

## Examination of the Nottinghamshire Minerals Local Plan

Submission made by Heatons on behalf of Tarmac Trading Limited

Supplementary Questions – June 2020

### Matter 2 – Vision, Strategic Objectives and Strategic Policies

#### Strategic Policies

#### Question 12

*Is policy SP1(1)(b) consistent with national policy in terms of prioritising the extension of existing sites?*

The National Planning Policy Framework does not advocate a priority for extensions to existing sites over new greenfield sites. Paragraph: 010 Reference ID: 27-010-20140306 provides more clarity over which circumstances it may be preferable to focus on extensions to existing sites rather than plan for new sites (my emphasis). These circumstances include:

- need for the specific mineral;
- economic considerations (such being able to continue to extract the resource, retaining jobs, being able to utilise existing plant and other infrastructure), and;
- positive and negative environmental impacts (including the feasibility of a strategic approach to restoration).
- the cumulative impact of proposals in an area.

The policy approach and preference for extensions pursued by the Council appears routed in the environmental facets of sustainable development. Whilst, as an operator Tarmac could not dispute the operational advantages in maintaining supply from an existing site, the policy neglects to address the need for mineral and maintaining a steady and adequate supply.

The concerns with an approach that focus and prioritise extensions is that an extension does not normally increase productive capacity just maintains the circumstances at a particular time. The Plan is based upon historic sales data. However, requires greater flexibility to ensure that new greenfield sites can come forward to enable an increase in production capacity and therefore increase the perceived demand (sales) for mineral. Even with this approach/flexibility, monitoring data over a minimum of 3 years to indicate a 'trend' is slow to provide the evidence or assurance to the MPA that a site coming forward will be able to demonstrate a need when assessed against policy or LAA evidence.

In addition, the time lag between the closure of a site and gaining permission for a potential replacement to at least maintain current production levels is an important consideration. It is not the case that one site will cease operating and another will start, there is a likely overlap needed in production.

Comments on Question 7, Question 8, Question 11, Question 27 are related to the above.