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From: Brian Squires [REDACTED]
Sent: 29 December 2017 12:07
To: Planning Policy
Cc: [REDACTED]
Subject: Local Minerals Plan Consultation
Attachments: Issues and Options response.doc; Sustainability Analysis response..doc
Follow Up Flag: Follow up
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Please find attached responses to the above from SAGE/Shelford Parish Council.
Regards
Brian Squires on behalf of both organisations.

Sent from [Mail](#) for Windows 10

Nottinghamshire Local Minerals Plan

Response from SAGE and Shelford Parish Council to the Issues and Options Consultation

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

The overview refers to the impact that quarrying has had on the creation of wetlands. It should be emphasised that the creation of so many lakes has already had an adverse impact by changing the whole nature of the traditionally farmed Trent Valley landscape. In terms of biodiversity many of the lakes have simply become large lakes of deep water, many of which are sterile, support a limited range of wildlife, attract a limited number of water-birds, and no longer contribute substantially to the County's biodiversity. On the contrary, farmland birds are amongst the most endangered species and note needs to be taken of the negative impacts of removing agricultural land from Nottinghamshire's landscape.

Perhaps we should protect and improve the biodiversity we have rather than looking for marginal increments.

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

We agree with the draft vision.

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

We believe the strategic issues are appropriate. However, whilst the preamble recognises that aggregates are generally located adjacent to rivers, under the heading "Minimise impacts on communities" no mention is made of flood risk and its potential effects on quality of life. At the very least the vision should include a statement to the effect that it will be policy that existing flood risk will not be allowed to increase by quarrying.

Q4 Do you think the average 10 year 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.

The average 10 year sales figure is probably the most appropriate and available measure to use although we have a number of concerns about the fact that this is a supply side figure and is only a proxy representation of demand. It does not show the spread or size of demand throughout the county nor reflect the export (from the county) of one third to one half of supply to South Yorkshire, largely from the northern quarries.

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?

Please see our answer to question 4. There is no science that would indicate any greater accuracy for measuring the demand for different aggregates.

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

Yes – we believe that the expansion of existing quarries has resolved most of the strategic and practical issues facing the aggregates industry over the time they have been operated and their extension is the best way forward to protect the environment.

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

We see no particular merit in this approach.

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?

We recognise the importance of closeness to market and the high bulk low value equation of transport costs as well as the social and traffic implications.

It is important to determine the approximate size of the market from the requirements of infrastructure and house and commercial building, and to produce a scientific approach to the selection of quarry sites which optimally meet requirements.

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

We believe that those sites which have the least impact on communities should be prioritised.

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?

Clearly movement of sand and gravel by barge is more desirable than by road.

Whilst there appears, to our knowledge, to have been no published and objective cost-benefit analysis of transporting aggregates by barge we simply have the rationale provided by individuals and the industry itself. For example the industry has moved away from barging as an economical means of transport because of the double handling and

processing costs. One operator provided a cost estimate of £13 to £15 per tonne for moving sand and gravel by barge which makes this a very uncompetitive solution.

Also the publication “Gravel Extraction: History of Aggregate Extraction in the Trent Valley” states *“Since the mid 1950’s, haulage economics have dictated that the vast majority of sand and gravel aggregates are transported by road”*.

Q.14 Are you aware of any issues relating to alternative aggregates that should be considered through the Minerals Local Plan?

We believe that greater emphasis should be given to the search and support for alternative aggregates and their recycling so as to reduce the pressure on mineral reserves within the County.

Nottinghamshire Local Minerals Plan

Response from SAGE and Shelford Parish Council to the Sustainability Analysis Consultation.

Chapter 1: Introduction

1. Has the requirement for, and purpose of, SEA and SA, been adequately explained?

Yes, we believe this is clearly explained.

Chapter 2: Methodology

2. Has the methodology been adequately described and is it considered to be appropriate?

The methodology is described adequately and appears to be the best available. However it is crucial that independent and objective assessment is included at later stages of this process.

Chapter 3: Other relevant Plans, Policies and Programmes

3. Have all the relevant documents been listed in Appendix 1? If not, what others should be included?

The list is comprehensive.

4. Have the key messages from the documents review been correctly identified in Table 1? If not, what should be added, amended or deleted?

The key messages are appropriate.

5. Have the implications for the SA framework been accurately assessed in Table 1. If not, what should be added, amended or deleted?

The implications, in the main, are appropriate but please note:

Landscape and Countryside: There is an implication that habitats can be created. This is directing biodiversity and not maintaining it.

Transport: Reducing distances to market should be the key implication (although this is an objective and indicator noted in Table 4)

Chapter 4: Baseline information and characteristics of Nottinghamshire

6. Has all the relevant baseline data been included in Appendix 2? If not, what else should be included?

The baseline data is adequate as a general description.

7. Are there any inaccuracies in the baseline data?

None as far as we are aware but this is more descriptive, soft rather than hard data.

Hard data will be needed to determine flooding and transport issues.

8. Have all the key characteristics of Nottinghamshire been adequately described?

For plan purposes – yes. However see the note above.

Chapter 5: Sustainability issues

9. Have all the relevant sustainability issues been correctly identified in Table 2? If not, what amendments are required?

Yes – we believe so.

10. Has the significance of the sustainability issues been correctly assessed in Table 2? If not, what amendments are required?

We believe that the following issues require amendment:

Natural Environment and Biodiversity – change to Moderate
Air Quality – change to Moderate
Flooding – change to High
Transport – change to High
Sustainable Communities – change to High

11. Have the ways in which the Minerals Local Plan can influence the sustainability issues been adequately addressed in Table 2? If not, what amendments are required?

Yes – we believe so.

Chapter 6: Developing our sustainability objectives (the SA framework)

12. Do the SA objectives adequately cover the sustainability issues which are relevant to the Minerals Local Plan? If not, what amendments are required?

Yes – we believe so.

13. Are the decision-making criteria and proposed indicators appropriate? If not, what amendments are required?

Comments:

2. Protect and enhance biodiversity at all levels and safeguard features of geological interest.

While accepting that LBAP indicators are the only policy objectives available, there are other issues connected with the loss of farmland habitats and information from wildlife surveys and RSPB red and amber listed birds should be noted.

3. Average distance travelled by minerals (no local data currently available).

Information about demand patterns and tonne/mile data has been supplied in the past by Shelford Parish Council and SAGE and can again be made available.

6. Number of permitted sites with flood alleviation benefits

Number of sites permitted against EA flood advice.

Number of permitted sites with flood management plans in place.

We believe it is unwise to proceed without hard data on flood risk and suggest that the EA be requested to produce an interim risk assessment so that the indicators are more robust.

7. Average distance travelled by minerals (no local data currently available).

See response to note 3 above.

11. Number of sites permitted that are judged to have an adverse impact on air quality.

What measures will be used to form this judgment? Harder evidence is required.

13. Number of new jobs created by new mineral sites.

Since jobs will also be lost, this indicator needs to be NET new jobs introduced to Nottinghamshire (i.e. not filled by transfer from outside the area.)

14. Number of confirmed complaints.

This is possibly an “after the event” indicator and has no bearing on selection of sites.

Further indicators should include “the duration of quarrying at the site in years” and the duration of quarrying at possible further linked sites or extensions”.

14. Do you have any other comments on this Scoping Report?

No further comments, as at this stage of the process any comments would be treated informally.

