

Planning Policy

From: Will Ryan [REDACTED]
Sent: 14 January 2018 21:15
To: Planning Policy
Subject: Notts Minerals Local Plan: Issues & Options Consultation Paper
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Follow Up Flag: Follow up
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Sir/Madam

Please find attached a copy of representations made by Savills on behalf of Earl of Listowel & Mrs. Margaret Campbell in respect of the above.

I would be grateful for acknowledgment of receipt of this email.

Please contact me should you require any further information.

Regards

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12 January 2018

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Dear Sir/Madam

RE: NOTTINGHAMSHIRE MINERALS LOCAL PLAN ISSUES AND OPTIONS CONSULTATION

These representations to the Nottinghamshire Minerals Local Plan (NMLP) are made on behalf of our clients, Earl of Listowel & Mrs. Margaret Campbell, landowners in Nottinghamshire. Submissions to previous draft documents in respect of the NMLP have been made in respect of these landowners who retain an interest in promoting their interests at North Road Quarry for sand and gravel extraction.

Our clients wish to make representation in respect of the general issues covered in the Issues and Options Paper and also to support Tarmac's promotion of North Road Quarry as part of the Call for Sites process.

The following are offered in respect of the Issues & Options Consultation:

Question 2: Do you agree with the draft vision? Are there other things we should include?

We do not agree with the draft vision. The "Vision" set out in the Consultation paper is essentially a policy review and offers little in the way of a vision. It sets out a defensive approach to the extraction of minerals, rather than an aspiration of promoting a sustainable industry in Nottinghamshire over the next 20 years.

The provision of minerals should be used not just to support the economy, as set out in the Vision, but as a driver to realise economic, social and environmental benefits and sustainable growth.

This is particularly evident given the major infrastructure projects planned for the region in the short-term over the Plan period, identified in the National Infrastructure Delivery Plan 2016–2021, and those that are likely to come forward in the longer term. The NMLP should provide sufficient flexibility and a Vision to ensure that Nottinghamshire can play a fundamental role in providing appropriate materials for these projects. Such an approach will assist national, regional and County objectives of economic growth through infrastructure improvement.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Question 4: Do you think that the average 10 years sales figure 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.

No - the approach to forecasting proposed is fundamentally flawed. The methodology of using 10 year sales figures focuses on historic demand and not on what is likely or possible to come forward during the Plan period.

There is sufficient doubt about the basis of the information used in the Local Aggregate Assessment, and the relationships between extraction from Nottinghamshire and adjoining Authorities, to suggest that the approach should be re-considered. . Of particular concern is the apparent recent anomaly of a downturn in sales as the general economy of Nottinghamshire has recovered from the recession. This suggests that there has been a structural change in the way in which production rates are measured/considered: the implication of this is that a declining rate such as that seen is a self-serving prophecy and will result in a long-term supply that will not ensure a steady and adequate supply of aggregates.

The heavy influence on the forecast of the recession and immediate post-recession during which sales were slow to recover results in a misleading approach. A more rounded assessment is required that considers, in accordance with relevant national policy, other relevant information as well as historic sales figures. With regards to Nottinghamshire, this other information is likely to include the changing production patterns within and immediately adjacent to the County that have taken place over the last few years, and the general increase in sales figures that other counties in the region have experienced.

It is likely that the void in strategic planning and the resulting uncertainty in investment decisions has also played a role in the low sales figures attributed to the County.

In essence the approach does not adequately demonstrate that the proposed plan provision meets the NPPF (para. 145) requirement to "*plan for a steady and adequate supply of aggregates*". Instead, it proposes that the plan is to maintain current low levels of production. This does not provide the flexibility and vision required to encourage this important industry in the County.

Question 6: Do you think extensions to existing permitted quarries should be prioritised over new greenfield quarries.

No - the approach should be based on the sustainability merits of each proposal in accordance with the policy advocated in the NPPF. This will ensure that appropriate flexibility can be maintained to bring forward the appropriate sites in the right locations to serve the required markets. As part of this approach, the application of a locational strategy which recognises the advantages and disadvantages of new or continued operations in each of the three areas historically associated with sand and gravel extraction (the Trent

Valley near Nottingham, to the north of Newark and in the Idle Valley) would appear to be an appropriate basis for decision making.

Question 8. 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?

As stated above, the historic area of sand and gravel production within Nottinghamshire appears to present an appropriate basis upon which to develop a coherent minerals planning policy that will ensure that Nottinghamshire can meet and (if necessary) exceed its requirements for the next twenty years.

Question 25. Do you agree with the proposed development management policy areas? Are there any others that should be covered?

The proposed development management policy areas focus solely on environmental issues. The proposed Vision for the Plan identifies the "economic, social and environmental benefits of sustainable growth" that the identification of sites can promote. However, the development management policy areas ignore the potential social and economic factors that should be taken into account in order to secure a comprehensive decision making process. The next stage of Plan preparation should remedy this to ensure that a true and accurate consideration of sustainability can be applied through the planning process to secure the most appropriate outcome to decision making.

Call for Sites

Our clients, Earl of Listowel & Mrs. Margaret Campbell, wish to promote land at North Road Quarry (NRQ) for consideration for allocation within the emerging Nottinghamshire Minerals Local Plan. The land extends to some 74 hectares north of the A617, east of the village Kelham. The greenfield site has the potential to realise approximately 4 million tonnes of good quality Trent Valley sand and gravel suitable for production of concreting aggregate.

Our clients have granted Tarmac a formal option to take a lease of the surface and the minerals, and Tarmac have made more detailed representations in respect of the Call for Sites as part of this consultation exercise. Our clients support this submission and draw on its content in support. You will be aware that this site has previously been promoted by Tarmac (and its various precursors) as "Home Farm" at various stages of the Nottinghamshire Minerals Local Plan review process, and the landowners have been aware of and are familiar with those previous submissions.

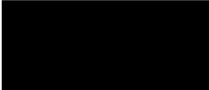
It is proposed that the Tarmac has secured the mineral working rights and promoted the NRQ site as a direct replacement for the Company's long standing operations in the Trent Valley which have served markets to the East of Nottingham.

The suggested details of production, rates of extraction, access, method of working, restoration and all other matters of interest are as set out in the submission made by Heaton Planning on behalf of Tarmac dated 10th January 2018.

Closure

Our clients have welcomed the opportunity to make submissions in respect of the Consultation paper and look forward to further input into the preparation of the Nottinghamshire Minerals Local Plan.

Yours sincerely



Will Ryan
Director