

From: Peter Doyle [REDACTED]
Sent: 29 November 2017 10:35
To: Planning Policy
Subject: Issues and Options Consultation

We have been invited to participate in the Mineral Local Plan in regard to the previous MLP being withdrawn in May 2017. The new draft vision of the Issues and Options Consultation is based primary around the economic and environmental need in general for aggregates, however the attention given to the social aspects, is directed primary on the benefits gained from the use of aggregates rather than giving some thought to the detriment this creates by the mining of these aggregates, and how these detrimental impacts can directly affect the communities where sites are proposed.

To balance this we hope our input into this area will resonance into to a change of policy into how sites are assessed for their suitability and in validating our viewpoint we have given examples of how the present policy has affected those communities.

Q1 Do you think any further information should be included in the overview of the area?

Answer: I have nothing to add to this question

Q2 Do you agree with the draft vision? Are there other things we should include?

Q3 Are the above strategic issues appropriate? Are there others we should consider?

In regard to the above questions we would like the draft vision to review its policy on site selection and its responsibilities to safeguarding our communities from poor site choices causing detrimental impact.

As we have gone through all the stages of the consultation process in the previous MLP, we are in an enviable position recognising that the need for minerals should be balanced fairly. It is important that no community feels it is forced to have an unfavourable site allocated to them just to meet this need and in this context we would like to see a more pro-active policy to ensure that unsuitable sites submitted by the mineral operator/ owners will not automatically be considered for selection.

We believe this process should start at the 'call for site' stage, in as those submitting sites should have to meet a criteria to prevent unsuitable sites being allocated, we feel this would eliminate problems further along in the consultation process. I believe at the moment there appears to be no restrictions to where a site can be placed, and the call for sites has no guidelines at all. The responsibility is then left to the mineral operators to make crucial amendments, (due to a conflict of interest) inevitably some people will be considered less important than others and those who are not protected by guidelines will still be the ones expected to adversely take the brunt of it.

As an example of this, the site at Barnby Moor (SA score -15) was submitted for selection without initially any constraints at all, sited on a large area of agricultural land between two sections of the community, the proposed site butted up to a small modern development of new homes, which then continued down the A638 totally engulfing two bungalows on all three sides and open countryside (designated to be Grade 3 best and versatile agriculture soil) it then continued to the boundary of [REDACTED] (if approved it will not only take away our open aspect and our long distance views, but also affect the quality of air we breathe, and eventually take away our peace and quiet).

In regard to the decision made by the mineral operators to protect the residents from these undesirable affects, the decision was made to alleviate the distress of those living in the new homes on this modern development, whilst the decision to those elderly residents in the bungalows and ourselves was that the quarry would still border our properties and we would still be subjected to the noise, pollution and dust which is inevitable due to the nature of the industry.

Due to amendments made by the mineral operators, they were then entitled to acquire more land [REDACTED] [REDACTED] on the north side sprawling northwards up to the new business venture, 'Torworth Grange' which as a farm shop, a lovely restaurant, fishing lakes and is leisure based, at the moment it is a quiet place to relax!

The need for minerals cannot justify allocating quarries into the heart of communities, disrupting and destroying the vibrancy of village life, in to one where peace and tranquility is lost, polluting the village from fumes and dust from commercial plant machinery, increasing levels of toxic compounds from the HGV fumes which travel in and out of site, (76 per day to the proposed PA01 site) green fields and open countryside eliminated, destroyed and then shrouded from view.

This is not the vision as quoted by the draft vision that "the quality of life and health of those living, working or visiting Nottinghamshire will be protected". However what it does tell us, unfortunately is that these are just words on paper and the hypocrisy of it all is that communities are not protected, there are no guidelines that prevent the worse sites being allocated into the MLP.

If the site with the worse SA score in the County can be allocated, not as an error, but with intent then clearly we are not protected.

In conclusion we believe it is crucial that the Notts County Council should take the lead in ensuring that no undesirable sites are allowed to be submitted for consideration into the MLP. A criteria should apply when sites are being called for, any site that intrudes into the residential community should be viewed as being undesirable. If those sites submitted demonstrate an undesirable and detrimental SA score, it should not be then submitted into the MLP especially if there is a spurious attempt given to dismiss the detrimental consequences these site will have.

In your draft vision you have invited us to have our say, I hope in the same spirit our input will resonance into policy in safeguarding our communities.

Q (4) (5)

I am not informed enough to comment on these questions.

Q 6 Do you think extensions to existing permitted quarries should be prioritised over new greenfield sites?

If this question relates to an existing permitted quarry not allocated within a residential community or sited in a place of beauty, then I would agree with the draft vision that extending an existing quarry would be the best option, as long as it is supported by a favourable SA score. However if the existing permitted site was sited detrimentally within the community I believe it should not be allowed further extensions. In regard to new greenfield sites, It would be more diligent to site these proposed quarries outside residential communities to achieve a more productive lifespan.

Q7 Should different approaches (new sites/extensions to existing permitted quarries) be adopted for individual minerals types?

There are huge differentials in the problems experienced when adopting different mineral types to existing quarries. These may cause unacceptable impacts if these sites are based close to residential communities, however even sites that are outside the residential community can have a detrimental affect on the area.

Q8. How important is it to maintain a geographical spread of sand and gravel across the county (Idle Valley near Newark and Notts) to minimise distance transported to market?

I feel setting the agenda for sites to be closer to the major markets would hinder the process of finding the most suitable and sustainable sites. In attempting to raise the bar too high to achieve both good sites, transport links and also close to the major markets would not be achievable without compromising integrity by allowing the most undesirable sites to be submitted into the mineral local plan just in a effort to support this policy.

The sites in the Idle Valley have the worse scores in the county yet was allocated into the MLP, purely to support the policy of sites being chosen close to the major markets despite the sites unsuitability. Those sites in the Idle Valley have been affected by this policy as the following example shows:-

On the A638 Great North Road, classified as being in the Idle Valley are the villages of Barnby Moor and Scrooby, there are 4 miles between these two villages, yet each of these villages have been selected for two allocations each, two New Greenfield sites. PA01, PA06 to the north and south of Barnby Moor, and in the village of Scrooby (existing permitted quarries) to the north and south, both have been allocated extensions PA31/PA32, four sites in total. As there is also a working quarry set between these two villages, accumulatively if approved, there will be five quarry sites, within a four miles radius.

These site allocations have demonstrated the worse Sustainability Appraisal scores of all the sites submitted throughout the county, their scores are extremely negative, both of the quarries in Scrooby are -13. The site with the worse score submitted throughout the county is Barnby Moor which is -15. The only other site in the MLP demonstrating this score was withdrawn.

The question is why has this area in the Idle Valley been selected for multiple allocations when the evidence from the SA score clearly demonstrates that these sites will have an a detrimental affect on the community. The reason is that the transport mode objective is encouraging sites to be chosen closer to the major markets, despite the adverse impact they will have on those communities.

The draft vision, on page 14, fifth paragraph confirms this policy as written - "within geological constraints mineral development will be concentrated in locations that offer the greatest level of accessibility to the major markets and growth areas and to sustainable transport nodes to encourage sustainable patterns and modes of movement".

There are 14 objectives in the proposed SA scoping report, the above paragraph stating "mineral development will be concentrated in locations that offer greater accessibility to the major markets" is classified as 3) on the list, however at the bottom of the list at 14) is the objective to "protect human health and quality of life" these two objectives can conflict with each other when human health and quality of life becomes secondary, to choosing sites closer to the major markets.

The reason given to choose sites closer to the major market is for financial gain in transport cost and to a lesser degree reduce pollution, however siting a quarry in the wrong location creates pollution, so it is a very weak argument. The following paragraph demonstrates the consequence of allocating quarries to unsuitable sites.

The sites in question are within a community setting and are all close to residential properties. In siting a quarry close to residential properties the levels of pollution are greater when sited in a concentrated area than when it is fluent on the road. A poor site choice exposes the community to the pollution created just by the industry itself, with diggers, bulldozers, and plant hire continually depositing on a daily basis, pollution, dust, and noise. The increased number of (76) movements per day of HGV lorries will also make the situation worse for the community by the increasing levels of hazardous toxic gases to those communities and residential properties placed unjustly close to the site.

The only day this constant stream of pollution would cease would be on a Sunday, (just one day where one can appreciate where one lives). That is why these proposed sites in the Idle Valley have the worse SA scores in the County, and predictively by its negative score will have a detrimental impact on their quality of life.

If a site is to be chosen for allocation into the MLP it has to be shown, that the site was not allocated purely because of its location, but due to the consultation process confirming its suitability by the evidence gathered throughout all the different stages of the process. Deciding to allocate a site simply on location, does not require a consultation process, if a decision is made irrespective of the consultation, then it has breached the rules of the consultation process.

This trust in the consultation process of it being democratic by having our say can also be tested when we discovered that in the previous MLP that the 'site selection background paper' May 2014 had published its

conclusions to why the PA01 site was to be allocated into the MLP even though the consultation process was still ongoing until July 2014.

It is important if we are to participate in the consultation process, that decisions are taken because of the due processes of the consultation process than being made by partiality to a particular policy.

Q9. Would it be more appropriate to prioritise specific areas above others?

In my view of the above question, I would prioritise all areas that are consistent in demonstrating positive SA scores, either from evidence of previous allocations, or in regard to new allocations, I would ensure that in all areas and site allocations landowners/mineral operators would have to meet a criteria in as that a site would not be intrusive to the communities way of life. All sites chosen should be respectful of the community, this should be a priority before taking other considerations into account.

Q. 10 - 26. I am not informed enough to comment on these questions.

Sustainability Appraisal Scoping Report

My only comments regarding this report, is that the primary factor in making decisions should revolve around the SA score, in all the questions posed one can only reply by knowing this information. I believe in question 8, there has been an attempt to diminish the importance of the SA score by supporting preferential policies without incorporating this important tool.

This is our input on the Issues and Options Consultation and our comments regarding the Sustainability Appraisal Scoping Report.

Peter A Doyle

Sent from my iPad