the suitability of further mineral allocations.

4.4 The Difference Between Cumulative Impact and Cumulative Burden

Planning policy rightly requires decision-makers to consider cumulative impacts⁶.

This representation respectfully suggests that, for established communities such as West Deeping, there is an additional strategic consideration.

Whilst cumulative impacts are commonly assessed in relation to the environmental effects of development proposals, cumulative burden describes

⁶ National Planning Policy Framework .Planning Practice Guidance - Minerals. Planning Practice Guidance - Environmental Impact Assessment (cumulative effects).

the long-term experience of communities that have accommodated successive phases of mineral extraction over many decades.

For the purposes of this representation, the Parish Council uses the expression "**cumulative burden**" to describe the enduring consequences of successive generations of mineral extraction for an established rural community.

Whilst related to the recognised planning concept of cumulative impacts, cumulative burden extends beyond the environmental effects of individual proposals.

It encompasses the continuing influence upon health, wellbeing, quality of life, community confidence and the long-term sustainability of village life.

The Parish Council considers that this broader perspective becomes particularly important where mineral extraction has already affected the same community for many decades.

Cumulative Impacts	Cumulative Burden
Environmental assessment of development proposals	Long-term experience of an established community
Usually proposal-specific	Develops across successive generations of extraction
Focuses on environmental effects	Includes health, wellbeing, confidence and sustainability
Assessed through planning applications	Relevant to strategic minerals planning

This representation respectfully suggests that both concepts have a legitimate role within strategic minerals planning, particularly where communities have accommodated mineral extraction over many decades.

4.5 Resilience Should Not Be Assumed

West Deeping has adapted to successive phases of mineral extraction for many years.

The Parish Council recognises the resilience demonstrated by the community throughout that period.

However, previous acceptance of mineral development should not be interpreted as evidence that further extraction can be accommodated indefinitely.

Nor should the absence of previously identified unacceptable impacts be taken to imply that cumulative effects cannot arise over time.

Strategic planning should consider whether the continued extension of industrial mineral activity around the same community remains consistent with the long-term objectives of sustainable development.

4.6 More Than Half the Parish

Over successive decades, more than half of the parish has been excavated for mineral extraction.

This provides important context for understanding the concerns expressed by residents during the preparation of the Local Plan.

The proposed allocation of SG17 was not viewed as the introduction of quarrying into West Deeping.

It was viewed as the continuation of a process that had already transformed substantial areas of the parish landscape.

The cumulative significance of that history formed an important part of the Parish Council's representations throughout the preparation of the Plan.

This has remained a consistent theme throughout the Parish Council's representations, including its Regulation 18 submission, which described SG17 as extending the cumulative burden of mineral extraction already experienced by West Deeping for more than seventy years.⁷

4.7 Looking Forward, Not Back

This chapter is not intended to revisit previous planning decisions.

Nor does it suggest that earlier mineral permissions were necessarily wrongly granted.

Rather, it respectfully submits that strategic planning should recognise the cumulative legacy of those decisions when considering future allocations.

Each individual planning permission may have been acceptable when considered in isolation.

⁷ West Deeping Parish Council Regulation 18 Representation

The strategic planning question is whether their combined legacy should influence decisions regarding future mineral development affecting the same community.

Strategic Planning Question

Should strategic minerals planning consider not only the cumulative impacts of an individual proposal, but also the cumulative burden experienced by communities that have accommodated successive generations of mineral extraction over many decades?

Chapter 5

Industrial Development Within a Living Community

Mineral extraction is not experienced by communities as an abstract land use allocation. It is experienced as prolonged industrial activity within the landscape in which people live.

5.1 Beyond Mineral Extraction

Much of the evidence prepared during the allocation of Site SG17 necessarily focused upon the principle of mineral extraction and the extent of the proposed workings.

The Parish Council recognises the importance of that assessment.

However, for residents of West Deeping, the proposal represented considerably more than the excavation of sand and gravel.

It involved the potential establishment and operation of industrial processing infrastructure, heavy goods vehicle movements, stockpiling, loading operations, plant, machinery and associated activity in close proximity to an established rural community over a prolonged period.

The Parish Council respectfully submits that understanding this broader industrial context forms an important part of strategic plan-making.

5.2 The Nature of Mineral Processing

Whilst mineral extraction progresses across a site over time, associated processing infrastructure frequently occupies relatively fixed locations for many years.

Depending upon the detailed design of any future proposal, such infrastructure may include crushing and screening plant, conveyors, stockpiles, loading facilities, weighbridges, lighting, ancillary buildings, vehicle movements and other operational activities necessary to support mineral extraction.

The Parish Council recognises that the detailed location and design of such infrastructure would ordinarily be determined through a subsequent planning application.

However, the strategic planning question is not where individual items of infrastructure might ultimately be located.

It is whether the long-term implications of introducing industrial activity of this nature adjacent to an established rural community were sufficiently understood before Site SG17 was considered suitable for allocation.

5.3 Living Beside Industry

Mineral extraction is frequently described in planning terms as a mineral site. For the residents of West Deeping, however, the proposal represented **a forty-year industrial neighbour. The distinction is important.** Strategic planning should seek to understand not simply the characteristics of the site itself, but the relationship created between prolonged industrial activity and the community living immediately alongside it.

Throughout the preparation of the Local Plan, residents repeatedly expressed concern regarding the proximity of industrial mineral activity to homes, gardens, public rights of way and community facilities.

These concerns extended beyond the extraction area itself.

They reflected the reality that mineral development is experienced through its day-to-day operation.

Residents were concerned about:

- prolonged industrial noise;
- processing activity;
- loading and unloading operations;
- heavy goods vehicle movements;
- dust generated through extraction and processing;
- long term health implications associated with prolonged mining including airborne particulate matter and respirable crystalline silica
- artificial lighting;
- reversing alarms and operational plant;
- the visual presence of industrial infrastructure within the rural landscape.

The Parish Council submits that these concerns should be understood collectively as representing the experience of living alongside prolonged industrial activity rather than as isolated technical issues.

5.4 The Village Edge

One recurring concern throughout the consultation process was the relationship between the proposed allocation and the existing village.

The proposed site would have extended mineral extraction and the associated industrial activity, including a new processing plant, to the immediate edge of the settlement, bringing operational mining development into close proximity with residential properties, gardens, community amenities and public spaces.

The Parish Council does not suggest that proximity alone determines the acceptability of development.

However, proximity inevitably influences the way in which industrial activity is experienced by the community and therefore forms an important strategic planning consideration.

5.5 Industrial Activity and Rural Character

West Deeping is a historic rural village whose character derives from its agricultural setting, the River Welland, its historic landscape and the everyday experience of village life.

Mineral extraction has long formed part of that wider landscape.

Nevertheless, the examination may wish to consider that there remains an important distinction between acknowledging the contribution of minerals to the local economy and extending prolonged industrial activity ever closer to the heart of an established community.

Strategic planning should seek to understand how that changing relationship may influence the character, attractiveness and long-term sustainability of rural settlements.

5.6 Temporary Development and Permanent Experience

Mineral development is often described as temporary because extraction ultimately ceases and restoration follows.

That is correct in planning terms.

However, from the perspective of the community, developments extending over several decades are experienced very differently.

For a child growing up in West Deeping, a forty-year mineral development is not temporary.

It represents much of a lifetime.

For families establishing homes within the village, successive phases of mineral extraction become part of the long-term character of the place in which they live.

The Parish Council considers that strategic planning should recognise this distinction when considering the cumulative implications of mineral allocations.

5.7 Understanding Before Allocation

The purpose of this chapter is not to determine whether any future mineral processing plant could ultimately be designed to meet environmental standards.

Those matters properly belong within any subsequent planning application.

Rather, it respectfully asks whether the strategic assessment adequately considered the implications of introducing prolonged industrial activity into such close proximity with an established rural community before concluding that Site SG17 was suitable for allocation. Implications with far reaching consequences including the health and wellbeing of the community.

Strategic Planning Question

Should strategic plan-making consider not only the suitability of land for mineral development but also the long-term relationship created between prolonged industrial activity and an established rural community before determining that land is suitable for allocation?

Mineral Site	Living Community
Extraction	Homes
Processing	Gardens
Crushing	Public rights of way
HGV movements	Village streets
Stockpiles	Recreation
Lighting	Night-time tranquillity
Operational plant	Daily life

Strategic planning should seek to understand both sides of this relationship before allocation is contemplated.

PART II Strategic Assessment and Its Limits

Chapter 6

Strategic Assessment

The purpose of strategic planning is not simply to identify land capable of accommodating development. It is to determine, through proportionate evidence and informed judgement, whether development is appropriate in that location before land is allocated.

6.1 The Purpose of Strategic Assessment

The preparation of a Local Plan differs fundamentally from the determination of an individual planning application⁸.

At the plan-making stage, the Mineral Planning Authority is required to consider whether potential sites are suitable for allocation within the wider strategy of the Plan. This necessarily involves identifying opportunities, recognising constraints and exercising planning judgement based upon the evidence then available.

The Parish Council fully recognises that not every technical matter can or should be resolved before a site is allocated. Strategic planning does not require the level of detailed design expected at the planning application stage.

However, it does require sufficient understanding of the principal planning considerations to enable informed decisions regarding the suitability of a site for allocation.

⁸ NPPF- Plan-making, Soundness, Evidence base

6.2 Strategic Understanding

Strategic assessment is concerned not simply with identifying individual constraints but with understanding how those constraints interact.

A community does not experience planning issues as separate disciplines.

Health, traffic, air quality, landscape, industrial activity, public rights of way, residential amenity and community wellbeing combine to influence how a place functions and how people experience it.

The Parish Council respectfully submits that strategic planning should therefore seek to understand these relationships before concluding that land is suitable for mineral allocation.

The evidence assembled during the preparation of the Plan extended beyond technical disciplines such as health, transport, ecology and landscape to include heritage evidence⁹ concerning the nationally important historic environment immediately adjoining Site SG17, most notably Molecey Mill and The Granary. Together, these different strands of evidence formed part of the strategic planning context against which the suitability of Site SG17 required assessment.

6.3 The Role of Evidence

Throughout the preparation of the Lincolnshire Minerals and Waste Local Plan, an extensive body of evidence was assembled concerning Site SG17¹⁰.

This included technical assessments, statutory consultation responses, specialist advice, local representations and the Council's own site assessment documentation.

Each document performed an important function. Collectively, they contributed to a progressively developing understanding of the planning issues associated with the proposed allocation.

The value of this evidence lies not simply in the conclusions of individual reports, but in the progressively developing understanding that emerges when the evidence is considered as a whole.

The preparation of that evidence base also demonstrates the importance of ensuring that strategic site assessments consistently identify and evaluate the principal

⁹ Historic England Regulation 18 submission; Molecey Mill & The Granary Regulation 18 submission

¹⁰ SG17 Site Assessment, Consultation Outcome Statement, Sustainability Appraisal, HRA, Consultation Documents.

opportunities and constraints affecting proposed allocations throughout the plan-making process.

6.3A Mitigation

Throughout the evidence base, many of the planning issues identified in relation to Site SG17 are accompanied by references to stand-offs, buffer zones, landscaping, operational controls, mitigation measures or further assessment at the planning application stage. Such measures undoubtedly have an important role within the planning system.

However, the Parish Council submits that mitigation should follow strategic understanding rather than replace it. Before considering how the effects of development might be reduced, it is first necessary to establish whether the proposed location is fundamentally appropriate for prolonged mineral extraction adjacent to an established rural community.

The Parish Council therefore invites the Examination to consider whether strategic plan-making should first determine the suitability of a proposed allocation before relying upon later mitigation to address concerns identified during plan preparation.

6.4 Strategic Judgement

Strategic planning ultimately requires judgement.

Technical evidence informs that judgement, but it does not replace it.

The purpose of site allocation is not simply to catalogue constraints or identify matters requiring further investigation.

Rather, it is to exercise informed planning judgement regarding whether a site is suitable to form part of the strategic development framework.

The Parish Council submits that this distinction is important because strategic judgement necessarily precedes the detailed assessments undertaken at the planning application stage.

6.5 West Deeping

The proposed allocation of Site SG17 presented an unusual planning context.

Unlike many mineral allocations, the site lay immediately adjacent to an established rural community that had already experienced approximately seventy years of successive mineral extraction.

The strategic assessment therefore required consideration not only of the characteristics of the site itself, but also of the cumulative implications for the community that would continue to live alongside mineral extraction for many years to come.

The Parish Council considers that this wider context formed an integral part of the strategic planning judgement required before allocation was contemplated.

6.6 What Should Be Understood Before Allocation?

The preceding chapters have examined a number of themes arising from the preparation of the Local Plan:

- the long-term health and wellbeing of the community;
- the cumulative burden of successive mineral extraction;
- the relationship between industrial activity and residential amenity;
- the sustainability of West Deeping as a living rural community.

These are not separate planning questions.

Collectively, they form part of the strategic understanding required before land is allocated for mineral development.

The Parish Council submits that strategic assessment should seek to understand these relationships before concluding that further assessment can appropriately be deferred to the planning application stage.

6.7 The Boundary Between Strategy and Detail

The Parish Council does not suggest that every technical issue must be resolved before a Local Plan is adopted.

Detailed matters relating to engineering, site design, operational management and mitigation will inevitably be addressed through future planning applications if sites are allocated.

However, there is an important distinction between:

- **refining the details of an acceptable strategic proposal; and**
- **deferring consideration of fundamental planning questions necessary to determine whether allocation is appropriate in the first place.**

It is this distinction that lies at the heart of the present representation.

6.8 A Strategic Planning Question

The purpose of this chapter is not to suggest that Site SG17 should have been assessed to the same level of detail as a planning application.

Rather, it respectfully invites the Examination to consider whether the strategic assessment demonstrated sufficient understanding of the principal planning issues affecting West Deeping before Site SG17 was considered suitable for allocation.

That question provides the context for the following chapter, which considers the role of deferred assessment within the plan-making process.

Strategic Planning Question

Should strategic planning establish sufficient understanding of the principal planning considerations affecting an established community before determining that land is suitable for allocation?

Chapter 7

Deferred Assessment and the Limits of Strategic Planning

Strategic planning cannot resolve every technical question. Equally, it should not defer so many fundamental questions that the strategic assessment itself becomes incomplete.

7.1 Strategic Planning and Planning Applications

The planning system deliberately distinguishes between the preparation of a Local Plan and the determination of individual planning applications.

That distinction serves an important purpose.

A Local Plan establishes the strategic framework for future development by identifying locations considered suitable in principle for allocation.

Planning applications then examine the detailed design, operation and mitigation of development proposals within that strategic framework.

The Parish Council fully supports this distinction.

Indeed, it is fundamental to the operation of the planning system.

7.2 The Purpose of Deferral

The Parish Council recognises that some matters are entirely appropriate for consideration at the planning application stage.

These commonly include detailed matters such as engineering design, construction methods, landscaping, operational management, restoration design and other site-specific issues that cannot reasonably be resolved during strategic plan preparation.

The ability to defer such matters is both necessary and appropriate.

Without it, plan-making would become unnecessarily complex and inflexible.

7.3 The Limits of Deferral

However, the ability to defer detailed matters does not remove the need for sufficient strategic understanding before land is allocated.

The purpose of strategic assessment is not simply to identify issues requiring further investigation.

It is to establish whether a site is suitable for allocation having regard to the principal planning considerations affecting that location.

Where numerous fundamental planning issues are acknowledged but repeatedly identified as matters for subsequent assessment, an important strategic planning question naturally arises.

Has sufficient understanding been established to support allocation in principle?

7.4 The Experience of Site SG17

Throughout the preparation of the Local Plan, a number of significant issues affecting West Deeping were identified within the evidence base¹¹.

These included matters relating to:

- health and wellbeing;
- quality of life;
- residential amenity;
- industrial processing activities;
- traffic and heavy goods vehicle movements;
- air quality, dust and noise;
- hydrology and groundwater;
- landscape and visual effects;
- cumulative impacts;
- heritage and setting.

The Parish Council recognises that detailed assessment of each of these matters would ordinarily continue through any subsequent planning application.

However, taken together they represent considerably more than a series of isolated technical matters.

Collectively, they define the strategic planning context within which Site SG17 was being considered.

¹¹ See Consultation Outcome Statement; Site Assessment; Statutory Consultee Responses; Regulation 18 consultation evidence.

7.5 The Cumulative Effect of Deferral

The concern raised by this representation is not that any individual matter was proposed for later assessment.

Rather, it is the cumulative effect of repeated deferral.

When viewed individually, each deferred matter may appear entirely reasonable.

When viewed collectively, however, an important planning question emerges.

If health and wellbeing is deferred...

If air quality is deferred...

If industrial processing is deferred...

If cumulative impacts are deferred...

If residential amenity is deferred...

If hydrology is deferred...

If landscape is deferred...

If heritage is deferred...

At what point does the strategic assessment itself become insufficiently informed?

This representation respectfully submits that this is the principal question arising from the preparation of the Local Plan in relation to West Deeping.

Strategic Planning Consideration	Recognised During Plan Preparation	Detailed Assessment Deferred
Health and wellbeing	✓	✓
Residential amenity	✓	✓
Industrial processing	✓	✓
Traffic and HGV movements	✓	✓
Air quality, dust and noise	✓	✓
Hydrology and groundwater	✓	✓
Landscape and visual effects	✓	✓

Heritage and setting	✓	✓
Cumulative impacts	✓	✓

The Parish Council also notes that elements of the heritage evidence, like the evidence relating to hydrology, cumulative burden, health and wellbeing, relating to the historic environment surrounding Site SG17 similarly evolved throughout the preparation of the Plan. This included nationally important heritage assets, the West Deeping Conservation Area and, amongst others, the Grade II* Molecey Mill and The Granary, with detailed consideration similarly anticipated at the planning application stage. The Parish Council considers that this illustrates the wider strategic question explored throughout this chapter, namely the extent to which fundamental planning considerations should be sufficiently understood before allocation is contemplated.

The Parish Council accepts that detailed technical work properly follows at the planning application stage. The planning question arising from the cumulative pattern identified throughout the evidence base is whether sufficient strategic understanding had been established before Site SG17 was considered suitable for allocation.

7.6 Strategic Understanding Before Strategic Judgement

The Parish Council does not suggest that strategic assessment should replicate the detailed analysis expected of a planning application.

Nor does it suggest that every uncertainty must be resolved before allocation decisions are taken.

However, strategic judgement necessarily depends upon strategic understanding.

Without sufficient understanding of the principal planning considerations affecting an established community, there is a risk that the decision to allocate land becomes separated from the very evidence intended to inform that decision.

The Parish Council respectfully submits that this distinction is central to the proper preparation of a Local Plan.

7.7 The Particular Circumstances of West Deeping

West Deeping presents an unusual planning context.

The proposed allocation did not concern a previously undeveloped community unaffected by mineral extraction.

It concerned an established rural parish that had already accommodated approximately seventy years of quarrying and where more than half of the parish had experienced mineral extraction.

The strategic planning question was therefore not simply whether the technical impacts of one further quarry could ultimately be mitigated.

It was whether the continuation of industrial mineral extraction around the same community for several further decades was consistent with the long-term health, wellbeing and sustainability of that community.

The Parish Council considers that this question should itself have formed part of the strategic assessment.

7.8 Learning from the Plan-Making Process

As noted throughout this representation, the Parish Council welcomes the Council's decision not to allocate Site SG17 and does not revisit that outcome here. Rather, it respectfully suggests that the Examination provides an opportunity to consider the wider lessons arising from the preparation of the Plan.

One such lesson concerns the relationship between strategic assessment and deferred assessment.

Where a proposal gives rise to numerous interrelated planning issues affecting an established community, strategic understanding may itself become one of the principal tasks of the plan-making process rather than a matter capable of being assembled incrementally through future planning applications.

Strategic Planning Question

Should the strategic planning process distinguish between matters that can properly be deferred and matters that require strategic understanding before land is allocated?

PART III

Applying the Strategic Principles

Chapter 8

Reading the Evidence as a Whole

The preparation of a Local Plan involves many documents prepared for different purposes. Strategic understanding emerges not from any single document, but from reading the evidence collectively.

8.1 The Evidence Base

Throughout the preparation of the Lincolnshire Minerals and Waste Local Plan, a substantial body of evidence¹² was assembled in relation to Site SG17 and SG11 and their potential effects upon West Deeping.

This evidence included site assessment reports, technical studies, consultation responses, statutory consultee advice, planning policy documents and representations submitted by local residents, community organisations and the Parish Council.

Each document fulfilled a different purpose within the plan-making process.

Some considered transport.

Others considered landscape, ecology, hydrology, heritage, health and wellbeing or environmental matters.

Collectively, however, they described the relationship between the proposed allocation and the community of West Deeping from a variety of different perspectives.

The Parish Council submits that the true value of the evidence lies not simply in the conclusions reached by individual documents, but in the broader understanding that emerges when those documents are read together.

¹² Consultation Outcome Statement, Evidence Base

8.2 Different Documents, Shared Themes

Although prepared independently, many of the documents considered during the preparation of the Plan returned repeatedly to similar themes.

These included:

- the cumulative effects of prolonged mineral extraction;
- the relationship between industrial activity and residential amenity;
- impacts upon health and wellbeing;
- traffic and highway safety;
- environmental quality;
- the rural character of the village;
- the long-term sustainability of the community.

Each document examined those matters through its own professional discipline.

Taken together, however, they reveal a consistent picture of the planning issues that shaped public concern regarding Site SG17 and SG11.

The Parish Council suggests that these recurring themes should be understood collectively rather than as isolated technical considerations.

8.3 The Value of Community Knowledge

One of the strengths of the consultation process was the contribution made by local residents and organisations with longstanding knowledge of West Deeping.

Residents brought an understanding of how the village functions in practice.

They described daily patterns of movement, the use of public rights of way, recreational activity, community facilities and the cumulative experience of living alongside successive phases of mineral extraction.

This local knowledge did not replace technical evidence.

Rather, it complemented it.

Strategic planning is strongest when professional expertise and community knowledge are considered together, each informing the other.

8.4 A Progressive Understanding

As the preparation of the Local Plan progressed, the evidence base developed accordingly.

- Additional technical work was undertaken.
- Further consultation responses were received.
- Statutory consultees provided advice.
- The Parish Council and many residents continued to contribute local evidence and observations.

Taken together, the evidence created a **progressively developing understanding** of the relationship between Site SG17 and the community of West Deeping.

That understanding did not arise from any single report or consultation response.

It emerged incrementally through the interaction of multiple disciplines and the cumulative contribution of many participants.

8.5 Reading the Evidence Collectively

The purpose of this representation is not to suggest that every document reaches identical conclusions.

Differences of professional judgement are entirely legitimate.

Nor should every consultee be expected to attach equal weight to the same planning considerations.

Rather, the Parish Council submits that the evidence should be considered collectively.

When viewed as a whole, it provides a richer understanding of the strategic planning context than may be apparent from considering individual documents in isolation.

It is this broader understanding that should inform the Examination's consideration of the Plan.

The relationship between SG17 and SG11 provides a further example of why the evidence should be read collectively. Throughout the evidence base, SG11 is repeatedly described as dependent upon SG17 for highway access and not feasible as a standalone allocation. The Site Assessment Report records that "no access to the highway network exists without using the access proposed for SG17" and recommends that SG11 "be considered as an extension to SG17 allocation, not feasible in isolation." The Integrated Sustainability Appraisal reaches the same conclusion. The evidence suggests that, where two proposed allocations were recognised as functionally

interdependent, it is legitimate to ask whether their cumulative implications were considered sufficiently as a single mineral complex during plan preparation.

8.6 Strategic Understanding

Earlier chapters have suggested that strategic planning should seek to understand communities before allocating land for development.

This chapter suggests that such understanding often emerges through the cumulative effect of the evidence rather than through any individual document.

The Examination therefore has an opportunity to consider not only the findings of individual reports but also the wider understanding that develops when the evidence is read as an integrated whole.

Strategic Planning Question

Should strategic planning draw its understanding from the cumulative evidence as a whole, rather than from individual documents considered in isolation?

Chapter 9

Consultation and Community Understanding

Consultation is not simply a procedural requirement. At its best, it enables strategic planning to benefit from the knowledge and experience of the communities it serves.

9.1 The Purpose of Consultation

Public consultation forms an essential part of the preparation of a Local Minerals Plan.

Its purpose extends beyond providing an opportunity to support or oppose development proposals. Consultation enables local communities, statutory consultees, specialist organisations and other interested parties to contribute evidence, local knowledge and professional expertise that may assist the planning authority in understanding the implications of proposed allocations.

The Parish Council submits that effective consultation is therefore an important component of strategic planning itself. It allows the evidence base to evolve and supports better-informed planning judgements.

9.2 The Response to Site SG17

Throughout the preparation of the Lincolnshire Minerals and Waste Local Plan, Site SG17 generated a substantial volume of public representations¹³.

The consultation process demonstrated a remarkable level of constructive public engagement. Residents devoted substantial time to understanding technical planning documents, attending public meetings and submitting detailed representations. The Parish Council respectfully submits that this collective effort materially enriched the evidence available to the Mineral Planning Authority and contributed to a progressively developing understanding of the planning implications of Site SG17.

Those representations were submitted by local residents, the Parish Council, statutory consultees, elected members, specialist organisations and other interested parties. Together, they created one of the most extensive community evidence bases

¹³ Consultation Outcome Statement

assembled in relation to any individual site considered during the preparation of the Local Plan.

Although individual representations naturally differed in emphasis, many identified common themes, including:

- the cumulative effects of long-term mineral extraction;
- health and wellbeing;
- residential amenity;
- industrial activity in close proximity to the village;
- traffic and highway safety;
- landscape and environmental effects;
- hydrology and groundwater;
- the long-term sustainability of West Deeping as a living rural community.

The recurrence of these themes across a broad range of representations demonstrates that they reflected genuine strategic planning concerns rather than isolated individual objections.

9.3 A Progressively Developing Understanding

As consultation progressed, the evidence relating to Site SG17 became increasingly comprehensive.

Professional assessments were supplemented by local knowledge.

Statutory consultee advice was considered alongside the lived experience of residents.

The Parish Council continued to develop and refine its own representations as additional information became available.

The result was a **progressively developing understanding** of the relationship between the proposed allocation and the community of West Deeping.

The Parish Council considers that this cumulative understanding forms an important part of the Examination evidence.

9.4 The Significance of Community Knowledge

Residents possess a form of knowledge that cannot always be captured through technical assessment alone.

They understand how the village functions on a daily basis.

They know how public rights of way are used, where children walk, how traffic behaves at different times of the day, how the landscape is experienced throughout the seasons and how successive phases of mineral extraction have affected community life over many decades.

This knowledge should not be regarded as an alternative to professional assessment.

Rather, it complements technical evidence by providing context and practical understanding that may not otherwise be apparent.

The Parish Council submits that the consultation process demonstrated the value of integrating community knowledge into strategic planning.

9.5 The Outcome of Consultation

In reporting the outcome of consultation to the Council's Executive¹⁴ prior to the commencement of the Regulation 19 consultation, officers observed that:

"Most public reaction has been in relation to the proposed site at West Deeping (SG17). The proposed next iteration of the plan will de-allocate therefore removing that significant local opposition."

This reflected earlier reporting to the West Deeping Quarry Liaison meeting, where officers advised that the Regulation 18 consultation had generated **approximately 3,000 consultation responses**, with **around 85% relating to West Deeping**¹⁵. Those figures illustrate the exceptional level of public engagement generated by the proposed allocation and the extent to which the strategic issues associated with SG17 came to dominate the consultation process.

However, the significance of the consultation extends beyond the withdrawal of a single allocation. Throughout the preparation of the Plan, residents, statutory consultees, elected members, specialist organisations and the Parish Council collectively generated a substantial body of evidence concerning the long-term implications of mineral extraction for West Deeping. That evidence contributed to a progressively developing understanding of the planning issues associated with Site SG17 and the community it would have affected.

The Parish Council also notes that, whilst the Regulation 18 consultation generated approximately **3,000 individual representations**, the Proposed Submission consultation material necessarily condenses those responses into a much smaller number of summarised representations and themes¹⁶. The Parish Council fully recognises that summarisation is both legitimate and necessary within the plan-making

¹⁴ Executive Meeting 9th June 2026 - Officer presentation slide number 3

¹⁵ West Deeping Quarry Liaison Meeting – 10th April 2025 MPA update

¹⁶ Consultation Outcome Statement

process. However, it respectfully submits that there is a corresponding responsibility to ensure that the exceptional scale of public participation, and the consistency with which strategic planning concerns were repeatedly identified, are not diminished in the permanent Examination Record.

The removal of SG17 resolved the immediate question of site allocation. It did not diminish the value of the strategic understanding that emerged through the consultation process. That understanding remains relevant to the Examination because it forms part of the evidence base explaining how the proposed allocation was considered, challenged and ultimately withdrawn.

9.6 Consultation as Evidence

One of the strengths of the plan-making process has been the breadth of participation.

Technical specialists contributed professional expertise.

Statutory consultees considered matters within their respective responsibilities.

Residents and the Parish Council contributed local knowledge accumulated over many years.

Each brought a different perspective.

Together, they enriched the strategic understanding of West Deeping.

The Parish Council respectfully submits that the Examination should therefore regard this consultation record not simply as a collection of representations but as an important component of the evidence base informing the evolution of the Plan. Furthermore, the permanent Examination Record should accurately reflect both the scale of public participation and the strategic planning issues repeatedly identified through that consultation.

9.7 Looking Beyond SG17

The strategic lessons emerging from the consultation process extend beyond the proposed allocation of Site SG17.

They demonstrate the value of meaningful engagement between planning authorities and the communities affected by strategic planning decisions.

Where consultation reveals recurring concerns supported by evidence from multiple sources, those concerns contribute to the progressively developing understanding upon which sound strategic planning depends.

The Parish Council submits that this represents one of the lasting benefits of the preparation of the Lincolnshire Minerals and Waste Local Plan.

Strategic Planning Question

Should the consultation process be regarded not merely as a means of recording support and objection, but as an important mechanism through which the strategic understanding of places and communities develops during the preparation of a Local Plan?

Chapter 10

Lessons for Strategic Plan-Making

Every Local Plan is prepared for a particular place and a particular time. The planning principles emerging from that process, however, may have wider application.

The preceding chapters have considered the strategic planning issues arising from the proposed allocation of Site SG17 and their implications for the community of West Deeping.

As before, this representation does not seek to revisit the Council's decision not to allocate Site SG17; rather, it respectfully suggests that the preparation of the Plan provides an opportunity to reflect upon a number of broader planning lessons that may assist both the present Examination and future plan-making.

The experience of West Deeping further illustrates the importance of considering communities, nationally important assets and the wider historic environment collectively when exercising strategic planning judgement.

10.1 Communities Experience Development Collectively

One recurring theme throughout this representation has been the distinction between the way planning assessments are undertaken and the way communities experience development.

Technical assessments necessarily examine individual disciplines such as transport, air quality, noise, ecology or landscape.

Communities experience those matters together, as Chapter 3 describes, rather than as separate technical disciplines.

Rather, they experience the combined effect of those influences upon everyday life.

The Parish Council considers that strategic planning should seek to understand those cumulative relationships before land is allocated for development.

10.2 Strategic Understanding Extends Beyond Individual Disciplines

Another lesson emerging from the preparation of the Local Plan concerns the nature of strategic understanding itself.

The evidence assembled throughout the preparation of the Plan demonstrated that no single technical assessment was capable of describing the relationship between Site SG17 and the community of West Deeping in its entirety.

That understanding emerged progressively through the interaction of technical evidence, statutory consultation, local knowledge and the continuing refinement of the evidence base.

The Parish Council submits that strategic understanding is therefore more than the sum of individual technical disciplines.

It is the product of considering those disciplines together.

The experience of West Deeping also demonstrates the importance of considering communities, health impacts, heritage, landscape and the historic environment collectively, rather than as separate planning disciplines, when exercising strategic planning judgement.

10.3 Deferral Has Practical Limits

The Parish Council fully recognises the important role played by deferred assessment within the planning system.

Many matters are properly addressed through the detailed design and mitigation considered at the planning application stage.

However, the preparation of the Local Plan also demonstrates that there are practical limits to deferral.

Where numerous fundamental planning considerations affecting an established community remain dependent upon later assessment, an important strategic planning question arises.

Has sufficient understanding been established before the principle of allocation is accepted?

The Parish Council considers that this question is likely to remain relevant in the preparation of future Minerals Local Plans as well as the present Examination.

10.4 Consultation Improves Strategic Planning

One of the strengths of the preparation of the Lincolnshire Minerals and Waste Local Plan has been the breadth and quality of public participation.

The consultation process generated substantial contributions from statutory consultees, elected representatives, technical specialists, local residents and community organisations.

Those contributions did more than record support or opposition.

They enriched the understanding of West Deeping and the planning issues associated with Site SG17.

The Parish Council respectfully submits that meaningful consultation should be recognised not merely as a statutory requirement but as an integral part of strategic planning.

10.5 West Deeping beyond West Deeping

The issues considered throughout this representation extend beyond the proposed allocation of Site SG17.

They concern the broader relationship between strategic planning and the communities it serves.

West Deeping is unlikely to be the only community facing the long-term implications of successive phases of mineral extraction.

The Parish Council therefore hopes that the strategic planning questions raised through this representation may assist future plan-making by encouraging continued reflection upon the relationship between sustainable mineral development and the long-term health, wellbeing and resilience of established communities.

Strategic Planning Question

Should future strategic minerals planning draw broader lessons from the experience of West Deeping in balancing mineral development with the long-term sustainability of established rural communities?

PART IV

Stewardship

Planning is ultimately concerned with places. Those places derive their character not only from the land itself, but from the communities who live there and the generations who will inherit the consequences of today's decisions.

The preparation of the Lincolnshire Minerals and Waste Local Plan has involved extensive technical assessment, public consultation and professional judgement.

Throughout that process, West Deeping Parish Council has sought to participate constructively by contributing local knowledge, evidence and the experience of a community that has lived alongside mineral extraction for approximately seventy years.

The Council welcomes the decision not to allocate Site SG17 within the Proposed Submission Version of the Local Plan.

This representation is therefore not concerned with revisiting that decision.

Rather, it respectfully seeks to ensure that the strategic understanding developed throughout the preparation of the Plan is fully reflected within the permanent Examination Record.

One consistent theme has emerged throughout this representation.

Strategic planning should seek to understand not only land capable of accommodating development but also the communities who will experience that development over many years.

West Deeping has demonstrated remarkable resilience throughout successive generations of mineral extraction.

The Parish Council submits that such resilience should not be regarded simply as evidence that further development can always be accommodated.

Rather, it reinforces the importance of understanding the cumulative implications of strategic planning decisions before further land is allocated for mineral extraction.

The preparation of this representation has therefore not been concerned solely with Site SG17.

It has sought to contribute to a broader understanding of the relationship between mineral planning and community wellbeing.

The purpose of this representation has never been to oppose mineral extraction as a matter of principle. Rather, it has sought to ensure that the strategic planning process fully understood the long-term implications for an established rural community before further mineral extraction was contemplated.

Whatever conclusions are ultimately reached through the present Examination, it is hoped that the understanding developed through the preparation of the Plan will remain of lasting value for future planning, future communities and future generations.

Closing Reflection

Communities are not simply locations identified within a development plan.

They are places where people build their lives, raise families, care for neighbours and create the shared experiences that give meaning to place.

Strategic planning should therefore seek to understand not only the environmental, health and wellbeing and economic consequences of development but also its long-term implications for the communities who will live with those decisions.

West Deeping Parish Council welcomes the outcome reached in respect of Site SG17.

Its purpose in making this representation has not been to reopen that decision.

Rather, it has sought to ensure that the permanent Examination Record reflects the considerable understanding that emerged through the preparation of the Local Plan and the exceptional contribution made by residents, statutory consultees and many others who participated constructively throughout that process.

Strategic planning will always involve difficult choices. Those choices will be better decisions when communities are understood with the same care, rigour and respect as the land upon which they live.

Submitted on behalf of West Deeping Parish Council

Appendix A

The Strategic Planning Questions Raised by this Representation

This representation has been structured around a series of strategic planning questions. Each chapter considers a particular aspect of the preparation of the Lincolnshire Minerals and Waste Local Plan before inviting the Examination to reflect upon the wider planning principle arising from the experience of West Deeping.

Chapter	Strategic Planning Question
2. West Deeping – An Established Rural Community	Should strategic minerals planning seek to understand the characteristics, function and long-term sustainability of an established rural community before determining that land is suitable for mineral allocation?
3. Health, Wellbeing and Quality of Life	Should strategic minerals planning recognise the long-term health, wellbeing and quality of life of established rural communities as fundamental considerations before determining that land is suitable for mineral allocation?
4. The Cumulative Burden of Successive Mineral Extraction	Should strategic minerals planning consider not only the cumulative impacts of an individual proposal, but also the cumulative burden experienced by communities that have accommodated successive generations of mineral extraction over many decades?
5. Industrial Development Within a Living Community	Should strategic plan-making consider not only the suitability of land for mineral development but also the long-term relationship created between prolonged industrial activity and an established rural community before determining that land is suitable for allocation?
6. Strategic Assessment	Should strategic planning establish sufficient understanding of the principal planning considerations affecting an established community before determining that land is suitable for allocation?

7. Deferred Assessment and the Limits of Strategic Planning	Should the strategic planning process distinguish between matters that can properly be deferred and matters that require strategic understanding before land is allocated?
8. Reading the Evidence as a Whole	Should strategic planning draw its understanding from the cumulative evidence as a whole, rather than from individual documents considered in isolation?
9. Consultation and Community Understanding	Should the consultation process be regarded not merely as a means of recording support and objection, but as an important mechanism through which the strategic understanding of places and communities develops during the preparation of a Local Plan?
10. Lessons for Strategic Plan-Making	Should future strategic minerals planning draw broader lessons from the experience of West Deeping in balancing mineral development with the long-term sustainability of established rural communities?

Taken together, these questions are not intended to prescribe particular planning outcomes. Rather, they invite the Examination to consider whether sufficient strategic understanding existed before Site SG17 was considered suitable for allocation, and whether those wider planning principles may assist future strategic minerals plan-making.