Planning Policy

John King From: 05 January 2018 11:19 Sent: To: Planning Policy Minerals Plan - Rushcliffe BC Representation Subject: **Attachments:** Notts Min Plan Issues and Options - Rushcliffe Representation.pdf Dear Sir/Madam, Please find attached Rushcliffe Borough Council's representation on the Minerals Local Plan - Issues and Options and SA. Regards John John King MRTPI Planning Policy Officer Rushcliffe Borough Council Rushcliffe Arena Rugby Road West Bridgford Nottingham NG2 7YG This transmission is intended for the named addressee(s) only and may contain sensitive or protectively marked material up to RESTRICTED and should be handled accordingly. Unless you are the named addressee (or authorised to receive it for the addressee) you may not copy or use it, or disclose it to anyone else. If you have received this transmission in error please notify the sender immediately. All GCSX traffic may be subject to recording and/or monitoring in accordance with relevant legislation. Follow us on Twitter https://twitter.com/Rushcliffe Like us on Facebook - https://www.facebook.com/rushcliffeborough See us on Pinterest - http://www.pinterest.com/rushcliffe/ Connect with us on LinkedIn - www.linkedin.com/company/rushcliffe-borough-council/

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When telephoning, please ask for:

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Planning Policy Team

Date: 5 January 2018

Rushcliffe Borough Council

Rushcliffe Community Contact Centre

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County Hall
West Bridgford
Nottingham
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By email

Dear Sir/Madam

Nottinghamshire Minerals Local Plan Issues and Options

Thank you for consulting Rushcliffe Borough Council on the Minerals Local Plan Issues and Options and supporting Sustainability Appraisal Scoping Report. Having read the document, please accept the following responses to selected questions which are pertinent to minerals developments in Rushcliffe.

John King

Minerals Local Plan

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

Rushcliffe Borough Council considers the information within the overview sufficient as an introduction to the minerals local plan. Whilst not critical, Plan 1 (Spatial portrait of Nottinghamshire) should accurately identify the inner Green Belt around the edge of the main urban area within Rushcliffe. The removal of Green Belt land to accommodate the strategic urban extensions on land south of Clifton, at Edwalton and east of Gamston are not shown.

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

Rushcliffe Borough Council broadly supports the overarching vision.

However the vision should not prioritise proximity to major markets, growth areas and sustainable transport nodes. Whilst these are important considerations, the location of minerals development should also consider environmental constraints (including impacts on the natural environment and local communities). Consequently the second paragraph should read:

In person

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"Within geological and wider environmental constraints, minerals development will be concentrated in locations that offer..."

Furthermore, in accordance with the mitigation hierarchy as set out in paragraph 118 of the NPPF (avoid, mitigate and last resort compensate), prioritise sites with less harmful impacts and avoids adverse impacts on the environment rather than mitigation or compensations measures such as appropriate working, restoration and after-use. The fourth paragraph should read:

"All minerals workings will contribute towards a greener Nottinghamshire by ensuring that the County's diverse environmental and historic assets are protected, maintained and enhanced through the <u>sensitive selection of minerals sites</u>, appropriate working, restoration and after use."

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

Rushcliffe Borough Council supports the key strategic issues.

Q4 Do you think the average 10 years sales figure is the most suitable methodology for forecasting future aggregate demand in Nottinghamshire? If not please identify any alternatives you feel are realistic and deliverable and the evidence to support this approach.

Rushcliffe Borough Council supports the use of the average 10 years sales figures as the basis for forecasting future aggregate demand in Nottinghamshire. This methodology is required by paragraph 145. However, other local information may be used to support this forecasting.

Q5 Do you think the same methodology (most recent average 10 year sales) should be used for each aggregate or is there merit in using different methodologies for different aggregates?

The same methodology should be used for each aggregate, however as stated above local factors may have implications for different aggregates.

Q6 Do you think extensions to existing permitted quarries should be prioritised over new green field quarries?

Subject to any environmental constraints, Rushcliffe Borough Council support the prioritisation of extensions to existing permitted quarries rather than new green field quarries, as the infrastructure for extraction, processing and transportation is in place.

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

Yes, depending on remaining reserves, feasibility of extraction, impacts on the environment and human health which may constrain extensions to existing permitted quarries.

Q8 How important is it to maintain a geographical spread of sand and gravel quarries across the County (i.e. Idle Valley, near Newark and near Nottingham) to minimise the distance minerals are transported to markets?

Rushcliffe Borough Council considers the geographical spread of sand and gravel quarries across the County is important. As this will meet demand both within and outside the County, including Greater Nottingham, South Yorkshire and elsewhere in the East Midlands.

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

It would be appropriate to prioritise specific areas, depending on the socio-economic and environmental benefits these areas provide relative to each other. Whilst the proximity to markets is an important factor, it should not be the overriding consideration. Impacts on local populations and the natural environment must be equally weighted and assessed through the Sustainability Appraisal.

Q10 Is it economical to transport mineral by river barge and if so should proposed quarries with the potential for moving sand and gravel by river barge be prioritised over other proposals?

Whilst Rushcliffe Borough Council has no position regarding the economics of transporting minerals by river barge, doing so clearly brings environmental benefits and reduces adverse impacts on the highway network and amenity of local residents.

If the potential for moving sand and gravel by river barge is identified as a positive factor when identifying quarries in the minerals plan, the ability to transport the mineral in this manner must be realised. Criteria based policies that support allocations and ensure they deliver sustainable development should therefore require this transportation method.

Q17 Should the plan seek to identify specific site allocations for gypsum provision or should a criteria based policy be developed to ensure an adequate supply of gypsum can be maintained over the plan period?

As permitted reserves exist at East Leake and Balderton (these should be sufficient to 2026 and 2027 respectively) and there is considerable uncertainty regarding future demand beyond this date (due to the closure of coal fired power stations which provide desulphogypsum and unknown future demand for specific grades of gypsum during the plan period), Rushcliffe Borough Council support the use of criteria based policy rather than the identification of specific site allocations.

Q18 are you aware of any issues regarding the provision of gypsum that should be considered as part of the Minerals Local Plan review?

Rushcliffe Borough Council notes that the Issues and Options consultation identifies the closure of coal fired power stations, including the Ratcliffe on Soar Power Station, by 2025 and the

subsequent reduction in supply of desulphogypsum. As recognised, this may have particular implications for the demand for Gypsum resources in Rushcliffe.

Q24 Are you aware of any issues relating to hydrocarbon extraction that should be considered through the Minerals Local Plan review?

Rushcliffe Borough Council supports the inclusion of criteria based policies which protect local communities and the natural environment from unacceptable direct and indirect environmental impacts of hydrocarbon extraction facilities during their construction and operation.

Q25 Do you agree with the proposed development management policy areas? Are there any others that should be covered?

Rushcliffe Borough Council welcomes and supports the development management policies proposed.

Sustainability Appraisal Scoping Report

Having read the SA Scoping Report, Rushcliffe Borough Council supports: the methodology proposed; the main sustainability issues identified; the documents that form the evidence base; and the SA objectives and decision making criteria. We have no detailed comments on the SA at this stage.

We look forward to reviewing the next iteration of the Minerals Local Plan and supporting SA in due course.

This concludes Rushcliffe Borough Council's representation.

If you would like to discuss our comments on the emerging plan, please feel free to contact me.

Yours sincerely

John King MRTPI
Planning Policy Officer
Rushcliffe Borough Council.