

Nottinghamshire Mineral Local Plan Independent Examination

Inspector's Supplementary Questions

Statement by Jennifer Owen BA Geog, BSc Est Man, MRTPI on behalf of Brett Aggregates Ltd.

Matter 2 – Vision, Strategic Objectives and Strategic Policies.

Strategic Objectives.

Question 7. Does the statement in the penultimate sentence of Strategic Objective SO1 imply that extensions to existing sites will be developed before new sites? If so does this require clarification?

The Minerals Local Plan (MLP) provides a delivery schedule for sand and gravel (Appendix 1) which demonstrate that the Council relies on a new site coming forward at the same time as existing sites are extended. Consequently, it is the case that in order to effectively deliver the MLP sand and gravel landbank in a way that provides for "...a steady and adequate supply of aggregates.", in accordance with NPPF para.s 207 and 208, the penultimate sentence of Policy SO1 should be deleted as being inconsistent with NPPF and the MLPs delivery schedule.

Question 8. Is the prioritisation of extensions to existing sites consistent with Planning Practice Guidance?

Prioritising extension to existing sites over new sites is not consistent with Planning Practice Guidance on Minerals para. 10. Each proposal whether an extension or a new site should be decided on its merits.

Strategic Policies.

Question 12. Is Policy SP1 (1) (b) consistent with national policy in terms of prioritising the extension of existing sites?

SP1 (1) (b) is not consistent with national policy in respect of the consideration of extensions to existing sites over new site as set out above. SP1 (1) (b) should be

deleted and the site selection process for increasing the landbank should be reassessed.

Question 19. Is the requirement of Policy SP4 (2) (a) for new mineral workings and related development to be within close proximity to markets sufficiently clear?

Policy SP4 (2) (a) as currently worded only applies to “new” mineral workings. It is not clear, therefore, whether extensions to existing workings will need to comply with the policy. Consequently, in respect of sand, gravel and sandstone there is the potential for significant environmental harm to go unmitigated as the MLP currently proposes only one “new” site. This harm is further exacerbated by the spread of existing sites where extensions are proposed not being well related geographically to future markets as set out and evidenced in the BAL representations made to the MLP publication version (pages 18 to 22). The word “new” in Policy SP4 (2) (a) should be removed and the site selection process reassessed to properly take into account the geographical spread of future resources and future markets.