

Planning Policy Team  
Place Department  
Nottinghamshire County Council  
County Hall  
West Bridgford  
Nottingham  
NG2 7QP

25<sup>th</sup> September 2018

Dear Sirs,

**Nottinghamshire Minerals Local Plan Draft Plan Consultation  
Representations by Mick George Ltd (MGL)**

Suggested additions are in **bold**; suggested deletions are in ~~strikethrough~~.

**Question 1 - What do you think to the draft vision and strategic objectives set out in the plan?**

1. MGL wishes to comment on the Strategic Objectives. Whilst the aspiration in SO1 to increase the levels of aggregate recycling and the use of alternatives from secondary and recycled sources appears laudable it does not seem to be informed by the conclusions of your own LAA (Oct 2017). This remarks that national estimates suggest that around 80-90% of construction and demolition waste is re-used or recycled (in fact, in 2014 only 4% of mineral wastes in England which comprises 'typically construction materials such as bricks, stone and road planings that are converted into usable aggregates'<sup>1</sup> were landfilled). Moreover, the LAA observes that availability of PFA and FBA is likely to disappear by 2025. The scope for material changes to the quantities of primary minerals needed for development in these circumstances is very low and the Plan should be realistic about what it can achieve. Since so much has been made by some consultees about the substitution of primary aggregates by secondary aggregates, we think the Council should be more explicit in its conclusion that despite the encouragement to be given to the latter, it will not make much difference to the demand levels of the former.
2. There is also an objective to prioritise the improved use or extension of existing sites before considering new locations. MGL believes this is misguided and contrary to national policy. NPPF contains no such provision, whilst PPG advises that there are cons as well as pros when considering extensions and new sites, and that therefore all proposals should be treated on their merits. Each operator should be allowed to make a case for new working without being hamstrung by a policy bias.

<sup>1</sup> UK Statistics On Waste, DEFRA, 15 December 2016, first bullet point, page 18

Mick George Ltd Registered no. 2417831 (England)

Mick George Managing Director    Jon Stump Finance Director    Geoff Craven Logistics Director  
Neil Johnson Technical and Waste Director    Pete Newman MSOE MIRTE (Eng-Tech) Engineering Director    Michael George Contracts Director





3. MGL therefore opposes both statements in SO1 and suggests a rewording,

*"Ensure more efficient exploitation and use of primary mineral resources by minimising waste, ~~increasing levels of aggregate recycling and the use of alternatives from secondary and recycled sources.~~ Secure a spatial pattern of mineral development that efficiently delivers resources to markets within and outside Nottinghamshire. ~~Prioritise the improved use or extension of existing sites before considering new locations.~~ Make use of sustainable modes of transport."*

4. MGL has identified that there is a conflict between SO6 & SO8. Good planning is about the reconciling of competing objectives for land, and a good plan will highlight this and propose appropriate policies to manage the conflict. There is a clear potential for conflict between the competing objectives of being a 'restoration to biodiversity' led Local Plan, and one which the long-term potential of best and most versatile agricultural soils, but this is not evident from the Plan. In cases where there is a conflict, MGL proposes that the plan and the strategic objectives should identify this. Accordingly, MGL suggests a rewording of SO6,

*"Maximise biodiversity gain by creating new habitats at a landscape-scale through mineral restoration schemes which take in to account the Council's priority for biodiversity-led restoration, focusing on priorities set out in the Nottinghamshire Local Biodiversity Action Plan, in particular meeting reed bed and floodplain grazing marsh targets through sand and gravel restoration schemes, and heathland targets through sandstone restoration schemes, and achieving the targets set out in the Water Framework Directive objectives **but only where to do so would not compromise other objectives such as the safeguarding of best and most versatile soils.**"*

#### **Question 2 - What do you think of the draft strategic policy for sustainable development?**

5. No comment

#### **Question 3 - What do you think to the draft strategic policy for minerals provision?**

6. MGL opposes Policy SP2 – Mineral Provision and in particular part b) of the strategy which is to give priority to the extension of existing sites. Not only is this contrary to national policy and guidance, but it also entrenches an uncompetitive market by nakedly preferring incumbent operators and raising barriers to entry to the local aggregates market to new firms, and it has not been shown to be justified by evidence.
7. PPG paragraph 27-010 specifically states in answer to the question, "Under what circumstances would it be preferable to focus on extensions to existing sites rather than plan for new sites?" that "The suitability of each proposed site, whether an extension to an existing site or a new site, must be considered on its individual merits..." There is therefore no allowance for a policy preference as the Plan seeks to have; all sites must be treated on their merits, and the evidence should be presented to be able to judge whether the comparative merits in each case have been





examined. We suggest that the policy preference set out in this policy and explained in paragraph 3.11 is contrary to national policy and guidance and should be removed.

8. Accordingly,

***“Policy SP2 – Minerals Provision***

*1. The strategy for the supply of minerals in Nottinghamshire is as follows:*

- a) Identify suitable land for mineral extraction to maintain a steady and adequate supply of minerals during the plan period;*
- b) ~~Give priority to the extension of existing sites, where economically, socially and environmentally acceptable;~~*
- c) Allow for development on non-allocated sites where a need can be demonstrated; and*
- d) Ensure the provision of minerals in the plan remains in-line with wider economic trends through regular monitoring.”*

9. MGL also doubts that the level of provision has been arrived at with due regard to part d) of the strategy since the way the provision has been calculated fails to take account of such wider economic trends.

**Question 4 - What do you think of the draft strategic policy for biodiversity led restoration?**

10. MGL objects to Policy SP3 – Biodiversity-Led Restoration and in particular part 1 of the policy which does not clarify sufficiently the potential conflict with the type of restoration sought and the need to preserve the long term potential of best and most versatile soils. Although paragraph 3.23 contains some guidance on what habitats might be created there is no specific allowance for restoration to agriculture where it is necessary to retain the best and most versatile soils. Essentially, MGL is seeking the acknowledgement that agricultural afteruses are still important for the best soils which is contained in paragraph 3.28, for inclusion in the policy to aid clarification of potentially conflicting objectives.

11. Accordingly,

***“Policy SP3 – Biodiversity-Led Restoration***

*1. Restoration schemes that seek to maximise biodiversity gains in accordance with the targets and opportunities identified within the Nottinghamshire Local Biodiversity Action Plan and Biodiversity Opportunity Mapping Project will be supported. **Best and Most Versatile Soils may be returned to an agricultural afteruse in appropriate cases.”***

**Question 5 - What do you think of the draft strategic policy for climate change?**

12. No comment

**Question 6 - What do you think of the draft strategic policy for sustainable transport?**

13. Whilst the objective of the policy is laudable there are two considerations which are either not clear, or have been missed.



14. Firstly, if the preference for extensions and their claimed lack of environmental impact is partly based on the availability of infrastructure or potential for barge transport, and this is a major consideration in the choice of a site for inclusion in the plan, then MGL considers that such transport ought to become mandatory for a proportion of the proposed development, otherwise it vitiates the reason for the choice of the site. Such considerations are already part of the minerals policy of the Yorkshire Dales National park, which requires a certain proportion of quarry output to be transported by rail (negotiable) and MGL considers the same type of policy would be appropriate here. Thus the enforcement of a minimum proportion to be transported from a site by barge could be achieved through a legal agreement and this is commended to the mpa.
15. Secondly, minimising travel is a major consideration of national policy for sustainable transport (NPPF 2, para 103). Therefore, it follows that in a local policy on sustainable transport similar considerations will apply. Not only does this relate to the use of alternative transport modes but also to that which reduces the levels of imports to an area, where local material can be used instead, which is a different point to sites being in close proximity to markets; this is about reducing the levels of material traded unnecessarily between areas. This is in accordance with the draft Plan which says that sand and gravel is a relatively low cost mineral and is not generally cost effective to transport over long distances. The plan should actively seek to provide minerals supplies indigenously in accordance with national policy and should repatriate material imported from other areas, if it can be supplied locally.
16. Accordingly,  
***“Policy SP5 – Sustainable Transport***
  1. *All mineral proposals should seek to maximise the use of sustainable forms of transport, including barge and rail. **At those sites where barge or rail is proposed, proposals will be expected to make provision for an appropriate reduction in road haulage to be secured through a legal agreement.***
  2. *Where it can be demonstrated that there is no viable alternative to road transport, all new mineral working and mineral related development should be located as follows:*
    - a) *within close proximity to existing or proposed markets to minimise transport movement; and*
    - b) *within close proximity to the County’s main highway network and existing transport routes in order to avoid residential areas, minor roads, and minimise the impact of road transportation.*
  3. *Proposals requiring the bulk transport of minerals, minerals waste/fill or materials/substances used for the extraction of minerals by road will be required to demonstrate that more sustainable forms of transport are not viable.*
  4. ***Proposals for mineral development will be supported where unnecessary imports are reduced or avoided.”***





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**Question 7 - What do you think of the draft strategic policy for the built, historic and natural environment?**

17. MGL considers that Policy SP6 does not deal with potential conflicts between different policy areas, nor provide advice on where the balance lies when considering such conflicts. Our major concern is the conflict between a biodiversity led restoration policy approach and the need to conserve best and most versatile soils. Apart from saying that the loss of agricultural land to wetland can be managed (paragraph 3.60) the plan is silent on how this can be achieved and what policy position would be taken when loss of agricultural land is unavoidable.
18. MGL believes what is needed is a statement about the level of acceptable losses of best and most versatile soils (say, limited to less than 20 ha) and an indication of how to minimise such losses even if this should be at the expense of less wetland habitat. The plan should also say that if restoration schemes can demonstrate that soil grade can be preserved so there is no permanent loss of agricultural land or its quality, then the NPPF policy of preference of development of poorer quality land over higher quality land does not apply (NPPF footnote 53).
19. Accordingly, MGL considers this could best be handled by additional explanatory text in paragraph 3.60;

***“Agricultural land and Soil***

*3.60. Minerals development often involves large areas of land and is limited to areas where the mineral naturally occurs and agricultural land quality is often heavily influenced by the underlying geology. This means that a balance has to be made between the need for the mineral and the protection of the agricultural land. Land quality varies from place to place. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. The ALC system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most versatile land is defined as Grades 1, 2 and 3a. The majority of sand and gravel extraction in the Trent and Idle Valleys will result in the substantial permanent loss of agricultural land to wetland which along, with other development pressures, is causing a continuous erosion of the County’s finite agricultural resources. However, appropriate management and restoration of mineral workings can secure the safeguarding of best and most versatile soils. **For example, limited loss of such land (to less than 20ha) or only temporary disturbance to high quality soils where soil quality can be demonstrated to be preserved or enhanced, will not be considered to be contrary to national policy to prefer the development of poorer quality land over higher quality areas.**”*

20. Regarding infrastructure in paragraph 3.66 the Local Plan is in danger of mispresenting the legal situation. Not all infrastructure has rights of absolute protection. Utility companies install below ground infrastructure under explicit title provision that should the land and mineral owners wish to extract minerals then either the apparatus is removed or compensation is paid when the working face approaches the pipeline and a statutory notice is served. This is a commercial



matter and the planning system should not be used to subvert the legitimate rights of landowners under other codes. Accordingly, paragraph 3.66 should be modified as follows,

***“Infrastructure***

*3.66. Nottinghamshire has an extensive physical network of transport, communications, water, energy, and waste infrastructure. Mineral working provides the raw materials to maintain much of this essential infrastructure but it is important that the process of mineral extraction does not compromise the operation of existing or planned future infrastructure. When considering development proposals, consultation **will take place** with the utility companies, rail operators and other network providers. ~~will be required to identify potential risks and to ensure appropriate safeguards and/or mitigation measures. This is likely to include the need for appropriate stand-offs from overhead or underground transmission cables, buried or surface pipelines and rail infrastructure.~~ **Appropriate safeguards and/or mitigation measures may be required in certain circumstances, or provision will be made to relocate the infrastructure to accommodate minerals working.”***

**Question 8 - What do you think of the draft strategic policy for the Nottinghamshire Green Belt?**

21. No Comment

**Question 9 - What do you think of the draft strategic policy for Mineral Safeguarding, Consultation Areas and associated minerals infrastructure?**

22. No Comment

**Question 10 - What do you think of the draft policy approach towards aggregate provision?**

23. MGL considers that the Local Plan severely under-provides for sand and gravel. In particular, reliance on a bare 10 year average past sales as a forecast of future demand is clearly not appropriate on its own. Thus the Local Plan does not take into account planned development so that the LAA ‘forecast’ is based entirely on past sales trends contrary to national policy and guidance (NPPF paragraph 207 a) & PPG paragraph 27-064).
24. Since the averages of the last 10 years’ production are heavily skewed towards recessionary conditions, by basing future provision on such a figure the Council risks building in a permanent loss of capacity at a time of increased market demand, and expectations by communities for new houses and more jobs. If Nottinghamshire underprovides for its own needs, it will put strain on other areas to make up the shortfall.
25. There are two possible approaches to a consideration of future demand. First, the statistical link between sand and gravel production and housing completions may be used, which can be derived from figures used in the LAA. Using sand and gravel and soft sand sales and housing completions between 2007 and 2016 gives a Pearson Correlation Coefficient (PCC) of +0.700642 which is a statistically significant linear relationship, and which has an equally strong basis as a





causative effect. Applying the expected annual average planned housing completion rate for the county over the plan period of 4,574 dwellings to that PCC using the forecast function in Excel gives a return sand and gravel/soft sand forecast of 3.17 Mt pa. Deducting a figure of 0.37 Mtpa for soft sand leaves a sand and gravel provision figure of 2.8 Mtpa which MGL suggests is a robust alternative to the 10 year average.

26. There is a statement in the LAA that implies that one cannot use housing completions to forecast sand and gravel demand because it is only part of the overall demand and sand and gravel gets used for other construction projects. However, this is a red herring for two reasons. One, if there exists a statistically significant linear relationship between two variables which are causatively linked then knowing one variable leads to the prediction of the other variable. This is why statistically significant relationships are researched in all walks of life – to be able to make predictions. Therefore, it is irrelevant that sand and gravel is used for other things. The statistical relationship is all that is necessary to predict future sand and gravel demand knowing future housing completion rates. Two, construction of housing goes hand in hand with other types of development requiring sand and gravel such as commercial, retail, industrial and infrastructure, which are all related to population and economic growth. The driving force of sand and gravel demand is not housing per se but the underlying economic and population growth. Therefore, if it can be shown to be statistically significant then the relationship between sand and gravel and housing completions can be used as a proxy for all types of development.
27. Second, the situation in Nottinghamshire is similar to that pertaining in Oxfordshire. Here, the onset of the recession led to the major operators mothballing sites and delaying implementation of planning permissions, just as in Nottinghamshire and transferring production to other sites outside of the county. These commercial decisions in Oxfordshire reduced the 10 year rolling average below what it would have been had these commercial decisions not been taken. Oxfordshire took the view that it would be prudent to assume that this would only be a temporary market distortion and that as growth returned production would recommence at the affected sites. As such, the 10 year average would underestimate the true level of future demand.
28. Quantification of the effect was approached by considering how the county's sales had reduced compared to the whole of England during the baseline period. Given that the county and the country were subject to the same recession, it was reasonable to conclude that any differences between the percentages during the period reflected specific local factors.
29. If this approach is applied to Nottinghamshire then in the five year period prior to the recession (2004-2008) Nottinghamshire's sand and gravel sales (including soft sand) as a proportion of all England averaged 6.53%. In the last year (2016) the proportion was 3.85%. If this is converted into a figure for the county linked to the current level of sales in England which in 2016 was 41.26 Million tonnes, then applying a pre-recession proportion of 6.53% gives us a demand for Nottinghamshire of 2.694 Million tonnes. Once an allowance for soft sand has been deducted, the like-for-like sand and gravel demand figure is about 2.4 Million tonnes pa. Although this is



lower than the first method, this is because all the Oxfordshire method does is restore the county to conditions as they were before the distorting effects of the recession; it does not explicitly take account of future growth , which is why the statistical method is to be preferred.

30. Both these alternative methods demonstrate that the 10 year average should not be pursued by the County Council if it wants to provide for future growth and truly take into account other relevant local information in accordance with national policy. MGL strongly urges the County Council to abandon its current methodology and to adopt a more realistic alternative as outlined here.

31. Accordingly,

***"Policy MP1: Aggregate Provision***

*1. To meet identified levels of demand for aggregate mineral over the plan period (2017-2036) the following provision will be made:*

*- ~~32.30~~ 53.20 million tonnes of Sand and Gravel*

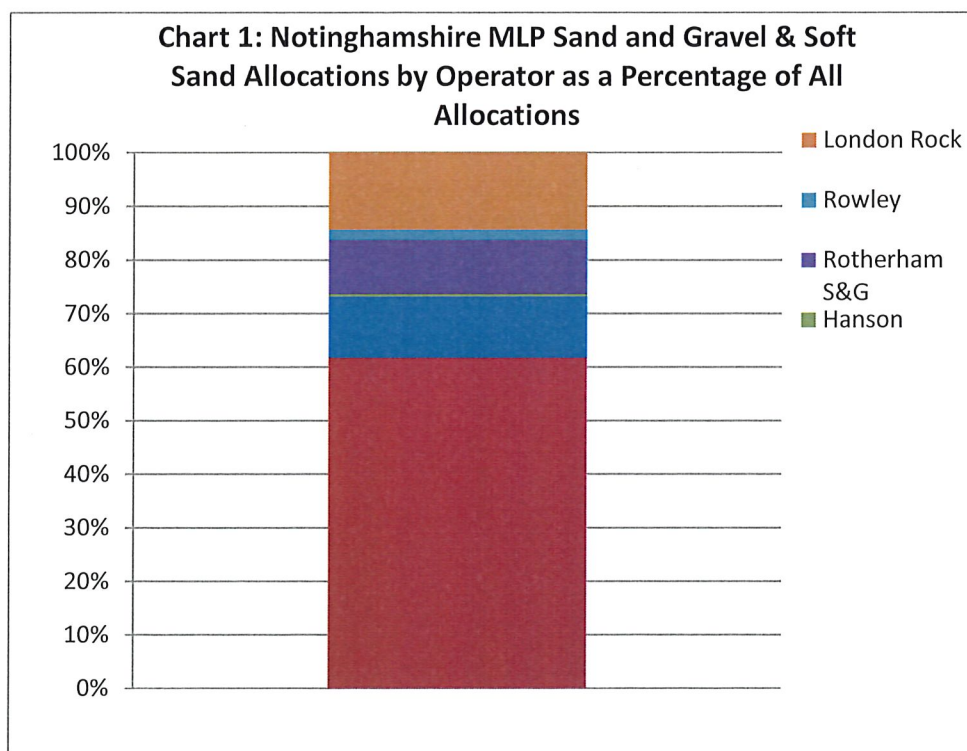
*- 7.03 million tonnes of Sherwood Sandstone*

*- 0.09 million tonnes of crushed rock*

*2. The County Council will make provision for the maintenance of landbanks of at least 7 years for sand and gravel, 7 years for Sherwood Sandstone and 10 years for crushed rock, whilst maintaining a steady and adequate supply over the plan period.*

*3. Proposals for aggregate extraction outside those areas identified in policies MP2, MP3 and MP4 will be supported where a need can be demonstrated."*

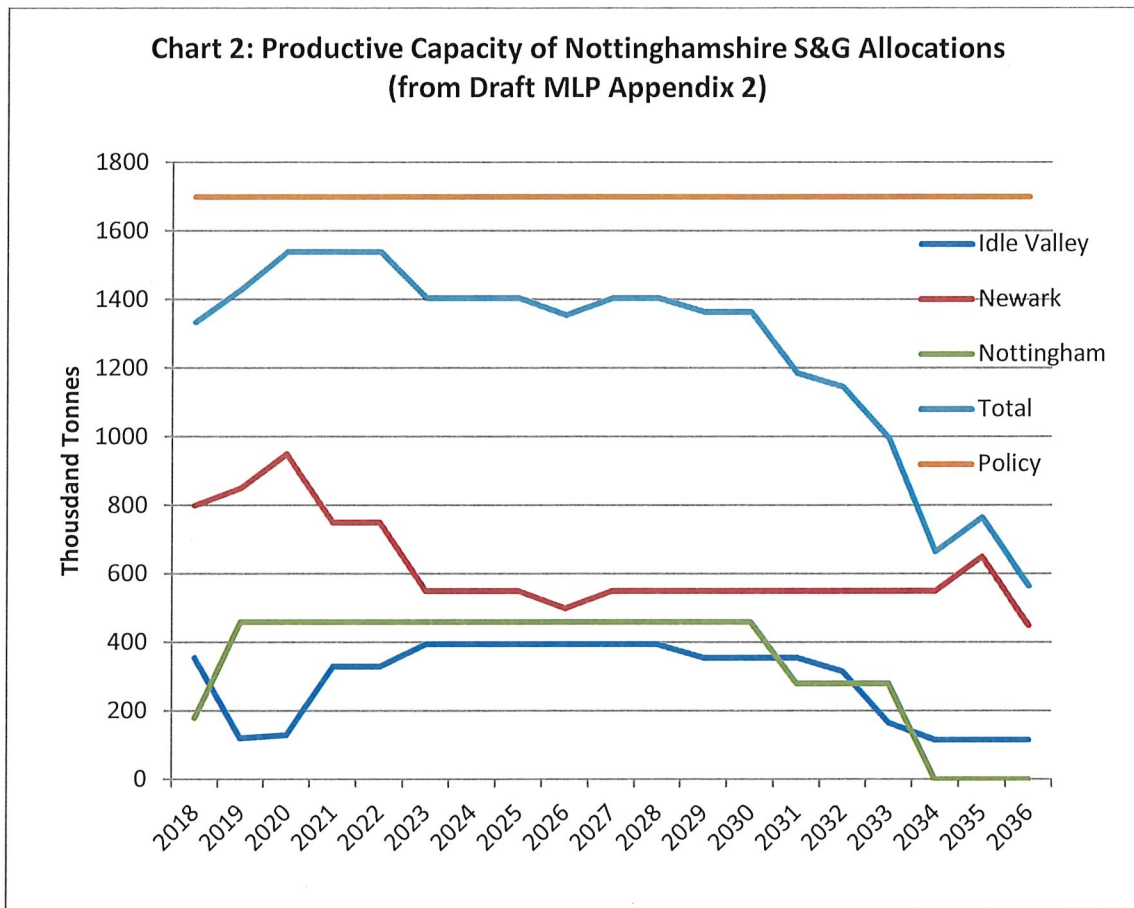
32. Moreover, the County Council's policy of preferring extensions over new sites and underproviding for the total quantity of sand and gravel and favours incumbent companies over new entrants, which is anti-competitive. An analysis of the allocations compared to Appendix 2: Delivery Schedule shows two major outcomes.







33. The first outcome is that one company has been granted 60% of the allocations (Chart 1) and the next largest allocation is one new entrant. This means that some companies have been left out completely and have no new reserves to replace exhausted operations further reducing the spread of competition in the county. This is fundamentally anticompetitive. Moreover, the second major outcome is shown in Chart 2.



34. Chart 2 shows the allocations split between the three production/market areas of the Plan. The light blue line shows the total allocated and this does not reach the policy level proposed to be adopted at any point in the Plan period. Moreover, capacity falls off rapidly after 2030 to nominal levels as existing pits close through exhaustion. Therefore, the plan does not make full provision for productive capacity through any part of its plan period.
35. It is clear that if a non-doctrinaire approach to provision is taken, which includes provision for planned growth and for maintaining productive capacity, and is more equal in the allocation of reserves across a number of companies, then much more provision is needed.

**Question 11 - What do you think of the draft site specific sand and gravel allocations?**

36. MGL has no comment about the specifics of the allocations except to reiterate the need for more provision in the form of new quarries and a more equitable spread of sites among the



industry. Thus MGL wishes to promote its own site at Flash Farm, Averham. This site was allocated in the former abandoned Plan in 2016, and clearly retains a number of advantages which make it suitable for working. This means that it has no overriding adverse environmental impacts and the only reason it appears not to have been included in this plan is the change of approach to local plan provision following the County Council elections of 2017.

37. This site located on the A617 at Averham west of Newark and would produce about 200,000 tonnes of high quality aggregate a year for markets to the north of Nottingham, Ashfield, Mansfield and possibly Derbyshire beyond. Some material is also likely to be sold in the Newark area.
38. A planning application including a comprehensive Environmental Impact Assessment has been prepared for the Flash Farm quarry (see Drg N° F18/15/01). The application is in an advanced state to formally submit to the County Council. However, that submission is currently being held in abeyance awaiting the progression of the consultation process but demonstrates a clear commitment to “deliver” the site.
39. The environmental appraisals undertaken have raised no issues that would warrant refusal of the development proposals and confirm that the site is eminently suitable as a Local Plan allocation.
40. The site is located partially within the western floodplain of the north-eastward flowing River Trent and consists of gravels and sandy gravels concealed in part by shallow deposits of alluvium. The mineral deposit is characterised by low fines content and high percentage of gravel. The gravel fraction is predominantly fine with occasional cobbles whilst the sand is medium grained and these consist primarily of quartz and quartzite with subordinate amounts of flint, chert and sandstone.
41. The site lies in the Trent Valley in the Trent Washlands Landscape Character Area and the proposed extraction area is largely flat lying at about 14m AOD and located in open countryside characterised by large fields, low hedges with sporadic hedgerow trees, and occasional blocks of woodland on higher ground to the north. It is also fairly isolated with the property of Flash Farm itself located 160 metres to the north. All other properties are at the villages of Averham and Kelham which are 540m and 660m to the south east and north east respectively.
42. The Flash Farm site comprises a number of agricultural fields, sub-divided primarily by fencing, under arable and pasture use. The site is crossed by a 400 Kva overhead power line with three substantial stanchions within the land in question. The wider landscape is dominated by adverse detractors consisting of the Staythorpe Power Station (to the south) and power lines leading from it as well as the dominant flue stack from the sugar beet factory to the north-east.
43. As the mineral extraction area is not sub-divided by any hedgerows, the scheme of working therefore importantly does not require the removal of any sections of vegetation (i.e. hedgerow or trees) whatsoever.





44. The quarry has been designed to reinstate the land in a sensitive fashion seeking to apply best environmental practice and give practical effect to strategic government initiatives on protection of soil resources and habitat creation using importation of suitable inert material as a catalyst for the beneficial restoration of the land to be reinstated to its existing “best and most versatile” agricultural land status.
45. Moreover, the opportunity has afforded conditions to create bio-diversity action plan priority habitats such as species rich grassland and lowland wet grassland as well as some 2.3km of new hedgerows (which currently do not exist).
46. The proposed scheme of working has been devised to reflect current landscape improvement and nature conservation policies. Net biodiversity gain would be achieved through the creation of a cohesive network of new habitats, contributing to the Government’s commitment to halt the overall decline in biodiversity. The application site itself is currently of limited ecological value with a majority of the site consisting of intensively managed fields with very limited hedgerows of variable quality within the site itself.
47. Accordingly, the scheme provides a high standard of mitigation by delivering net gain in environmental capital and strategic bio-diversity networks. Such benefits to bio-diversity are envisaged within the National Planning Policy Framework and Planning Practice Guidance as well as emerging plan policies within the draft Minerals Local Plan which contains a “bio-diversity led” philosophy for the restoration of quarry workings.
48. Given the site’s location the proposed scheme of working can readily provide effective protection against unreasonable noise and dust emissions with the site design carefully aimed to balance protection of the local environment with the requirement to extract and process mineral.
49. The site access will be directly onto the A617 upgrading an existing gated access. The A617 is part of the Strategic Highway Network and policy objectives (locally and nationally) support the use of such roads to transport goods and materials (including minerals).
50. The Flash Farm site is the only sand and gravel allocation identified within the Consultation Plan in the Newark area lying to the west of Kelham Bridge which is ideally located to serve markets to the north and west of the bridge. Without Flash Farm being present other quarries would have to transport material across Kelham Bridge to serve those same markets. Congestion around Kelham Bridge has been highlighted by the County Council and residents as being of concern although the A 617 is identified as part of the County’s Core Road Network. Accordingly, Flash Farm would have a neutral effect as movements west over the bridge would be balanced by movements in the other direction.
51. As such, MGL commends the Flash Farm site to the County Council as a prospective site specific allocation.



52. MGL would like to remind the County Council that this site was allocated in the previous Plan and it consequently was considered suitable for inclusion as a working site. Environmentally, it passed the test of sustainability and therefore should be included in the Plan given the shortfall of provision MGL has identified. An extract of the 'Minerals Local Plan Consultation Submission Draft February 2016, Appendix 3: Site Allocation Development Briefs' is enclosed which contains a description of the site.

**Questions 12-38**

53. No comment

Yours faithfully,



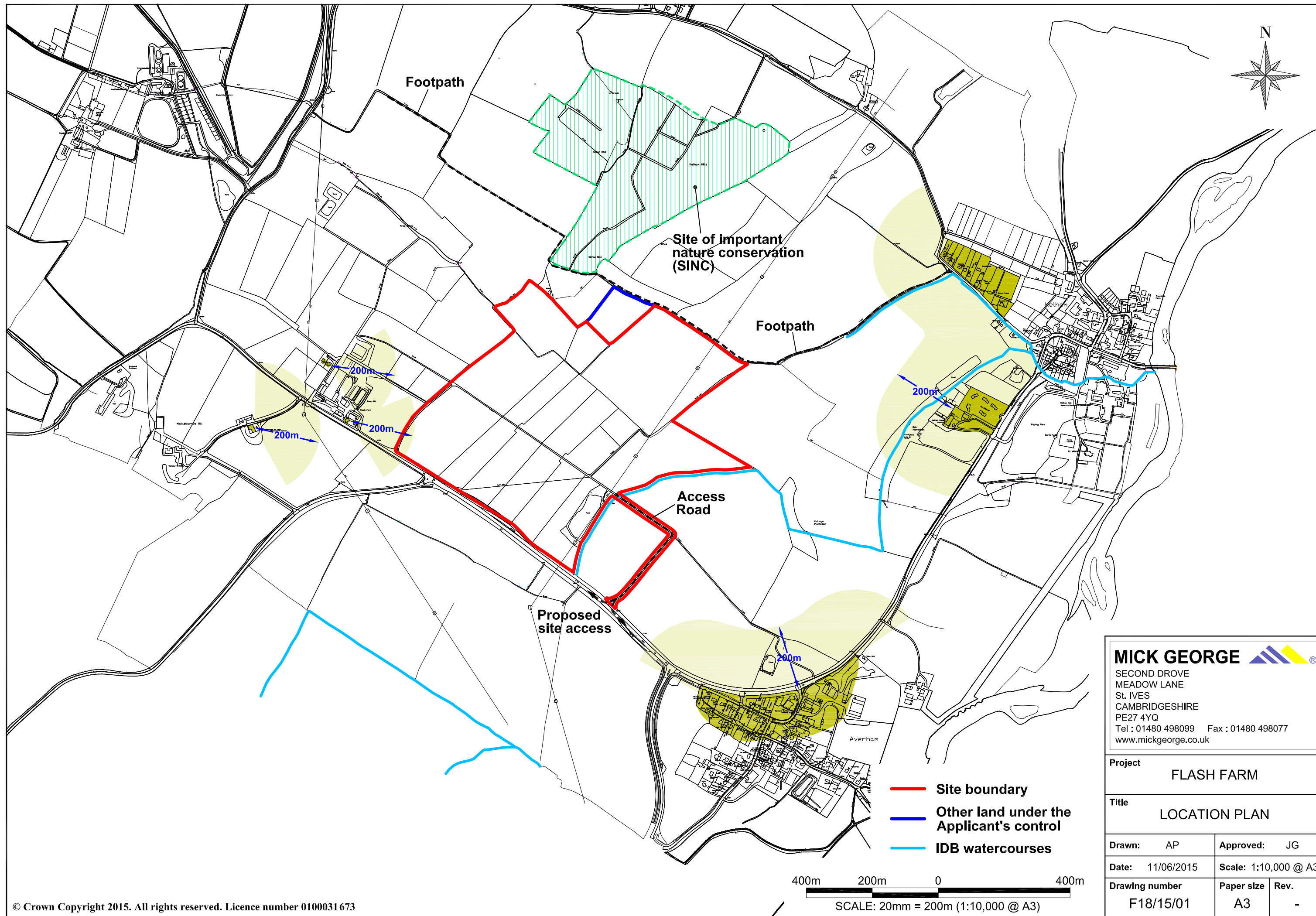
**John Gough**  
**Planning Director**

**Enc.**

Drg N° F18/15/01

Extracts from Nottinghamshire Minerals Local Plan Consultation Submission Version Draft (February 2016)





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Project			FLASH FARM		
Title			LOCATION PLAN		
Drawn:	AP		Approved:	JG	
Date:	11/06/2015		Scale:	1:10,000 @ A3	
Drawing number	F18/15/01		Paper size	A3	Rev.
					-







**MP2p – Flash Farm****Grid reference:** 475815, 355472**District:** Newark and Sherwood District Council**Parish:** Averham Parish Council**Area:** 47.44 hectares**Total mineral resource:** 3.08 million tonnes**Quarry restoration**

All proposals for restoration schemes should be in line with the County Council's approach to Biodiversity-Led Restoration contained within Policy SP3.

Restoration should be biodiversity-led, and precise details will be dependent upon landform, hydrology and substrate characteristics. However, restoration should target the creation of:

- Wet Grassland (Floodplain Grazing Marsh)
- Lowland Neutral Grassland
- Marsh and Swamp
- Ponds

Other habitats that may be appropriate for creation include:

- Reedbed
- Lowland Fen
- Wet Woodland
- Mixed Ash-dominated Woodland (Lowland Mixed Deciduous Woodland)

Restoration should seek to maximise the extent of target habitat(s) and avoid habitat packing, where small areas of lots of habitats are packed into the site. Priority should be given to wet grassland creation, which, in combination with the creation of other grassland and wetland types, will allow the creation of important areas of habitat, whilst also conserving Best and Most Versatile soils.

**Location**

- West of Kelham and north west of Averham
- See Policies Map Inset 15

**Environmental and cultural designations**

- Indirect impacts on Kelham Woods LWS must be considered
- High archaeological potential to be managed through appropriate survey methods
- Consideration of Landscape Character Assessment, Policy Zone recommendation: 'Conserve and Create' – actions should conserve distinctive features and features in good condition, whilst creating new features or areas where they have been lost or are in poor condition
- Potential impacts on heritage assets in Kelham and Averham

**Access and transport**

- Access on to public highway to the south east of the site on to the A617

**Amenity**

- Protection or suitable management of Averham footpath 6





## Water and flooding

A Flood Risk Assessment should address:

- Surface and ground water flooding
- Overland flow paths
- Mitigation of potential flooding as part of the site lies in Flood Zone 3.



**From:** MG Planning  
**To:** [REDACTED]  
**Subject:** Consultation on the Draft Nottinghamshire Minerals Local Plan - Representations of Mick George Ltd  
**Date:** 25 September 2018 15:00:27  
**Attachments:** [REDACTED]

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Dear Sirs,

Please find attached copy correspondence which has been posted to you today in respect of the consultation on the Draft Nottinghamshire Minerals Local Plan.

Regards,

**John Gough**  
Planning Director



Tel: 01480 499152 Mob: [REDACTED]  
[www.mickgeorge.co.uk](http://www.mickgeorge.co.uk)

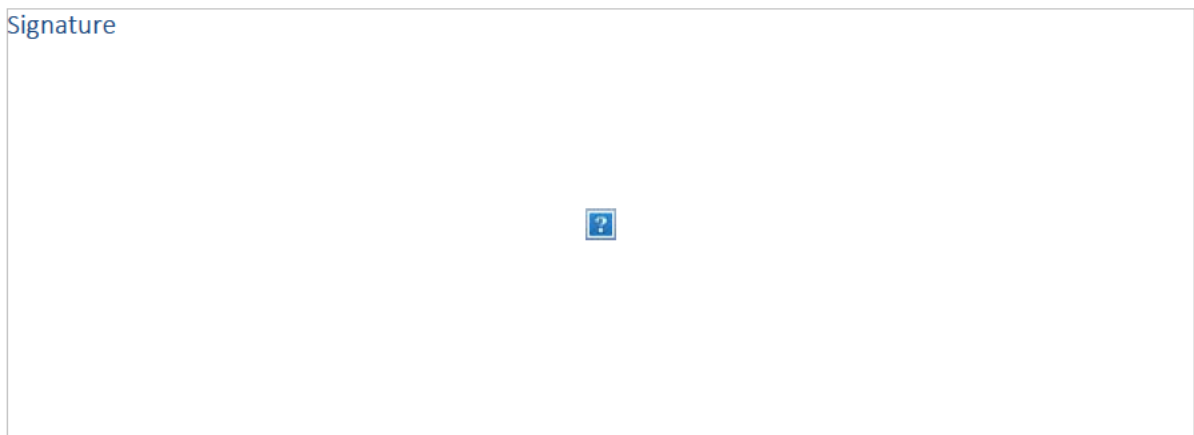


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Signature



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