

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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### Sustainability Appraisal

#### Sustainability Appraisal

29860 - Mick George (Mr John Gough) [2752]	Object	<p>MGL believes the Sustainability Appraisal is unsound in respect of the site selection methodology and in particular the scores for each site as set out in that document because it is not justified by the evidence. MGL challenges the scores applicable to the Flash Farm allocation believing that the County Council has either ignored evidence submitted on behalf of the site or has been inconsistent in the application of the sustainability scores across sites.</p> <p>Please see attachment for full discussion and reappraisal.</p>		<p>Objection not accepted. The County Council did reassess this site on the basis of additional information provided and the SA was revised accordingly. Whilst it is recognised that, due to the nature of sustainability issues, there is inevitably some subjectivity involved in the appraisal (as stated in paragraph 6.7 of the SA report), scoring was designed to be as fair as possible and was consistently applied across all the sites in line with the details set out for each SA objective in paragraphs 6.11 to 6.45 of the SA report. It was also clearly stated, in paragraph 6.7 of the SA report, that the commentary and potential mitigation sections of the appraisal matrices should be referred to rather than looking at the scores in isolation.</p>	
29954 - London Rock Supplies Ltd [7882]	Object	<p>Undertaking our own SA appraisal using updated site information for the Barton Proposal the 'score' for the operational period has increased from -10 to -5. The main difference is the flood risk score. During the long term restoration phase the 'score' increases from -2 to +3. The overall 'score' is -2.</p>		<p>Objection not accepted. This site was re-appraised on the basis of information in the Scoping Opinion submission (30.03.15) and the revised results are detailed in the site appraisal matrix in Appendix D of the SA report. (The overall score improved from -12 to -11.) On the basis of the information in the Scoping Opinion submission it was considered that the site's potential to provide LBAP priority habitats would not be maximised. In terms of the flood risk score, scoring was consistent with that across all the other potential sites, being based on the flood zone within which the site is located.</p>	
29551 - Mrs Jackie Armstrong [2881]	Object	<p>The scoring of sites in MLP Sustainability Appraisal against SA Objective 8: Protection of high quality agricultural land and soil is flawed. It takes no account of the amount of agricultural land lost only the overall quality of the land, whereas SA Objectives 1 and 13 give the maximum positive score for a large area of quarry.</p>	<p>Sustainability appraisal of sites against SA Objective 8: Protection of high quality agricultural land and soil - need to be revised to take account of the amount of agricultural land lost and not just the overall quality of the land, to provide a balanced appraisal against the scoring of SA Objectives 1 and 13 where these score +3 for a large area of quarry.</p>	<p>Objection not accepted. Based on the information available, for many sites the exact quantity of best and most versatile agricultural land (BMVL) was not evident, particularly where Grade 3 land was involved and there was no information as to whether this was Grade 3a or 3b or a mix of the two. It was therefore considered that the most appropriate way of appraising the potential effects was on the basis of whether a site contained any BMVL and if so, whether it comprised the majority or minority of the site. As such, the scoring could be applied consistently across all sites.</p>	

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29528 - Mrs Jackie Armstrong [2881]	Object	The scoring of sites in MLP Sustainability Appraisal against SA Objective 3: 'Promote sustainable patterns of movement more sustainable modes of transport' is flawed. Based primarily on the export mode and site proximity to the main highway network, it fails to capture several criteria against which the objective must deliver. Site impacts against 'reducing transport distances for minerals' are not covered, yet vehicle kilometres determine/strongly relate to many of the negative impacts of HGVs, including carbon-footprint (Objective 7, climate change). Information on markets and their appropriateness to site location is collected in 'Site Information Request Forms'.	Sustainability appraisal of sites against Objective 3: Sustainable transport need to be revised to take account of the available market information from developers to capture environmental impacts of transport to and from the forecast market locations.	Objection not accepted. As stated in paragraph 6.18 of the SA report, it was considered that attempting to score sites on the basis of transport distances for the minerals would be misleading given that the minerals could be transported from any site to any market within an economic distance and the locations of markets for minerals from any specific site could change during the Plan period.	
29661 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	Although the national Planning Framework allows for this method, the sole use of the points scoring system for the evaluation of sites is subjective and inappropriate.  See further notes on page 2 of Attachment A.	The sole use of a purely subjective points scoring system needs to be replaced with a more objective approach to site selection.	Objection not accepted. Whilst it is recognised that, due to the nature of sustainability issues, there is inevitably some subjectivity involved in the appraisal (as stated in paragraph 6.7 of the SA report), scoring was designed to be as fair as possible and was consistently applied across all the sites in line with the details set out for each SA objective in paragraphs 6.11 to 6.45 of the SA report. It was also clearly stated, in paragraph 6.7 of the SA report, that the commentary and potential mitigation sections of the appraisal matrices should be referred to rather than looking at the scores in isolation. It should also be noted that comments from officers from specialist disciplines within the County Council and from a wide range of external stakeholders were taken into account in determining the scoring.	

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29967 - Rushcliffe Borough Council (Mr Richard Mapletoft) [969]	Object	<p>Rushcliffe Borough Council is concerned that the SA's assessment of site MP2r (Shelford West) is not correct and that the focus upon a scoring system of each site's economic, social and environmental effects does not adequately consider the existence of significant effects which by themselves (or cumulatively) would normally prevent development. There is also concern that the SA does not clearly outline the reasons the sites where selected in light of the alternatives (as required by The Environmental Assessment of Plans and Programmes Regulations 2004 and National Planning Policy Guidance).</p> <p>The SA assessment of Shelford West within the Draft Preferred Approach identified negative effects on a number of objectives. Since the Preferred Approach, two further consultations have amended the Shelford West proposal and the effect upon landscape and openness are critical given the site's location within the Green Belt and it is not clear if the changes to the proposal have been considered at this stage. The Borough Council is concerned that the scoring of effects on biodiversity does not reflect the potential impacts on four Local Wildlife Sites which are in close proximity of the site and that in terms of the Equality Impact Assessment, the 'local area' has a higher than 'Rushcliffe level' of residents with a long-term activity-limiting illness or disability who may be disproportionately affected by the proposal.</p> <p>In terms of site selection, there is no clear explanation why the Sand and Gravel sites in South Nottingham have been selected in light of alternatives.</p>	<p>Until concerns regarding the SA and site selection process have been resolved Rushcliffe Borough Council does not support the inclusion of site MP2r within the Nottinghamshire Minerals Plan. It should be removed.</p>	<p>Objection not accepted. SA objective 5 (townscape and landscape) - as explained in paragraphs 6.23 to 6.25 of the SA report, scoring for this objective was based on the Nottinghamshire Landscape Character Assessment and, in particular, the landscape action categorisations, which enabled consistency in scoring across all the submitted sites. The additional infrastructure was not considered to have an impact which would warrant overriding this score.</p> <p>The potential effects of the amended proposals for Shelford, including the conveyor and processing area were fully considered against all the SA objectives.</p> <p>SA objective 2 (biodiversity) - scoring of effects on biodiversity reflects the location and level of significance of the wildlife sites concerned (as stated in paragraphs 6.13 - 6.15 of the SA report) such that scoring is consistent across all the submitted sites.</p> <p>SA objective 14 (human health and quality of life) - with regard to the level of residents with illness/disabilities it is recognised in the scoring that there will be a very negative impact (-3) on human health and quality of life during the operational phase. The EqIA was completed on a policy-by-policy basis to assess whether the policies will ensure that there is no disproportionate effect on any group above another. It was not completed on a site-by-site basis as it was considered that this would not be effective given the information available at the Plan making stage.</p> <p>It is clearly stated in paragraph 6.7 of the SA that 'the commentary explaining the reasoning behind each predicted effect and the potential mitigation should also be referred to rather than looking at the scores in isolation'.</p> <p>The overall sustainability of all the alternatives, i.e. all the potential sites, is set out in the summaries for each site in the appraisal matrices in Appendices C and D of the SA report.</p>	

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29643 - Shelford Parish Council [7840]	Object	<p>Although the national Planning Framework allows for this method, the sole use of the points scoring system for the evaluation of sites is subjective and inappropriate.</p> <p>See further notes on page 2 of Attachment A.</p>	The sole use of a purely subjective points scoring system needs to be replaced with a more objective approach to site selection.	<p>Selection of sites for minerals development is constrained by considerations not applicable to other types of development, such as housing, as minerals can only be worked where they are found and if the sites are deliverable in terms of having an operator in place and can be worked before the end of the Plan period. Geographical spread is also a consideration in terms of transportation of minerals to market. The selection of sites could not, therefore, be determined purely on the basis of the SA. The SA informed the site selection process set out in the Site Selection Background Paper.</p> <p>Objection not accepted. Whilst it is recognised that, due to the nature of sustainability issues, there is inevitably some subjectivity involved in the appraisal (as stated in paragraph 6.7 of the SA report), scoring was designed to be as fair as possible and was consistently applied across all the sites in line with the details set out for each SA objective in paragraphs 6.11 to 6.45 of the SA report. It was also clearly stated, in paragraph 6.7 of the SA report, that the commentary and potential mitigation sections of the appraisal matrices should be referred to rather than looking at the scores in isolation.</p>	

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### Chapter 1: What is the Minerals Local Plan

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29622 - Southwell Town Council (Ms C Standish) [784]	Object	The Council also notes that the 20 year Plan period is in excess of the seven year plan period suggested by the Sub-Regional Apportionment and National Planning Policy Framework.	The Plan should be amended to reflect a seven year Plan period.	Objection not accepted. The 7 year period referred to in relation to the NPPF and the Sub-Regional Apportionment concerns the landbank for sand and gravel, it is not applicable to Plan periods. The County Council considers that the plan period for the Minerals Local Plan is appropriate given the guidance set out in National Planning Practice Guidance.	
29418 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	<p>The formal consultation process on the submission draft is not considered valid as it is understood that representations are being rejected and returned to members of the public, after being prompted to write in by their Member of Parliament.</p> <p>It is clear from the explicit statement on timing that late representations will not be accepted, but there is no similar explicit statement made that ONLY representations made (online or otherwise) using the form provided would be accepted. There is also a positive statement that ALL of the representations received will be submitted with the plan.</p>	<p>In compliance with the statement:</p> <p>* "All of the representations received will be submitted with the Plan and will be examined by a planning inspector who will consider whether the Plan is 'sound' and complies with the legal requirement"</p> <p>All of the representations received must be submitted with the plan, even if in a different format or incomplete.</p> <p>Alternatively, the consultation process should be extended with greater clarity on the format required of representations.</p>	Objection not accepted. All of the representations received within the consultation period have been registered and will be sent to the planning inspector for consideration. As the consultation form/online system included important elements, including whether individuals wished to appear at the examination in public and the questions regarding soundness and legal compliance, any representations that were submitted not using these methods were returned with a copy of the form, inviting the respondent to complete all sections. This was to ensure that members of the public were given the opportunity to fully participate in the process and provide all of the information required by the Planning Inspectorate. Those comments that were not submitted with all of the required information have been marked as NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE to identify them. There is no guarantee that the inspector will take account of these representations.	
29153 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	The form designed by NCC omits the fundamental question from the Planning Inspectorate model form "Do you consider the Local Plan - Complies with the duty to co-operate", and therefore will inhibit the representations on the DTC during the formal consultation stage.	The representation form, in its printable and electronic forms, needs to be redesigned to prompt representations on the duty to co-operate during the formal consultation stage. Any related documents, such as the form guidance, may also need to be redesigned. The redesign of the form and any other documents should be publicised and the formal consultation period extended to allow such representations to be made.	Objection not accepted. The Duty to Cooperate is a legal requirement of plan production and so any objections on these grounds would be made against the legal compliance question. This was detailed on the guidance note that accompanied the representation form. The County Council considers that the representation form and the guidance enabled objections to be made on the ground of the Duty to Cooperate and that any redesign or extension of the consultation period was therefore not necessary.	

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29774 - Roger Fell [2474]	Object	<p>The document has been issued for final consultation following a decision made by Members of the County Council where votes were cast in a 'block format' corresponding to political groups rather than individual votes.</p> <p>Members were confused by the procedural issues and Members stated that the Document was an officer led decision.</p> <p>Voting on planning matters shall not be the subject of predetermination but shall be capable of demonstrating that each Member has been able to consider the relevant arguments. It appears doubtful that at any future planning application stage for individual sites that those voting will be able to prove there is no predetermination and thus an open mind.</p> <p>The plan uses out-of-date information (calculation of required mineral provision over plan period). It is required that the latest information possible shall be used to form the plan. Consultees have been denied opportunity to cross-examine relevant data.</p>	Return plan to Committee and Full Council for a recorded Member vote and including latest set of data.	<p>Not accepted. The relevant reports regarding the Submission Draft consultation document were published in advance of the legally required timescales to ensure that people had adequate opportunity to read and digest the contents. The approval given by Committee and Full Council was to publish the submission draft document for public consultation rather than for a specific planning application. The responsibility for deciding individual planning applications lies with Planning and Licensing Committee which is a separate decision making process from the Local Plan process. Members of the committee would make decisions based on a more detailed information in the planning application and it is not considered that members involved in the plan making process would not have an open mind when considering any application for a particular site allocated in the Plan.</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves. It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and</p>	

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				growth increases during this period.	

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29439 - Michael Staff [3695]	Object	<p>The LMP is flawed since it does not aim to understand the numerical data that is available for construction output, the effect of landfill taxes, and the growth of secondary and in particular recycled minerals which is documented numerically in the NCC Waste Core Strategy 2014. The effect is that the changes to primary minerals sales are not understood and forecast requirements for the future are overstated. Greenfield sites are subject to development which will prove unnecessary.</p>	<p>The quantified data that is available on construction, recycling and landfill taxes needs to be incorporated in working out future demand</p>	<p>Not accepted. National estimates for recycled aggregate production has seen levels increase as a result of greater awareness of environmental impacts, increasing costs to dispose of material and reducing disposal capacity. They now play an important role in the overall supply of aggregates and it is estimated that 29% of the aggregate market is supplied which is three times higher than the Europe average however it is acknowledged by the British Geological Survey and the Minerals Products Association that future growth in this sector is limited.</p> <p>At a local level, data on material such as construction and demolition waste that has the potential to be used as recycled and secondary aggregates is limited and often based on the capacity of sites rather than actual throughput. This data is contained within the Waste Core Strategy as this is the document that makes provision for additional capacity for waste infrastructure.</p> <p>In terms of recycled aggregates the Minerals Local plan complements the Waste Core Strategy as policy MP5 supports development proposals which will increase the supply of secondary aggregates. The Local Aggregates Assessment also sets out permitted capacity for aggregates recycling facilities. It should be noted that both plans are part of the development plan and when necessary should be read as a whole.</p> <p>Like sales of primary mineral, recycled aggregates also follow the wider economic demand for aggregates and the amount produced varies as a result. Given the lack of reliable local data it is not possible to forecast future demand for secondary and recycled aggregates. Unlike primary aggregate forecasting there is no national guidance as to how future demand would be quantified.</p> <p>Expected demand for minerals over the plan period is based on the information set out in the Local Aggregates Assessment. Although local data on recycled aggregates is limited, its contribution to overall sales will be reflected in the 10 year average sales figure for each of the aggregate minerals. Therefore estimates of future requirements take account of the</p>	



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				proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.	

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29216 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The draft MLP does not incorporate and integrate findings and data from the NCC core waste strategy of 2014. Hence there is a conflict of information and data between the two documents. There is highly significant data on increased construction and demolition waste that can be recycled. As an example, crushed concrete is used as a gravel substitute	The draft MLP should be reworked to ensure it is aligned with the adopted core waste strategy of 2014	<p>Not accepted. National estimates for recycled aggregate production has seen levels increase as a result of greater awareness of environmental impacts, increasing costs to dispose of material and reducing disposal capacity. They now play an important role in the overall supply of aggregates and it is estimated that 29% of the aggregate market is supplied which is three times higher than the Europe average however it is acknowledged by the British Geological Survey and the Minerals Products Association that future growth in this sector is limited.</p> <p>At a local level, data on material such as construction and demolition waste that has the potential to be used as recycled and secondary aggregates is limited and often based on the capacity of sites rather than actual throughput. This data is contained within the Waste Core Strategy as this is the document that makes provision for additional capacity for waste infrastructure.</p> <p>In terms of recycled aggregates the Minerals Local plan complements the Waste Core Strategy as policy MP5 supports development proposals which will increase the supply of secondary aggregates. The Local Aggregates Assessment also sets out permitted capacity for aggregates recycling facilities. It should be noted that both plans are part of the development plan and when necessary should be read as a whole.</p> <p>Like sales of primary mineral, recycled aggregates also follow the wider economic demand for aggregates and the amount produced varies as a result. Given the lack of reliable local data it is not possible to forecast future demand for secondary and recycled aggregates. Unlike primary aggregate forecasting there is no national guidance as to how future demand would be quantified.</p> <p>Expected demand for minerals over the plan period is based on the information set out in the Local Aggregates Assessment. Although local data on recycled aggregates is limited, its contribution to overall sales will be reflected in the 10 year average sales figure for each of the aggregate minerals. Therefore estimates of future requirements take account of the</p>	

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				proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.	

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29955 - London Rock Supplies Ltd [7882]	Object	<p>The plan is not positively prepared - The vision and strategic objectives of the MLP have not been "objectively met". Plan fails to assess aggregate demand market to 2030. Main market is located in southern part of greater Nottingham. Other potential demand is likely to be HS2 from 2026. Government Guidance states that evidence documents are published when completed, rather than waiting until consultation stages. MLP failed to use up-to-date information and consult in a manner that allows development to proceed in the most acceptable way, within the timescales identified in the Plan.</p> <p>The plan is not justified - Alternative options to deal with supply of aggregates in the County not considered. Majority of allocations near Newark when demand is in Nottingham. Not justified on economic or environmental grounds. The exclusion of sites on arbitrary SA scores undermines the whole plan process when other factors should also be considered in line with the Vision and Strategic Objectives of the plan. Plan not considered to be flexible enough to meet the market requirements or robust enough to ensure that any site allocation that does not come forward will not present any major supply issues for the construction industry.</p> <p>Plan is not effective - Plan not considered effective as it is not considered to be deliverable. The allocations included in the plan will not come forward before 2020</p> <p>Not consistent with National Policy - The plan is not considered to be consistent with national policy, especially in relation to the requirements of the NPPF. We consider that the following sections of the NPPF have not been met as part of the MLP formulation: NPPF para 155/156/158/186/187/190</p>	<p>We consider that the Plan should be amended to be "Sound" by undertaking the following: No proposals are suggested to amend Policy MP1, Policy MP2 - sand &amp; gravel Provision Part 1b) New sand and gravel sites - This should be amended to include the land at Barton in Fabis. The policies map should be amended accordingly. The reason and justification for the inclusion of this site are set out in the previous section of this document. By including the site, the Plan will comply more fully with its "Vision" and "Strategic Objectives" and policies, especially related to sustainable development, sustainable transport, flexibility in the plan and satisfying the local needs of the housing and construction sectors. The Rushcliffe Local Plan (adopted in 2014) has not been referenced in the MLP formulation, but this local plan identifies the main area of aggregate, ready mixed concrete and construction material supply in the County- located adjacent to the proposed site at Barton. A review of the Sustainability Appraisal for the Barton site needs to be undertaken using up-to-date information and relevant information. This will show that the site can comply with the highest sustainability requirements for new sites within the MLP. Justification text: Para 4.17 - Mention should be made of the closure of major sites over the past 10 years or so that had not been replaced. Mention of the closure of the Attenborough site should also be made, especially as the site is closing that will reduce the amount of available sand and gravel within Nottingham by 200,000 tpa and will reduce the availability of ready mixed concrete with the closure of the works. Para 4.21 and table 3 should be amended for the following sites:</p>	<p>Not accepted. The Minerals Local Plan includes a geographical spread of site specific allocations made up of extensions to existing quarries along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. Minimising transport distances has been taken into account alongside a range of other considerations. However, it is not possible to guarantee that the sand and gravel worked will always supply the closest markets. The availability of suitable minerals elsewhere and the need for companies to supply individual contracts will influence the movement of sand and gravel. The number of quarries within Nottinghamshire has fallen over the last 20 years partly due to sand and gravel resources being worked out, commercial decisions of the minerals industry not open replacement quarries in Nottinghamshire and more recently the impact of the recession reducing demand for minerals. The remaining permitted reserves at Attenborough quarry are worked within Derbyshire, however they continue to be processed in Nottinghamshire. Given the location of the processing plant on the Nottinghamshire/Derbyshire border, the sand and gravel extracted will supply both the Nottinghamshire and Derbyshire markets. All sites put forward by the industry through the call for sites process have been assessed to identify those that were realistic, deliverable and achievable. The allocations identified as a result of the assessment work are those that are considered most suitable in principle for future minerals development and as a combination can met the identified demand over the plan period. The delivery schedule included in appendix 2 sets out when extensions to existing quarries and new sites are expected to be worked, in order to provide a steady and adequate supply of minerals over the plan period. The schedule is based on information supplied by minerals operators. However, actual start dates are likely to be influenced by the economic situation at any given time. If demand significantly</p>	

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			<p>Cromwell - No requirement for an extension to this site (0.8 million tonnes). The site gained planning permission in 1998 and has not yet come forward. If an extension is required at some time towards the end of the plan period, once it is operational, this should be assessed at that time on its merits.</p> <p>Coddington - There is no clear need for this site to come forward in 2023 at a rate of 500,000 tpa. No sites are proposed to be closed and there is no construction activity planned that would warrant this substantial allocation towards the end of the plan period. Both Flash Farm and Shelford have identified reserves to 2029, this is the time that Coddington needs to come forward. The location of Coddington in the rural eastern part of the County on the Lincolnshire border is remote from the main market and thus this site cannot economically supply the Nottingham market.</p> <p>If the site was to come forward in 2029 rather than 2023, this would leave the plan short by 3 million tonnes, which is almost the same reserve that is proven within in the Barton site. The Barton site can provide sand and gravel in to the Nottingham market, as it is the closest potential site. Coddington can come forward when all of the major development in the Greater Nottingham area (identified in the Rushcliffe Local Plan) has been completed.</p> <p>Shelford - It is considered that Shelford and Flash Farm will not start production in 2016, as set out in the delivery schedule. It is most likely that both sites may not come forward to production until at least 2019 or 2020 due to the time taken for complex planning application to be prepared and approved. The Shelford site has the added complication by the need for a wharf and a "satellite quarry" in Colwick to process the 180,000 tpa that will be</p>	<p>increases, sites could be brought forward sooner to meet demand. However, if demand remains low new quarries are unlikely to be worked.</p> <p>The estimated start date of the proposed quarry at Coddington was put forward by the operator to follow on from the companies draft allocation at Barnby Moor which itself would replace the company's existing permitted reserves at Newington South.</p> <p>A planning application to extend the time limit for the implementation of Cromwell quarry was permitted in June 2016. In line with this application the quarry is expected to be operational by the end of 2016.</p> <p>The draft allocation at Shelford was fully assessed and is considered deliverable within the plan period.</p> <p>Policy MP1: 'Aggregates provision' sets out estimated demand over the plan period and site specific allocations have been made in Policy MP2 'Sand and gravel provision' in order to meet identified levels of demand.</p>	

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			<p>transported by barge.</p> <p>This suggests a potentially undeliverable site with an output rate of 500,000 tpa. If the Shelford and Flash Farm sites do not come forward until 2019, the plan will not provide reserves of over 2.7 million tonnes in the period 2016-2019. To ensure that the plan delivers a constant and adequate supply of sand and gravel to the market and is both flexible and deliverable, the land at Barton should be included. It should be noted that the delivery schedule for the preferred options has Barton starting production in 2017, which is currently deliverable.</p> <p>Para 4.35 - this should be removed as this allocation of an extension to Cromwell, that received planning permission in 1998 and has not come forward, is deemed unnecessary.</p> <p>Para 4.49 - this should be amended to show Coddington coming forward with the closure of Flash Farm and Shelford towards the end of the plan period. The market for 500,000 tpa from 2023 is not justified.</p> <p>Para 4.51 should be amended as Flash Farm will not be operational in 2016. A more realistic time for production to start would be 2019 or 2020.</p> <p>Para 4.52 - Shelford - text should be amended as this site will not be operational in 2016. A more realistic time for production to start would be 2019 or 2020. Mention should also be made that 180,000 tpa of the total 500,000 tpa output will be transported by barge from the site, up-river, to a "satellite quarry" operation located at Colwick.</p> <p>In conclusion, it is considered that the MLP in its current form is "not sound" as the plan has not been positively prepared; is not justified (when considered against reasonable alternatives, based on proportionate evidence); is not effective (as it is not</p>		

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29511 - Mr David Armstrong [2806]	Object	The Health Impact Assessment makes recommendations for policy actions (Paragraph 6.3) which it is stated have been included in the submission draft. Several recommendations have been omitted which are listed in the changes to be made before submission, or explanations provided in the submission draft for their omission.	deliverable); and is not consistent with national policy, especially the NPPF. To ensure that the plan becomes "Sound", we consider that the amendments proposed should be implemented and the Minerals Local Plan amended accordingly.		
			<p>Strategic Objectives: SO5 - add reference to the promotion/encouragement of community benefit funding schemes.</p> <p>Development Management Policies: DM1 - add reference to sensitive locations/features. The justification text should set out that for noise, schools and nurseries are sensitive locations.</p> <p>Consider inclusion of new policy requiring community benefit funds for all minerals development.</p>	<p>Not accepted. The Health Impact Assessment makes recommendations for changes to the Plan. In some instances they may be deemed inappropriate in the wider context of the Plan preparation process, the justification for this is as follows:</p> <p>SO5 - the inclusion of the promotion of community benefit schemes was considered to be inappropriate as the objective concerns minimising impacts on communities, which is different from the provision of benefit funds. However, there is a discussion of this topic under DM11: Planning Obligations (see paragraph 5.117 of the Submission Draft) which states that 'Nottinghamshire County Council would encourage negotiated agreements between relevant minerals operators and a community as a source of funding for local benefits...The County Council cannot be party to such agreements because planning decisions must be impartial and made on planning grounds alone.'</p> <p>This latter point is the reason why a policy on community benefit schemes has not been included within the Plan.</p> <p>DM1 - it was not considered appropriate to include reference to 'sensitive locations' within the Policy itself as it was written in such a way as to cover all aspects of amenity and singling out one particular issue would not be suitable. However, additional text about sensitive locations was added to the justification text. The suggested reference to specific facilities in relation to noise was not included as sensitive receptors will depend on a variety of site specific characteristics and so listing specific facilities could be counter-productive.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 1: What is the Minerals Local Plan

Chapter 1: What is the Minerals Local Plan

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
30066 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  Paragraph 1.3 - Replace "waste" with "minerals"	Paragraph 1.3 - Replace "waste" with "minerals"	Objection accepted. Typographical error to be corrected.	Paragraph 1.3 Title - Replace "waste" with "minerals"



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 1: What is the Minerals Local Plan

Chapter 1: What is the Minerals Local Plan

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29720 - Mr Adrian Hatton [2828]	Object	<p>The Policy is not legally compliant in preparation by means of failure of duty to Cooperate.</p> <p>An FOI requesting disclosure of information regarding legal opinion sought by NCC as directed by Item 2 of Motion 10 at Full Council Meeting on 14th January 2016 as below:</p> <p>ITEM 10 - MINERALS LOCAL PLAN SUBMISSION DRAFT CONSULTATION</p> <p>Motion as agreed:-</p> <ol style="list-style-type: none"> <li>1) That County Council note the Consultation Statement set out in Appendix C.</li> <li>2) That the County Council approve the publication of the Submission Draft document for the Minerals Local Plan for a 6 week public consultation period and that during this period Officers will verify the legitimacy of the methodology used to determine the need and apportionment figures for sand and gravel within Nottinghamshire and review the strategic transport assessment.</li> <li>3) That the Corporate Director, Place, be authorised, in consultation with the Chairman of Environment and Sustainability Committee, to agree any minor editing changes prior to publication.</li> <li>4) That an information document updating the public and councillors on onshore oil and gas development (including unconventional hydrocarbons) in Nottinghamshire will be published in order to keep the public and councillors up-to-date on this significant issue.</li> </ol> <p>The FOI request was returned (late, and after reminder of NCC's obligation to respond within statutory timescales) with notice that information requested was being withheld so as not to affect the course of justice.</p> <p>NCC Duty to cooperate has not been adhered to and therefore makes MLP process not legally compliant.</p>	NCC must disclose QC opinion to all and allow sufficient time extension to consultation period thereafter to permit residents to respond with access to all relevant data made freely available.	Not accepted. The duty to co-operate process requires local planning authorities to engage with other public bodies on strategic cross boundary issues as part of local plan preparation. This requirement will be tested by the Inspector at the examination. The duty to co-operate does not relate to the entirely separate process of information requests made under the Freedom of Information Act and does not require the publication of legally privileged information.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 1: What is the Minerals Local Plan

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29452 - Mrs Jackie Armstrong [2881]	Object	<p>Site Selection Background Paper, Appendix 1 gave a list of the information required of each developer and stated that 'all information provided will be publicly available'. The 'Site Information Request Form' responses from developers were not published in the consultation papers at any stage. The lack of this essential data prevented communities from making fully informed representations about their own and other sites.</p> <p>NCC should have published all of the Site Information Request responses from developers at every stage of the consultation process, including the formal stage, as part of the evidence base, rather than providing them on request.</p>	<p>All developers should provide a comprehensive level of information, guided by the Site Information Request Form. Developers failing to do so should not be considered in the MLP.</p> <p>All of the site information request responses provided by developers should be placed in the public domain with the rest of the consultation papers to provide a transparent and comprehensive evidence base.</p>	<p>Not accepted. As part of the evidence gathering process, a call for sites was undertaken with the minerals industry to identify those sites that they wished to be considered for allocation in the emerging Minerals Local Plan. A minimum level of information was required to ensure that the sites were deliverable, realistic and achievable. However it should be noted that site allocations are in principle suitable for future minerals development and as part of any planning application further detailed assessment work and information would be required. The site information put forward by the minerals industry has been publicly available on request throughout the plan preparation.</p>	
29419 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	<p>During the formal consultation stage on the submission draft, no "Duty to Cooperate Statement" has been made available to the public with the other evidence supporting the draft, making it very difficult for any comments to be made on whether the County Council has met the essential requirement "Duty to Cooperate" to be assessed at the start of the Examination.</p>	<p>* A "Duty to Cooperate Statement" should be provided for a minimum six week period during the formal consultation.</p> <p>* A question on whether the "Duty to Cooperate" has been met should be included in the representation form, following the model provided by the Planning Inspectorate.</p>	<p>Not accepted. The duty co-operate process requires local planning authorities to engage with other public bodies on strategic cross boundary issues as part of the local plan preparation. The requirement to meet the duty will be tested by the inspector at the examination, however there is no requirement to publish or consult on the duty to co-operate as part of the wider plan consultation stages.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 1: What is the Minerals Local Plan

Chapter 1: What is the Minerals Local Plan

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30036 - Nottingham City Council (Planning Policy Team) [1036]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Plan identifies sites and sets out policies against which all minerals development proposals will be assessed and determined. The overall aim is to ensure that sufficient minerals are provided to meet expected demand in the most sustainable way and to safeguard proven mineral resources from being unnecessarily sterilised by other development. Of most relevance to the City it is noted that sand and gravel extraction is not proposed at Barton in Fabis which could have potentially adjoined or crossed over the administrative boundary into the City. Your decision to not allocate at Barton in Fabis is justified by the clear background evidence contained within the accompanying Sustainability Appraisal. It is also noted that the appraisal for the site despite the separate methodology applied is broadly consistent with that undertaken by the City in the Publication Version of the Land and Planning Policies Part 2 Local Plan Sustainability Appraisal (see page 991 to 996 in Appendix 8: Sustainability Appraisals of Sites Not Taken Forward into the LAPP). Therefore, on behalf of the Nottingham City Council, we wish to raise no objections to the plan due to legal compliance or soundness of your plan.</p>		Comments noted	
29128 - Rolandon Water and Sea Freight Advisory Services (Mr John Dodwell) [2077]	Support	Consider whole Plan to be legally compliant and sound		Support noted	
29239 - Sport England (Mr Steve Beard) [1586]	Support	Sport England have no comments to make on the Plan.		Comments noted	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 1: What is the Minerals Local Plan

Chapter 1: What is the Minerals Local Plan

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29615 - Commercial Boat Operators Association (CBOA) (Richard Horne) [3319]	Support	<p>The Commercial Boat Operators Association (CBOA) represents operators of freight carrying vessels in the UK's inland and estuarial waterways and is accepted by the Government as the representative industry body.</p> <p>On behalf of CBOA, I would like to comment that CBOA is in agreement with the soundness and structural integrity of the proposed Draft Nottinghamshire Minerals Local Plan.</p> <p>We also very much commend the stated proposed use of barge transport for sites at Shelford and Besthorpe for shipment of as much aggregate as possible, and for transporting equipment to site. This is in line with reducing the carbon footprint and reduction of road use by HGV traffic.</p>		Support noted	
29205 - West Stockwith Parish Council (Mr David Harford) [2701]	Support	West Stockwith Parish Council have no major comments to make on this submission document.		Comments noted	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 1: What is the Minerals Local Plan

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<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29624 - Public Health England (Dr Stuart Aldridge) [7747]	Support	<p>Public Health England welcomes the opportunity to comment on the Nottinghamshire Minerals Plan. Whilst we have no specific comments to make on the consultation, we welcome the consideration of local amenity, and inclusion of pollution control measures within the document.</p> <p>We do note that Paragraph 2.18 states "Air quality is generally good across the County but several Air Quality Management Areas (AQMAs) have been designated around Nottinghamshire because of known traffic and congestion problems."</p> <p>Environmental health teams would be able to add more detail to this.</p> <p>Further to this Paragraph 2.19 states "Overall health indicators are slightly lower...Obesity, amongst both children and adults is also a concern."</p> <p>We would recommend that if there are any intentions to expand the plan further then county council public health may wish to comment and expand further on health inequalities.</p> <p>PHE welcomes the opportunity to comment on individual planning applications, if requested.</p>		Support noted.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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### Chapter 2: Overview, vision and strategic objectives

#### Overview of the plan area

30067 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>P16 para 2.16 Water:</p> <p>Phosphates are also one of the main Reasons For Failure under the WFD for virtually all of Nottinghamshire's watercourses and so should be mentioned. Many watercourses fail for poor hydromorphology, which can sometimes be remedied through the restoration process, where channels are re-created which should be recognised in the text.</p>	<p>Add reference in the text to acknowledge that many watercourses fail for poor hydromorphology, which can sometimes be remedied through the restoration process, where channels are re-created and also in restoration to deliver WFD objectives.</p>	<p>Partially accepted. This part of the plan provides a broad overview of the plan area and is not intended to be exhaustive in detail. It is accepted that a specific reference to the significance of phosphates in relation to water quality would therefore be beneficial within paragraph 2.16. However, opportunities for remediation and environmental benefits through site restoration are already highlighted within paragraph 5.16. The plan should be read as a whole and it is not considered necessary to specifically repeat this point here.</p>	<p>Add reference to phosphates within third sentence of paragraph 2.16.</p>
29552 - Mr Ian Bradey [7824]	Object	<p>The Trent Valley is already recognised as having a raised level of respiratory disease in its population, of which a major contributory factor is particulates in the air, additional mineral extraction and associated increase in traffic can only exacerbate this problem. Consideration must also be given to the additional water drainage issues extraction would cause, as this can only increase flood risk. In the Newark / Kelham area there are 18 sites / buildings of historic interest, these must be safeguarded.</p>	<p>remove site MP2p (Flash Farm) from the draft minerals plan</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29472 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The Trent Valley is already recognised as having a raised level of respiratory disease in its population, of which a major contributory factor is particulates in the air, additional mineral extraction and associated increase in traffic can only exacerbate this problem. Therefore this needs to be considered as part of the environmental impact on health in the relative health assessment. Consideration must also be given to the additional water drainage issues extraction would cause, as this can only increase flood risk. In the Newark / Kelham area there are 18 sites / buildings of historic interest, these must be safeguarded.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
30068 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  Overview of the Plan Area, p15, Nature - Support NWT now supports this description and welcomes the inclusion of the changes suggested in our previous response.		Support noted	

### Plan 1: Overview of the Plan Area

29167 - Mrs Linda White [7642]	Object	The already high level of respiratory disease amongst those living in the Trent Valley is not mentioned in the Health summary. This particular condition is closely linked to particulate levels in the air, and as these are likely to be increased by mineral extraction activity and increased traffic, this aspect of environmental impact on health should be recognised in the health assessment	Inclusion of reference to respiratory disease and sites to be assessed against this factor	Not accepted. The overview of the plan area sets out the key issues faced across Nottinghamshire including a broad comparison of overall health indicators against regional and national averages. It is not considered appropriate to include specific health issues. As part of a detailed planning application for any minerals development, a wide range of assessment work would be undertaken and this would include potential impacts arising from issues such as noise and dust. The planning application would then be assessed against the policies contained in the Minerals Local Plan such as DM1: 'Protecting Local Amenity'.	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29217 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Health overview does not recognise the high incidence of respiratory disease in the Trent Valley	Above average incidences of particular diseases in parts of the county should be recognised	Not accepted. The overview of the plan area sets out the key issues faced across Nottinghamshire including a broad comparison of overall health indicators against regional and national averages. It is not considered appropriate to include specific health issues. As part of a detailed planning application for any minerals development, a wide range of assessment work would be undertaken and this would include potential impacts arising from issues such as noise and dust. The planning application would then be assessed against the policies contained in the Minerals Local Plan such as DM1: 'Protecting Local Amenity'.	
29344 - Rachel Bradey [3623]	Object	The Health summary fails to acknowledge the current high level of respiratory disease within the Trent Valley population. Respiratory disease is closely linked to particle levels in the air which will only increase with this proposed mineral extraction and greater volumes of vehicles. This should clearly be acknowledged in the health assessment.	Acknowledge current levels of respiratory disease and use information accordingly.	Not accepted. The overview of the plan area sets out the key issues faced across Nottinghamshire including a broad comparison of overall health indicators against regional and national averages. It is not considered appropriate to include specific health issues. As part of a detailed planning application for any minerals development, a wide range of assessment work would be undertaken and this would include potential impacts arising from issues such as noise and dust. The planning application would then be assessed against the policies contained in the Minerals Local Plan such as DM1: 'Protecting Local Amenity'.	
29516 - Mrs Deborah Cassidy [7818]	Object	An assessment of the impact on health needs to be completed in relation to the school and village within close proximity to the proposed site at Flash Farm.	An assessment of the impact on health needs to be completed in relation to the school and village within close proximity to the proposed site at Flash Farm.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29474 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The Trent Valley is already recognised as having a raised level of respiratory disease in its population, of which a major contributory factor is particulates in the air, additional mineral extraction and associated increase in traffic can only exacerbate this problem. Therefore this needs to be considered as part of the environmental impact on health in the relative health assessment. Consideration must also be given to the additional water drainage issues extraction would cause, as this can only increase flood risk. In the Newark / Kelham area there are 18 sites / buildings of historic interest, these must be safeguarded.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29553 - Mr Ian Bradey [7824]	Object	The Trent Valley is already recognised as having a raised level of respiratory disease in its population, of which a major contributory factor is particulates in the air, additional mineral extraction and associated increase in traffic can only exacerbate this problem. Consideration must also be given to the additional water drainage issues extraction would cause, as this can only increase flood risk. In the Newark / Kelham area there are 18 sites / buildings of historic interest, these must be safeguarded.	Remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 2: Overview, vision and strategic objectives

Nottinghamshire's mineral resource and industry

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>Nottinghamshire's mineral resource and industry</i>					
29345 - Rachel Bradey [3623]	Object	Recycled and secondary waste has not been considered as resources.	The contribution of waste should be included among the resources.	Objection accepted. This section of the Plan was intended to cover the natural mineral resource and industry that is specific to Nottinghamshire and as such contains no reference to recycled and secondary aggregates. However, it is recognised that adding reference to the role of these materials in the 'Wider Issues' section would be beneficial in terms of clarifying that the Plan has taken account of this source of mineral. A change to the Plan is therefore proposed. These changes do not affect any other part of the Plan, as the role of recycled and secondary aggregates is already accounted for in the level of provision made for primary aggregates in the Mineral Provision Policies.	Amend title of section starting at paragraph 2.21 to 'Nottinghamshire's natural mineral resource and industry' and add following as separate paragraph after paragraph 2.27, in 'Wider issues' section: 'Recycled and secondary aggregates contribute to the supply of aggregates nationwide. In Nottinghamshire the main sources of these materials include construction and demolition waste, power station ash, road planings and rail ballast. In the past colliery spoil and river dredgings were also used.'
29283 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The draft MLP focusses entirely on the primary minerals industry, there is no quantitative mention of secondary minerals estimated at 900K tons per annum or the estimated 2.75m tons per annum projection of available material from construction and demolition waste (NCC waste strategy 2014 (WCS)). Recycled materials are a growing resource which is being better recovered (WCS). This suggests that the reliance on primary minerals is overstated. The increased volume of material and recycling rates (NCC Waste Core Strategy) is leading to a structural decline in the need for primary minerals such as sand and gravel.	Quantified data should be provided for the recycling part of the minerals industry. The structural change being created by recycling should be reflected in the forecast demand for primary minerals and the forecast for primary minerals should be downsized accordingly.	Objection partially accepted. This section of the Plan was intended to cover the natural mineral resource and industry that is specific to Nottinghamshire and as such contains no reference to recycled and secondary aggregates. However, it is recognised that adding reference to the role of these materials in the 'Wider Issues' section would be beneficial in terms of clarifying that the Plan has taken account of this source of mineral. A change to the Plan is therefore proposed. These changes do not affect any other part of the Plan, as the role of recycled and secondary aggregates is already accounted for in the level of provision made for primary aggregates in the Mineral Provision Policies.  The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	Amend title of section starting at paragraph 2.21 to 'Nottinghamshire's natural mineral resource and industry' and add following as separate paragraph after paragraph 2.27, in 'Wider issues' section: 'Recycled and secondary aggregates contribute to the supply of aggregates nationwide. In Nottinghamshire the main sources of these materials include construction and demolition waste, power station ash, road planings and rail ballast. In the past colliery spoil and river dredgings were also used.'

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29168 - Mrs Linda White [7642]	Object	In considering the mineral resource available the role of recycled and secondary waste as resources is not considered	The contribution of waste should be included among the resources	Objection accepted. This section of the Plan was intended to cover the natural mineral resource and industry that is specific to Nottinghamshire and as such contains no reference to recycled and secondary aggregates. However, it is recognised that adding reference to the role of these materials in the 'Wider Issues' section would be beneficial in terms of clarifying that the Plan has taken account of this source of mineral. A change to the Plan is therefore proposed. These changes do not affect any other part of the Plan, as the role of recycled and secondary aggregates is already accounted for in the level of provision made for primary aggregates in the Mineral Provision Policies.	Amend title of section starting at paragraph 2.21 to 'Nottinghamshire's natural mineral resource and industry' and add following as separate paragraph after paragraph 2.27, in 'Wider issues' section: 'Recycled and secondary aggregates contribute to the supply of aggregates nationwide. In Nottinghamshire the main sources of these materials include construction and demolition waste, power station ash, road planings and rail ballast. In the past colliery spoil and river dredgings were also used.'

### Plan 2: Nottinghamshire's mineral resource

29304 - Andrew Fereday [7756]	Object	I would like to question the figures which form the basis of the MLP especially in relation to sand and gravel extraction. From the representation seen to date it would appear these figures are based on old out of date information. Again the projections for the volumes required also seem over estimated given the huge drive in the construction industry towards sustainability. More and more companies are using re-cycled aggregates and materials arising from demolition in lieu of quarried materials.	The MLP should be revised using more relevant and up to date figures	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>Vision</i>					
29645 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	<p>The significantly increased number of traffic movements created by the selection of Shelford West compared to Barton-in-Fabis has not been considered or commented on in reporting consultation responses to either the decision-making Council Committees or the public.</p> <p>Insufficient attention has been paid to the major demand patterns in the county and the optimal choice of supply.</p> <p>The practicality of the use of a conveyor in the manner described by the developer and the impact of moving 680k tonnes p.a. by this means has been ignored. This is an important element of the selection process.</p> <p>These issues contravene the policy requirement to minimise the impact of operational practices on climate change.</p> <p>See further notes in paragraph 1, Locational Demands for Sand and Gravel on pages 2 and 3 of Attachment A.</p>	<p>A scientific assessment of closeness of sites to market should be produced and the analysis of data provided in Attachment B should be properly considered in assessing the tonne-miles impact on the environment.</p> <p>A thorough investigation and explanation of how the conveyor system for Shelford West can be buried below the water table and operated should be carried out.</p> <p>The energy requirements of barge loading and conveyor transport should be properly assessed relative to those of other sites.</p>	<p>Objection not relevant to the Vision. The County Council's response to the points raised are addressed in other parts of the Plan. For example, site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29235 - Harworth Estates Ltd [1941]	Object	<p>We support the recognition of the coal mining industry's major impact on the social and economic development and environment of the County (at paragraph 2.21). The legacy of deep coal mining is an important and locally distinctive issue and we consider it would be helpful if the MLP contained a policy and supporting text on developments needed to address this legacy and assist in the regeneration of the former mining communities following the closure of these deep mines.</p> <p>Whilst we note that 'Policy MP11: Coal' deals with incidental mineral extraction/ potential future reworking of colliery tips, there is currently no policy regarding the restoration/ reclamation of former colliery sites. We recognise the cross-over with the Waste Local Plan/District Local Plans but consider it would be beneficial if the Plan could provide either a policy or some supporting text on this issue in the interest of clarity.</p> <p>The strong focus on 'biodiversity-led' restoration is not wholly appropriate in terms of former colliery sites, where there is a need to strike a balance between the provision of amenity/ public access, biodiversity contributions and the delivery of employment/ other mixed-uses. The redevelopment of colliery sites to employment uses has the potential to off-set some of the adverse social and economic impacts of the mine closures on local communities in the vicinity.</p>	<p>A section (policy and supporting text) should be added to the Plan on the legacy of deep coal mining. It should consider:</p> <ul style="list-style-type: none"> <li>- The potential recovery of any remaining mineral/ coal fines</li> <li>- The importation of wastes to facilitate the restoration of un-restored tips</li> <li>- The reclamation/ restoration of sites to amenity and/ or biodiversity after-uses, where appropriate</li> <li>- The redevelopment of former colliery/ tip sites to employment/ mixed-uses, where appropriate</li> </ul> <p>A section (policy or support text) on restoration/reclamation of former colliery sites (including the importation of materials to facilitate restoration, acceptable restoration end-uses etc.)</p> <p>Harworth Estates own a number of former colliery/colliery tip sites in Nottinghamshire and these changes would ensure that there is a suitable policy framework in place for the determination of a series of proposals in respect of the County's former colliery sites. It would also provide greater clarity to both developers and local communities.</p>	<p>Not accepted. It is not considered necessary to include a specific policy regarding the restoration/reclamation of former colliery sites. Where appropriate, a new planning application or application to revise a permitted restoration scheme would be assessed against the policies contained in the minerals plan including MP11: 'Coal' and DM12: 'Restoration, after use and after care'. It may also be necessary to take account of policies contained in the Nottinghamshire and Nottingham Waste Core Strategy. The redevelopment of former colliery sites to employment/mixed uses would be a district/borough planning function and would require reference to policies contained in the relevant local plan.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30051 - IGas Energy [7911]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>We do not feel the part of the 'Vision' stating environmental assets should be "enhanced" can be made applicable for "all mineral workings" and, as a result, is not sound. For example, the site off Springs Road is located on a former Cold War Missile base. There is a clear expectation that the integrity of this use is protected with restoration back to original conditions. For this site, we do not feel it is possible to "enhance" environmental assets. This will be the case where the operating company does not own the land and the landowner wishes to return the land to the original use. Without landowner support the vision will be difficult to deliver.</p>		<p>Objection not accepted. The Vision is supported by the Strategic Objectives and Strategic and Development Management Policies which provide greater detail about how the Vision will be achieved. The application of the policies to planning applications will address situations where there may be deviations from the Vision, such as a lack of opportunity to enhance environmental assets.</p>	
29525 - mr john watchman [7785]	Object	<p>I understand that there is a Minerals Supply Hierarchy that states:-</p> <ol style="list-style-type: none"> <li>1 Reduce the quantity of minerals used as far as practicable</li> <li>2 use the maximum amount of secondary and recycled minerals as possible</li> <li>3 finally use primary mineral to fill the gap</li> </ol> <p>The vision appears to concentrate on primary minerals and not fully explore the importance of recycled/secondary minerals.</p> <p>Using the adage that if you cannot measure it you cannot manage it, the draft MLP only provides a figure for the extractive industry and does not appear to understand quantitatively the growing importance of secondary and recycled minerals.</p> <p>The vision is incomplete.</p>	<p>The vision should encompass the minerals supply hierarchy to ensure it is well balanced</p>	<p>Objection not accepted. The Vision clearly sets out the role of both secondary and recycled minerals and primary minerals, as follows: 'Consumption [of minerals] will be minimised, by promoting the use of secondary and recycled minerals.'</p> <p>'Minerals are a valuable nature resource and should be worked and used in a sustainable manner and where possible reused to minimise waste'</p> <p>Definitive figures are only available for primary mineral extraction as secondary and recycled aggregates come from a variety of sources, some of which are contained within a closedloop system (such as the reuse of demolition waste in the construction of a new building on the same site). The Plan accounts for the role of recycled and secondary aggregates through the Local Aggregate Assessment which was used to identify the level of mineral provision made in the Plan. For more details on this, see the County Council's response to MP1.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29679 - Tarmac Ltd [580]	Object	<p>The Council's vision states that: 'all mineral workings will contribute towards 'a greener Nottinghamshire' by ensuring that the County's diverse environmental assets are protected, maintained and enhanced... This will result in improvements to the environment, contribute to landscape-scale biodiversity delivery... the creation of large areas of new priority habitat, and the reconnection of ecological networks, with sensitivity to surrounding land uses' (emphasis ours).</p> <p>In Tarmac's opinion, the Council's vision that all mineral workings should contribute to the delivery of such ambitious biodiversity gains (as set out above) is unrealistic and unachievable.</p> <p>It is not always possible or appropriate for the restoration of minerals sites to be primarily focussed on the delivery of biodiversity/ ecological improvements. There will be occasions where restoration to leisure/ tourism uses may be appropriate or where the landowner requires the land to be returned to an agricultural use.</p>	<p>It is considered that the Council's vision should adopt a more balanced stance in respect of the restoration of mineral sites taking account of the three elements of sustainability set out in the NPPF (e.g. economic, social and environmental).</p>	<p>Objection not accepted. The Vision is supported by the Strategic Objectives and Strategic and Development Management Policies which provide greater detail about how the Vision will be achieved. The application of the policies to planning applications will address situations where there may be deviations from the Vision, such as restoration to leisure/tourism. It should be noted that the bio-diversity led restoration strategy does not exclude these types of restoration types, see County Council's response to SP3 for more detail and paragraph 3.27 of the Plan which explicitly recognises this.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29937 - Burton Joyce Village Society [7122]	Object	DM2 & vision Statement. Flood risks. Existing Flood Risk Assessments are clearly obsolete in view of current conditions and climate change. as illustrated by recent events in Cumbria. and a little earlier in the west of England. While in "normal" times gravel extraction on the Right Bank of the Trent would not increase flooding dangers to Burton Joyce on the Left Bank, the course of the Trent is historically unstable just in this area and weakening the solidity of the bank by quarrying could in severe conditions cause the river to wash away its existing banks causing flooding on the Burton Joyce side, much of which is a level 3 flood risk area.	Further research in to flood risk in exceptions conditions. Overall, reversion to 2013 Draft Plan, excluding site MP2r entirely.	<p>Objection not accepted. A Strategic Flood Risk Assessment (SFRA) was completed to support the development of the Plan and the site allocation process (see Flood Risk Assessment Background Paper for more details). The SFRA followed national guidance and included consideration of the impact of climate change on flooding. The site specific flood risk assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time.</p> <p>The County Council is satisfied that these elements ensure that a comprehensive assessment of flood risk will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage. The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29939 - Burton Joyce Village Society [7122]	Object	SP4 & Vision Statement. Transport. New proposals for barging about 1/3 of material from the Shelford site to Colwick appear pivotal in recalculating the acceptability of the site after such problems appeared fatal in the 2013 Draft. However, problems caused to the immediate road system on the A6097 would still be unacceptable. Even if all direct lorry traffic is prevented from using the A612 (the main road through Burton Joyce, which has already a very bad accident rate) which itself appears impracticable, many Burton Joyce people currently need to use the A6097, Northward or Southward, on the journey to work. Furthermore the barging "solution" would be a direct detriment to Burton Joyce. It would require an environmentally damaging conveyer directly to a wharf opposite Burton Joyce. Both construction and operation of the conveyer and wharf would be visually destructive, and a source of noise and dust pollution in addition to that produced in the quarrying. Furthermore, since gravel would be taken only to Colwick, to be loaded there onto lorries, the congestion and air pollution caused there on the A612, the major route from the village to Nottingham would be further problems for residents on this side of the Trent. No significant research appears to have been conducted into these factors.	Further research into traffic congestion for both the A6097 and A612. Overall, reversion to 2013 Draft Plan, excluding site MP2r entirely.	<p>Objection not accepted. A Strategic Transport Assessment was completed to support the development of the Plan and the site allocation process. The STA followed national guidance. The site specific traffic assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time. The County Council is satisfied that these elements ensure that a comprehensive assessment of the impact on the traffic network will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.</p>	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29635 - Shelford Parish Council [7840]	Object	<p>The parameters of flood risk are continuously changing and the significant impact of climate change is only being coarsely estimated.</p> <p>The risk to Shelford is high, a fact recognised by the developer who intends to raise the flood banks which protect the village.</p> <p>The Plan Vision Statement specifically calls for a reduction in flood risk and the selection of Shelford West runs contrary to this.</p> <p>The choice of this site is a high risk strategy which has implications for other villages on the north western bank and downstream of Shelford. This risk has not been properly assessed since data sets that have been used are inaccurate and out of date.</p> <p>See further notes under Flood Risk on page 5 of Attachment A.</p>	A more up to date and accurate flood risk assessment for Shelford West needs to be prepared taking into account plans for flood alleviation on the Trent flood plain.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29627 - Shelford Parish Council [7840]	Object	<p>The significantly increased number of traffic movements created by the selection of Shelford West compared to Barton-in-Fabis has not been considered or commented on in reporting consultation responses to either the decision-making Council Committees or the public.</p> <p>Insufficient attention has been paid to the major demand patterns in the county and the optimal choice of supply.</p> <p>The practicality of the use of a conveyor in the manner described by the developer and the impact of moving 680k tonnes p.a. by this means has been ignored. This is an important element of the selection process.</p> <p>These issues contravene the policy requirement to minimise the impact of operational practices on climate change.</p> <p>See further notes in paragraph 1, Locational Demands for Sand and Gravel on pages 2 and 3 of Attachment A.</p>	<p>A scientific assessment of closeness of sites to market should be produced and the analysis of data provided in Attachment B should be properly considered in assessing the tonne-miles impact on the environment.</p> <p>A thorough investigation and explanation of how the conveyor system for Shelford West can be buried below the water table and operated should be carried out.</p> <p>The energy requirements of barge loading and conveyor transport should be properly assessed relative to those of other sites.</p>	<p>Objection not relevant to the Vision. The County Council's response to the points raised are addressed in other parts of the Plan. For example, site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29652 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	<p>The parameters of flood risk are continuously changing and the significant impact of climate change is only being coarsely estimated.</p> <p>The risk to Shelford is high, a fact recognised by the developer who intends to raise the flood banks which protect the village.</p> <p>The Plan Vision Statement specifically calls for a reduction in flood risk and the selection of Shelford West runs contrary to this.</p> <p>The choice of this site is a high risk strategy which has implications for other villages on the north western bank and downstream of Shelford. This risk has not been properly assessed since data sets that have been used are inaccurate and out of date.</p> <p>See further notes under Flood Risk on page 5 of Attachment A.</p>	A more up to date and accurate flood risk assessment for Shelford West needs to be prepared taking into account plans for flood alleviation on the Trent flood plain.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
30069 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>NWT now supports this vision and welcomes the inclusion of the changes suggested in our previous response regarding landscape-scale biodiversity restoration and after-use and the creation of large areas of priority habitats.</p>		Support noted	
29839 - National Trust (Kim Miller) [2987]	Support	The Vision is supported		Support noted	
29202 - Environment Agency (Mr Andrew Pitts) [2714]	Support	We particularly welcome the inclusion within the Vision that quarries will be designed, operated and managed in a way to help reduce flood risk and management of surface water in an sustainable way. We also support the strong focus on the the protection and enhancement of environmental assets in particular biodiversity and geodiversity.		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>Strategic Objectives</i>					
29840 - National Trust (Kim Miller) [2987]	Support	The Strategic Objectives are generally supported. SO2 currently contains some repetition.		Support noted. Comment regarding SO2 noted - last sentence of SO2 to be deleted.	Delete last sentence of SO2
<i>SO1: Improving the sustainability of minerals development</i>					
29948 - London Rock Supplies Ltd [7882]	Object	The spatial pattern of mineral development is skewed disproportionately towards Newark. This spatial distribution will see increased HGV travel from quarries to the market.		The Minerals Local Plan includes a geographical spread of site specific allocations made up of 10 extensions to existing quarries along with 5 new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. Minimising transport distances has been taken into account along with a range of other considerations. However, it is not possible to guarantee that the sand and gravel worked will always supply the closest markets. The availability of suitable minerals elsewhere and the need for companies to supply individual contracts will influence the movement of sand and gravel.	
29680 - Tarmac Ltd [580]	Object	SO1 makes reference to ensuring the more 'efficient exploitation' of mineral resources. As stated in our previous representations, it is not clear what is meant by 'efficient exploitation' and how the MPA propose to monitor and enforce the more efficient use of primary mineral resources. Clarification is requested from the MPA on these points.  Tarmac support the Council's prioritising of the improved use or extension of existing sites.		Not accepted. The strategic objectives have been identified to achieve the delivery of the spatial strategy and in turn these have informed the specific policies set out in Chapters 3-5. SO1 makes reference to ensuring the efficient exploitation and use of primary minerals resources. This could be achieved by maximising the use of existing quarries, prioritising the extension of existing sites before considering new locations and encouraging the use of recycled aggregates as explained in the remainder of the text of SO1. There strategic objectives are not monitored separately, rather it is the policies which are monitored as set out within Appendix 5 of the Plan.	
29284 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The draft document fails to acknowledge the significant and growing contribution of the recycling industry. Figures should be incorporated from the Waste Core Strategy and elsewhere. The recycling industry is pivotal to maintaining the sustainability of minerals development.	Incorporate figures for recycled minerals and build in their contribution into the demand forecast. Remove resultant overcapacity from the primary minerals provision forecast Remove unnecessary greenfield sites from the plan	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1. This covers how recycled and secondary aggregates have been accounted for in the Plan.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 2: Overview, vision and strategic objectives

SO1: Improving the sustainability of minerals development

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29305 - Andrew Fereday [7756]	Object	Estimates for quarried material in the future appear to have been overestimated as old data has been used for forecasting purposes. The ever increasing use of recycled material and aggregates appear not to have been considered resulting in the forecast requirements being well in excess of the volumes required.	Review forecast future requirements using most up to date figures	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29789 - Mr J Potter [2108]	Object	SO1 , minimizing waste could also do with being applied re the-use of recycled aggregates; aggregate recycling in-itself ought to be lessening its impacts; MP5 , demolition /'regeneration' does appear excessive currently.		<p>Not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period.</p> <p>Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 2: Overview, vision and strategic objectives

SO1: Improving the sustainability of minerals development

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29738 - Elizabeth Stokes [7844]	Object	Not sound. Authorities should not be acting as standalone institutions but should be taking account of plans made by neighbouring authorities e.g. Lincoln, who have taken greater account of the use of recycled materials and reflected this in its calculations of requirements.	The Council should work closely with other Local Authorities, in particular neighbouring authorities who will have a secondary impact on sustainability in this area, and take their information, calculations and considerations into account before making decisions which could impact on this community as if it were outside of the nationwide plan.	Not accepted. The National Planning Policy Framework sets out guidance for calculating sand and gravel demand over the plan period. It states that a 10 years sales average taking account of any relevant local information should be used. All Minerals Planning Authorities in the East Midlands (including Nottinghamshire and Lincolnshire) follow national guidance.  The Lincolnshire Minerals Local Plan originally based future sand and gravel demand on a previous methodology that took account of high sales figures during a period of economic prosperity. At the Lincolnshire examination in public (November 2015) the inspector concluded that their approach was incorrect and that the guidance set out in the NPPF should be used. As a result of this, expected demand over the plan period was reduced. This reduction was due to the 10 year average taking into account a drop in sales due to the recession as opposed to an increase in recycled aggregate. The 10 year average sales figures used to calculate future demand in Nottinghamshire takes into account a period of growth and a period of recession in order to provide a steady and adequate supply over the plan period.	
29441 - Michael Staff [3695]	Object	The document does not use available and quantified information with regard to secondary and recycled minerals. This information is available in the NCC Waste Core Strategy.  Use of available data will cause significantly better understanding of the levers that effect primary minerals demand and therefore significantly improve the sustainability of minerals development	Numerical data on recycled and secondary minerals from NCC Waste Core Strategy 2014 and elsewhere needs to be incorporated into the forecast of demand.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 2: Overview, vision and strategic objectives

SO2: Providing an adequate supply of minerals

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SO2: Providing an adequate supply of minerals</i>					
29285 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Out of date figures from LAA 2013 have been used as the basis for future annual demand of 2.58m tonnes. Using LAA 2015 figures would require an average annual provision 2.24m tonnes. Using most up to date figures would reduce sand and gravel requirements over the life of the plan by 9.44m tonnes. Coupled with integration of recyclable materials from NCC waste strategy 2014, would lead to further reduction, making the need to exploit greenfield sites unnecessary	Use figures from LAA 2015 Use data from NCC Waste Core Strategy and integrate these into plan  Rework forecast figures for primary minerals, particularly sand and gravel Remove unnecessary greenfield sites from MLP	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
30070 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  The Trust support this policy in principle, but there appears to be unnecessary repetition of the first and last sentences of the paragraph.		Objection accepted. Amendment will be made to the Strategic Objective to correct this typographical error.	Delete last sentence of Strategic Objective 2 (to correct typographical duplication error).
29390 - John Allan [3617]	Object	Guidelines not followed in that latest available figures have not been used. Supply tonnage for the plan period is overstated. No account taken of recycled and secondary aggregates.	Use the latest available figures in the MLP. Make an estimation of recycled aggregates to deduct from the new tonnage demand forecast.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29346 - Rachel Bradey [3623]	Object	The figures which have been used within the plan are out of date and, as such, irrelevant to the needs of today and the future.	Correct and up to date information needs to be used and more evidence given of local growth plans.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29375 - Kirklington Parish Council (Helen Cowlan) [879]	Object	The data used to identify demand is out of date, and inflates the demand stated/quoted. Predictions for future demand are insufficient in that they do not quote any data, or reflect actual trends, let alone build in any reflection of recycling rates.	*Use the most recent LAA data *Acknowledge declining trends even during recessionary recovery *Identify an estimate model which is more accurate than simply stating an allowance for "5 years of famine and 5 years of feast" - the "feast" has yet to be justified or quantified	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29475 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	NPPF and Planning Officers Society and Aggregate working party guidelines states that MPAs should use available latest figures when looking at apportionment within emerging MLP calculations. In failing to take into account the most up to dates figures regarding aggregates demand and without giving evidence to support the assumed regional growth demand this plan does not present a credible evidence base.	Flash Farm, site MP2p should be removed from the local minerals plan.	<p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
29554 - Mr Ian Bradey [7824]	Object	The plan should be based on the current requirement figures of minerals and take into account the current recycling of minerals.	Remove site MP2p (Flash Farm) from the draft minerals plan	<p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
29723 - Mr Adrian Hatton [2828]	Object	Figures used are out of date and result in apportionment of sand and gravel that is too high for current and projected market requirements during plan period.	Use most up to date figures as directed by national policy. Use LAA as intended as management tool to manage MLP throughout its life - rather than trying to predict ahead of 15 yr lifespan requirements as in past. LAA has 10yr and 3yr rolling average sales figure presented for exactly that reason. Otherwise, why bother to prepare an annual LAA if it is not to be used (Rhetorical question!)?	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29172 - Mrs Linda White [7642]	Object	By using out of date figures regarding demand and without giving evidence to support the assumed regional growth demand this plan does not have a credible evidence base	Up to date information needs to be used and evidence of local growth plans detailed. With minerals being described as for local use, sites should also be linked to potential local development areas/needs	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29739 - Elizabeth Stokes [7844]	Object	Not sound. There is no mention here of taking into account the community who live in the area and the effect that any extraction site would have on them, as a whole. The extraction should reflect the need to avoid disturbance of the environment, infrastructure, geographical topography and the community wherever possible.	Offer due consideration to the environment, infrastructure, geographical topography and local community, who are the most important factor in this proposal	Objection not accepted. SO2 is one of a series of Strategic Objectives covering a range of topics. The elements mentioned in the objection are covered by other objectives (SO5: Minimising impacts on communities and SO6: Protecting and enhancing natural assets) and as such it would be inappropriate to repeat these provisions within SO2.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29785 - Mr J Potter [2108]	Object	SO2 /SP2 1.a) & 1.c) (/SP1/MP1), disagree on the-imposition re supply, and the unnecessary over-use - or waste - of mineral resources is observed.		<p>Not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period.</p> <p>Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate. However, a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SO3: Addressing climate change</i>					
29681 - Tarmac Ltd [580]	Object	SO3 makes reference to '...encouraging efficient ways of working including reductions in transport and onsite machinery emissions'. It is not currently clear how the MPA will encourage efficient ways of working. Further explanation is required by the MPA to demonstrate that this objective is deliverable.		<p>Objection not accepted. The Plan is structured and written in such a way that the Strategic Objectives provide details of how the Vision will be achieved. The policies then cascade down from the Strategic Objectives, setting out the criteria by which the objectives (and thus vision) will be achieved. The delivery of the policies (and thus the vision and objectives) will be monitored using the framework set out in Appendix 5.</p> <p>In terms of the specifics of '...encouraging efficient ways of working including reductions in transport and onsite machinery emissions' the County Council would draw particular attention to the following policies which detail how this will be achieved: SP4 - Climate Change, SP5 - Sustainable Transport, DM1 - Protecting Local Amenity and DM9 - Highways Safety and Vehicle Movements/Routeing.</p>	
29949 - London Rock Supplies Ltd [7882] 30052 - IGas Energy [7911]	Object			<p>Objection not accepted. The Plan is structured and written in such a way that the Strategic Objectives provide details of how the Vision will be achieved. The policies then cascade down from the Strategic Objectives, setting out the criteria by which the objectives (and thus vision) will be achieved. The delivery of the policies (and thus the vision and objectives) will be monitored using the framework set out in Appendix 5.</p> <p>In terms of the specifics of '...encouraging efficient ways of working including reductions in transport and onsite machinery emissions' the County Council would draw particular attention to the following policies which detail how this will be achieved: SP4 - Climate Change, SP5 - Sustainable Transport, DM1 - Protecting Local Amenity and DM9 - Highways Safety and Vehicle Movements/Routeing.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29740 - Elizabeth Stokes [7844]	Object	<p>Not sound. Will encourage the operators to keep transport movements and onsite machinery emissions to a minimum. The general public have no way of knowing if the operator is complying with the "request" or if it will be measured in any way to ensure compliance, therefore the calculations upon which these statements are based must be available for consideration.</p> <p>Appropriate restoration - who ensures that this is actually done? Because it is well known and documented that operators of sites are deficient in the provision of sufficient funds to implement these schemes and there seems to be no way of enforcing the restoration once the extraction has taken place. Flash Farm, for instance, is agricultural land at present and cannot possibly be restored to agricultural land of similar type if it is to be back filled with material which has no agricultural value. Flash Farm, and any other area of agricultural land, is already a diverse wildlife habitat and implying that that will be improved after restoration is misleading.</p>	<p>Make available the calculations of transport movements and machinery emissions which have been used to consider the Flash Farm site as a possible contender for mineral extraction. The need for transparency throughout this document is essential.</p> <p>Ensure that appropriate restoration means that it will actually happen and that the operator will have to make funds available from the outset to ensure that restoration is undertaken in accordance with the original planning and not to a revised plan due to the operator's change of business development.</p>	<p>Objection not accepted. The County Council has a Monitoring and Enforcement Team who ensure that operators are complying with the conditions of their planning permission through regular site inspections. They also investigate any complaints about the operation of sites.</p> <p>National policy states that financial guarantees for restoration should only be sought in exceptional circumstances. A restoration scheme for any minerals development would be required as part of a detailed planning application and it is only at this stage that such a requirement could be included if it was deemed necessary.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
30071 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>NWT support the text and welcome the changes since our last response.</p>		Support noted	
29210 - Environment Agency (Mr Andrew Pitts) [2714]	Support	We particularly welcome that the issue of flood risk stems from the Vision into Objective 3. A commitment to reducing future and existing flood risk and climate change adaptation is encouraging.		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SO4: Safeguarding of mineral resources</i>					
29741 - Elizabeth Stokes [7844]	Object	<p>Not sound. This paragraph implies that economic considerations are the only importance. Surely the most important reasons for safeguarding the mineral resources is, again, to protect the environment, infrastructure, geographical topography and the local community. No disturbance is surely better than any forced and unnatural disturbance. This does not imply that there would be no economic growth but that the local community would be able to have a say and make choices and prepare for future mineral extractions if the need arose.</p> <p>Over allocation of sand and gravel sites results in developers seeking extension to planning permission time limits to permit working out of quarries with attendant delays in restoration programs and does not allow safeguarding of minerals for future use but gives them away far earlier than they should be, putting the outcome and timing of extraction in the hands of the developers rather than in the hands of the LAA.</p>	Ensure that economic viability is not the only consideration. Ensure that sites are fully extracted before allowing further sites into the plan.	<p>Objection not accepted. Strategic Objective 4 seeks to protect land which contains mineral resources from being developed for non-minerals purposes (such as housing). If land which contains minerals is built on, it means that the mineral underneath has been lost and will never to be able to extracted. Given that minerals are a limited resource, it is important to ensure that they are managed sustainably.</p> <p>Other policies within the Plan cover the concerns raised in the objection, with a variety of policies covering economic, environmental and social impacts (for example, SP3- Biodiversity-led restoration, SP6 - The Built, Historic and Natural Environment and DM1 - Protecting Local Amenity) and Policy SP2 giving priority to the extended working of existing sites prior to the development of new greenfield sites.</p>	
30007 - The Coal Authority (Rachael Bust) [2853]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Coal Authority supports Strategic Objective, SO4 which sets out the high level commitment to the safeguarding of mineral resources within Nottinghamshire. This is considered to accord with the broad requirements of the National Planning Policy Framework.</p>		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SO5: Minimising impacts on communities</i>					
29442 - Michael Staff [3695]	Object	The draft plan does not minimise impacts on communities since it does not fully explore and incorporate data re construction activity, landfill tax and reduction of actual landfill, and increasing role of recycling inert waste. Also since it uses out of date data for forecasting demand it projects greater demand than has already been proven by sales in the LAA 2015.	Impact on communities can be significantly reduced by up to date data (LAA 2015) and building in effects of recycling and drastically reduced figures of waste going to landfill.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29533 - Miss Myra Ng [7757]	Object	No notification has been received at all to date regarding the proposed gravel pit. I live 489 m away from the proposed site, so there would be significant impact from noise, disruption, pollution and destruction of the natural countryside and wildlife habitats to a previously tranquil site.	Assume written notification would have been desirable to persons directly affected due to living in very close proximity to the proposed site.	Objection not accepted. Throughout the development of the Plan, the County Council has utilised a variety of methods to engage the public in the process, including use of direct mailing (email and letter), use of local media (written and oral) and face to face meetings/events. In line with the County Council's Statement of Community Involvement all properties within 250m of a proposed site were contacted directly to inform them about the Plan.	
29742 - Elizabeth Stokes [7844]	Object	Not sound. Makes reference to local people having the opportunity to be involved in decisions and yet this has not been an easy process, as clearly demonstrated by the format of this particular form.	Ensure that the general public are able to communicate with the Council by means other than by using the internet or on a special form.	Objection not accepted. Throughout the development of the Plan, the County Council has utilised a variety of methods to engage the public in the process, including use of direct mailing (email and letter), use of local media (written and oral) and face to face meetings/events. At this latest stage of consultation the County Council provided guidance to local communities about how to submit comments in relation to the soundness and legality of the Plan and further guidance was available on request. Comments could be submitted online, via email or by post. All comments that were received on the Plan, regardless of the form in which they were submitted to the County Council, have been considered and will be sent to the Planning Inspector.	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 2: Overview, vision and strategic objectives

SO5: Minimising impacts on communities

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29724 - Mr Adrian Hatton [2828]	Object	A plan that allocates too many sites will result in unnecessary impact on local communities with opening of quarries that are not needed and increase in traffic flow. Surplus sand and gravel availability results in mothballed quarries and developers seeking extensions of planning time limits to permit working out of existing quarries.	Use up to date figures and re-assess requirement for opening new greenfield quarries. Enforce planning time limits to ensure effective MPA management of quarry lifespan and restoration programmes.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29376 - Kirklington Parish Council (Helen Cowlan) [879]	Object	This document does not fully include the potential impacts to residents (or indeed road user) health and safety. No consideration has been given to associated problems. For example, noise surveys carried out in Kirklington and Hockerton on the A617, have shown that existing noise levels already exceed World Health Organisation (WHO) recommendations, and additional HGV traffic will exacerbate this further (along with any air pollution).	*Remove Flash Farm from the MLP as it is not required if up to date data is used.	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p> <p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p>	
29555 - Mr Ian Bradey [7824]	Object	The complicated method being used of raising concerns/objections is a barrier for the wider community involvement in the planning process. The effects of this are frustration on not getting valid points across and in creating apathy when public input is sought in the future. As the local community will not be able to maintain their current level of quality of life, and health from impacts such as traffic, visual impact, dust, noise and water resources should Flash Farm quarry development proceed, it should be withdrawn from the Minerals Local Plan.	remove site MP2p (Flash Farm) from the draft minerals plan	<p>Objection not accepted. Throughout the development of the Plan, the County Council has utilised a variety of methods to engage the public in the process, including use of direct mailing (email and letter), use of local media (written and oral) and face to face meetings/events. At this latest stage of consultation the County Council provided guidance to local communities about how to submit comments in relation to the soundness and legality of the Plan and further guidance was available on request. All comments that were received on the Plan have been considered and will be sent to the Planning Inspector.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29367 - Mrs Jackie Armstrong [2881]	Object	Traffic levels on the A17 Bypass already intimidate pedestrians/cyclists from Coddington, severing them from leisure amenities, footpaths, bridleways and cycleways accessed from Drove Lane North. Adding a roundabout and 200 HGVs/day on this road will make this situation worse. Although STA claims to support the Local Transport Plan (encouraging active transport for health benefits), the traffic and other impacts of quarry Coddington MP2o act against the aims of Newark & Sherwood's Green Infrastructure Strategy, and will actually discourage physical activity and reduce opportunities for people of all ages in Coddington and Newark.	<p>Inclusion of Coddington MP2o is not sound with regard to Strategic Objective 5 - Minimising impacts on communities, Overview Para 2.19 Health, nor with Policy DM1 Protecting local amenity nor DM7 Public Access.</p> <p>Remove Coddington MP2o from the Minerals Local Plan, and develop an alternative site with fewer effects on the local and wider community.</p> <p>If the site were to be included (once the transport and other issues have been resolved) ensure that:</p> <ul style="list-style-type: none"> <li>1 community health is protected,</li> <li>2 sport facilities are relocated within the village (where appropriate),</li> <li>3 a light-controlled pedestrian crossing or a foot/cycle-friendly bridge/tunnel is constructed to reconnect Coddington to Drove Lane N,</li> <li>4 additional public footpaths are provided to provide a circular walk connecting Drove Lane S, Drove Lane N, to Stapleford Woods and to the pavement along Beckingham Rd.</li> </ul>	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29219 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Poor publicity and lack of active involvement of local people by NCC, has ensured that involvement in the decisions has been denied to most people. The method of responding to this consultation further disenfranchises those without access to IT	<p>NCC to actively inform people in areas likely to be affected by significant planning decisions</p> <p>NCC to widen their communication routes</p>	Objection not accepted. Throughout the development of the Plan, the County Council has utilised a variety of methods to engage the public in the process, including use of direct mailing (email and letter), use of local media (written and oral) and face to face meetings/events. At this latest stage of consultation the County Council provided guidance to local communities about how to submit comments in relation to the soundness and legality of the Plan and further guidance was available on request. Comments could be submitted online, via email or by post. All comments that were received on the Plan have been considered and will be sent to the Planning Inspector.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 2: Overview, vision and strategic objectives

SO5: Minimising impacts on communities

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29476 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Firstly the complicated method being used of raising concerns/objections is a barrier for the wider community involvement in the planning process. Unfortunately the effect of this is frustration on not getting valid points across and in creating apathy when public input is sought in the future. Secondly as local community will not be able to maintain their current level of quality of life, and health from impacts such as traffic, visual impact, dust, noise and water resources should Flash Farm quarry development proceed, it should be	Flash Farm, site MP2p should be removed from the local minerals plan.	<p>Objection not accepted. Throughout the development of the Plan, the County Council has utilised a variety of methods to engage the public in the process, including use of direct mailing (email and letter), use of local media (written and oral) and face to face meetings/events. At this latest stage of consultation the County Council provided guidance to local communities about how to submit comments in relation to the soundness and legality of the Plan and further guidance was available on request. Comments could be submitted online, via email or by post. All comments that were received on the Plan have been considered and will be sent to the Planning Inspector.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
29174 - Mrs Linda White [7642]	Object	Flash Farm site should be removed from the plan as there is no way that the local community can have their quality of life, health etc protected if this quarry is allowed. Methods for raising concern are a barrier for community involvement in the planning process	Removal of Flash Farm Recognition that not everyone is IT savvy and therefore making use of other more active means to ensure that people are given information about what is planned for their area	<p>Objection not accepted. Throughout the development of the Plan, the County Council has utilised a variety of methods to engage the public in the process, including use of direct mailing (email and letter), use of local media (written and oral) and face to face meetings/events. At this latest stage of consultation the County Council provided guidance to local communities about how to submit comments in relation to the soundness and legality of the Plan and further guidance was available on request. All comments that were received on the Plan have been considered and will be sent to the Planning Inspector.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
29560 - Dr Judith Mills [7829]	Object	The inclusion of Flash Farm in the Draft Plan will have a significant impact on the surrounding communities due to increased traffic resulting in considerable congestion especially through Kelham and increased noise and air pollution along the length of A627	Remove Flash Farm from the Draft Plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29347 - Rachel Bradey [3623]	Object	The impact on the local community would be massive. I have already commented on health aspects. The quality of life of local communities would be greatly compromised.	Remove Flash Farm from the minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
<i>SO6: Protecting and enhancing natural assets</i>					
29743 - Elizabeth Stokes [7844]	Object	Not sound. It should be stated that the preferred method of protecting the landscapes, biodiversity, etc, would always be by non-intrusion wherever possible. This could be by extending present sites or choosing areas of low impact. Flash Farm is a high impact area. It is already a site rich in bio diversity and wildlife habitat and is close enough to the housing of the local community to have a visual and aural impact as well as creating dust, litter, machinery emissions and traffic problems.	Consider that the only true way to protect the mineral deposits for the future is not to allow them to be extracted prematurely.	Objection not accepted. The Plan has to make provision for sufficient mineral to meet demand over the Plan period and this cannot be done solely through extension of existing sites. The site allocation process took account of a wide variety of factors, including, but not limited to the impact on landscapes, biodiversity and amenity. The County Council considers that the sites that have been allocated are those that are most sustainable.	
29220 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Where the current landscape is distinctive to the area and forms a backdrop to historic assets it should be preserved, or restored to its original status. New environments should not automatically be preferred over existing ones	Consideration of the importance of the current landscape to the area	Objection not accepted. The County Council agrees that the current landscape is an important consideration and this is already reflected in the Strategic Objective. It seeks to 'Conserve and enhance Nottinghamshire's...distinctive landscapes...minimising and mitigating potential negative impacts.' and 'Support minerals development what will provide long term enhancements to landscape character and which avoids damaging the highest quality landscape'.	
30053 - IGas Energy [7911]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  SO 06 states, 'Appropriate restoration will result in a net gain for biodiversity through the creation of new ecologically valuable habitats, and will contribute to the delivery of biodiversity at a landscape-scale and the enhancement of ecological networks.' As this statement implies that restoration that cannot provide a net gain is inappropriate we do not believe this approach can be justified.		Objection not accepted. The Strategic Objectives build on the Vision and set out what the Plan as a whole sets out to achieve. The details of how the vision and objectives will be applied to planning applications are set out in the policies. The policies set out criteria for the assessment of all schemes that are proposed and allow for flexibility to take account of the specifics of individual proposals. The County Council therefore do not consider that the Strategic Objective is unjustified.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30059 - Derbyshire County Council (Mr Rob Murfin) [1041]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>There is concern that a biodiversity-led restoration objective (SO6) may lead to negative impacts on landscape character and the historic environment in pursuit of ecological enhancements in so far as proposed sites border Derbyshire. As a member of the Lowland Derbyshire and Nottinghamshire Local Nature Partnership (LNP), DCC is aware that the LNP has targeted the Trent Valley as a priority area for environmental enhancement <a href="http://ldnlnp.org/focus-areas/">http://ldnlnp.org/focus-areas/</a>. The LNP is pursuing a multi-faceted approach to the ongoing planning of the Trent Valley to ensure that it maximises the delivery of economic, social and environmental benefits, which will require planning authorities to protect the best parts of the landscape and historic environment whilst developing a new character for the area that better responds to the challenges it faces. See also comments under Section 4, Development Management Policies, Social and Environmental Impacts.</p>		<p>Not accepted. The biodiversity led restoration approach does not preclude different types of restoration schemes, rather it aims to maximise biodiversity gains through the suitable restoration of quarries. As part of a detailed planning application, a wide range of assessment work would be undertaken including the potential impacts on landscape character and the historic environment. The outcomes from this work would then inform the final proposal put forward.</p>	
29950 - London Rock Supplies Ltd [7882]	Object	<p>Objective not adequately addressed in relation to the restoration proposals put forward for the Barton site at it will maximise biodiversity gain in line with biodiversity led restoration approach.</p>		<p>Objection not accepted. The site allocation process took account of a wide variety of factors, including, but not limited to the impact on the environment. The County Council is satisfied that the site allocation process took due account of all of the policy considerations set out in the Plan. As the policies are derived from the Strategic Objectives their provisions have been covered in the process.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29682 - Tarmac Ltd [580]	Object	<p>SO6 states that: "Appropriate restoration will result in a net gain for biodiversity through the creation of new ecologically valuable habitats, and will contribute to the delivery of biodiversity at a landscape-scale and the enhancement of ecological networks'.</p> <p>This statement suggests that restoration that does not result in a net gain for biodiversity, contribute to the delivery of biodiversity at a landscape-scale and enhancement of ecological networks is inappropriate. The MLP's focus upon the need for restoration proposals to provide ecological enhancement/ biodiversity gains is excessive/ unjustified and contrary to national policy contained within the NPPF (which advocates a balanced approach to sustainable development taking account of economic, social and environmental considerations).</p>		<p>Objection not accepted. The Strategic Objectives build on the Vision and set out what the Plan as a whole sets out to achieve. The details of how the vision and objectives will be applied to planning applications are set out in the policies. The policies set out criteria for the assessment of all schemes that are proposed and allow for flexibility to take account of the specifics of individual proposals. The County Council therefore do not consider that the Strategic Objective is unjustified.</p> <p>Mineral extraction sites can provide the greatest potential for biodiversity gain both nationally and locally and as such Policy SP3 highlights this potential. The policy does not exclude any particular type of restoration proposal, but seeks that all restoration proposals are biodiversity-led. This is explicitly recognised in paragraph 3.27 of the justification text for the policy which states that: 'It is recognised that in some cases restoration for leisure uses or for agriculture may be appropriate. Nevertheless, such restorations can still be 'biodiversity-led', for example by ensuring that agricultural restorations reinstate native hedgerows with wide field margins, and create new areas of species-rich grassland, copses and ponds.' In this way, the County Council does not consider that the biodiversity-led restoration strategy is contrary to national policy regarding the three strands of sustainable development.</p>	
30072 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>NWT strongly support the text and welcome the changes since our last response regarding the mitigation hierarchy, the commitment to landscape-scale biodiversity-led restoration, and the need to follow the Lawton approach, which has been included with the reference to ecological networks.</p>		Support noted	
29211 - Environment Agency (Mr Andrew Pitts) [2714]	Support	We fully support SO6 as it is this type of objective. The Plan needs to help support national and local biodiversity targets.		Support noted	

# Nottinghamshire Minerals Local Plan Submission Draft

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Chapter 2: Overview, vision and strategic objectives

SO7: Protecting and enhancing historic assets

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SO7: Protecting and enhancing historic assets</i>					
29348 - Rachel Bradey [3623]	Object	This area is rich in history and heritage and should be respected and protected.	Remove Flash Farm from the mineral plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
29426 - Andrew Fereday [7756]	Object	Detrimental effect to the significant historical built environment of the area	Removal of Flash Farm from the plan or provisional of alternate route for the transportation of aggregates & land fill	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
29175 - Mrs Linda White [7642]	Object	The area around Kelham is a highly significant site in our history and heritage with its connections to the civil war and also the evidence found of earlier civilisations in archaeological test digs. Listed structures need to be protected, including Kelham Bridge	Remove Flash Farm from the list of sites	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
29556 - Mr Ian Bradey [7824]	Object	Historic England lists eleven listed structures in Kelham, all no more than 200 metres from the A617, which will be used by HGVs carrying aggregate towards the A1/A14. These include several Grade II residences within 50 metres of the road and the Grade I listed Kelham Hall and St Wilfred's Church. The road passes over Grade II listed Kelham Bridge, originally designed as a toll bridge with a 90-degree turn intended to slow traffic. The inclusion of Flash Farm will pose additional threats to these historic structures.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
29565 - Dr Judith Mills [7829]	Object	There are 11 listed structures in the village of Kelham alone, including Kelham Bridge over which much of the additional, slow-moving traffic created by the proposed quarry at Flash Farm would pass.	Remove Flash Farm from the Plan on the grounds of its affect on the historic assets of the village.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	

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Chapter 2: Overview, vision and strategic objectives

SO7: Protecting and enhancing historic assets

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29477 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Historic England lists eleven listed structures in Kelham, all no more than 200 metres from the A617, which will be used by HGVs carrying aggregate towards the A1/A4. These include several Grade II residences within 50 metres of the road and the Grade I listed Kelham Hall and St Wilfred's Church. The road passes over Grade II listed Kelham Bridge, originally designed as a toll bridge, deliberately narrow, with a 90-degree turn intended to slow traffic. The inclusion of Flash Farm will pose additional threats to these historic	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
<i>SO8: Protecting agricultural soils</i>					
29790 - Mr J Potter [2108]	Object	SO8 /DM3 1.b., I question, why only the long-term potential, because unadulterated agricultural land is a finite resource too.		Objection noted. SO8 seeks to protect the long-term potential of agricultural for the reason set out in the objection; both minerals and agricultural land are finite resources and so the two resources need to be managed sustainably. This is the purpose of this Strategic Objective, along with the policies associated with it (primarily SP6 - The Built, Historic and Natural Environment and DM3 - Agricultural Land and Soil Quality).	
29725 - Mr Adrian Hatton [2828]	Object	Opening new greenfield quarries that are not required will result in destruction of best and most versatile agricultural land. Restoration of such land is never done to the standard required to bring it back to pre-quarrying state.	Re-consider requirement for opening new greenfield quarries.	Objection not accepted. The level of demand for minerals over the Plan period is set out in the Minerals Provision Policies. The site allocations that are made in the Plan to meet this requirement have been subject to a site allocation process, which included consideration of a wide range of factors, including the impact on agricultural land.	
29391 - John Allan [3617]	Object	Flash Farm is a green field site actively farmed for dairy grazing. Green field sites should not be considered as their agricultural value will not be reinstated to a quality that would support the previous level of food production.	Remove Flash farm from the MLP	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29558 - Mr Ian Bradey [7824]	Object	Flash Farm is a green field site actively farmed for dairy grazing. Green field sites should not be considered for minerals extractions as their agricultural value will never be fully reinstated to the previous quality required for food production.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29349 - Rachel Bradey [3623]	Object	Flash Farm is a greenfield site. Existing brownfield sites should be used.	Remove Flash Farm from minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29177 - Mrs Linda White [7642]	Object	This plan includes greenfield sites. Flash Farm is actively farmed for grazing at present, but could be used to produce bio-fuels or other crops. Where other sources of minerals exist new green field sites should not be considered as their agricultural value will not be reinstated	Remove Flash Farm from plan. NCC to start to look at the integration of planning issues as there is considerable cross impact	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29478 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Flash Farm is a green field site actively farmed for dairy grazing. Green field sites should not be considered as their agricultural value will not be reinstated to a quality that would support the previous level of food production.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
30073 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust strongly welcome the change in emphasis of this Objective from protecting agricultural land specifically, to protecting B&amp;MV soils, as requested in our previous response. We consider that this is a more sustainable way forward and this amended objective will substantively reduce the potential conflict between SO6 and SO8. We commend the County Council for this approach. We still consider, however that the relationship between the conservation of soils and the potential to deliver habitats is not clearly stated, nor does it reflect that several of the priority habitats such as species-rich grasslands, floodplain grazing marshes and heathland can be managed through extensive grazing, which is a form of pastoral farming. Therefore NWT would expect to see the text amended.</p>	<p>Amend text as follows:</p> <p>"Support minerals developments that will protect the best and most versatile agricultural soils, whilst delivering biodiversity-led restoration which will contribute to UK targets for biodiversity conservation and enhancement."</p>	Objection not accepted. The County Council's priority for biodiversity-led restoration is clearly references in Strategic Objective 6. The County Council consider it unnecessary and inappropriate to repeat the provision of SO6 within the other strategic objectives.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29223 - AKS Community Action Group (Mrs Linda White) [7742]	Object	New greenfield sites included in the draft plan currently contribute to food and/or biomass production. The latter is significant in meeting objectives for greener power and meeting long term energy needs. Loss of productive farmland is permanent	Strengthening the statement about safeguarding agricultural soils	<p>Objection not accepted. The site allocations that are made in the Plan have been subject to a site allocation process, which included consideration of a wide range of factors, including the impact on agricultural land.</p> <p>Further requirements regarding the protection and management of soils is set out in the following policies:            SP6 - The Built, Historic and Natural Environment            DM3 - Agricultural Land and Soil Quality            DM12 - Restoration, After-use and Aftercare            The County Council consider that these policies in combination ensure appropriate management and protection of soils as part of minerals development.</p>	
29744 - Elizabeth Stokes [7844]	Object	Not sound. Obviously the proposed sites for mineral extraction are not of "best and most versatile agricultural soils" or one assumes that they would not be considered as potential sites. However, Flash Farm has most certainly been used as agricultural land for a very long time and due to the fact that it is still being operated as a farm today we have to assume that it is profitable. This paragraph makes no mention of the fact that "good" agricultural land will still be considered.	Do not allow sites of agricultural land with proven profitability to be considered even if an application is made.	<p>Objection not accepted. The site allocations that are made in the Plan have been subject to a site allocation process, which included consideration of a wide range of factors, including the impact on agricultural land.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
<i>Plan 3: Key Diagram</i>					
29137 - Mr Robert Jones [7680]	Object	object re increase in traffic.	cancel the option for gravel extraction at Drove Lane Coddington.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29841 - National Trust (Kim Miller) [2987]	Object	<p>Paragraph 2.31 of the plan suggests that the key diagram shows 'the principal constraints' but only shows Green Belt and urban areas, along with roads, waterways and railways. This map could therefore be significantly improved by including environmental constraints such as:</p> <ul style="list-style-type: none"> <li>-International sites (SPA, SAC)</li> <li>-National sites (SSSI)</li> <li>-Registered Historic Parks and Gardens</li> <li>-Country Parks</li> </ul>	<p>Add environmental constraints to the map, including:</p> <ul style="list-style-type: none"> <li>-International sites (SPA, SAC, Ramsar)</li> <li>-National sites (SSSI)</li> <li>-Registered Historic Parks and Gardens</li> <li>-Country Parks</li> </ul>	<p>Not accepted. Plan 3 sets out the principal constraints, however it is intended to be a diagrammatic interpretation of the Spatial Strategy and is not intended to portray any site specific activity or proposal with any accuracy. The detailed policies map contained in Appendix 4 includes greater detail on environmental designations.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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### Chapter 3: Strategic Policies

#### Chapter 3: Strategic Policies

29780 - Mineral Products Association (Malcolm Ratcliff) [1517]	Object	<p>New Strategic Policy for Mineral Safeguarding</p> <p>The lack of a strategic policy for mineral safeguarding is UNSOUND by reason of</p> <ul style="list-style-type: none"> <li>* not being positively prepared</li> <li>* not being effective</li> <li>* not being consistent with national policy</li> </ul> <p>The existing policy for mineral safeguarding (DM13) sits in the wrong part of the plan since it is phrased in strategic terms yet does not have all the information necessary on which to hang further development management policies or the Proposals Map. Furthermore, the existence of a Strategic Objective for safeguarding merits a new policy for that in the first part of the Plan to address SO4. We therefore suggest that a new policy is inserted at this point that makes the strategic case for safeguarding and is in the form recommended by the BGS Good Practice guidance (2011).</p>	<p>This policy will necessitate changes to the Plan as follows:</p> <p><b>NEW POLICY SP8 MINERAL SAFEGUARDING</b></p> <p>Economically important mineral resources will be safeguarded from unnecessary sterilisation by non-mineral development through the designation of Minerals Safeguarding Areas as identified on the Policies Map.</p> <p>The Mineral Safeguarding Areas are shown on the Policies Map for sand and gravel, Sherwood Sandstone, Limestone, Brick Clay, Gypsum and surface Coal, using the best available geological information, and include environmental designations, urban areas, and buffer zones to safeguard against sterilisation by proximal development. All mineral resources within Mineral Safeguarding Areas will be protected from unnecessary sterilisation by other development.</p>	<p>Objection not accepted. The County Council do not agree that minerals safeguarding should be identified as a strategic policy. The Minerals Local Plan forms part of the Development Plan for an area and all policies contained within it should be read in conjunction with one another and considered as part of a suite of policies through the development management process at both the District/Borough and County Council levels.</p>	
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#### SP1: Sustainable Development

29432 - Holme Parish (Patricia Richards) [1835]	Object	<p>This Minerals Local Plan together with other Plans across Derbyshire, Leicestershire, Lincolnshire, Staffordshire and Warwickshire collectively conceals proposals for 8,000 hectares of wetlands (roughly equivalent to the area covered by the City of Nottingham). It argues for a strategic coordinated approach yet makes the case for considering each renovation proposal on a planning application by planning application basis. A vision on this scale should surely be subject to wide community and elected County Council Members' consultation. What are the implications? Who has agreed to this vision to establish one of Britain's greatest wetlands.</p>	<p>Major sustainable development proposals should be subject to wide community consultation across MPA boundaries if appropriate.</p>	<p>Objection not accepted. In addition to extensive consultation within Nottinghamshire (covering all communities affected by minerals development), as part of the Duty to Cooperate, the County Council has consulted and engaged with a range of stakeholders in the development of the Plan, including the biodiversity-led restoration strategy. This includes consultations with neighbouring local authorities and parish councils and organisations that cover a wider area, such as the Lowland Derbyshire and Nottinghamshire Local Nature Partnership. As such, the County Council considers that sufficient consultation has taken place in the development of all of the strategies contained within the Plan.</p>	
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# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29726 - Mr Adrian Hatton [2828]	Object	Apportioning too high a figure for sand and gravel results in more rapid extraction of a finite resource of mineral.	Sustainability would be better served by conservation of county's valuable resources with long term view to future self sufficiency.	Objection not accepted. The level of provision set out in the Plan was determined by the Local Aggregate Assessment, in line with national guidance set out in the National Planning Policy Framework. See response to MP1 for more detail.	
29869 - Councillor Sue Saddington [1195]	Object	See Rep No. 29702 (Policy MP2)	See Rep No. 29702 (Policy MP2)	See response to Rep No. 29702 (Policy MP2)	
29876 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	
29796 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	
29280 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Development at Flash Farm will have a negative effect on the economic, social and environmental conditions in the immediate and wider area, contrary to the stated policy	Remove Flash Farm from the list of preferred sites	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29787 - Mr J Potter [2108]	Object	SO2 /SP2 1.a) & 1.c) (/SP1/MP1), disagree on the-imposition re supply, and the unnecessary over-use - or waste - of mineral resources is observed.		Objection not accepted. The level of provision set out in the Plan was determined by the Local Aggregate Assessment, in line with national guidance set out in the National Planning Policy Framework. See response to MP1 for more detail.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29828 - Newark PAGE (Enquiries .) [2485]	Object	<p>We are concerned that this policy unnecessarily replicates national policy. It complies more closely with the soundness test of compliance with national policy by avoiding reference to a specific national policy document (which may be added to or amended in future). It prevents the "locking-in" of what is accepted as a broad presumption in favour of development that was framed during recession.</p> <p>It avoids circular reference to out-of-date policies, which would most likely include the policy itself.</p> <p>We suggest that in the context of minerals, true sustainability ought to at least reflect the need to continuously increase the proportion of mineral provided through re-use, recycling or other alternative sources. Incorporating a requirement for development to promote or contribute to minerals being obtained by methods that avoid irreversible consumption of resources might achieve this.</p> <p>Releasing sites only when a certain proportion of supply is recycled and subject to conditions that require the output to be matched by a certain proportion of recycled mineral are ways of achieving this and would ensure compliance with NPPF paragraph 143, which clearly prioritises recycled mineral over new extraction.</p>	<p>We consider a more concise and future-proof policy might read as follows:</p> <p>"Planning applications that accord with policies in this and other parts of the development plan will be approved unless material considerations indicate otherwise. Where no such policies are relevant to the application, it will be granted unless: (a) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against national policies taken as a whole; or (b) specific national policies indicate development should be restricted."</p>	<p>Comments not accepted. The County Council considers that this policy is in line with the model policy on sustainable development as advocated by the Government and the Planning Inspectorate.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP1 Justification</i>					
29298 - Mrs Sally JOHN [7710]	Object	<p>Our village is in a flood risk area and has suffered a flood as recently as 2 years ago. My concern is the impact of gravel washing, in terms of extra water feeding into local water ways. It could increase the risk of flooding to the area.</p> <p>I also have a concern about sufficient landfill material being available to replace the gravel extracted.</p>	<p>A more detailed assessment of the impact of the extraction of gravel with special reference to flood risk.</p> <p>An accurate figure on the volume of landfill available.</p>	<p>Objection not accepted. National policy defines sand and gravel extraction as 'water compatible' and sets out that such development is appropriate in all flood zone area (see National Planning Practice Guidance for further information). A Strategic Flood Risk Assessment was completed to inform the production of the Plan and a Sequential Test was completed as part of the site allocation process. The outcomes of these assessments have been incorporated in to the Plan, with site specific recommendations included within the Site Allocation Development Briefs. Site specific flood risk assessments will be completed as part of any planning application which will look in detail at local flood issues, including the use of water on site for mineral processing. The County Council therefore considers that flood risk in relation to minerals development has been subject to appropriate levels of assessment as part of the Plan making process and the securing of further detailed assessment has been provided for through the requirement for site specific flood risk assessments to be undertaken at the planning application stage.</p> <p>Details regarding county-wide landfill provision and need are set out in the Nottinghamshire and Nottingham Waste Core Strategy. In terms of the need on a site-specific basis, the availability of material will be dealt with at the planning application stage at the time an application is made. Policy DM12 of the Plan sets out a requirement for proposals that rely on the importation of waste for restoration to demonstrate that the waste will be available over an appropriate timescale in the type and quantities assumed.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP2: Minerals Provision</i>					
29178 - Mrs Linda White [7642]	Object	By failing to use the most up to date figures NCC cannot demonstrate that their plan is in line with economic trends. It also ignores the contribution of recycled and secondary minerals and changes in construction materials	Plan to be reconsidered using the most recent LAA figures combined with recycling stats	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29362 - Mr. Andrew Twidale [7744]	Object	The council used data from 2002-2011. If they had used 2004-2013 data, they would have seen a decking need for sand and gravel, the needs that are easily met with current quarries. They also failed to take into account the increasing use of recycled material.	Use latest figures and remove Flash Farm from the plan.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29393 - John Allan [3617]	Object	The draft MLP fails to use the most up to date figures for demand throughout the plan period.	Use latest available and up to date figures	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29857 - Mick George (Mr John Gough) [2752]	Object	The policy gives priority to extensions of existing operations where economically, socially and environmentally acceptable. We disagree with this because it is contrary to national policy and guidance and not justified by evidence.	We suggest that the criterion 1b in the policy should be deleted.	Objection not accepted. Extending existing quarries is considered more sustainable than developing new quarries as the infrastructure required, such as the processing plant, is already in place. This is to ensure that valuable mineral reserves are not unnecessarily sterilised. It is important to note that as part of the site allocation process, extensions were still assessed to ensure that they were economically, socially and environmentally acceptable.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29829 - Newark PAGE (Enquiries .) [2485]	Object	We welcome the commitments to give priority to the extension of existing sites, to prevent the development of nonallocated sites where need cannot be demonstrated and to require the avoidance of adverse social, economic and environmental impacts to be prioritised. However, we are concerned that the policy does not specify how need would be assessed in terms of meeting market requirements and considering alternative (existing or proposed) sites.	We suggest that strategy (c) should be amended to read "Allow for development on non-allocated sites where a need can be demonstrated that cannot be met in the foreseeable future on allocated sites that are suitable, viable and available to serve the same market requirement;" We suggest that part (2) should be amended to read "All proposals for mineral development must demonstrate that they have prioritised the avoidance of adverse social, economic and environmental impacts of the proposed development, or make use of appropriate mitigation measures, and that the need cannot be met in the foreseeable future on sites that are suitable, viable and available to serve the same market requirement, the development of which would have lesser residual social, economic and environmental impacts;" The latter amendment would make the policy more strategic in nature.	Amendment 1, not accepted. As part of any planning application for a non-allocated minerals site, the applicant would need to provide a detailed assessment of current capacity and identify a clear need for further reserves to be permitted in line with the existing point 'c' of SP2.  Amendment 2, not accepted. The sites put forward through the call for sites process were fully assessed and those that were considered deliverable and to have the least social and environmental impacts have been allocated in the Plan.	
29361 - Mr. Andrew Twidale [7744]	Object	The council have used out of date figures greatly overestimating the required amount of need for sand and gravel. They have also failed to consider the amount of recycled material.	The most up-to-date figures need to be used and the consultation should be restarted.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29935 - Burton Joyce Village Society [7122]	Object	Minerals Provision Policy SP2 & MP1. We consider the entire assessment of requirements for gravel to be overstated. Demand has consistently below the previous assessments and no part of the current draft plan shows any tendency to remove the anomaly. Thus communities will be consistently disadvantaged for the sake of unnecessary over-estimates.	Further research into demand for gravel. Overall, reversion to 2013 Draft Plan, excluding site MP2r entirely.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29821 - Mr Philip Bell [3585]	Object	<p>We do not believe that the provision of 49 million tonnes of sand and gravel reserves through the plan period to 2030 is high enough due to the likelihood of greater demand as the economy pulls out of recession.</p> <p>We continue to query the deliverability of a number of the sites that have been used to meet the 49 million tonne requirement proposed by the County Council.</p> <p>Such inflexibility we believe is contrary to the direction of travel of the National Planning Policy Framework and the purpose of the minerals plan and we would suggest that greater flexibility is necessary.</p> <p>We believe that the plan should seek to maximise the opportunity of extensions rather than the need to introduce new sites to the plan. We do not feel that this is necessary given the potential extensions that have not been allocated at this stage and that the site at Manor Farm, Spalford, which offers the potential to operate as an extension to Gorton, should have been preferred to the new sites on a sequential test basis.</p>	<p>We seek the allocation of the Manor Farm, Spalford site (PA27) as a site suitable for sand and gravel extraction. The above site will bring the necessary flexibility to the reserve allocation in the minerals plan providing as it does have a proven reserve of 7 million tonnes of sand and gravel. Furthermore its location in the north of the county gives it the flexibility to supply markets either within Nottinghamshire or, as is currently the case with much of the material dug in Nottinghamshire, to be delivered to Yorkshire and Humberside. This site is extremely flexible in its nature and has the potential to operate as a new greenfield site, given the excellent road links it benefits from.</p> <p>A site such as Manor Farm, Spalford offers the opportunity for such a small or medium sized operator to enter the market. The evidence to allocate such a site is presented in the Nottinghamshire Minerals Local Plan Background Paper - Site Selection Update (Sand and Gravel) May 2014, which considered that, 'the site scores very positively in terms of its contribution to the economic aspect of sustainability' but recognises that this was hindered by its potential impact and the risk of flooding. However, the extract concludes and places most emphasis on the fact that due to there being no operator in place to work the mineral on the site, that the County Council are not proposing to allocate the site. However, this does not recognise that due to the closure of Gorton, this site has the opportunity to act as a replacement and could potentially operate on a stand-alone basis. Most recently, the site has not been allocated within the Nottinghamshire Minerals Local Plan Background Paper, published in January 2016, due to the following explanation: "NOT ALLOCATED - No operator in place to work the mineral therefore not deliverable, realistic or achievable". We do not feel that this should represent</p>	<p>Objection not accepted. The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p> <p>Adequate sand and gravel reserves to meet expected demand over the plan period been identified through the site allocation process. Based on the assessment work undertaken during this process, the County Council considers that the sites allocated are deliverable and realistic. The Manor Farm proposal was not allocated in this plan period as it is not considered deliverable due to the lack of a mineral operator signed up to the scheme. Sand and gravel demand will be monitored over the plan period and if it becomes clear that further reserves are required the plan will be reviewed. If a mineral operator has been signed up to the Manor Farm scheme the site could be considered at this point.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			<p>a determining factor in the allocation of preferred areas for minerals extraction, and that if a site is suitable and the reserves are required to fulfil the land bank requirements then it should be allocated, especially given the changes the industry is undergoing and the prospects of finding a new and independent operator. Therefore we are of the contention that if the site is allocated for mineral extraction, the plan will become a more effective document, helping to ensure a greater and more realistic source of sand and gravel supply within Nottinghamshire, and thereby also complying with National Planning Policy. At present we believe that if sites such as these are not brought forward for development, conflict will arise with paragraph 145 of the NPPF which states, 'Mineral planning authorities should plan for a steady and adequate supply of aggregates'.</p>		
29258 - Cromwell Parish Meeting (Mr David Swift) [7619]	Object	The plan seems to take no account of the modern engineering techniques of hard core and aggregate reclamation and re-use which has significantly reduced the demand for these minerals in the last decade. Estimates of need based upon historical records are likely to be misleading in the current situation. A healthy margin for increase is only prudent, but needs to be justified data which are not date expired.	The anticipated requirement should be re-considered.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29527 - mr john watchman [7785]	Object	<p>This section does not adequately state the great importance of recycled and secondary minerals which now account for a greater proportion of minerals supply than primary material.</p> <p>To enable long term plans to be effective the contribution of the secondary and recycled minerals industry has to be quantified. Figures are produced in the NCC Waste Core Strategy 2014 but are never used in this draft document.</p> <p>Similarly the effect of landfill taxes is not explored in the rapid increase expected in recycled minerals ( see NCC Waste Core Strategy 2014)</p>	<p>Secondary and recycled minerals need to be built into the LMP in just the same quantified way as primary minerals are. The LMP should be aligned with the NCC Waste Core Strategy which has figures from 2010 and forecast availability of recycled minerals from 2015 to 2030 which indicate massive increase in availability .</p>	<p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p>	
29479 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	<p>NPPF and Planning Officers Society and Aggregate working party guidelines states that MPAs should use available latest figures when looking at apportionment within emerging MLP calculations.</p> <p>NCC have failed to use the most up to date data in calculation of sand and gravel requirement throughout the plan period.</p> <p>As a result the forecasted tonnage is unnecessarily high and is out of line with economic trends. The calculated tonnage forecast ignores the positive impact of recycled and secondary minerals and material differences in future construction methods.</p>	<p>Flash Farm, site MP2p should be removed from the local minerals plan.</p>	<p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29776 - Roger Fell [2474]	Object	<p>Analysis of required sand and gravel demand is deeply flawed and simplistic over the plan period. The figures are out-of date and not as required in the process which requires latest data to be used.</p> <p>It appears that recent extensions to planning permissions may be unrecorded in the present data - for instance the 800,000 tons of unused reserves at Besthorpe now granted additional time of 8years supply together with retention of the currently 'mothballed' loading conveyor at Besthorpe Wharf.</p> <p>There is a poor analysis of market demand and geographical distribution over plan period as there is no substantive data to support the argument to supply the Nottingham market and the potential use of barging to Colwick wharf.</p>	<p>Latest production and demand data required.</p> <p>Detailed market requirement to justify total estimated allocations.</p> <p>Detailed analysis of use of secondary (re-claimed) material required and supply.</p> <p>Detail breakdown of geographical demand to establish lorry routeing etc.</p> <p>Detailed analysis of type of material (aggregate) from different quarry locations.</p>	<p>Objection not accepted. The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1. Geographical distribution of aggregate mineral is considered in the Local Aggregate Assessment to the extent that available data allows. Due to commercial sensitivities, detailed data (for example destinations from specific quarries) is not available.</p> <p>The total remaining reserves at all sites have been accounted for in the calculations. An extension of time does not alter the level of permitted reserves, just the amount of time available in which to work said reserves.</p>	
29350 - Rachel Bradey [3623]	Object	Out of date figures have been used to draw up the minerals plan so it clearly does not show a true picture.	Without doubt, correct figures must be used.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29303 - Mrs amanda armstrong [7755]	Object	the policy is to allow for development "only where a need can be demonstrated" but the figures used for demand are from 2011. They are therefore not up to date so cannot be used to demonstrate current need.	<p>Use the data in the 2015 LAA document which show that forecast demand is 6.42 million tonnes lower over the life of the plan.</p> <p>Other counties have been required to use their most up to date data eg Warks and Lincs</p>	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29786 - Mr J Potter [2108]	Object	SO2 /SP2 1.a) & 1.c) (/SP1/MP1), disagree on the-imposition re supply, and the unnecessary over-use - or waste - of mineral resources is observed.		The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29877 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29557 - Miss Frances Snell [7759]	Object	For a plan that is looking years ahead why would you not use the most up to date figures available? You cannot demonstrate therefore that your plan is in line with current economic trends, particularly in view of recycling targets being applied to relevant companies	Use the most up to date data available.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29727 - Mr Adrian Hatton [2828]	Object	MLP design in current format uses out of date figures and over estimates requirement for sand and gravel in Nottinghamshire. The proposed plan is strongly reliant on historical success on Notts in extracting and selling minerals - in simple terms a successful history of mineral extraction would appear to generate apportionment for higher than required provision for future extraction. MLP does not use most up to date LAA figures and does not reflect changes in increased secondary use of recycled materials. MLP has provision in national policy to provide additional sites as required during plan period and is directed to use Latest LAA to monitor usage and adapt plan as required throughout its life. MLP has mechanism in place via LAA annual review to look forward rather than backwards and should be aiming to provide steady release of minerals as required by market balanced with long term protection our assets.	MLP has provision in national policy to provide additional sites as required during plan period and is directed to use Latest LAA to monitor usage and adapt plan as required throughout its' life. Forward rather than backwards and aiming to provide steady release of minerals as required by market and long term protection our assets.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29559 - Mr Ian Bradey [7824]	Object	Use current figures for the basis of the requirements within the plan.	Use current figures for the basis of the requirements within the plan. remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29567 - Dr Judith Mills [7829]	Object	Para 2 of this Policy requires that developments must prioritise the avoidance of adverse social, economic and environmental impacts. The inclusion of Flash Farm in the Plan has not taken the potential adverse impacts on the surrounding communities.	Remove Flash Farm from the Plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29951 - London Rock Supplies Ltd [7882]	Object	<p>Future demand is not being given enough weight in the MLP.</p> <p>Sites that are closer to the market will minimise impacts on the wider community particularly through reduced traffic/ traffic congestion. This was not considered when Barton site removed.</p> <p>Flood risk issues related to previous Gunthorpe proposal will need to be addressed as part of Shelford application. Lafarge Tarmac merger, together with the recession has masked the lack of available supply in the Nottingham market. This will impact on economy as economic activity increases.</p>		<p>Objection not accepted. The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p> <p>Proximity to markets, and associated impacts in terms of transport, were considered as part of the site allocation process, particularly through the Sustainability Appraisal.</p> <p>Site specific flood risk assessments are required as part of planning applications, including for the site at Shelford.</p>	
29797 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29806 - Campaign to Protect Rural England Nottinghamshire Branch (Mr Frederick Cook) [2833]	Object	<p>This ignores the ability of developers to recycle existing aggregates, it bases its estimates of future primary sand and gravel extraction on a simple model that fails to take into account that construction methods are changing as many new buildings . The Minerals Plan ought to have regard to the Nottinghamshire County Council Waste Core Strategy (Jan 2014).</p> <p>The supply of minerals should the use of minerals, use maximum amounts of recycled materials and only then use primary aggregates to fill the gap.</p> <p>According to the Waste Core Strategy 2014 estimate there were 1 million tonnes per year of construction and demolition waste available annually for recycling, rising to a forecast 2.75 million tonnes per annum from 2015 to 2030. The strategy is that 70% of construction and demolition waste was to be recycled by 2025, which would give an annual figure for recycled aggregates of 1.905 million tonnes. In addition, Nottinghamshire power stations currently produce 900,000 tonnes of fly ash and bottom ash per year suitable for recycling — although this may reduce as EU regulation on coal-fired electricity generation escalates.</p> <p>The draft Minerals Local Plan takes none of this into account in its estimation of potential demand for primary extraction and the allocation of new green-field sites to be turned into quarries.</p> <p>Given that several current extraction sites are requesting time extensions and other previously allocated sites have yet to have ground broken on them it is clear that the Minerals Plan has overestimated the amount of fresh material which needs to be extracted. Contractors are struggling to find buyers for minerals from existing sources.</p>	<p>Mineral provision should</p> <ul style="list-style-type: none"> <li>* replace the old 'predict and provide' approach to minerals planning with more positive planning policies which use the principles of 'plan, monitor and manage' and environmental capacity assessments to govern where quarrying may be required. Such a change should also promote more sustainable construction techniques which reduce reliance on mineral extraction;</li> <li>* achieve the more prudent use of natural resources through reuse, recovery and recycling, use of alternative including non-aggregate) materials and techniques, and closer integration with land use planning. Suppliers would be responsible for providing the right material for the right purpose, and not over-specifying in order to win contracts or meet timeframes.</li> </ul>	<p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p>	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29870 - Councillor Sue Saddington [1195]	Object	See Rep No. 29702 (Policy MP2)	See Rep No. 29702 (Policy MP2)	See response to Rep No. 29702 (Policy MP2)	
30074 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>NWT agree with the wording of the policy, as it makes a clear statement that avoiding adverse environmental and social impacts must be prioritised. We also welcome the change since the Preferred Options approach, to adopt our suggestion that the positive aspect of the potential gain to priority biodiversity habitats and species targets which can be secured through a scheme should be highlighted, as a means help to inform decision-making for site provision.</p>		Support noted	

### SP2 Justification

29341 - Michael Staff [3695]	Object	<p>The justification is built round the provision of primary minerals and does not acknowledge the importance and growing significance of , in particular, recycled minerals.</p> <p>This singularity of focus leads to the important role of recycled and secondary minerals not fully integrated in the plan. It may also be a reason behind the quantified data in the Core Waste Strategy not being incorporated.</p> <p>The end result is that the requirement for primary minerals is overstated which can cause the LMP to fail on its sustainability and environmental pre requisites.</p>	<p>Stress and quantify the expanding role of recycled minerals in particular. Align document with Waste Core Strategy</p> <p>Adjust forecasts to incorporate quantified role of recycled and secondary minerals .</p>	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.
29394 - John Allan [3617]	Object	The Most up to date minerals usage figures have not been used to inform the demand plan for the plan period.	Use the most up to date figures.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29286 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The provision of minerals in the plan is not in line with wider economic trends through regular monitoring because it is based on out of date data rather than the latest available. It also fails to acknowledge the reduction in the reliance on primary minerals as recycled and secondary minerals play an ever increasing part in the supply process	Use latest data and rework supply plan	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29297 - Mrs Sally JOHN [7710]	Object	Surely more recent figures of projected gravel demand need to be considered.	To use more up to date figures for demand of gravel	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29464 - Dr Valerie Willcocks [7774]	Object	By failing to use the most up-to-date figures NCC cannot demonstrate that their plan is in line with economic trends. It also ignores the contribution of recycled and secondary minerals and changes in construction materials.	Stress and quantify the expanding role of recycled minerals in particular. Align document with Waste Core Strategy. Adjust forecasts to incorporate quantified role of recycled and secondary minerals.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29377 - Kirklington Parish Council (Helen Cowlan) [879]	Object	Gravel requirements have been based on data which is out of date, inflating potential need when average demand is actually lower. Planning Practice Guidance states the need for emphasis on the last three years of data - this has not been demonstrated. Future demand predictions are insufficiently factually based.	*include most recent LAA figures to show most up to date sales trends *identify a more accurate model for predicting future demand rather *Remove Flash Farm from the MLP as existing sites can fulfil demand (based on more up to date and accurate figures)	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29351 - Rachel Bradey [3623]	Object	The information used to compile the minerals plan is out of date.	Remove Flash Farm from the minerals plan and, at the very least, use the correct, up-to-date figures.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.  The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29163 - Ian Woolridge [7726]	Object	The plan is using out of date information (2002-2011) This gives an overestimation of the planned sales for the period 2017 - 2030. using more up to date sales figures 2005-2014, gives average usage approx 5m tonnes lower over the lifetime of proposed plan. The extra capacity is not needed.	Withdraw Flash farm from plan as demand for sand and gravel can be obtained from existing or previously mothballed or un-used sites.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29487 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	NPPF and Planning Officers Society and Aggregate working party guidelines states that MPAs should use available latest figures when looking at apportionment within emerging MLP calculations. NCC have failed to use the most up to date data in calculation of sand and gravel requirement throughout the plan period. As a result the forecasted tonnage is unnecessarily high and is out of line with economic trends. The calculated tonnage forecast ignores the positive impact of recycled and secondary minerals and material differences in future construction methods.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29363 - Mr. Andrew Twidale [7744]	Object	Misused out of date figures greatly overestimating the required amount of sand and gravel required. Current stock levels and recycled aggregates negate the need for Flash Farm.	Used the most up-to-date figures. Remove Flash Farm from the policy.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.  The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29561 - Mr Ian Bradey [7824]	Object	use current figures for the basis of requirements within the plan.	use current figures for the basis of requirements within the plan. remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29420 - Creswell Heritage Trust (Mr Roger Shelley) [2978]	Object	In order to be effective, the document needs to specify the protection of heritage assets in this policy.	In section 2, I would like to see a strengthening of the sentence that reads 'proposals must demonstrate they have 'prioritised the avoidance of adverse social, economic and environmental impacts of the proposed development' to include specific reference to heritage impacts as well.	Objection not accepted. The policies in the Plan must be read as a whole and details concerning adverse social, economic and environmental impacts are set out in other strategic and development management policies within the Plan. The County Council does not consider it appropriate or necessary to repeat these provisions within SP2.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP3: Biodiversity-Led Restoration</i>					
29427 - Andrew Fereday [7756]	Object	While we support the Plan's emphasis on bio-diversity I do not see how the Flash Farm proposals will enhance bio-diversity in the long term. The current use of Flash Farm is grazing and the proposals are to return the site back to existing use thus negating any opportunity to increase bio-diversity in the area. The commercial nature of Flash Farm makes it an unsuitable site for development.	Removal of Flash Farm from MLP	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29352 - Rachel Bradey [3623]	Object	The area around Newark already has enough old gravel workings that now provide wetland/water environments. Given that there is unlikely to be enough inert backfill to enable Flash Farm to be restored to agricultural land based on NCC waste figures, this site is likely to become a lake. For all such lakes and wetland environments there should be an established and funded plan for their management before the site can be exploited.	Remove Flash Farm from the minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29179 - Mrs Linda White [7642]	Object	The area around Newark already has enough old gravel workings that now provide wetland/water environments. Given that there is unlikely to be enough inert backfill to enable Flash Farm to be restored to agricultural land based on NCC waste figures, this site is likely to become a lake. For all such lakes and wetland environments there should be an established and funded plan for their management before the site can be exploited.	Remove Flash Farm from the plan Establish a funded, post extraction management scheme for all sites to ensure that they become an asset rather than an eyesore	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29563 - Mr Ian Bradey [7824]	Object	The current use of Flash Farm is grazing and the likelihood is that it will be returned to the same, negating any opportunity to increase bio-diversity in the area. The commercial nature of Flash Farm makes it an unsuitable site for development.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29480 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	While we support the Plan's emphasis on bio-diversity, the current use of Flash Farm is grazing and the likelihood is that it will be returned to the same, negating any opportunity to increase bio-diversity in the area. The commercial nature of Flash Farm makes it an unsuitable site for development.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29365 - Mr. Andrew Twidale [7744]	Object	The council greatly overestimates the current level of inert waste. At current levels, it would take all Nottinghamshire inert waste to fill the quarry over the next 20 years. Also, drainage dykes are far too small for the quantity of water produced from quarrying.	Need is unjustified. Remove Flash Farm from the plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29942 - Burton Joyce Village Society [7122]	Object	SP3. Restoration. Proposed "Restoration to Wetland" is a euphemism for a big hole full of stagnant water. The destruction of the varied farmland habitat of the Shelford area would in no real measure be compensated by even more "wetland," a form of habitat already over-provided in this part of the Trent Valley. The presence of large areas of stagnant water close to the built-up area would cause atmospheric saturation, leading to dangerous foggy conditions on local roads, and health problems related to rheumatic and respiratory problems.	Overall, reversion to the 2013 Draft Plan. excluding site MP2r entirely.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30075 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>NWT wholeheartedly supports the principle of biodiversity-led restoration and therefore the principle underpinning Policy SP2, and has worked on developing this approach with NCC for many years. The wording of the policy at present, however, does not strongly give primacy to biodiversity as the highest priority restoration outcome, which was what NWT understood to be the case, and is what is necessary if Nottinghamshire is to meet its local and national targets for conserving and enhancing biodiversity. The Trust acknowledges that it is generally well covered in Policy DM12 but suggest that it should be referred to in this policy.</p> <p>It is also important to recognise that mineral extraction can present opportunities to re-create habitats that are hard to re-create on intensively farmed land, due to the years of soil modification for farming that have resulted in very high nutrient levels and high alkalinity (from the addition of lime) and also the existence of extensive under-drainage infrastructure.</p> <p>NWT are concerned by the suggestion that in some cases agricultural restoration might take precedence over biodiversity restoration. Whilst NWT agree that agricultural land is a finite resource, it is a fact that land occupied by wildlife habitats is a far smaller resource and is subject to many pressures.</p> <p>Mineral extraction can provide an opportunity to reconnect rivers to their floodplains and thus to both contribute to biodiversity targets and to sustainable flood management.</p>	<p>Amend wording as follows:</p> <p>Policy Paragraph 3: Restoration schemes for allocated sites should be in line with the relevant Site Restoration Brief, the principle of biodiversity-led restoration underpins this MLP, therefore the creation of priority biodiversity habitats will be the primary restoration aim for all allocations and extensions.</p> <p>Policy Paragraph 4: Provision should be made by the applicant to ensure that the biodiversity gains delivered by the restoration schemes can be secured in the long term.</p> <p>Add text to paragraph 3.34 as follows: On suitable sites, floodplain reconnection should be secured through the restoration scheme, in order to contribute to meeting WFD, Eel Regulations and Biodiversity 2020 targets.</p>	<p>Objection partially accepted. Mineral extraction sites can provide the greatest potential for biodiversity gain both nationally and locally and as such Policy SP3 highlights this potential. The policy does not exclude any particular type of restoration proposal, but seeks that all restoration proposals are biodiversity-led. This is explicitly recognised in paragraph 3.27 of the justification text for the policy which states that: 'It is recognised that in some cases restoration for leisure uses or for agriculture may be appropriate. Nevertheless, such restorations can still be 'biodiversity-led', for example by ensuring that agricultural restorations reinstate native hedgerows with wide field margins, and create new areas of species-rich grassland, copses and ponds.' The County Council considers this is the most suitable approach to biodiversity whilst balanced against the other elements of sustainability (economic and social considerations).</p> <p>The first proposed change to the Plan is not accepted. The biodiversity-led restoration strategy is subject to its own Strategic Policy; it is unnecessary and inappropriate to reiterate this point within the policy itself.</p> <p>The second proposed change to the plan is also not accepted. Provisions regarding the securing of restoration schemes is covered in DM12: Restoration, After-use and Aftercare. As the Plan should be read as a whole, the County Council does not consider it appropriate to repeat these provisions within SP3.</p> <p>It is accepted that reference to floodplain reconnection would be beneficial in paragraph 3.34 and a change is proposed to incorporate this, as per the third requested change to the plan.</p>	<p>SP3 justification text, paragraph 3.34, amend as follows: Minerals development can contribute towards meeting Water Framework Directive objectives, including by facilitating improvements to water quality, riverine habitats, floodplain reconnection and improving the status of fish populations, and restoration schemes will be expected to contribute towards these objectives, where appropriate.</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29224 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Restoration schemes should include as a first option restoration to the previous landscape and the previous habitat , rather than introducing a new habitat. This is especially important where the the landscape has historic or heritage value	Include a duty to restore the landscape and habitats where they have an historic or heritage value	Objection not accepted. Other policies within the Plan cover the protection and enhancement of historical and heritage interest (including SP6, DM6 and DM12), including the impact of restoration proposals and ensuring that they have regard to the wider context of the site (including the historic environment). As the Plan should be read as a whole, these policies would account for the situation specified and as such the County Council does not consider that it is necessary or appropriate to repeat the provision of these policies within SP3.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29683 - Tarmac Ltd [580]	Object	<p>Tarmac consider biodiversity gains should be balanced against the NPPF's three elements of sustainable development (economic, social and environmental factors). The MLP should recognise that the biodiversity-led approach is not always the most appropriate/ preferential strategy and that sites should be considered on a case-by-case basis.</p> <p>Considered that Policy SP3 is too rigid in its approach and too heavily focused on the provision of environmental/ biodiversity gains ahead of social and/or economic gains (which we consider to be inconsistent with national policy). As such, Policy SP3 it is not consistent with national policy.</p> <p>The development briefs provide a useful outline of the restoration of the allocations, however tarmac consider that some of the statements are overly rigid and prescriptive. The briefs should be sufficiently flexible not to put an unnecessary burden on operators. Question mark over the deliverability of the briefs and, therefore, the soundness of Policy SP3.</p> <p>Tarmac views Para 3.22 to 3.26 of supporting text as overly prescriptive and does not take into account site-specific circumstances. Recommend that wording of these paragraphs is amended to make clear that the creation of habitats is to be 'encouraged' in particular areas rather than required.</p>		<p>Objection not accepted. Mineral extraction sites can provide the greatest potential for biodiversity gain both nationally and locally and as such Policy SP3 highlights this potential. The policy does not exclude any particular type of restoration proposal, but seeks that all restoration proposals are biodiversity-led. This is explicitly recognised in paragraph 3.27 of the justification text for the policy which states that: 'It is recognised that in some cases restoration for leisure uses or for agriculture may be appropriate. Nevertheless, such restorations can still be 'biodiversity-led', for example by ensuring that agricultural restorations reinstate native hedgerows with wide field margins, and create new areas of species-rich grassland, copses and ponds.'</p> <p>Paragraphs 3.22-3.26 set out the priority habitats for the relevant areas and details of best practice to maximise biodiversity gains. As these elements are key to the achievement of the biodiversity-led strategy, the County Council does not consider it appropriate to change this text.</p> <p>The Site Allocation Development Briefs have been developed in line with advice from experts and set out the elements which the County Council feels needs to be considered during the planning application stage. Variations from the briefs will be a matter for the Development Management Team to assess in line with the policies set out in the Plan and any site specific considerations applicable at the time any application is made. Specific concerns about elements of the briefs expressed during consultation on the Plan can be investigated, but no details have been given in this instance.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29236 - Harworth Estates Ltd [1941]	Object	<p>Whilst we understand and appreciate the intent of Policy SP3, we believe that biodiversity/ environmental issues should be balanced against other relevant considerations taking account of the NPPF's three elements of sustainable development. Some sites (or parts of sites) will clearly be suitable for a nature conservation/ biodiversity-led end-use. Other sites (or parts of sites) may be more suited to a mix of uses - for example, recreation/ public access/ nature conservation - whilst others may be more suited to economic-led regeneration, where perhaps restoration to development platforms, for areas of employment use, is appropriate.</p> <p>At present we consider that Policy SP3 is too rigid in its approach and too heavily focused on the provision of environmental gains ahead of social and/ or economic gains (which we consider to be inconsistent with national policy).</p>	It would be useful if the MLP recognised that biodiversity-led restoration is not always the most appropriate/ preferential approach and that the restoration of sites should be considered on a case-by-case basis.	<p>Objection not accepted. Mineral extraction sites can provide the greatest potential for biodiversity gain both nationally and locally and as such Policy SP3 highlights this potential. The policy does not exclude any particular type of restoration proposal, but seeks that all restoration proposals are biodiversity-led. This is explicitly recognised in paragraph 3.27 of the justification text for the policy which states that: 'It is recognised that in some cases restoration for leisure uses or for agriculture may be appropriate. Nevertheless, such restorations can still be 'biodiversity-led', for example by ensuring that agricultural restorations reinstate native hedgerows with wide field margins, and create new areas of species-rich grassland, copses and ponds.'</p> <p>The County Council considers that this text already achieves the requested change to the plan.</p>	
29842 - National Trust (Kim Miller) [2987]	Support	Nottinghamshire County Council's restoration led approach, and commitment to biodiversity-led restoration are both supported by the National Trust.		Support noted	
29214 - Environment Agency (Mr Andrew Pitts) [2714]	Support	<p>Whilst we support the aim of policy SP3 but we are concerned with the wording of paragraph 1. This paragraph suggests that restoration to biodiversity would not necessarily be considered should other uses be needed or where biodiversity led restoration wouldn't be appropriate. To reflect this we have previously advised that paragraph 1 of SP3 (SP2 in the preferred approach consultation) is reworded as follows: * Restoration schemes contributing to the delivery of habitat creation targets within the Nottinghamshire Local Biodiversity Action Plan and contribute to the delivery of the Trent Valley Biodiversity Opportunity Mapping Project shall be supported.</p>		Comments noted. The County Council does not consider that paragraph 1 of SP3 'suggests that restoration to biodiversity would not necessarily be considered should other uses be needed or where biodiversity led restoration wouldn't be appropriate'. It clearly states that restoration schemes that seek to maximise biodiversity gains will be supported. Further, in paragraph 3.27 of the supporting text there is a clear explanation that restoration for uses such as leisure or agriculture can still be biodiversity-led.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29855 - R.S.P.B. (Central Region) (Mr Colin Wilkinson) [1006]	Support	<p>The MLP already addresses many of the principles that are set out in the two Bigger and Better Documents. In particular we support the proposal in the relevant Site Allocation Development Briefs in Appendix 3, to implement a master-planning process for the cluster of sites between Newark and South Clifton. The Concept Plan provides a natural starting point for this master-planning process. As such, we would like to see the Concept Plan explicitly referred to in the MLP.</p> <p>Whilst we support the reference to a master-planning approach in Appendix 3, we believe that this approach should also be reiterated within the main body of the MLP, ideally in the new supporting text for Policy SP2 - Biodiversity-led restoration). This would also be an appropriate place to explicitly reference the first Bigger and Better document as this document encapsulates many of the aspirations set out in this text.</p> <p>By incorporating the suggested amendments, we believe that the Nottinghamshire MLP will truly be an outstanding, national exemplar for the biodiversity-led restoration of mineral sites. The RSPB responds to Mineral Local Plans all around the UK and we often cross-refer to the latest visible example of best practice in each major policy area. The Nottinghamshire MLP could be just such an example for other mineral planning authorities to follow.</p>	<p>In the justification text for Policy SP2 (Biodiversity-led restoration): Paragraph 3.18: 'This landscape-scale approach seeks to look beyond small protected sites to deliver nature conservation on a larger scale across the countryside. The Trent and Idle Valleys are considered to be a key area for such a landscape-scale approach with opportunities for crossboundary action between Minerals Planning Authorities to enable a coordinated, strategic approach to maximise the restoration potential of individual sites. This approach is exemplified in 'Bigger and Better: how Minerals Local Plans can help give nature a home on a landscape scale in the Trent and Tame River Valleys'.</p> <p>Paragraph 3.19: 'By creating new habitats, and contributing to landscape-scale nature conservation, considerable progress can be made towards creating a countryside that is more permeable to wildlife by establishing linkages, stepping stones and corridors of habitat and more coherent ecological networks which are more resilient to future pressures such as climate change and which allow the movement and dispersal of wildlife species. This is particularly relevant for clusters of mineral sites such as the sites between Newark and South Clifton, as exemplified in 'Bigger and Better - giving nature a home in the Trent Valley: Newark to South Clifton Concept Plan'.</p>	<p>Comments noted. The County Council recognises the importance of landscape-scale schemes in relation to the restoration of mineral sites and this is clearly acknowledged within the Plan, particularly at paragraphs 3.17-3.19. Within this text there is reference to both the RSPB's Futurescapes and Nottinghamshire Wildlife Trust's Living Landscapes initiatives. The Bigger and Better documents are part of the Futurescapes project. The County Council does not consider it appropriate to make the suggested changes to the Plan to include reference the specific Bigger and Betters documents. Instead, the County Council considers it prudent to rely on the reference to the wider project which will cover any future changes or advancements to these locally specific documents.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP3 Justification</i>					
29254 - Mr David Walton [7745]	Object	It is unclear as to how much waste will be required, and over what timeframe, which thereby throws further questions up regarding where the waste will come from and the type/volume of traffic needed to transport it (all bringing further associated concerns regarding road safety and pollution)	remove flash farm from the proposals	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29564 - Mr Ian Bradey [7824]	Object	The current use of Flash Farm is grazing and the likelihood is that it will be returned to the same, negating any opportunity to increase bio-diversity in the area. The commercial nature of Flash Farm makes it an unsuitable site for development.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29486 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	While we support the Plan's emphasis on bio-diversity, the current use of Flash Farm is grazing and the likelihood is that it will be returned to the same, negating any opportunity to increase bio-diversity in the area. The commercial nature of Flash Farm makes it an unsuitable site for development.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29461 - Dr Valerie Willcocks [7774]	Object	Newark area already has old gravel workings that provide wetland/water environments. Flash Farm is unlikely to be restored to agricultural land given the lack of inert backfill based on NCC waste figures. As this site is likely to become a lake, a funded plan for the management of such lakes should be established before exploitation of the site.	Remove Flash Farm from the Plan. Establish a funded, post extraction management scheme for all sites to ensure that they become an asset rather than an eyesore.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29112 - National Farmers' Union (Paul Tame) [1564]	Support	The NFU completely supports paragraph 3.27 as it allows for restoration to agricultural use and leisure, provided they are 'biodiversity-led'.		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP4: Climate Change</i>					
29646 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	<p>The significantly increased number of traffic movements created by the selection of Shelford West compared to Barton-in-Fabis has not been considered or commented on in reporting consultation responses to either the decision-making Council Committees or the public.</p> <p>Insufficient attention has been paid to the major demand patterns in the county and the optimal choice of supply.</p> <p>The practicality of the use of a conveyor in the manner described by the developer and the impact of moving 680k tonnes p.a. by this means has been ignored. This is an important element of the selection process.</p> <p>These issues contravene the policy requirement to minimise the impact of operational practices on climate change.</p> <p>See further notes in paragraph 1, Locational Demands for Sand and Gravel on pages 2 and 3 of Attachment A.</p>	<p>A scientific assessment of closeness of sites to market should be produced and the analysis of data provided in Attachment B should be properly considered in assessing the tonne-miles impact on the environment.</p> <p>A thorough investigation and explanation of how the conveyor system for Shelford West can be buried below the water table and operated should be carried out.</p> <p>The energy requirements of barge loading and conveyor transport should be properly assessed relative to those of other sites.</p>	<p>Not accepted. The site allocations contained in the minerals plan are in principle suitable for future minerals development. Before extraction could take place, a detailed planning application would be required which would contain a wide range of assessments and design work including the location and use of on-site machinery such as conveyor belts. The outcomes from this work would inform the final working plan and restoration of the quarry. The minerals plan includes a geographical spread of site specific allocations made up of extensions to existing quarries along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. Minimising transport distances has been taken into account along with a wide range of other considerations, however it is not possible to accurately identify the end sales point or guarantee that the sand and gravel worked will always supply the closest markets. The availability of sand and gravel elsewhere, the need for companies to supply individual contracts and other market forces will influence the movement of sand and gravel.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29940 - Burton Joyce Village Society [7122]	Object	<p>SP4 &amp; Vision Statement. Transport. New proposals for barging about 1/3 of material from the Shelford site to Colwick appear pivotal in recalculating the acceptability of the site after such problems appeared fatal in the 2013 Draft. However, problems caused to the immediate road system on the A6097 would still be unacceptable. Even if all direct lorry traffic is prevented from using the A612 (the main road through Burton Joyce, which has already a very bad accident rate) which itself appears impracticable, many Burton Joyce people currently need to use the A6097, Northward or Southward, on the journey to work. Furthermore the barging "solution" would be a direct detriment to Burton Joyce. It would require an environmentally damaging conveyer directly to a wharf opposite Burton Joyce. Both construction and operation of the conveyer and wharf would be visually destructive, and a source of noise and dust pollution in addition to that produced in the quarrying. Furthermore, since gravel would be taken only to Colwick, to be loaded there onto lorries, the congestion and air pollution caused there on the A612, the major route from the village to Nottingham would be further problems for residents on this side of the Trent. No significant research appears to have been conducted into these factors.</p>	<p>Further research into traffic congestion for both the A6097 and A612. Overall, reversion to 2013 Draft Plan, excluding site MP2r entirely.</p>	<p>Objection not accepted. A Strategic Transport Assessment was completed to support the development of the Plan and the site allocation process. The STA followed national guidance. The site specific traffic assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time. The County Council is satisfied that these elements ensure that a comprehensive assessment of the impact on the traffic network will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30076 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust note the changes to the text but remain concerned that the focus of the policy remains on reducing the impacts of the techniques of mineral extraction on climate change, whilst potentially supporting extraction of energy minerals which will fundamentally contribute to further greenhouse gas emissions. There should be greater emphasis on reducing the greenhouse gases produced by different extraction methods per se. It is not clear how comparisons would be made as to the effectiveness of different extraction methods would be assessed with regard to the energy produced versus the greenhouse gases released. This is particularly pertinent in relation to comparisons between coal, oil, CBM, CMM and shale gas. Further explanation and clarification is required.</p>	Provide further explanation regarding how comparisons would be made as to the effectiveness of different extraction methods would be assessed with regard to the energy produced versus the greenhouse gases released.	Objection not accepted. The aim of the strategic policy is to minimise the environmental footprint of mineral workings through the use of best practice; for example through the use of modern energy efficient plant. The policy is not intended to make detailed comparisons between different extraction methods.	
29180 - Mrs Linda White [7642]	Object	Preferred sites are in areas of flood risk	Removal from plan of sites in areas of significant flood risk unless there are prior measures taken to reduce flood risk in the surrounding area	Objection not accepted. None of the sites allocated in the Plan are contrary to national policy and guidance on flood risk. Please see Flood Risk Assessment Background Paper for details of how flooding has been accounted for in the production of the Plan and the allocations. It covers the outcomes of the Strategic Flood Risk Assessment and the sequential test. Any planning application for mineral workings will have to complete a site specific flood risk assessment.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29481 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Averham and Kelham are in Environment Agency designated Flood Zones, which Clause B of the Policy advises should be avoided for development. Surplus water resulting from sand and gravel extraction at Flash Farm is likely to be pumped into Mission Dyke, which is unlikely to have sufficient capacity. The Dyke is the storm-drain for nearby domestic residences and there is potential for any overflow to pass backwards through the storm drain into these residencies. Any restorations schemes are unlikely to improve bio-diversity as the land is currently used for commercial farming.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29428 - Andrew Fereday [7756]	Object	Both Averham and Kelham are in Environment Agency designated Flood Zones, which Clause B of the Policy advises should be avoided for development. The surplus water resulting from sand and gravel extraction at Flash Farm is likely to be pumped into Mission Dyke, which will not have sufficient capacity to cope with these additional volumes. The Dyke is the storm-drain for nearby domestic residences and there is potential for any overflow to pass backwards through the storm drain causing flooding in these residencies.	Alternate site should be identified due to flood risk	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29628 - Shelford Parish Council [7840]	Object	<p>The significantly increased number of traffic movements created by the selection of Shelford West compared to Barton-in-Fabis has not been considered or commented on in reporting consultation responses to either the decision-making Council Committees or the public.</p> <p>Insufficient attention has been paid to the major demand patterns in the county and the optimal choice of supply.</p> <p>The practicality of the use of a conveyor in the manner described by the developer and the impact of moving 680k tonnes p.a. by this means has been ignored. This is an important element of the selection process.</p> <p>These issues contravene the policy requirement to minimise the impact of operational practices on climate change.</p> <p>See further notes in paragraph 1, Locational Demands for Sand and Gravel on pages 2 and 3 of Attachment A.</p>	<p>A scientific assessment of closeness of sites to market should be produced and the analysis of data provided in Attachment B should be properly considered in assessing the tonne-miles impact on the environment.</p> <p>A thorough investigation and explanation of how the conveyor system for Shelford West can be buried below the water table and operated should be carried out.</p> <p>The energy requirements of barge loading and conveyor transport should be properly assessed relative to those of other sites.</p>	<p>Not accepted. The site allocations contained in the minerals plan are in principle suitable for future minerals development. Before extraction could take place, a detailed planning application would be required which would contain a wide range of assessments and design work. The outcomes from this work would inform the final working plan and restoration of the quarry.</p> <p>The minerals plan includes a geographical spread of site specific allocations made up of extensions to existing quarries along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. Minimising transport distances has been taken into account along with a wide range of other considerations, however it is not possible to accurately identify the end sales point or guarantee that the sand and gravel worked will always supply the closest markets. The availability of sand and gravel elsewhere, the need for companies to supply individual contracts and other market forces will influence the movement of sand and gravel.</p>	
29353 - Rachel Bradey [3623]	Object	Sites are in areas of flood risk.	Remove Flash Farm from minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29566 - Mr Ian Bradey [7824]	Object	<p>Averham and Kelham are in Environment Agency designated Flood Zones, which Clause B of the Policy advises should be avoided for development. Surplus water resulting from sand and gravel extraction at Flash Farm is likely to be pumped into Mission Dyke, which is unlikely to have sufficient capacity. The Dyke is the storm-drain for nearby domestic residences and there is potential for any overflow to pass backwards through the storm drain into these residences.</p> <p>Any restorations schemes are unlikely to improve bio-diversity as the land is currently used for commercial farming.</p>	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30054 - IGas Energy [7911]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Policy SP4 seeks to minimise the impact on climate change of all mineral development. Where applicable development should assist in the reduction of vulnerability and provide resilience to the impact of climate change by:</p> <p>(a) Being located, designed and operated to help reduce greenhouse gas emissions, withstand unavoidable climate impacts and move towards a low-carbon economy.</p> <p>We believe it will be difficult to monitor and enforce these conditions and, therefore, we do not believe SP4 (a) is either a justifiable or effective aspiration.</p>		<p>Objection not accepted. The County Council considers that all minerals development will be able to address this policy criterion in some way. It is recognised that minerals can only be worked where they are found but there will be instances where alternative locations are considered (for example boreholes or wells) and all sites have various elements which can be designed to be in different locations within a site (such as the location of plant and access routes) or to be operated in alternative ways. In terms of monitoring the policy, the County Council's approach is set out in Appendix 5: Monitoring and Implementation Table.</p>	
29830 - Newark PAGE (Enquiries .) [2485]	Object	<p>We welcome a policy to address the impact of climate change, but consider that the policy as drafted reads too much like a development management policy. We are also concerned that simply avoiding areas of vulnerability to climate change and flood risk may actually miss opportunities to create new flood capacity and thereby increase resilience.</p>	<p>The policy would be more genuinely strategic if it were to positively require comparison of the relative contributions of greenhouse gases per tonne of mineral for all sites that are realistically suitable, viable and available to serve the same market requirement.</p> <p>It should be clear that this would apply to the order of release of allocated sites as well as the permitting of nonallocated sites in circumstances where need had outstripped foreseeable provision.</p>	<p>Objection not accepted. The County Council considers that the approach set out in SP4 appropriately covers both avoidance and mitigation measures. The requested change to the Plan is not realistic or achievable as there would be too many facets to a proposal to accurately establish emissions per tonne on a site by site basis to allow for a valid comparison.</p>	
29952 - London Rock Supplies Ltd [7882]	Object	<p>The site at Barton was removed between "preferred approach" to Submission Draft to be replaced by site at Shelford. The Barton site addresses all objectives of this policy, but this hasn't been considered when the site removed.</p>		<p>Objection not accepted. The site allocation process took account of a wide variety of factors, including, but not limited to the impact on the environment. The County Council is satisfied that the site allocation process took due account of all of the policy considerations set out in the Plan.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29684 - Tarmac Ltd [580]	Object	In respect of Policy SP4, we consider that criterion A. (i.e. locating and designing minerals developments to reduce greenhouse gases/ move towards a low carbon economy) is likely to prove difficult to achieve as minerals can only be worked where they are found. It is unclear how the Council propose to deliver and enforce criterion A.		Objection not accepted. The County Council recognises that minerals can only be worked where they are found. However, there will be instances where alternative locations are considered (for example boreholes or wells) and all sites have various elements which can be designed to be in different locations within a site (such as the location of plant and access routes) or to be operated in alternative ways. Therefore, all minerals development will be able to address this policy criterion in some way. In terms of the delivery of the policy, the County Council's approach to monitoring this is set out in Appendix 5: Monitoring and Implementation Table.	
29813 - Nottingham Friends of the Earth (Mr Nigel Lee) [1261]	Support	Further to comments made on the Preferred Approach and amendments made, we would like to support the following policies: Policy SP4 - Climate Change Policy DM1: Protecting Local Amenity Policy DM2: Water Resources and Flood Risk Policy DM4: Protection and Enhancement of Biodiversity and Geodiversity Policy DM8: Cumulative Impact		Support noted	
29843 - National Trust (Kim Miller) [2987]	Support	Policy SP4 - Climate change is supported		Support noted	
30008 - The Coal Authority (Rachael Bust) [2853]	Support	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  Support - At the previous consultation stage The Coal Authority requested that in the Submission version of the Local Plan, the justification text to accompany the policy should make it clear that this policy does not presume against the future extraction of energy minerals, including coal. Together with recognising the potential benefits of indigenous mineral extraction in environmental and climate change terms. The plan now does this in paragraph 3.46 which is welcomed.		Support noted	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP4 Justification</i>					
29299 - Mrs Sally JOHN [7710]	Object	Once again I am very concerned about the increased flood risk bearing in mind the areas near the proposed site, Flash Farm Quarry are already designated flood risk areas.	Consideration to be given to alternative methods of disposal of gravel washing water and possible recycling.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29568 - Mr Ian Bradey [7824]	Object	Averham and Kelham are in Environment Agency designated Flood Zones, which Clause B of the Policy advises should be avoided for development. Surplus water resulting from sand and gravel extraction at Flash Farm is likely to be pumped into Mission Dyke, which is unlikely to have sufficient capacity. The Dyke is the storm-drain for nearby domestic residences and there is potential for any overflow to pass backwards through the storm drain into these residencies. Any restorations schemes are unlikely to improve bio-diversity as the land is currently used for commercial farming.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29462 - Dr Valerie Willcocks [7774]	Object	Preferred site (Flash Farm) is in area of Flood Risk.	Remove Flash Farm from Plan unless prior measures are taken to reduce flood risk in area.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29485 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Averham and Kelham are in Environment Agency designated Flood Zones, which Clause B of the Policy advises should be avoided for development. Surplus water resulting from sand and gravel extraction at Flash Farm is likely to be pumped into Mission Dyke, which is unlikely to have sufficient capacity. The Dyke is the storm-drain for nearby domestic residences and there is potential for any overflow to pass backwards through the storm drain into these residencies. Any restorations schemes are unlikely to improve bio-diversity as the land is currently used for commercial farming.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP5: Sustainable Transport</i>					
29685 - Tarmac Ltd [580]	Object	<p>Policy SP5 states that 'proposals requiring the bulk transportation of minerals, minerals waste/ fill...by road will be required to demonstrate that more sustainable forms of transport are not viable'.</p> <p>7.2 Whilst Tarmac understand and appreciate the need to ensure that sustainable transport methods are maximised, it is not currently clear what level of detail will be required by the MPA to '...demonstrate that more sustainable forms of transport are not viable'.</p> <p>7.3 It would be useful if the Council could provide clarification as to the level of detail that would be required from an applicant. This should be proportionate to the scale of development proposed (including the nature/ duration of operations) and should not place an unnecessary burden on developers.</p>		<p>Objection not accepted. The County Council does not consider it appropriate to specify the level of information required to demonstrate that proposals have met the provisions of SP5 as this should be determined on site-by-site basis at the planning application stage, with the County Council able to provide site specific pre-application advice. This approach allows for the flexibility to respond to the nature and location of the development and to ensure that undue burden is not placed on developers whilst at the same time ensuring that proposals accord with the policy.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29650 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	<p>The effect of the number of vehicle movements onto the A6097 for aggregates from the Shelford West site has not been properly examined. In particular the Addendum to the STA dated February 2016, while recognising the possibility, fails to examine the implications of no barging of materials.</p> <p>The selection of Shelford West goes against the requirements of SP5 in that sites should be close to markets and the main highway network.</p> <p>The Highways authority state that the use of barging should be "thoroughly investigated" and this has not been carried out.</p> <p>Although this is a critical element in the choice of this site, the investigations into the viability and practicality of this mode of transport have been minimal.</p> <p>See additional notes under Transport on pages 3,4 and 5 of Attachment A.</p>	<p>A thorough investigation of traffic movements from potential sites serving the south of the county needs to be carried out.</p> <p>The implications of barging not being used as a means of moving 180k tonnes of aggregates to Colwick need to be rigorously examined.</p> <p>A proper and fact-based analysis of the practicality and viability of barging from Shelford West needs to be conducted and the probability determined of this mode of transporting materials actually being used in practice.</p>	<p>Not accepted. The minerals plan includes a geographical spread of site specific allocations made up of extensions to existing quarries along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. The Shelford site would have direct access on to the A6097 and is expected to serve the Greater Nottingham area. Minimising transport distances has been taken into account along with a wide range of other considerations, however it is not possible to accurately identify the end sales point or guarantee that the sand and gravel worked will always supply the closest markets. The availability of sand and gravel elsewhere, the need for companies to supply individual contracts and other market forces will influence the movement of sand and gravel.</p> <p>The site allocations contained in the minerals plan are in principle suitable for future minerals development. Before extraction could take place, a detailed planning application would be required which would contain a wide range of assessments and design work including the viability of barging sand and gravel along the river Trent. The outcomes from this work would inform the final working plan and restoration of the quarry.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30055 - IGas Energy [7911]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>We question whether SP5 (a) is justifiable and, as set out in the NPPF, whether it is 'the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence'.</p> <p>Furthermore, pages 37 and 38 of the MLP setting out the justification for the Policy readily acknowledges that there are difficulties within the County of barging minerals and that rail transport is prohibitively expensive. For the majority of planning applications submitted for new mineral development, an assessment will be required to demonstrate that alternative forms of transport to road have been assessed when it is clear that the MPA already acknowledge this to be an exercise of proving the negative. Accordingly, there seems little justification in retaining this policy.</p>		<p>Objection not accepted. The County Council considers that the approach set out in SP5 sets out a suitable approach to the promotion of sustainable transport that is consistent with the National Planning Policy Framework. It seeks to maximise sustainable transport, be that via the form of transport used or the location of the development.</p>	
29421 - Tony Warwick [3331]	Object	<p>Road congestion and pollution were ignored in the draft plan. Flash farm is environmentally unsuitable because of poor transport links.</p>	<p>Flash farm not to be included because of poor transport links.</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29775 - Roger Fell [2474]	Object	<p>The element of barging 180,000 tons per annum at Shelford over the plan period has clearly been a major contributing factor in the sustainability analysis to permit Shelford West to be allocated (and with inference that Shelford East will subsequently be allocated). There is no effective quantitative analysis to show the viability of this potential operation.</p> <p>Research has shown that gravel barging from Besthorpe Wharf cannot be achieved as the barges are too big for the Trent upstream of Cromwell. There is some issue about the provision of suitable dumb barges to service the Shelford West site but as of yet there is no proven operator in place and there appear no units available.</p> <p>There is no clarity as to how the 180,000 ton p.a volume is calculated and the actual demand at Colwick wharf which is owned by Canal and River Trust.</p> <p>There is no information of usable value to indicate how the proposed conveyor system and required loading gantry will operate, the trench is likely to be a significant scale to enclose the conveyor system and allow servicing access. The conveyor loading gantry will be a major industrial installation within an unspoilt riverscape if designed to the same specification as at Besthorpe Wharf.</p> <p>There is no statement of intention to deal with the potential lack of use of barging once permission may be granted as the 180,000 ton provision appears not to be an enforceable element of planning permission should the operator later wish to claim it is not economic.</p>	<p>Abandon all baring concept.</p> <p>Control lorry movement by routing agreements to minimise or totally restrict use of A612 via Burton Joyce.</p>	<p>Not accepted. The site allocations contained in the minerals plan are in principle suitable for future minerals development. Before extraction could take place, a detailed planning application would be required which would contain a wide range of assessments and design work. This would include the location and use of on-site machinery such as conveyor belts and information on the operation of the barge. The outcomes from this work would inform the final working plan and restoration of the quarry.</p> <p>As part of the wider assessment work, a strategic transport assessment and a further addendum (using more recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues relating to the Shelford proposal. As part of any planning permission for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p>	
29354 - Rachel Bradey [3623]	Object	<p>The local traffic volumes already create problems. Adding to these volumes will only make the local road networks more congested.</p>	<p>Remove Flash Farm from the minerals plan.</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29631 - Shelford Parish Council [7840]	Object	<p>The effect of the number of vehicle movements onto the A6097 for aggregates from the Shelford West site has not been properly examined. In particular the Addendum to the STA dated February 2016, while recognising the possibility, fails to examine the implications of no barging of materials.</p> <p>The selection of Shelford West goes against the requirements of SP5 in that sites should be close to markets and the main highway network.</p> <p>The Highways authority state that the use of barging should be "thoroughly investigated" and this has not been carried out.</p> <p>Although this is a critical element in the choice of this site, the investigations into the viability and practicality of this mode of transport have been minimal.</p> <p>See additional notes under Transport on pages 3,4 and 5 of Attachment A.</p>	<p>A thorough investigation of traffic movements from potential sites serving the south of the county needs to be carried out.</p> <p>The implications of barging not being used as a means of moving 180k tonnes of aggregates to Colwick need to be rigorously examined.</p> <p>A proper and fact-based analysis of the practicality and viability of barging from Shelford West needs to be conducted and the probability determined of this mode of transporting materials actually being used in practice.</p>	<p>Not accepted. The minerals plan includes a geographical spread of site specific allocations made up of extensions to existing quarries along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. The Shelford site would have direct access on to the A6097 and is expected to serve the Greater Nottingham area. Minimising transport distances has been taken into account along with a wide range of other considerations, however it is not possible to accurately identify the end sales point or guarantee that the sand and gravel worked will always supply the closest markets. The availability of sand and gravel elsewhere, the need for companies to supply individual contracts and other market forces will influence the movement of sand and gravel.</p> <p>The site allocations contained in the minerals plan are in principle suitable for future minerals development. Before extraction could take place, a detailed planning application would be required which would contain a wide range of assessments and design work including the viability of barging sand and gravel along the river Trent. The outcomes from this work would inform the final working plan and restoration of the quarry.</p>	
29953 - London Rock Supplies Ltd [7882]	Object	<p>It is considered that the objectives of the Sustainable Transport Policy have not been addressed adequately in the MLP. Especially when the site nearest the identified market at Barton has been excluded from the Submission Draft of the MLP, when it was originally included in the preferred approach.</p>		<p>Objection not accepted. The site allocation process took account of a wide variety of factors, including, but not limited to transport implications. The County Council is satisfied that the approach to sustainable transport set out in SP5 was reflected in the site allocation process.</p>	
29871 - Councillor Sue Saddington [1195]	Object	<p>See Rep No. 29702 (Policy MP2)</p>	<p>See Rep No. 29702 (Policy MP2)</p>	<p>See response to Rep No. 29702 (Policy MP2)</p>	
29257 - Cromwell Parish Meeting (Mr David Swift) [7619]	Object	<p>The local traffic problems have not been adequately assessed or considered as a whole. A wider view is needed to avoid a classic error from which there will be no retreat.</p>	<p>Since there is no prospect of road and bridge improvements, the quarry should be located in area with better communications.</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies.</p>	



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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29798 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	
29517 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The A617 currently handles on average 18000 vehicles a day and carries an increasing number of HGV's along this route as it is the main link from Mansfield to Newark and the A1. With the expansion of a number of haulage companies within the area this will further increase. The proposed site of Flash farm will introduce slow moving and contaminated vehicles onto this route creating further congestion and additional surface debris hazards as well as emerging vehicle hazards.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29878 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	
29728 - Mr Adrian Hatton [2828]	Object	Over apportionment of sand and gravel would result in unnecessary increases in traffic volumes on roads. Specifically Flash Farm site would have large negative impact on A617 traffic through local communities and further contribute to well known congestion at Newark pinch points.	Use up to date figures to re-assess requirement for opening up new quarries. Remove Flash Farm from preferred sites.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29512 - Andrew Fereday [7756]	Object	Proposals do not represent a sustainable solution when measured against the requirements of SP5	Identification of an alternative site to Flash Farm of a more sustainable nature in terms of transport	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29237 - Harworth Estates Ltd [1941]	Object	<p>Policy SP5 states that 'proposals requiring the bulk transportation of minerals, minerals waste/ fill...by road will be required to demonstrate that more sustainable forms of transport are not viable'.</p> <p>Whilst we understand and appreciate the need to ensure that sustainable transport methods are maximised, it is not currently clear what level of detail will be required by the MPA to '...demonstrate that more sustainable forms of transport are not viable'.</p>	<p>It would be useful if the Council could provide clarification as to the level of detail that would be required from an applicant. We believe that this should be proportionate to the scale of development proposed (including the nature/ duration of operations) and should not place an unnecessary burden on developers. In this regard we are conscious that a large proportion of the initial regenerative development required on the sites referred to above involves temporary and relatively short-term operations with transport movements (destinations/ sources) well dispersed. Such development is often not suited to non-road transport methods - i.e. rail and water - as there is insufficient volume, single destination/ source or long-term continuity to benefit from or justify (i.e. make viable) such alternatives.</p>	<p>Objection not accepted. The County Council does not consider it appropriate to specify the level of information required to demonstrate that proposals have met the provisions of SP5 as this should be determined on site-by-site basis at the planning application stage, with the County Council able to provide site specific pre-application advice. This approach allows for the flexibility to respond to the nature and location of the development and to take in to account those factors mentioned in the objection in terms of ensuring that undue burden is not placed on developers whilst at the same time ensuring that proposals accord with the policy.</p>	
29831 - Newark PAGE (Enquiries .) [2485]	Object	<p>We are concerned that the wording of the policy does not prioritise more remote sites accessible by environmentally acceptable routes over closer sites that are not accessible by environmentally acceptable routes.</p>	<p>We consider that the wording of part (1) (b) should read "as close as possible by environmentally acceptable routes" rather than "in close proximity", since the former is a matter of where minerals and routes occur, whereas the latter is a matter of opinion.</p>	<p>Objection not accepted. The County Council considers that the approach set out in SP5 sets out a suitable approach to the promotion of sustainable transport that is consistent with the National Planning Policy Framework. It seeks to maximise sustainable transport, be that via the form of transport used or the location of the development. The suggested wording change is not considered to be appropriate.</p>	
29575 - Dr Judith Mills [7829]	Object	<p>While Flash Farm is located close to the A617, the nature of this road means that it is susceptible to frequent traffic disruptions and passes through many small villages which are in themselves unsuitable for HGV traffic. Kelham Bridge is unsuitable for HGV traffic and the congestion created by the build up of traffic on the A46 (Cattle Market Island) mean that local residents already suffer considerable problems from heavy traffic, which this proposal will only worsen.</p>	<p>Remove Flash Farm from the Plan</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29571 - Mr Ian Bradey [7824]	Object	The A617 currently handles on average 18000 vehicles a day and carries an increasing number of HGV's along this route as it is the main link from Mansfield to Newark and the A1. With the expansion of a number of haulage companies within the area this will further increase. The proposed site of Flash farm will introduce slow moving and contaminated vehicles onto this route creating further congestion and additional surface debris hazards as well as emerging vehicle hazards.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29844 - National Trust (Kim Miller) [2987]	Support	Policy SP5 - sustainable transport is supported		Support noted	

### SP5 Justification

29572 - Mr Ian Bradey [7824]	Object	The A617 currently handles on average 18000 vehicles a day and carries an increasing number of HGV's along this route as it is the main link from Mansfield to Newark and the A1. With the expansion of a number of haulage companies within the area this will further increase. The proposed site of Flash farm will introduce slow moving and contaminated vehicles onto this route creating further congestion and additional surface debris hazards as well as emerging vehicle hazards.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29562 - Miss Frances Snell [7759]	Object	The Flash Farm Development would result in additional heavy lorries on the already busy A617. The holiday traffic from the Midlands already causes traffic build up and delays, this easter weekend is a good example. Accidents cause re-routing of traffic - A617 accident statistics do not reflect delays and rerouting of traffic. Not include accidents where there is no injury. Ambulance journeys to KM hospital have increased up to 29% a month during the past 3 years; EMAS statistics record one way only. Kelham Bridge is not wide enough for two HGVs to pass at the same time	Remove Flash Farm from the list of preferred sites. Plan with Highways Agency and NCC a traffic management scheme for the local area before considering and additional developments along the A617.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29225 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The transport route for HGVs from preferred site Flash Farm is limited to the A617 only, with the consequence that all the lorries from the site will pass through residential areas. The A617 is reduced to a single track road for HGVs through much of Kelham and over Kelham Bridge where the impact of HGV traffic is already unacceptably high	The A617 is not suitable for the current HGV usage where it runs through residential areas and no development should be allowed that might lead to increased HGV traffic until and unless road management systems through villages on its route are improved, including the management of traffic around Newark	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29378 - Kirklington Parish Council (Helen Cowlan) [879]	Object	Proposed increases in traffic may be quoted as being negligible when looking at overall levels, however, the increase in HGV traffic compared to existing HGV traffic is substantial. Most recent data fails to include a breakdown of vehicle types using the A617. Insufficient details is provided with regard to proposals for infill stages. No consideration has been demonstrated for local traffic issues/congestion, or for projects which will further increase HGV traffic in the area (for which planning permission has already been granted).	*provide further detail on/assessment of vehicle type and associated health impacts - demonstrate recognition/acknowledgement *Remove Flash Farm from the MLP as it is not required	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29369 - Mr. Andrew Twidale [7744]	Object	Road congestion and pollution have not been considered in the draft plan. They will have a serious impact on local residents along the route as well as many people commuting to work from the surrounding villages.	Flash Farm needs to be removed from the plan. Other sites, such as Barton in Fabis have far better road networks that would have far less impact in the surround area.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29518 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The A617 currently handles on average 18000 vehicles a day and carries an increasing number of HGV's along this route as it is the main link from Mansfield to Newark and the A1. With the expansion of a number of haulage companies within the area this will further increase. The proposed site of Flash farm will introduce slow moving and contaminated vehicles onto this route creating further congestion and additional surface debris hazards as well as emerging vehicle hazards.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29355 - Rachel Bradey [3623]	Object	The A617 is already a high usage road which has already had it's speed limit dropped as it has presumably been recognised as unsafe. There are regular delays heading through Kelham as there are numerous places where two large vehicles are unable to pass safely.	Remove Flash Farm from the mineral plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29300 - Mrs Sally JOHN [7710]	Object	Kelham Bridge is not fit for present purpose and certainly needs no more traffic added to it. Cars cannot proceed safely because of oncoming HGV vehicles in the middle of the road, on the bridge. A617 already heavily used and the impact of exiting/entering a quarry farm would cause even more disruption. Already minor accidents cause massive tailbacks even closure of the bridge. This is very worrying when considering the passage of emergency vehicles!!	A new crossing for the Trent is imperative. The present bridge is a listed bridge, but safety is being compromised even with its present usage, and certainly does not need yet more HGV traffic. Gravel Extraction at the proposed site should not be permitted until an alternative crossing is in place and a bypass of Kelham built.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29409 - Mrs amanda armstrong [7755]	Object	The data which sets out where the markets for the aggregates go is out of date. The published information is limited to surveys carried out by the RWP on Aggregates every four years (see the Habitats Regulation Assessment) and the one currently being relied on is from 2009. Where is the survey information from 2013? Furthermore, within this data from 2009, the destination of sand and gravel is lumped together with Sherwood Stone so there is not accurate information about how much sand and gravel goes where	To establish where the aggregates are going, use more up to data; a survey should have been carried out in 2013.  The data regarding the destination of extracted sand and gravel should be separated from that relating to Sherwood Stone in order to be able to assess whether a further site for extraction of sand and gravel at Flash Farm can be justified	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29465 - Dr Valerie Willcocks [7774]	Object	The Flash Farm Development would result in additional heavy lorries on the A617. The holiday traffic from the Midlands already causes traffic build up and delays. Accidents cause re-routing of traffic - A617 accident statistics do not reflect delays and rerouting of traffic. They do not include accidents where there is no injury. Ambulance journeys to Kings Mill hospital have increased up to 29% a month during the past 3 years; EMAS statistics record one way only. Kelham Bridge is not wide enough for two HGVs to pass at the same time. Flooding at Kelham causes traffic diversions. Legally Yes	Remove Flash Farm from the list of preferred sites. Plan with Highways Agency and NCC a traffic management scheme for the local area before considering and additional developments along the A617.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29204 - Tim Harrison [3311]	Object	Road congestion and pollution were ignored in the draft plan, particularly with reference to Flash Farm. Environmental consideration would suggest that mineral extraction takes place where good transport links are available. This section of the Plan makes no reference to the current situation regarding highway safety on the A617 between Newark and Lockwell Hill. It is impossible to assess impact if a baseline is not established. Increased heavy lorry traffic will exacerbate current hazards	Remove Averham Flash Farm from the Plan based on unsuitability of the road network.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29181 - Mrs Linda White [7642]	Object	Although Flash Farm exits onto an A road, this is already recognised as a dangerous road as it has been given a 50 mph speed limit. The road is a direct link between the M1 and the A46, A1 and A17. The A617 is not wide enough for 2 HGVs to pass in at least 3 places in Kelham. Gravel lorries will impact on the traffic flow as they exit and enter the site, especially as they will initially be slow moving. Impact on already congested A46/A617 junction	Remove Flash Farm from list of preferred sites. Plan with Highways Agency and NCC a traffic management scheme for the local area before considering any additional developments that will exit onto an already over stressed road network	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30033 - Highways England (Trevor Murrain) [7614]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Quarries can generate significant volumes of HGV traffic which could negatively impact upon the operation of the strategic road network. It is important that this is taken into consideration in order for appropriate solutions to be found. HE considers that detailed transport assessments of minerals developments are essential but not necessarily required at the plan making stage as traffic impacts of such developments are generally capable of being mitigated. HE welcomes that the Plan states that all minerals sites will require a detailed TA to be carried out at the planning application stage. This is especially the case for the sites in close proximity to the strategic road network.</p>		Comments noted	

### SP6: The Built, Historic and Natural Environment

29301 - Mrs Sally JOHN [7710]	Object	<p>As previously stated in my representation, circulation of traffic for surrounding villages and traffic between Mansfield and Newark, especially for emergency vehicles, will be compromised if Flash Farm is included in the plan. Potential increase of flooding is a great concern as Kelham and certainly Rolleston have sustained recent flooding.</p>	As stated previously in my representation in other sections.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29845 - National Trust (Kim Miller) [2987]	Object	<p>The policies in NPPF Chapter 12 are clear that the setting of a heritage asset should be protected insofar as it contributes to the significance of the heritage asset. Policy SP6 does not reflect this fundamental principle. It is therefore inconsistent with national policy and fails the fourth NPPF test of soundness in paragraph 182.</p> <p>National Trust is also concerned that neither the policy nor its supporting text provide any detail about the types and gradings of heritage asset that should be referred to, or how these might be treated when a development proposal arises. For instance nationally: Listed Buildings (Grade I, II* and II), Scheduled Monuments, Registered Historic Parks and Gardens, Battlefields etc., and locally: Conservation Areas, locally listed buildings and parks etc. We suggest that additional text is incorporated into the supporting paragraphs.</p>	<p>National Trust requests that the wording of Policy SP6 paragraph 3 is amended to say "heritage assets (designated and non-designated) and their settings, and other cultural assets".</p> <p>We also request that supporting text is added explaining the presence of national designations: Listed Buildings (Grade I, II* and II), Scheduled Monuments, Registered Historic Parks and Gardens, Battlefields etc.; local designations: Conservation Areas, locally listed buildings and parks; and un-designated assets e.g. known or unknown buried archaeology. How are these designations recorded by Notts CC and will different types be treated differently?</p>	<p>Objection accepted. The County Council agrees that SP6 does not reflect the need to consider the setting of heritage assets and so the proposed change to the policy will be made.</p> <p>In relation to the point made regarding the supporting text, details of the different classifications of heritage assets are already covered in DM6: Historic Environment. However, it is recognised that the justification text for SP6 sets out details about the number and types of nature conservation designations and so in order to be consistent with this, an amendment to the justification text for 'heritage and cultural assets' will be made, as requested. This is accompanied by a parallel change to the justification text to DM6.</p> <p>The justification text sets out that the assets are recorded on the Nottinghamshire Historic Environment Record and the policy provisions within DM6 (which reflect the approach set out in the NPPF) set out how the different types of asset will be treated.</p>	<p>Amend Policy SP6 bullet 3 to read: 'Heritage assets (designated and non-designated) and their settings, and other cultural assets'</p> <p>Add follow text after first sentence of paragraph 3.60 of SP6 justification text 'There are currently over 18,000 archaeological sites and historic features in Nottinghamshire registered on the Historic Environment Record, including:</p> <p>National designations:</p> <ul style="list-style-type: none"> <li>- 3,700 listed buildings</li> <li>- Over 150 scheduled monuments</li> <li>- 19 Registered Parks and Gardens</li> <li>- 1 Battlefield</li> </ul> <p>Local designations:</p> <ul style="list-style-type: none"> <li>- 174 Conservation Areas</li> </ul> <p>- Creswell Crags (which straddles the boundary between Nottinghamshire and Derbyshire) is also recognised for its international importance as this is currently on the UNESCO tentative list for Inscription as a World Heritage Site.'</p> <p>and create new paragraph starting at existing text 'Mineral extraction by its very nature...'</p> <p>Amend paragraph 5.72 of justification text to DM6 as follows: 'Nottinghamshire contains thousands of archaeological sites and historic features including national designations (including Listed Buildings, Scheduled Monuments, Registered Historic Parks and Gardens and Battlefields), local designations (including Conservation Areas, locally listed buildings and parks) and un-designated assets such as known or unknown buried archaeology. One site, Creswell</p>



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29872 - Councillor Sue Saddington [1195]	Object	See Rep No. 29702 (Policy MP2)	See Rep No. 29702 (Policy MP2)	See response to Rep No. 29702 (Policy MP2)	Crags, is currently on the UNESCO tentative list for Inscription as a World Heritage Site.'

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30077 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust support nearly all that is in this policy including the principles behind it and welcome the stronger emphasis now in the Policy wording on the avoidance of impacts, before mitigation and compensation is considered. But would still expect to see a definition of how the "overriding need for a development" will be assessed, as this is often poorly quantified or evidenced in planning applications. The Trust particularly welcome the recognition of the importance of "local sites" (LWS) and the need to protect them.</p> <p>The Trust support the principle of paragraph 3.58, but it seems to have ended part way through a sentence, we assume something is missing after the word "maximise" , which affects the meaning of the sentence.</p> <p>The Trust welcome the change that has been made to paragraph 3.67, as we requested previously, to emphasise that the conservation of "....Best and most versatile agricultural soils" is actually the issue rather than land. This should however also be reflected in the Policy wording, as this still says "land" as well as soils. We would still, also, expect to see text that reflects that whilst agricultural land is a finite resource, as stated, it is a fact that land occupied by wildlife habitats is a far smaller resource and is subject to many pressures.</p> <p>The Trust welcome the changes in the text that now reflect the positive contribution that mineral extraction can make to the management of flood risk and to meeting WFD objectives. However as part of this we would still expect to see a specific drive towards seeking to secure floodplain connection of restored mineral sites to the Trent and Idle, as part of the</p>	<p>Include definition in policy of how the "overriding need for a development" will be assessed, as this is often poorly quantified or evidenced in planning applications.</p> <p>Amend policy wording from "land" to "soils"</p> <p>Provide further reference in the justification text "to reconnect rivers to floodplains, where possible, for habitat creation and sustainable flood storage."</p>	<p>Objection not accepted. Policy SP6 is a strategic policy covering a wide range of issues not just the historic environment. The Plan must be read as a whole and details concerning the historic environment are covered within the more detailed development management policy DM6.</p> <p>Change to paragraph 3.58 to be made to amend typographical error.</p>	<p>Amend paragraph 3.58 as follows: 'It is therefore important to ensure that new minerals development is correctly managed and that no adverse impacts occur at designated sites, or priority habitats and species, as far as possible. Policy SP3 promotes a biodiversity-led restoration approach which seeks to maximise the biodiversity gains resulting from the restoration of mineral sites.'</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
		mineral schemes.			
29879 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	
29579 - Dr Judith Mills [7829]	Object	The are 18 listed structures in Kelham and Averham, all within a few hundred metres of the A617 which is the main transport route from the proposed quarry at Flash Farm. The quarry will also affect the character of the landscape, in particular towards Kelham Hills, and exacerbate existing problems of noise and air pollution.	Remove Flash Farm from the Plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29403 - KIRTON PARISH COUNCIL (MRS KAREN WILDGUST) [7714]	Object	CURRENT ADOPTED MINERAL PLAN (PAGE 51) OUTLINES IMPORTANT MATTERS TO BE OBSERVED WHICH DO NOT SEEM TO BE REFLECTED IN NEW PLAN. IMPORTANCE OF MAINTAINING LAND WITH OLD MLA STATUS NO MENTION OF PRESERVING CROSS WONG LANE A MAIN FEATURE IN THE LANDSCAPE.	WITHDRAW THE EXTENSION WHICH COVERS THE OLD MLA FIELD PRESERVE CROSS WONG LANE AS A MAIN FEATURE IN THE LANDSCAPE.	Not accepted. The existing Minerals Local Plan published in December 2005 contained policy M3.23 Mature Landscape Areas which considered the impact of minerals development on Mature Landscape Areas. However since this date the Mature Landscape designation has been replaced by Landscape Character Assessments. The emerging Minerals Local Plan contains policy DM5: Landscape character, against which any minerals development would be assessed against.  The site allocations contained in the minerals plan are in principle suitable for future minerals development. Before extraction could take place, a detailed planning application would be required which would contain a wide range of assessments and design work. The outcomes from this work would inform the final working plan and restoration of the quarry.	
29609 - Mrs Deborah Cassidy [7818]	Object	Kelham Bridge is a Grade 2 Listed Building. There is no mention of whether this structure can withhold the constant onslaught from the current traffic that passes over it and certainly no mention of whether it can cope with the additional HGVs that will drive over it each day if the proposal at Flash Farm is successful.	Complete an assessment to establish whether Kelham Bridge can withstand the weight of the current and additional vehicles that will pass over it if this plan is successful.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29573 - Mr Ian Bradey [7824]	Object	I believe that the development of Flash Farm will have a detrimental effect on the local heritage, which includes 18 listed structures in Averham and Kelham all of which contribute to the historic environment of the Villages. It will also affect the character of the landscape, in particular the landscape towards Kelham Hills. It presents an additional flood risk and will bring additional traffic onto an already busy road which narrows significantly through Kelham and over Kelham Bridge. This additional traffic will also exacerbate problems of noise and air pollution which already exceed CRTN and WHO standards.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
30064 - Historic England (East Midlands) (Consultation Services) [7609]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  We note that the first paragraph of Policy SP6 continues to refer to adverse environmental impacts being acceptable subject to two caveats. Firstly, if 'an overriding need' for development can be demonstrated. This does not reflect NPPF requirements for heritage assets which would need to demonstrate that public benefits of development outweigh the harm. Secondly, the policy, as currently worded, would allow for unacceptable adverse impacts on the built, historic and natural environment if 'any impacts can be adequately mitigated and/or compensated for.' It is not appropriate to have a blanket policy referring to compensation alongside mitigation. Compensatory measures are referred to in NPPF para.152 which clearly sets out that compensatory measures should be a last resort.		Objection not accepted. Policy SP6 is a strategic policy covering a wide range of issues not just the historic environment. The Plan must be read as a whole and these issues are covered within the more detailed development management policy DM6 which specifically covers the historic environment.	
29799 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29832 - Newark PAGE (Enquiries .) [2485]	Object	We welcome a strategic policy that addresses amenity, but consider that a requirement to consider alternatives with lesser impact should be made explicit. This is also essential to ensure, for example, that sites that do not sterilise the best and most versatile agricultural land are developed in preference to those that do.	Adding a part (2) to read: "All proposals for mineral development must demonstrate that the need cannot be met in the foreseeable future on sites that are suitable, viable and available to serve the same market requirement, the development of which would have lesser residual impacts."	Objection not accepted. Policy SP6 is a strategic policy covering a wide range of issues. The details for each topic area are set out in the Development Management Policies. This includes the inclusion of the consideration of alternatives where applicable, for example within DM3 in relation to agricultural land. As the Plan must be read as a whole it is not considered necessary or appropriate to repeat the need to consider alternatives within SP6.	
29429 - Andrew Fereday [7756]	Object	The development of Flash Farm will have a detrimental effect on the local heritage, which includes 18 listed structures in Averham and Kelham all of which contribute to the historic environment of the aforementioned Villages. It will also affect the character of the landscape, in particular the vista towards Kelham Hills. It also presents an additional flood risk and will bring additional traffic onto an already congested, busy road which narrows significantly through Kelham and over Kelham Bridge. This additional traffic will also exacerbate problems of noise and air pollution which already exceed CRTN and WHO standards.	Alternative site to be included in the plan where there is little or no risk to the built, historic and natural environment	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29309 - Mrs amanda armstrong [7755]	Object	There is no explanation of how an "unacceptable" adverse consequence would be measured. An adverse effect on its own should be enough to say that that extraction should not go ahead	Delete the word "unacceptable"	Objection not accepted. Policy SP6 is a strategic policy covering a wide range of issues. The Plan must be read as a whole and details on how impacts will be assessed (i.e. in terms of their acceptability) are set out in the detailed development management policies. The County Council do not consider it appropriate to remove reference to 'unacceptable' in SP6 as it has been used to apply a suitable level of protection for the elements listed.	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29482 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	We believe that the development of Flash Farm will have a detrimental effect on the local heritage, which includes 18 listed structures in Averham and Kelham all of which contribute to the historic environment of the Villages. It will also affect the character of the landscape, in particular the vista towards Kelham Hills. It presents an additional flood risk and will bring additional traffic onto an already busy road which narrows significantly through Kelham and over Kelham Bridge. This additional traffic will also exacerbate problems of noise and air pollution which already exceed CRTN and WHO standards.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>SP6 Justification</i>					
29755 - Brett Aggregates Limited [69]	Object	<p>There is a tension in the Plan between the requirement to prioritise biodiversity led restoration and the permanent loss of best and most versatile agricultural land. This is exacerbated by the increase in recycling of waste which leads to lack of material to bring land back up to vertical levels where agricultural production is possible. This is particularly the case in the valley of the River Trent where extraction of sand and gravel is below the water table. Consequently all soils and overburden will be needed to backfill the voids created by extraction in order that areas of deep water which have little ecological value do not predominate in the restoration. An amendment to the Plan is needed to resolve the tension between biodiversity led restoration and preserving high value agricultural land.</p> <p>This is required if the Plan is to be effective and policy conflict does not lead to allocated sites failing to get planning permission and come forward to meet the landbank requirement This needs to be recognised by the addition of the following sentence to end of Paragraph 3.67.</p> <p>A balance is also needed between restoration of high grade agricultural land and the policy requirement for biodiversity led restoration schemes.</p>	<p>This needs to be recognised by the addition of the following sentence to end of Paragraph 3.67.</p> <p>A balance is also needed between restoration of high grade agricultural land and the policy requirement for biodiversity led restoration schemes.</p>	<p>Objection not accepted. The interplay between the biodiversity-led restoration strategy and agricultural land is detailed in SP3 and its justification text, it would not be appropriate to discuss this relationship in SP6. The justification text to SP3 clearly sets out at paragraph 3.27 that agricultural restoration and the biodiversity-led approach are not mutually exclusive. The County Council does not consider that an addition to the justification text for SP6 at paragraph 3.67, as requested, is necessary or appropriate.</p>	
29226 - AKS Community Action Group (Mrs Linda White) [7742]	Object	<p>Flash Farm is adjacent to conservation areas and important historic structures. The area features in the final days of the civil war, a mainstay of tourism in the area which makes a considerable contribution to local prosperity and jobs. Setting preservation is vital to the maintenance of the historic houses and the employment which they provide. Test digs by the interested developer of the site found traces from early civilisations.</p>	<p>Extraction of minerals in historically important areas should only be considered as a last resort</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29209 - Tim Harrison [3311]	Object	Sections 3.74 and 3.76 do not take account of the impact congestion, road safety, noise, dust, and vehicle emissions in surrounding communities especially the villages on the A617 between Newark and Lockwell Hill. Noise levels and pollution caused by current traffic densities exceed CRTN and WHO standards in both Kirklington and Hockerton Traffic follows on the A617 on the Kelham Loop North East of Averham exceed 85,000 vehicles a week already, 15% are HGVs. No reference has been made to the effect a new superstore at the Cattle Market roundabout and increased volume at Newark Castle Station.	Remove Averham Flash Farm from the Plan on the grounds that the development will cause significant residual impact to health and congestion in the surrounding communities.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29327 - Miss Myra Ng [7757]	Object	Please double check the flooding risk as my small parcel of land is already waterlogged. I believe pit working increase the risk of flooding on adjacent land? I am 489 m away.	Please reassure me I will not be flooded if the proposal goes ahead and measures will be taken to prevent this.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.  A site specific flood risk assessment will be required with any planning application which will address all local flooding risk.	
29413 - Mrs amanda armstrong [7755]	Object	The Sustainability Appraisal objectives include ensuring that development is located so as to minimise the impacts on the historic environment. However, by creating a new site at Flash Farm, traffic movements over the grade II listed bridge at Kelham will increase, putting that structure at risk of damage.	Do not create a site at Flash Farm	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29513 - Mrs Deborah Cassidy [7818]	Object	The highway assessment used to influence this plan is not a credible representation of the current and future situation.	Complete a further Strategic Transport Assessment to establish a true picture of the likely increase in traffic and congestion in and around Newark on Trent. Specifics to include the planned A46 Relief Road as it is due to be built within the timescale of this plan; the planned building of offices to house Newark and Sherwood District Council; the planned conversion of Kelham Hall to a Hotel and Spa and the increase in traffic as a result of the caravan site. Also to complete a report that truly reflects the reality of 127 HGV's passing one at a time over Kelham Bridge and the true impact on surrounding areas when that bridge is closed.	Objection not accepted. The County Council considers that the Strategic Transport Assessment comprehensively assesses the impact of the Plan in matters concerning highways. It should be noted that any proposals for mineral workings will be subject to a site specific transport assessment at the planning application stage which will take account of the most up to date, local information available at the time.	
29368 - Mr Gary Athey [7790]	Object	The development would have severe impact on the major road network around Newark, in particular the A17, A46 and A1 and the associated junctions and roundabouts which are already overloaded and dangerous.	The development should be removed from the minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies.	
29356 - Rachel Bradey [3623]	Object	The plan will have a detrimental impact on a nationally important heritage site ,i.e. Kelham and its setting, where significant parts of the civil war where played out. Gravel exploitation will destroy evidence of previous use, as indicated by crop marks and other finds from test digs Pressure of increased HGV use on existing infrastructure especially road links and Kelham Bridge Unacceptable impact on community amenity for Averham , Kelham and other villages on A617.	Flash Farm to be removed from the list of preferred sites to meet the need to protect important heritage assets as per national policy and to prevent loss of community amenity and pressure on unsuitable and already stressed road system	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29574 - Mr Ian Bradey [7824]	Object	I believe that the development of Flash Farm will have a detrimental effect on the local heritage, which includes 18 listed structures in Averham and Kelham all of which contribute to the historic environment of the Villages. It will also affect the character of the landscape, in particular the landscape towards Kelham Hills. It presents an additional flood risk and will bring additional traffic onto an already busy road which narrows significantly through Kelham and over Kelham Bridge. This additional traffic will also exacerbate problems of noise and air pollution which already exceed CRTN and WHO standards.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
29411 - Mrs amanda armstrong [7755]	Object	The Scoping Report in the Sustainability Appraisal highlights that key concerns are congestion and air quality and the protection of the historic environment. It notes that congestion is focussed on Newark and Mansfield ie along the A617 which links those two towns. It says that sites which are close to minerals markets should be used but this information on this is out of date, using data from 2009, so it is not possible to establish whether the minerals market is sufficiently close to Flash Farm.	Carry out up to date survey on the destination of minerals to comply with the Sustainability Appraisal objectives.	Objection not accepted. The 2009 data referred to is on the destination of sales of aggregates by region or local authority. The data does not specify routes taken and is not site specific (due to commercial sensitivity). It also only covers operational sites. This data is used to identify wider inter-area movements. It has not been used for determining the market of proposed sites and so the requested change to the Plan is not relevant.	
29423 - Creswell Heritage Trust (Mr Roger Shelley) [2978]	Object	On grounds of effectiveness, I am not sure that the current proposed wording adequately demonstrates that there may be cases where no proposed mitigation or compensation is acceptable.	Proposed re-wording -  'All mineral development proposals will be required to deliver a high standard of environmental protection and enhancement to ensure that there are no unacceptable adverse impacts on the built, historic and natural environment. If it can be demonstrated that there is an overriding need for a development, any impacts must be adequately mitigated/ and/ or compensated for. In some cases proposals may not be acceptable despite proposed mitigation or compensation.'	Objection not accepted. The County Council considers that Policy SP6 adequately provides what the proposed change to the plan is seeking. Additionally, SP6 is a strategic policy covering a wide range of issues; the Plan must be read as a whole and details on the approach to be taken to each element listed in the policy are covered within the more detailed development management policies. Within these policies the scenarios which may make a development unacceptable are set out.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29379 - Kirklington Parish Council (Helen Cowlan) [879]	Object	Insufficient consideration has been given to associated problems with increased HGV traffic e.g. noise/air pollution and congestion. The A46/A1 junctions are already busy and suffer from congestion. the Government has stated intent to invest in improving the A46 around Newark which suggests it is nationally recognised to be unable to cope with existing traffic levels and patterns.	*complete a more thorough assessments of traffic impacts in the surrounding area, and associated issues *Remove Flash Farm from the MLP altogether	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29183 - Mrs Linda White [7642]	Object	The plan will have a detrimental impact on a nationally important heritage site .i.e. Kelham and its setting, where significant parts of the civil war where played out. Gravel exploitation will destroy evidence of previous use, as indicated by crop marks and other finds from test digs Pressure of increased HGV use on existing infrastructure especially road links and Kelham Bridge Unacceptable impact on community amenity for Averham , Kelham and other villages on A617	Flash Farm to be removed from the list of preferred sites to meet the need to protect important heritage assets as per national policy and to prevent loss of community amenity and pressure on unsuitable and already stressed road system	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29484 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	We believe that the development of Flash Farm will have a detrimental effect on the local heritage, which includes 18 listed structures in Averham and Kelham all of which contribute to the historic environment of the Villages. It will also affect the character of the landscape, in particular the vista towards Kelham Hills. It presents an additional flood risk and will bring additional traffic onto an already busy road which narrows significantly through Kelham and over Kelham Bridge. This additional traffic will also exacerbate problems of noise and air pollution which already exceed CRTN and WHO standards.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29754 - Brett Aggregates Limited [69]	Object	In relation to the historic environment it is important to note that landscapes as they appear now maybe relatively recent developments. This is particularly the case with large scale fields resulting from drainage in the valley of the River Trent. It is, therefore, the case that following mineral extraction there are opportunities to restore older landscapes and this is a positive benefit which should be set out in the Plan. This should be dealt with in the justification of SP6 at paragraph 3.60 where the following sentence should be added. " These changes may be positive or negative and restoration proposals should be designed so that where possible a positive contribution is made to the historic landscape."	This should be dealt with in the justification of SP6 at paragraph 3.60 where the following sentence should be added. " These changes may be positive or negative and restoration proposals should be designed so that where possible a positive contribution is made to the historic landscape."	Objection not accepted. The County Council considers that the point raised is already adequately covered in paragraph 3.64 of the justification text to SP6 which states that some landscapes have the potential to be improved and restored and that mineral restoration has the potential to improve landscapes. The Landscape Character Assessment Policy Zone actions will identify where their is potential for historical landscapes to be restored. Where applicable to allocated sites, this information is included within the Site Allocation Development Briefs.	
29538 - Miss Aarti Varma [7823]	Object	The proposed site at Flash Farm is situated along one of the busiest roads connecting the A46/A1 and M1 with a significant pinch point at Kelham Bridge. Unless improvements to this section are also considered congestion will only worsen and air pollution from HGV traffic impact on residents' health. This plan also contravenes the transport sustainability strategy to reduce CO2 emissions as HGVs are very polluting. I travel a One this route daily and feel this will be detrimental to the flow of traffic in the area, add to environmental concerns and should be rejected.	See above	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
29460 - Dr Valerie Willcocks [7774]	Object	Gravel exploitation will have a detrimental effect on important Civil War heritage sites. Unacceptable impact on rural amenity for Averham, Kelham and other villages near the A617.	Flash Farm to be removed from the list of preferred sites to meet the need to protect important heritage assets. To remove pressure on unsuitable road system.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	
29412 - Mrs amanda armstrong [7755]	Object	The Sustainability Appraisal also states that existing problems with air quality are not made any worse and do not create additional risks. Kirklington's air quality is already below European standards and further traffic through the village will make it worse.	Do not create a new site at Flash Farm as this will increase traffic through the village of Kirklington	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29410 - Mrs amanda armstrong [7755]	Object	The Habitats Regulation Assessment explains that sites within 200m of highways can be adversely affected by emissions, which will be the case if the gravel/sand travels beyond Rainworth or Chesterfield via the A617. As the RWP on Aggregates has not published a survey for 2013 and is relying on data from 2009, it cannot be said with any accuracy whether sites will be affected, as there is not up to data on the destination of the extracted aggregates.	carry out/publish data from 2013 in order to assess whether the sites will be affected by emissions	Objection not accepted. Data on destination of sales aggregates is not available on a site specific basis due to commercial sensitivity. In any case, the Aggregate Working Party data only covers operational sites, not proposed allocations and so would not contribute to the HRA. The HRA was completed on the basis of expected routes from proposed allocations given understanding of markets and any information supplied by the operator. In relation to emissions related impacts, the HRA concludes that the Plan will not represent an impact on Natura 2000 sites within the county but recommends that appropriate policies to manage traffic-related emissions are used. Policies SP5 and DM9 of the Plan cover highways related impacts of minerals development and will be used in the assessment of any planning application.	

### SP7: The Nottinghamshire Green Belt

29846 - National Trust (Kim Miller) [2987]	Object	Reflecting our 2013 comments, the National Trust considers that this policy (rather than only the supporting text) should clearly state that permanent structures are inappropriate in the Green Belt, in order to be consistent with national Policy.	"Minerals development, not involving the erection of permanent buildings, can be considered as appropriate in the Green Belt and will be supported where high quality restoration maintains the openness of the land and its ability to meet its purpose as Green Belt. "	The policy as presently worded, which requires the restoration of minerals development to maintain the openness of the Green Belt confirms that the retention of permanent structures would likely be inappropriate as they would not maintain openness. The policy therefore complies with national guidance.	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<b>Chapter 4: Minerals Provision Policies</b>					
<i>Chapter 4: Minerals Provision Policies</i>					
30078 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Paragraph 4.5, p.46</p> <p>The Trust continues to strongly support the MPA's biodiversity-led approach in this Plan and welcomes it as an important exemplar of how a mineral plan should be developed. In recognition of the importance of this, we expect this to be stated in the introductory section to this chapter.</p>	<p>Add the following to paragraph 4.5 "The principle of biodiversity-led restoration underpins this MLP, therefore the creation of priority biodiversity habitats will be the primary restoration aim for all allocations and extensions."</p>	<p>Objection not accepted. Worked out quarries can provide significant biodiversity gains if restoration is considered at an early stage of the design and development of new quarries and this is set out in Policy SP3 - Biodiversity-Led restoration. Policy DM 12 also covers restoration, after use and aftercare. However it is not the case that biodiversity habitats should be the primary aim for all allocations as this approach is not always appropriate. Important biodiversity gains can still be achieved / incorporated into other types of restoration schemes such as recreational and agricultural.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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MP1: Aggregate Provision

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29686 - Tarmac Ltd [580] 29756 - Brett Aggregates Limited [69] 29773 - . Latham Family [7847] 29781 - Mineral Products Association (Malcolm Ratcliff) [1517] 29858 - Mick George (Mr John Gough) [2752]	Object	<p>A number of representations made on this policy covered a range of similar issues, as follows:</p> <ul style="list-style-type: none"> <li>- The Local Aggregate Assessment only takes account of the 10 year average sales figure and does not adequately take account of future growth in Nottinghamshire and Doncaster Metropolitan Borough Council.</li> <li>- The Plan does not provide for a 7 year landbank beyond the end of the Plan period.</li> <li>- Concerned about the lack of justification for the use of the 2002-2011 10 year sales figures.</li> <li>- It is unclear why sales in Nottinghamshire decreased in 2012 and 2013 which is seemingly contrary to the wider local and national supply picture.</li> </ul>	<p>A range of similar suggested changes were put forward, as follows:</p> <ul style="list-style-type: none"> <li>- The annual demand forecast for sand and gravel provision should be increased from 2.58 million tonnes to between 3 and 3.54 million tonnes to accommodate growth.</li> <li>- The requirement over the Plan period should be increased from 49.02 million tonnes to 67.08 million tonnes to maintain a 7 year landbank beyond the end of the Plan period.</li> <li>- In order to justify the selection of allocated sites, additional justification text should be included in the Plan.</li> </ul>	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. The data used in the LAA is collated by the East Midlands Aggregate Working Party based on sales data supplied by the minerals industry.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, and used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves. Currently the average 3 year sales figures remain significantly below the average 10 year sales average.</p> <p>Depending on future local economic conditions, housing completions are expected to increase over the life of the plan period, however there is some uncertainty regarding the potential achievement of the planned housing completion rates. The average sales data contained in the LAA takes account of a period of higher house building as well as the period of recession.</p> <p>It is also important to note that whilst house building uses a significant amount of aggregates, the Minerals Product Association estimate that new house building only makes up approximately 20% of overall aggregate use and therefore is only part of the equation when considering future demand.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>The Rotherham and Doncaster LAA states that there are limited sand and gravel resources remaining in the area and that current permitted reserves may not be adequate to cover the proposed plan period.</p> <p>Given that Nottinghamshire has traditionally supplied sand and gravel to these areas any future demand is unlikely to be completely new demand that Nottinghamshire would have to meet on top of the existing supply. In the short to medium term, output from the Idle Valley/north Nottinghamshire will be maintained at current levels from existing permitted reserves and site allocations proposed in the draft minerals plan.</p> <p>A permitted but unused quarry at Sturton Le Steeple with an estimated output of 500,000 tonnes per annum has yet to be worked by the operator presumably due to lack of demand. If opened this quarry would provide a valuable long term source of sand and gravel to supply North Nottinghamshire and the Rotherham and Doncaster markets.</p> <p>Given the level of uncertainty regarding demand towards the end of the plan period it is not considered necessary to identify a 7 year landbank beyond the plan period as this would require a significant level of extra provision that may not be required. Annual monitoring will be undertaken through the LAA and the annual monitoring report to monitor the effectiveness of the Local Plan. If it becomes clear that further reserves are required, then an early review of the relevant part of the plan would be necessary.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29287 - AKS Community Action Group (Mrs Linda White) [7742] 29310 - Mrs amanda armstrong [7755] 29333 - Michael Staff [3695] 29488 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29529 - mr john watchman [7785] 29576 - Mr Ian Bradey [7824] 29621 - Southwell Town Council (Ms C Standish) [784] 29629 - Shelford Parish Council [7840] 29648 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29664 - Dr Paul Angelides [7833] 29666 - Dr Sree Thamburaja [7834] 29668 - Mark Stephens [7835] 29670 - Steve Grundy [7836] 29672 - Paul Collins [7837] 29674 - Sharon Collins [7838] 29676 - Annette Dankowski [7839] 29677 - Upton Parish Council [618] 29721 - Mr Adrian Hatton [2828] 29729 - Mr Adrian Hatton [2828] 29745 - Elizabeth Stokes [7844] 29763 - Craig Black [3612]	Object	A number of representations made on this policy covered a range of similar issues, as follows: - Future demand for sand and gravel is overstated as the 10 year average used is out of date. The most recent data should be used to give an accurate forecast. Sales of sand and gravel have fallen over the last 10 years. - Data on recycled aggregates (as set out in the Waste Local Plan) has not been taken into account when forecasting future sand and gravel demand. - Recent planning permissions for time extensions to existing permitted quarries have not been taken into account when forecasting future sand and gravel demand. - Not all of the site allocations identified in the Plan will be required if a reassessment is undertaken.	A range of similar suggested changes were put forwards, as follows: - The demand forecast should be revised to take account of the most recent sales data and the increasing contribution made by recycled aggregates. - The Local Aggregate Assessment should include further analysis regarding the location and types of future demand. - Site allocations, including Flash Farm and Shelford, should be removed to match the reduce demand forecast. - The demand forecast as set out in MP1 needs to be lowered, however a buffer should be included to take account of future economic growth. A 7.5% buffer would relate to a requirement of 45.75 million tonnes.	Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).  The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.  National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.  It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.  Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29769 - Coddington Parish Council (Linda Cox) [7846] 29777 - Roger Fell [2474] 29788 - Mr J Potter [2108] 29822 - Earl of Listowel and Mrs Margaret Campbell [7851] 29826 - Kelham Hall Limited (Jonathan Pass) [7854] 29833 - Newark PAGE (Enquiries .) [2485] 29931 - Burton Joyce Parish Council (Mrs Jackie Dawn) [896] 29936 - Burton Joyce Village Society [7122] 29945 - John Gillespie [7881]				<p>that the 70% figure for construction and demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29794 - Cllr Mrs K Cutts [6747]	Object	The data used to justify the plan and site allocations for aggregates is flawed as the future sand and gravel apportionment figures are not up to date and do not take account of a change in the use of secondary aggregates (see further comments relating to Policy MP2r).	Use the latest extraction figures available (2004-13) to project future aggregate requirements.	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average (2002-11) also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>Using the data contained in the 2013 LAA, 49.02 million tonnes of sand and gravel is required over the plan period to 2030. Once sand and gravel reserves contained in existing quarries with planning permission are taken into account, it leaves a shortfall over the plan period of 29.71 million tonnes that will need to be met through extensions to existing sites and new greenfield sites.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p>	
29800 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29709 - Newark and Sherwood District Council (Matthew Tubb) [2950]	Object	<p>The District Council considers the levels of demand for sand and gravel which the plan is seeking to meet through Policy MP1 'Aggregate Provision' to be unsound, with the policy having failed to be positively prepared, justified or consistent with national policy. It is considered to be too high as the most recent LAA 10 year sales average data should be used when considering the future need for aggregates (in line with national policy and guidance). The District Council would accept that relevant local information could include the levels of planned growth within the County.</p> <p>Whilst it is undeniable that a portion of the period 2004 - 2013 would have been subject to depressed economic conditions it is suggested that the assumption that there will be a return to previous levels of demand in line with an improved economic outlook is not certain. Economic activity has been increasing in recent years and it is notable that the trend over demand for the past three years is moving in a downwards direction. This may well be reflective of increased supply coming from secondary and recycled sources.. Accordingly it is put forward that it is entirely possible that the low levels of sand and gravel extraction currently being experienced may be the new reality. Regardless it certainly serves to underline that there is a great deal of uncertainty over the ability to accurately forecast future levels of demand for sand and gravel.</p> <p>The approach is therefore also inconsistent with the requirements of the NPPF regarding planning for a steady and adequate supply of aggregates.</p>	<p>It is considered that section MP1: Aggregate Provision can be made sound through modifications drawing on the most recent Suggested wording (see attachment for details of deletions and insertions):</p> <p>Policy MP1: Aggregate Provision</p> <ol style="list-style-type: none"> <li>1. To meet identified levels of demand for aggregate mineral over the plan period (2012 - 2030) the following provision will be made: <ul style="list-style-type: none"> <li>- 38.08 million tonnes of Sand and Gravel</li> <li>- 8.74 million tonnes of Sherwood Sandstone</li> <li>- 1.52 million tonnes of Limestone</li> </ul> </li> <li>2. The County Council recognises that calculating estimates of demand are increasingly uncertain. It is however crucial that sufficient mineral is provided to realise ambitions for growth within the County. The situation will however be carefully monitored as any increase in annual outputs very much depends on operational and economic factors outside of the control of the County Council. This will be done annually through the County Council's Local Aggregate Assessment. If production rates vary substantially to the annual requirement set out in Table 2 for an extended period, then the overall requirement will need to be re-evaluated through a review of this Plan.</li> <li>3. 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 Limestone, whilst maintaining a steady and adequate supply over the plan period.</li> <li>4. Proposals for aggregate extraction outside of those areas identified in policies MP2, MP3 and MP4 will be supported where it can be demonstrated there is an identified shortfall in the landbank.</li> </ol> <p>4.10 Based on the findings of the Local</p>	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>If sand and gravel reserves in Lincolnshire are used up quicker than expected, their sand and gravel landbank would fall below the minimum 7 years required by the NPPF. As a result, a review of the sand and gravel provision section of the Lincolnshire Minerals plan would be required to identify additional reserves within Lincolnshire to meet demand.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			<p>Aggregate Assessment published in April 2015 (2004-2013 data) demand over the plan period has been calculated. For this exercise the plan period covers a 17 period from 2014 - 2030 (inclusive). Tables 1 and 2 set out the production figures and demand over the plan period.</p> <p>Amend tables 1 and 2 to include data from the LAA published in April 2015 resulting in the following sand and gravel figures (see attachment):</p>		
29880 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	
29873 - Councillor Sue Saddington [1195]	Object	See Rep No. 29702 (Policy MP2)	See Rep No. 29702 (Policy MP2)	See response to Rep No. 29702 (Policy MP2)	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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MP1 Justification

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29185 - Mrs Linda White [7642] 29228 - Mr Martin Smith [7727] 29248 - Mr David Walton [7745] 29252 - Mr David Walton [7745] 29311 - Mrs amanda armstrong [7755] 29357 - Rachel Bradey [3623] 29380 - Kirklington Parish Council (Helen Cowlan) [879] 29395 - John Allan [3617] 29489 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29530 - mr john watchman [7785] 29578 - Mr Ian Bradey [7824] 29582 - Dr Judith Mills [7829]	Object	A number of representations made on this policy covered a similar range of issues, as follows: - Future demand for sand and gravel has been over stated as the 10 year average sales figures is out of date. The most recent data should be used to give an accurate forecast. - Data on recycled aggregates (as set out in the Waste Local Plan) has not been taken into account when forecasting future sand and gravel demand.	A range of similar suggested changes were put forward, as follows: - The demand forecast set out in the Plan should be revised to take account of the most recent sales data and the increasing contribution made by recycled aggregates. - Site allocations should be removed to match the reduced demand forecast (a number of specific sites were listed for removal).	Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).  The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.  National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.  It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.  Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>that the 70% figure for construction and demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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Table 1 Annual aggregate production

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29186 - Mrs Linda White [7642] 29288 - AKS Community Action Group (Mrs Linda White) [7742] 29334 - Michael Staff [3695] 29358 - Rachel Bradey [3623] 29381 - Kirklington Parish Council (Helen Cowlan) [879] 29396 - John Allan [3617] 29490 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29531 - mr john watchman [7785] 29534 - mr john watchman [7785] 29580 - Mr Ian Bradey [7824]	Object	A number of representations made on this policy covered a range of similar issues, as follows: - Future demand for sand and gravel has been over stated as the 10 year average sales figure used is out of date. The most recent data should be used to give an accurate forecast. - Data on recycled aggregates (as set out in the Waste Local Plan) has not been taken into account when forecasting future sand and gravel demand.	A range of similar suggested changes were put forward, as follows: - Recycled and secondary minerals should be shown as part of the supply mix. - Structural changes to the supply of minerals should be incorporated to provide more realistic future forecast figures. - Site allocations should be removed to match the reduced demand forecast (a number of specific sites were listed for removal).	Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).  The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.  National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.  It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.  Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>that the 70% figure for construction and demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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Table 2 LAA Average Production Figure and Estimated Total Aggregate Demand

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Table 2 LAA Average Production Figure and Estimated Total Aggregate Demand

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29289 - AKS Community Action Group (Mrs Linda White) [7742] 29312 - Mrs amanda armstrong [7755] 29336 - Michael Staff [3695] 29535 - mr john watchman [7785]	Object	A number of representations made on this policy covered a range of similar issues, as follows: - The most recent 10 year average sales data should be used as the current data gives a false picture of sales figures and future estimated demand. - A lack of data regarding recycled and secondary aggregates.	A range of similar suggested changes were put forward, as follows: - Amend Table 2 to show latest Local Aggregate Assessment data. - Incorporate data on recycled and secondary aggregates sales.	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>that the 70% figure for construction and demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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MP2: Sand and gravel provision



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29688 - Tarmac Ltd [580]	Object	<p>A number of sand and gravel allocations in the MLP do not fully reflect/accord with the SA scores. Does not appear to be explanation or justification for this.</p> <p>Unclear whether assessment has taken account of accessibility of major markets and growth areas &amp; highway network/ HGV routing constraints.</p> <p>Should this be the case, the Council's site selection criteria is not reflective of the Local Plan Vision and, is fundamentally flawed.</p> <p>Unclear if cross boundary imports/ exports taken into account. Imports of sand &amp; gravel into county small but no consideration of how shortfall would be met. Demand from Doncaster MBC considered, however, unclear if demand or supply from neighbouring authorities considered.</p> <p>Sand and gravel supply in Leicestershire, likely to decline markedly post-2023. Decline in production expected in west of the county. Tarmac's Brooksby &amp; Lockington sites (serve Nottinghamshire, Leicestershire &amp; Derbyshire) likely to fill gap in supply in Leicestershire market. As a result Tarmacs reserves potentially 'pulled southwards' so need to ensure sufficient sources to supply Nottinghamshire.</p> <p>The Doncaster LAA (2013) identifies a 6.65 mt shortfall over the life of their plan. Tarmac's Nottinghamshire quarries and Cromwell Quarry (cemex) well placed to serve the South Yorkshire market. However could result in less material available for the Nottingham market.</p>		<p>Objection not accepted. The Sustainability Appraisal document forms part of the evidence gathering and site selection process, however other considerations such as deliverability, location and contribution of mineral during the Plan period are taken into account when identifying a suitable mix of sites to meet demand over the Plan period.</p> <p>Based on the export data from Leicestershire's 2016 Local Aggregates Assessment (2014 data) total sand and gravel imports into Nottinghamshire totalled just over 50,000 tonnes per annum. Although this contributes to supplying the south of Nottinghamshire it is a very small percentage compared to overall production in Nottinghamshire.</p> <p>As part of the wider assessment work, a strategic transport assessment and a further addendum was commissioned to assess the wider impacts of the increase in HGV movements. This hasn't raised any significant issues related to the proposed site allocations. It is also worth noting that all the allocations contained in the draft plan are proposed to access 'A' roads. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic.</p> <p>The Rotherham and Doncaster LAA states that there are limited sand and gravel resources remaining in the area and that current permitted reserves may not be adequate to cover the proposed plan period. Given that Nottinghamshire has traditionally supplied sand and gravel to these areas any future demand is unlikely to be completely new demand that Nottinghamshire would have to meet on top of the existing supply. In the short to medium term, output from the Idle Valley/north Nottinghamshire will be maintained at current levels from existing permitted reserves and site allocations proposed in the draft minerals plan.</p> <p>A permitted but unused quarry at Sturton Le</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29823 - Earl of Listowel and Mrs Margaret Campbell [7851]	Object	<p>Objection is raised to the exclusion of North Road Quarry (NRQ) from Policy MP2 it has previously been promoted by Tarmac as "Home Farm" at various stages of the Local Plan.</p> <p>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 served markets to the East of Nottingham. The intention is that the operation of NRQ would complement Tarmac's existing operation at Langford Lowfields, which predominantly serves markets north and south along the A1 corridor.</p> <p>NRQ can be considered to be advantageous over other sites that have been identified within Policy MP2 as new or extended extraction areas. Sites have been included within the Policy that have little or no hope of producing the stated reserves either during the Plan period or during the years within the Plan period that are claimed.</p> <p>The owners do not agree that the site is not deliverable within the plan period as the site is well located to serve the Nottingham market in which the other Tarmac sites would not. The SA for the site scores it better than others in the locality.</p>	The Policy MP2 should include reference to the ability of North Road Quarry to supply some 8.1 million tonnes of sand and gravel from approximately 177 hectares.	<p>Steeple with an estimated output of 500,000 tonnes per annum has yet to be worked by the operator presumably due to lack of demand. If opened this quarry would provide a valuable long term source of sand and gravel to supply North Nottinghamshire and the Rotherham and Doncaster markets.</p> <p>Objection not accepted. The North Road quarry has been assessed through the Sustainability Appraisal and does 'score' higher than some of the other allocated sites, however the SA is not the only consideration when assessing potential allocations. The North Road proposal (formally Home Farm) is not considered deliverable within the Plan period given the company's existing permitted but unworked/mothballed quarries at Sturton Le Steeple and Girton, permitted quarries at Langford Lowfields and Besthorpe as well as the company's site allocations included in the draft Plan. Inconsistent information has also been provided by the company during the plan preparation regarding the potential start date of the quarry.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29320 - Mrs Sally JOHN [7710]	Object	I do not think that the projected amount of sand and gravel needed has been based on the most up to date figures. Also I understand that demand for gravel and sand is decreasing with the building methods now being employed.	Prediction of required material needed should be revisited taking into account the latest figures available.	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>that the 70% figure for construction and demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29443 - Michael Staff [3695]	Object	<p>The sites have been identified to provide an adequate supply of minerals during the life of the plan.</p> <p>However the demand analysis is both fundamentally flawed since it uses out of date data, and does not utilise numerical data about construction activity, effects of landfill tax or recycled information as supplied in the NCC Core Waste Strategy 2014</p>	<p>The forecast demand will hopefully be reworked enabled removal of green field sites from the plan.</p>	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>that the 70% figure for construction and demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29536 - mr john watchman [7785]	Object	This table is based upon out of date data and does not identify the contribution of recycled minerals.	<p>If the demand figures are reworked using latest LAA data and build in the structural change to minerals supply caused by the effects of the landfill taxes and use the data in the NCC Waste Core Strategy, the table should be reworked and greenfield sites resorted.</p> <p>Accepting that long term forecasting is imprecise the sites identified for immediate exploitation should be removed and a list of sites that could be called upon in the future if required be identified as a reserve.</p>	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period. Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates that the 70% figure for construction and</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	
29746 - Elizabeth Stokes [7844]	Object	<p>Not sound. The current calculation would require a 70% growth in sand and gravel sales from current annual amount ( c. 1.5mt/annum) to utilise the apportioned quantity. There is no justification predicted for such growth within the plan period.</p> <p>Over allocation of sand and gravel sites results in developers seeking extension to planning permission time limits to permit working out of quarries with attendant delays in restoration programs.</p>		<p>Objection not accepted. The minerals plan has to provide a steady and adequate supply of minerals to meet expected demand over the Plan period based on the data contained in the Local Aggregates Assessment. It is important to note that the annual demand forecast is not a target and sales will depend on the economic conditions at the time. If demand for minerals remains low it is unlikely that mineral operators would invest large sums of money in new green field sites. Therefore it is likely that existing sites would continue to be worked and the new greenfield would only come forward at a later stage once demands picks up.</p>	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29710 - Newark and Sherwood District Council (Matthew Tubb) [2950]	Object	<p>The District Council does not consider the proposed allocation of the Coddington and Flash Farm sites to be sound. This approach would not represent the most appropriate strategy, when considered against the reasonable alternatives. Accordingly the Plan has failed to be justified in this regard. The District Council object to the sand and gravel apportionment figure (see previous representation) and as such the need for these two sites is not justified.</p> <p>The District Council has identified sites other than Coddington and Flash Farm which are anticipated to become operational within the current 7 year period (and so able to be counted as 'permitted reserves'). As such the ability of the MPA to demonstrate a 7 year landbank, based on the most up-to-date data and with the Coddington and Flash Farm sites having been deleted, is illustrated by the District Council and on this basis taking the most up-to-date LAA data and the reserves from new sites the Plan can meet the landbank requirement without the need for the Coddington and Flash Farm sites.</p> <p>The District Council considers the MPA's approach to the selection and spatial distribution of future sand and gravel sites is unsound, with the Strategy failing to represent the most appropriate when considered against reasonable alternatives.</p> <p>The District Council requests a more equitable and proportionate distribution of future extraction across the three Production Areas of Nottinghamshire. The balance of future sand and gravel sites proposed through the Plan is overwhelmingly loaded towards Newark &amp; Sherwood District as opposed to the Nottingham and Idle Valley and Trent Valley north Production Areas.</p>	<p>It is considered that section MP2: Sand and Gravel Provision can be made sound through the deletion of the Coddington and Flash Farm allocations. Policy MP2 'Sand and Gravel Provision' - Coddington and Flash Farm should be deleted from the policy. Paragraphs 4.16 - 4.20 will need to be amended to reflect the data from the most recent (April 2015) LAA and the modifications identified through the District Council's representations over Section MP1 of the submission draft place.</p> <p>Table 3 'Contributions to the sand and gravel shortfall over the plan period' - Coddington and Flash Farm should be deleted from the table with the figures being sequentially amended.</p> <p>New greenfield quarries - Newark Area section - delete removing the Coddington (MP2o) and Flash Farm (MP2p) content.</p> <p>Appendix 3 Site Allocation Development Briefs - Delete MP2o Coddington and MP2p Flash Farm</p> <p>Policies Map - Delete MP2o Coddington and MP2p Flash Farm</p> <p>Inset 13 - Delete</p> <p>Inset 15 - Delete</p>	<p>Objection not accepted. The NPPF requires Minerals Planning Authorities to maintain a minimum 7 year landbank of sand and gravel. The landbank is calculated by dividing existing reserves with planning permission by the latest 10 year average sales figure. The landbank as of December 2013 stood at 7.95 years. Site specific allocations contained in the Minerals Local Plan are in principle suitable for future minerals development, however before these allocations could be worked, a detailed planning application would need to be submitted. The start dates for the allocations are also estimates as the requirement for the mineral would depend on economic conditions at the time. Because of this, allocations cannot be included within the landbank figure.</p> <p>Minerals can only be worked where they are found, however the draft minerals plan includes a geographical spread of site allocations across the county made up of extensions to existing sites along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. Reserves located close to Newark are also well placed to serve the wider market within Nottinghamshire as it is well served by major routes such as the A 1 and A46. If the Coddington and Flash Farm proposals were removed from the plan, identified demand over the plan period to 2030 would not be met.</p>	

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29620 - Cllr Maureen Dobson [3619]	Object	<p>The evidence produce is not robust or sensible because you have not presented any documented evidence as to why Home Farm Kelham is not being consider as an alternative site instead of Coddington MP2o.</p> <p>I believe that the Holme Farm site is more suitable for delivery of sand and gravel over the next planned period and based where it would be capable of delivering direct to A1 North and therefore supply Yorkshire and the A46 south Nottingham/Leicester area with less problems for the community of which in item 2 of the submission draft 2.1 Your Vision I quote 'Planning effectively for the future means having a good understanding of our current situation and what is likely to change. It is important to take account of environmental assets including our countryside, wildlife and heritage, as well as the quality of life and well-being of our communities'</p> <p>The Authority does not seem to take account of representation from the people.</p> <p>It is for these reasons that I consider the plan unsound</p>	<p>Strategic Traffic Assessment Addendum Feb 2016 -</p> <p>4.8 Coddington (site MP2o) 4.8.4 'The form of access junction onto the A17 has still to be determined and this would be examined in greater detail as part of a supporting Transport Assessment for any subsequent planning application. The A17 is a modern high standard road (open to traffic in 1993), is subject to the national speed limit of 70mph along the proposed quarry site frontage and forms part of the County Council's Primary Route Network, bypassing the village of Coddington on its' north eastern side. A junction would need to be designed and constructed to full Design Manual Roads and Bridges (DMRB) standards. A range of junction options present themselves from priority junctions (with or without ghost island right turn lanes and possible restricted HGV movements), a roundabout junction or traffic signal control. The County Council as local highways authority is content that an acceptable access solution is deliverable.'</p> <p>Within this statement there are inaccuracies ie the A17 is 60mph not 70 as stated (one small correction but how many more within this document)</p> <p>It has not been consider how much traffic the Newark Showground generates, there is a minimum of 500 large event's per annum generating 600,000 visitors per year, while not all will be single car users.</p> <p>I feel you have already decided this a suitable application for a quarry without any transport problems I was under the impression that every planning application was taken on its merits.</p>	<p>Objection not accepted. The North Road quarry has been assessed through the Sustainability Appraisal and does 'score' higher than some of the other allocated sites, however the SA is not the only consideration when assessing potential allocations. The North Road proposal (formally Home Farm) is not considered deliverable within the Plan period given the company's existing permitted but unworked/mothballed quarries at Sturton Le Steeple and Girtton, permitted quarries at Langford Lowfields and Besthorpe as well as the company's site allocations included in the draft minerals plan. Inconsistent information has also been provided by the company during the plan preparation regarding the potential start date of the quarry.</p>	

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29689 - Tarmac Ltd [580]	Object	<p>Tarmac strongly dispute the Council's view that the North Road quarry (Home Farm) is not deliverable in the Plan period.</p> <p>Tarmacs permitted sites/ allocations will, in the main, serve north Nottingham and South Yorkshire markets. This has been repeatedly conveyed to the Council. Considered that report taken to Committee in January 2016 misinformed members of the deliverability of the North Road quarry.</p> <p>Site is well located via A46 to serve the Nottingham/ south Nottingham market.</p> <p>Therefore the Council's view that the North Road Quarry site is undeliverable is unfounded/ misinformed and is not a valid reason to discount the site.</p> <p>Tarmac consider the North Road Quarry site to be a more a sustainable option than Coddington (MP2o); Flash Farm (MP2p); Shelford (MP2r).</p> <p>The Council have acknowledged that the North Road site is not being allocated despite the outcome of the SA. The SA indicates that the North Road Quarry site is more sustainable than Coddington and Flash Farm, and equally sustainable to Shelford .</p> <p>Detailed comments in respect of the Coddington, Flash Farm and Shelford sites are contained within the subsequent sections of this report.</p>		<p>Objection not accepted. It is acknowledged that some of Tarmacs sites supply the North Nottinghamshire and South Yorkshire markets, however the permitted sites still contribute to the overall sand and gravel provision and future shortfall identified in the emerging Minerals Local Plan. The North Road proposal is still considered un-deliverable due to the number of existing permitted, un-worked and mothballed Tarmac quarries in Nottinghamshire.</p> <p>The North Road quarry has been assessed through the Sustainability Appraisal and does 'score' higher than some of the other allocated sites, however the SA is not the only consideration when assessing potential allocations. The North Road proposal (formally Home Farm) is not considered deliverable within the Plan period given the company's existing permitted but unworked/mothballed quarries at Sturton Le Steeple and Girton, permitted quarries at Langford Lowfields and Besthorpe as well as the company's site allocations included in the draft minerals plan. Inconsistent information has also been provided by the company during the plan preparation regarding the potential start date of the quarry.</p>	

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29875 - Councillor Bruce Laughton [1073]	Object	<p>The Averham Flash Farm site be REMOVED from the Nottinghamshire Minerals Local Plan Submission Draft document. The document represents tonnes of sand and gravel that isn't needed, because Demand for the period 2012 - 2030 inclusive has been over-estimated as the Submission Draft document uses demonstrably out-of-date and therefore inaccurate and misleading data.</p> <p>Objection to Flash Farm site include:</p> <ul style="list-style-type: none"> <li>* Should encourage recycling to take place at sites that are already extracting gravel e.g. Cromwell;</li> <li>* Already there are sites allocated with planning permission (e.g. Sturton);</li> <li>* Cemex have 2.5 million tonnes allocated north of Cromwell;</li> <li>* Large allocation also recently allocated at Swinderby;</li> <li>* Recent approval by the Planning committee of the Besthorpe site adding an extra 800,000 tonnes to the extraction over the next six years;</li> <li>* Sites should be allocated as close to need as possible i.e. the main market areas of South Yorkshire, South Nottinghamshire and the A1 corridor;</li> <li>* Some of the sites to be considered have more potential for road improvements than others;</li> <li>* A number of developers own interests in preferred sites at better locations than Averham, and should be encouraged to develop those sites.</li> </ul> <p>Recognise that development can take place quite close to communities as long as it has direct access to a main road e.g. Cromwell</p> <p>Objection to the Barton site not be included in the plan as it appeared to be removed by officers behind closed doors supposedly for "ecology" reasons, without any convincing explanation in this paper. Where was this decision initially made and by whom? How is this transparent?</p>	<p>Crucially, the estimates of future sand and gravel aggregate requirement for Nottinghamshire in the Minerals Local Plan should be based on the latest available data for annual aggregate production which, as of January 2016, was from the years 2004 to 2013 (published in the Nottingham and Nottinghamshire Local Aggregates Assessment April 2015). As it stands, the Plan uses data from 2002 to 2011, which does not reflect the scale of falling aggregate demand over and above any effects of the recession.</p> <p>After the Full Council meeting, all the Members supported an Amendment to the Motion to Council, that under paragraph 2 stated: "That the County Council approve the publication of the Submission Draft document for the Minerals Local Plan for a 6 week public consultation period and that during this period Officers will verify the legitimacy of the methodology used to determine the need and apportionment figures for sand and gravel within Nottinghamshire and review the strategic transport assessment."</p> <p>I also believe, as stated above, that the traffic data and forecasts upon which the Minerals Local Plan currently bases its proposal for the Flash Farm site are out-of-date and inadequate. A complete review of the traffic situation around Newark should be undertaken now, prior to it being included in the Minerals Local Plan, and before an application for Flash Farm is submitted. Officers have argued that such considerations would be addressed by the planning process, but I believe there is a responsibility on the Council to ensure that the Minerals Local Plan itself is sound. If a review based on up-to-date traffic information that finds the highway infrastructure in and around Newark is unable to sustain a development at Flash Farm, then the site should not be included in the Minerals Local Plan at all.</p>	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average (2002-11) also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>Using the data contained in the 2013 LAA, 49.02 million tonnes of sand and gravel is required over the plan period to 2030. Once sand and gravel reserves contained in existing quarries with planning permission are taken into account, it leaves a shortfall over the plan period of 29.71 million tonnes that will need to be met through extensions to existing sites and new greenfield sites.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>If the sales data contained in the 2015 Local Aggregates assessment (2004-2013) was used, demand over the plan period would be reduced by 4.95 million tonnes as opposed to 6.42 million tonnes stated. This is due to the</p>	

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		Serious questions over the publication of these papers on 18th December 2015 for a meeting on 4th January 2016, meaning no opportunity over Christmas to properly inform or consult residents.	<p>I have received a number of complaints that this consultation form is too complicated and that the online forms are difficult to download and access. Residents have expressed their views alternately by letter and email and have been told such communications are inadmissible, which is surely unfair if the points they are raising are relevant. This is despite a well-attended public meeting specifically to inform people of the process, where complaints were raised about the complicated nature of the response system.</p> <p>A Freedom of Information request was made on 13th February 2016 seeking copies of all questions put to Queen's Counsel who was examining the aggregate assessment, which was refused under Regulation 12 (5) (b) of the Environment Information Regulations on the grounds that disclosure would adversely affect the course of justice. In my view, this is a misuse of that regulation and denied public access to potentially important information that could be relevant to the overall objections being raised.</p>	<p>need to take account of the most recent sand and gravel reserves with planning permission which fell to 17.8 million tonnes in December 2013. The Mineral Planning Authority is also required to maintain a minimum 7 year landbank for sand and gravel. As of December 2013 this stood at 7.95 years.</p> <p>Reference has been made to a number of other Mineral Planning Authorities approaches to identifying demand in their Minerals Local Plans. The Warwickshire Local Aggregates Assessment states that the latest 10 year average sales figure should be used, however in order to take into account future growth, an additional figure of 10% has been added. Lincolnshire's plan was based on figures included in the Regional Plan (abolished in July 2013) which used a different methodology to that set out in the NPPF. The Planning Inspector concluded that the figures set out in the Regional plan no longer provided a reliable forecast. The Derby and Derbyshire Minerals Local Plan is using the most up to date LAA figures as the base date for forecasting demand over the plan period. When the Nottinghamshire Minerals Local Plan review commenced, the most up to date LAA figures were also used as the base date to forecast future demand.</p> <p>The recent planning application for Besthorpe quarry was for an extension of time to the existing permitted quarry rather than to work additional mineral. Therefore the mineral is already taken into account within the demand forecast.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and the Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are</p>	

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				<p>likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p> <p>The site allocations are those that in principal are suitable for minerals development. As part of the evidence gathering and site selection process, a number of strategic assessments have been completed. It is however worth noting that detailed assessment work would be required as part of any planning application including the working area of the site, standoffs from any existing infrastructure, location of site machinery such as conveyors and the site access.</p> <p>Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. As part of the wider assessment work, a strategic transport assessment and a further addendum (using more recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues relating to the Flash Farm or Shelford proposals. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>The draft minerals plan includes a geographical spread of site specific allocations made up of extensions to existing sites along with new greenfield sites to serve the three main markets of Greater Nottingham, Central</p>	

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				<p>Nottinghamshire including Newark and the north of the county. All of the allocations have proposed access on to the 'A' road network.</p> <p>According to the mineral operator, the proposed restoration scheme for Flash Farm quarry will use suitable inert material to create a mix of grassland, hedgerows and wetland areas however detailed information regarding the final restoration scheme would only be available through the planning application process. This would include details on restored ground levels and the extent of different habitats. As a result it is not possible to quantify the exact amount of inert fill that would be required at this stage. It is estimated that approximately 1 million tonnes of inert waste is produced annually in Nottinghamshire much of which is recycled. It is therefore incorrect to suggest that the Flash Farm proposal would take 87% of the inert waste produced in Nottinghamshire. More recent disposal figures published by the Environment Agency highlight a significant increase in the amount of inert waste disposed of annually since 2010 which is likely to signify a higher overall volume of inert waste production in line with economic recovery due to increased construction rates.</p> <p>The Barton in Fabis proposal was not included in the draft plan as more suitable sites were identified through the evidence gathering process (including the Sustainability Appraisal) to meet expected demand over the plan period. This is set out in the site selection background paper.</p> <p>The consultation on the Minerals Local Plan Submission Draft document was the formal stage of consultation and focused on the legal compliance and soundness of the draft minerals plan. All those who had commented on previous stages of consultation were informed in advance of the consultation going live.</p> <p>Due to the nature of the consultation, a specific consultation form was available and this was based on the template provided by the</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

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				<p>Planning Inspectorate. A guidance note was also available to assist members of the public fill out the form correctly. There were a number of different ways representations could be made and included the online consultation system, forms to download and fill in either electronically or by hand as well as paper copies of the forms on request. Paper copies of the Submission Draft document were also available at the main libraries.</p> <p>As the consultation form included important questions including whether individuals wished to appear at the examination in public, any representations that were submitted without filling in the form were returned with a copy of the form. This was to ensure that members of the public were given the opportunity to fully participate in the process.</p> <p>All the representations made during the consultation will be submitted to the inspector as part of the minerals plan submission however there is no guarantee that the inspector will take account of those representations that have not indicated whether they consider the plan to be sound or legally complaint.</p>	



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29922 - Peter Doyle [2788]	Object	<p>There are quarries proposed in the Idle Valley which have not been positively prepared or justified with regard to why they have been allocated in the Plan:</p> <ul style="list-style-type: none"> <li>- The argument that they serve the Doncaster and Yorkshire markets should not be the sole consideration. Instead it should be on the basis of the Sustainability Appraisal. The sites in the Idle Valley (particularly those on A638) have the worst SA scores.</li> <li>- The allocation of Barnby Moor (-15 score) is contrary to treatment of Little Carlton where -15 score resulted in non-allocation.</li> <li>- Of the Idle Valley Sturton le Steeple should be allocated (lowest SA score -8, output same as Barnby Moor and Botany Bay combined, valid permission until 2017)</li> <li>- Support Barnby Moor Parish Council comments, as attached</li> </ul>	<p>There are sites in the Nottinghamshire and Newark area which have demonstrated their suitability but have been withdrawn. We feel these sites should be re-assessed as it would be beneficial for the County to make these sites operational. If the sites have been withdrawn due to having no operator then more publicity and encouragement should be made to include these sites into the Minerals Local Plan. If these sites have been withdrawn due to other reasons then justification needs to be demonstrated why these sites are not being used. We would like to know the reason why the Sturton-le-Steeple PA35 has been withdrawn.</p>	<p>Objection not accepted. Minerals can only be worked where they are found and generally supply specific markets due to the cost of transporting the material. The Idle Valley serves the local markets of North Nottinghamshire, Doncaster and South Yorkshire. Reserves of sand and gravel in the Idle valley are limited and extensions to existing sites have been allocated wherever suitable, however further reserves are required in this area. Existing sand and gravel quarries close to Newark could potentially serve this market; however this would lead to increased HGV traffic, environmental impacts and financial cost due to the need to transport sand and gravel greater distances.</p> <p>Although the existing permitted quarry at Sturton Le Steeple has yet to be worked, the sand and gravel reserves have been taken into account when calculating demand over the plan period. As identified in the delivery schedule (Appendix 2 of the plan) Sturton Le Steeple is expected to be operational throughout the plan period to 2030. The proposed extension to the existing Sturton Le Steeple quarry (PA35) is therefore not required within this plan period.</p>	
29581 - Mr Ian Bradey [7824]	Object	<p>The use of the site will create noise and air pollution in the surrounding villages as well as in the town of Newark and this factor has also not been properly considered within the Plan. Increase in HGV traffic along the A617. Negative and detrimental impact on the local environment and human health.</p>	<p>remove site MP2p (Flash Farm) from the draft minerals plan</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

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29834 - Newark PAGE (Enquiries .) [2485]	Object	<p>Shelford West and its possible extension as more sustainable options for the supply of sand and gravel to the Nottingham market.</p> <p>The detailed environmental impacts of MP2p 'Flash Farm' were not properly assessed, having assumed what would be an illegal route through Southwell to the Nottingham area and not taking account of the resulting circuitous route through sensitive villages or the lack of waterway or rail connections.</p> <p>Strategically, Shelford West and its possible extension are much closer to Nottingham than the majority of the draft allocations so far proposed and would address this fundamental imbalance, reducing the environmental impact of longer journeys to market and reducing costs to the economy.</p> <p>In terms of quantity, the 2.75 million tonnes expected from MP2p 'Flash Farm' is simply not required, when extensions to established sites in less environmentally-damaging areas are possible.</p>	Delete allocation MP2p	<p>Objection not accepted. In order to meet estimated demand over the plan period, the Shelford West and Flash Farm proposals are both currently allocated in the draft plan. The Shelford east site is not being considered as it is expected that this site would not be required until after the plan period. The Flash Farm site was assessed through the Strategic Transport Assessment and took account of the Environmental weight limits through Southwell. The traffic is expected to travel along the A617 in both east and westerly directions.</p>	
29491 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	<p>The proposed new site near Newark at Averham will result in a significant increase in traffic volumes in and around Newark, with the majority being Heavy Goods Vehicles, this would further exacerbate the problems with traffic congestion in the Newark area. This factor has not been properly taken into account within the Plan.</p> <p>The use of the sites will also create noise and air pollution in the surrounding villages as well as in the town of Newark and this factor has not been properly considered within the Plan.</p> <p>Increased traffic through local villages</p> <p>Heavy lorries over an old bridge not suitable for lorries.</p>	Flash Farm, site MP2p should be removed from the local minerals plan.	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

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30079 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Mineral Provision Paragraph 4.5 p46:</p> <p>The Trust does not object in principle to the majority of the proposed allocations, subject to information on any important habitats and species that may come forward through surveys. If any significant and unmitigable ecological impacts are predicted at the application stage, then the Trust would object. The wording of the policy appears to assume that there would be no significant effects that would prevent a site from proceeding, which is a conclusion that cannot be reasonably drawn at this time, in advance of EIA.</p> <p>The Trust's reason for objection also relates to the details in the justification text as follows:</p> <p>The proposed allocations in the Besthorpe, Langford and Cromwell areas would benefit from a coherent approach to planning restoration to ensure that opportunities for the creation of priority biodiversity habitats are maximised and also that all suitable opportunities for floodplain reconnection are delivered. It is particularly important that the options for floodplain reconnection are explored at the earliest possible stage so this warrants specific mention in the justification text.</p>	<p>Add the following to the policy wording:</p> <p>1. Subject to there being no significant environmental effects that cannot be mitigated, an adequate supply of sand and gravel will be identified to meet expected demand over the plan period from:...</p> <p>Add text to justification text to state that options for floodplain reconnection are required to be explored at the earliest possible stage.</p>	<p>Objection not accepted. The site allocations selected are those that are in principal suitable for future minerals development. As part of a planning application detailed assessment work would be required. Where appropriate reference to flood plain reconnection has been included in the relevant site allocation development briefs in Appendix 3.</p>	

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29687 - Tarmac Ltd [580]	Object	<p>Tarmac strongly object to the Council's approach to sand and gravel provision in the Lower Trent Valley. The Delivery Schedule contains output estimates that appear unrealistic and unachievable -in the early phases of the Plan period.</p> <p>The Delivery Schedule indicates that the proposed allocations at Flash Farm (MP2p) and Shelford (MP2r) will commence production in 2016. In 2017, production at Shelford anticipated to double. Tarmac consider this to be unrealistic and undeliverable as neither have undertaken EIA scoping requests or Planning Permission.</p> <p>Preparation of a Planning Application and EIA, is generally a circa two year process. As such, the earliest that the sites could begin production is 2018.</p> <p>If the sites come on stream two years later than predicted (i.e. 2018), sand and gravel supply in the early stages of the plan period would be over 1 million tonnes less.</p> <p>Tarmac have submitted an updated version of the amended Delivery Schedule (Appendix A). As shown the Sturton le Steeple could start two years earlier than set out in the Council's Delivery Schedule (i.e. 2017). This could assist with any shortfall during the early phases of the Plan period.</p>		<p>Objection not accepted. The delivery schedule sets out how existing permitted quarries along with draft allocations (extensions to existing quarries and new greenfield quarries) are expected to provide a steady and adequate supply of minerals over the Plan period. The information contained in the table is based on estimates put forward by the industry or from existing planning applications. However due to the timescales involved in the plan making process and the changing economic climate (i.e. changing demand for minerals) it can only be used as a guide. If economic activity increases during the Plan period it is likely that quarries will be brought forward to meet demand. Equally if demand remains low, new quarries will be delayed until demand increases.</p> <p>The estimated start date of 2019 for Sturton Le Steeple quarry was provided by Tarmac as part of the evidence gathering. As this site has the benefit of a current planning permission, the quarry could be worked sooner. However the sand and gravel reserves contained in the quarry have already been taken into account when identifying the shortfall over the Plan period.</p>	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29702 - Councillor Sue Saddington [1195]	Object	Flash Farm should be removed. Demand over the plan period has been over estimated as the Submission Draft uses out of date and therefore misleading data. Recycling should be encouraged at existing extraction sites. There are already sites allocated with planning permission (Sturton le Steeple) and allocations at Cromwell and Swinderby (Lincolnshire). Sites should be allocated as close to need as possible i.e. the main market areas of South Yorkshire, South Nottinghamshire and the A1 corridor. Some sites have better potential for road improvements. Developers should be encouraged to develop sites in better locations. Object to Barton site not being included in the plan supposedly for 'ecology' reasons.	Remove Flash Farm allocation. Revise estimates of minerals demand to take account of data in the 2015 Local Aggregates Assessment. Undertake a complete review of the traffic situation around Newark.	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average (2002-11) also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>Using the data contained in the 2013 LAA, 49.02 million tonnes of sand and gravel is required over the plan period to 2030. Once sand and gravel reserves contained in existing quarries with planning permission are taken into account, it leaves a shortfall over the plan period of 29.71 million tonnes that will need to be met through extensions to existing sites and new greenfield sites.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>If the sales data contained in the 2015 Local Aggregates assessment (2004-2013) was used, demand over the plan period would be reduced by 4.95 million tonnes as opposed to 6.42 million tonnes stated. This is due to the</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>need to take account of the most recent sand and gravel reserves with planning permission which fell to 17.8 million tonnes in December 2013. The Mineral Planning Authority is also required to maintain a minimum 7 year landbank for sand and gravel. As of December 2013 this stood at 7.95 years.</p> <p>Reference has been made to a number of other Mineral Planning Authorities approaches to identifying demand in their Minerals Local Plans. The Warwickshire Local Aggregates Assessment states that the latest 10 year average sales figure should be used, however in order to take into account future growth, an additional figure of 10% has been added. Lincolnshire's plan was based on figures included in the Regional Plan (abolished in July 2013) which used a different methodology to that set out in the NPPF. The Planning Inspector concluded that the figures set out in the Regional plan no longer provided a reliable forecast. The Derby and Derbyshire Minerals Local Plan is using the most up to date LAA figures as the base date for forecasting demand over the plan period. When the Nottinghamshire Minerals Local Plan review commenced, the most up to date LAA figures were also used as the base date to forecast future demand.</p> <p>The recent planning application for Besthorpe quarry was for an extension of time to the existing permitted quarry rather than to work additional mineral. Therefore the mineral is already taken into account within the demand forecast.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and the Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p> <p>The site allocations are those that in principal are suitable for minerals development. As part of the evidence gathering and site selection process, a number of strategic assessments have been completed. It is however worth noting that detailed assessment work would be required as part of any planning application including the working area of the site, standoffs from any existing infrastructure, location of site machinery such as conveyors and the site access.</p> <p>Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. As part of the wider assessment work, a strategic transport assessment and a further addendum (using more recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues relating to the Flash Farm proposal. As part of any planning permission for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>The draft minerals plan includes a geographical spread of site specific allocations made up of extensions to existing sites along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>north of the county. All of the allocations have proposed access on to the 'A' road network.</p> <p>According to the mineral operator, the proposed restoration scheme for Flash Farm quarry will use suitable inert material to create a mix of grassland, hedgerows and wetland areas however detailed information regarding the final restoration scheme would only be available through the planning application process. This would include details on restored ground levels and the extent of different habitats. As a result it is not possible to quantify the exact amount of inert fill that would be required at this stage. It is estimated that approximately 1 million tonnes of inert waste is produced annually in Nottinghamshire much of which is recycled. It is therefore incorrect to suggest that the Flash Farm proposal would take 87% of the inert waste produced in Nottinghamshire. More recent disposal figures published by the Environment Agency highlight a significant increase in the amount of inert waste disposed of annually since 2010 which is likely to signify a higher overall volume of inert waste production in line with economic recovery due to increased construction rates.</p> <p>The Barton in Fabis proposal was not included in the draft plan as more suitable sites were identified through the evidence gathering process (including the Sustainability Appraisal) to meet expected demand over the plan period. This is set out in the site selection background paper.</p> <p>The consultation on the Minerals Local Plan Submission Draft document was the formal stage of consultation and focused on the legal compliance and soundness of the draft minerals plan. All those who had commented on previous stages of consultation were informed in advance of the consultation going live.</p> <p>Due to the nature of the consultation, a specific consultation form was available and this was based on the template provided by the Planning Inspectorate. A guidance note was</p>	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>also available to assist members of the public fill out the form correctly. There were a number of different ways representations could be made and included the online consultation system, forms to download and fill in either electronically or by hand as well as paper copies of the forms on request. Paper copies of the Submission Draft document were also available at the main libraries.</p> <p>As the consultation form included important questions including whether individuals wished to appear at the examination in public, any representations that were submitted without filling in the form were returned with a copy of the form. This was to ensure that members of the public were given the opportunity to fully participate in the process.</p> <p>All the representations made during the consultation will be submitted to the inspector as part of the minerals plan submission however there is no guarantee that the inspector will take account of those representations that have not indicated whether they consider the plan to be sound or legally complaint.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29947 - London Rock Supplies Ltd [7882]	Object	<p>We consider that the Plan in its current form is not legally compliant for the reasons set out below:</p> <ol style="list-style-type: none"> <li>1. Methodology to identify location of allocations not adequately addressed. Allocations skewed towards Newark, when majority of demand in Nottingham area.</li> <li>2. Environmental issues specifically impacts from increased transport distances not been adequately addressed.</li> <li>3. Local circumstances not taken in to account in allocation process and implementation of the vision. Cluster of sites towards Newark don't comply with Sustainable Development objectives.</li> <li>4. Definition of sustainable transport not addressed when assessing proposed allocations.</li> <li>5. Cumulative impacts of concentrating all allocations in the Newark area, not assessed.</li> <li>6. Minerals demand not adequately addressed. Closure of quarries within the County over last 10yrs with no replacements in similar locations. Fewer sites detriment to competition.</li> <li>7. Engagement not undertaken, between May 2014 &amp; Jan 2016. NCC didn't indicate the Barton site would not be allocated. Evidence documents should be published as they are completed.</li> <li>8. Inclusion of allocations that have major "burdens" will impact the viability and deliverability. NCC knew that new information was available for Barton site but didn't use it.</li> <li>9. SCI has not been met by NCC who has not consulted adequately. Substantial economic impacts as a result.</li> </ol>	<p>We consider that the Plan should be amended to make it legally compliant by re-assessing various issues in line with the requirements with NPPF and the SCI. The process in formulating the preparation of the plan is flawed and the exclusion of the site at Barton in Fabis at the Submission Draft stage (in January 2016) that was allocated for sand and gravel extraction from the early stages of the Plan (in May 2014) contradicts the aims and objectives of sustainable development that is clearly set out in the NPPF.</p> <p>To achieve the stated objective to supplying minerals into the Nottingham market by 2017, as set out in "delivery schedule" this would require substantial investment in 2015 to prepare a planning application for submission in early 2016 to achieve that 2017 target. This planning and environmental work has taken place, together with extensive consultation and commercial assessment, with the full knowledge of NCC who were actively involved in the consultation process at every stage. No reason has been provided as to why the Barton site was not include in the Submission Draft other than "sustainability appraisal identifies the site as being less suitable than other sites in the Nottingham and Newark areas". It would appear the sustainability score was based on initial work carried out in 2014 (when the site was included in the plan) but does not include any of the more detailed environmental or economic work carried as part of the planning application and EIA work in 2015.</p> <p>At no time was additional information requested by NCC, even though NCC would have known that this information was available due to the substantial amount of liaison between the developer and various departments within NCC. This included the request for a Scoping Opinion from NCC (with a detailed</p>	<p>The Plan includes a geographical spread of site specific allocations made up of extensions to existing quarries along with new greenfield sites to serve the three main markets of Greater Nottingham, Central Nottinghamshire including Newark and the north of the county. Minimising transport distances has been taken into account along with a range of other considerations. However, it is not possible to guarantee that the sand and gravel worked will always supply the closest markets. The availability of suitable minerals elsewhere and the need for companies to supply individual contracts will influence the movement of sand and gravel.</p> <p>The number of quarries within Nottinghamshire has fallen over recent years partly due to sand and gravel resources being worked out, commercial decisions of the minerals industry to work sand and gravel elsewhere and the impact of the recession reducing demand for minerals. All sites put forward by the industry through the call for sites process have been assessed. Those that were considered most suitable in principle and as a combination met the identified demand over the plan period have been included for allocation in the Minerals Local Plan.</p> <p>Wherever possible additional information supplied by operators was taken into account when assessing the proposed schemes. However, given the plan preparation deadlines it was not always possible to take account of additional information. In the case of Barton in Fabis, additional information supplied was included in an updated version of the sustainability appraisal however further information submitted was too late to be considered through the plan preparation process.</p> <p>Consultation on the minerals local plan was undertaken in line with the Statement of Community Involvement specifically through the main consultation documents (Issues and Options, Preferred Approach and Submission draft consultation documents). If additional information was required consultation was</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			<p>response) and meetings with local bodies and the parish council. By using the available information from the preparation of the EIA, the Sustainability Assessment scores could have been modified, even though the Barton site was already allocated as a "preferred site" in the emerging plan.</p> <p>To make the plan legally compliant we would recommend the following:</p> <ol style="list-style-type: none"> <li>1. Re-evaluation of the Evidence Gathering, to include an assessment of the spatial impacts of the proposed site locations being skewed towards the eastern part of the County in relation to the main market areas in Nottingham.</li> </ol> <p>The Strategic Transport Assessment needs to be re-evaluated as part of the "sustainable transport" issues as stated in the NPPF.</p> <p>The evidence gathering also needs to show how specific market demand can be met in an economic and sustainable way and that opportunities for reducing transport miles to comply with the objectives of sustainable transport can be achieved. The original inclusion of the site at Barton in Fabis would ensure that the major proposals for house building and construction in the Nottingham market could be supplied in the most environmentally acceptable way, with minimum travel distances, reduced market prices and lower congestion to benefit the wider economy.</p> <ol style="list-style-type: none"> <li>2. The deliverability of sites needs to be re-assessed to comply with the requirements of the NPPF, which should also include the viability of sites and where the market for the minerals produced will be located. The specific allocation at Shelford does not have a "normal cost of development" due to the scale of obligations and policy burdens applied to the site. The mineral allocations should be "adequately assessed and located in the correct places to supply a willing market at an</li> </ol>	<p>undertaken with the relevant bodies. There is no requirement to inform individual mineral operators if specific sites were being considered for allocation, as these were identified at the relevant consultation stage.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			<p>economic price, in compliance with the Sustainable Development Objectives", as set out in the NPPF.</p> <p>3. The consultation process that is encouraged throughout the NPPF to ensure that local communities, together with local business and other stakeholders can prepare applications to satisfy both market need for the minerals (in the timescale required) that also addresses the environmental concerns of local residents and statutory bodies. This obligation and requirement has been met by the proposed developer of the Barton site, within the requirements of the emerging MLP between 2014-2016.</p> <p>The complete lack of any contact from the NCC policy team to advise that the Barton site may not come forward in the Submission Draft (even though a planning application was known to be in the process of preparation) or that more information may be required to address the "sustainability score" is considered inconsistent and contravenes the stated aims of the NPPF and the County's own policies.</p> <p>The Plan as it currently stands is therefore not considered legally compliant.</p>		

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29753 - Brett Aggregates Limited [69]	Object	<p>The draft Minerals Local Plan (the Plan) is predicated on providing future provision through extending existing sites where possible however there are a number of problems associated with solely relying on extensions:</p> <p>* Firstly, as Minerals Plans come to the end of their lives as is the case in Nottinghamshire with the current adopted plan some sites will be worked out and there may not be any suitable extensions possible. Consequently there may not be enough existing sites where suitable extensions will provide a geographically sustainable distribution of mineral production for the future. The latest draft of the Plan has included the Shelford site which helps to address the geographic balance of sites.</p> <p>* Secondly is the issue of when mineral will be worked. Where extensions are allocated these are likely to be worked sequentially. Consequently where existing sites prior to the adoption of a new plan are small in number the allocation of extensions will result in material being worked from the allocations towards the end and even beyond the end of the plan period.</p> <p>In light of this there is a need for new sites to be allocated in order that supply of minerals is steady and adequate through the plan period.</p>	<p>Policy SP2 - Minerals Provision</p> <p>a)....</p> <p>b) Give priority to the extension of existing sites, where economically, socially and environmentally acceptable and in order to ensure a sustainable geographic distribution of sites across the County.</p> <p>Consequently paragraph 3.10 should be amended as follows:-</p> <p>3.10. .... development are considered in all cases. It is also the case that overall distribution of sites needs to be taken into account and particularly the depletion of reserves of sand and gravel in the south of the County. All new proposals.....</p>	<p>Objection not accepted. The Plan sets out that extensions are preferred over new sites as they can be more sustainable as mineral reserves are maximised and environmental impacts can be less than setting up new greenfield sites. However the Plan also allocates new greenfield sites in order to meet expected demand over the Plan period. Therefore the combination of extensions to existing sites and new greenfield sites will provide a steady and adequate supply over the Plan period.</p>	
29703 - Hanson Aggregates North (Mr Ben Ayres) [1021]	Support	<p>Hanson Quarry Products Europe Limited supports the following elements of the Minerals Local Plan:</p> <ul style="list-style-type: none"> <li>- Policy MP2, parts 1.b and 2.2</li> <li>- Site allocations MP2m and MP2o</li> <li>- Policies Map Insets 5 and 13</li> </ul>	n/a	Support noted	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 4: Minerals Provision Policies

MP2: Sand and gravel provision

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29616 - Diane Harrison [3321] 29625 - Barton in Fabis Parish Council (Mr Bev Angell) [891] 29707 - Andrew Harrison [7843] 29708 - Charlotte Harrison [3322] 29718 - Bryn Baxendale [3993] 29719 - Dr Liz Mossop [3038] 29864 - Robert Fletcher [2990] 29886 - Alisan Yesil [2994] 29887 - Edna Harrison [7859] 29888 - Beryl Edis [7860] 29889 - Mrs Alison Harrison [4011] 29890 - Jonathan Harrison [3068] 29891 - Yasmin Holmes [3063] 29892 - Custas Michaelides [7862] 29893 - Clifford William Harrison [4251] 29894 - Mr Martin Brandon-Bravo [2993] 29895 - Mr Christoipher Bowerman [2997] 29896 - Mr A Towers [3001] 29897 - Arthur Howick [7863] 29898 - June Mary Howick [7864] 29899 - Heather Harris [7865] 29900 - Lee Harris [7866] 29901 - Joy Allen [7867]	Support	Fully SUPPORT Submission Draft of Minerals Local Plan in respect of EXCLUSION of site at Barton in Fabis as the overall environmental impacts are considered more severe than other sites as set out in the Sustainability Appraisal which accompanies the Local Plan.		Support noted	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 4: Minerals Provision Policies

MP2: Sand and gravel provision

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29902 - Glen Harris [3044]					
29903 - Mrs Jane Batchford [3045]					
29904 - Mrs Bev Sketchley [3476]					
29905 - Mr E Julian Coles [2981]					
29906 - Mrs saniye yesil [7811]					
29907 - Steven Weightman [7868]					
29908 - Gail Weightman [7869]					
29909 - Olwen Wright [7870]					
29910 - Dorothy Pearson [7871]					
29911 - Eva Riddell [7872]					
29912 - Nina Beecroft [7873]					
29913 - Caroline Coles [3895]					
29914 - Mehmet Erdem Yesil [7874]					
29915 - Dileksu Yesil [7875]					
29916 - John Kawecki [7876]					
29917 - Tony Austin [7877]					
29918 - Carol Pierrepont [3729]					
29919 - Neil Pollock [7878]					
29920 - Mrs Angela Plowright [3160]					
<hr/>					
<i>MP2c Scrooby North</i>					
29245 - Rotherham Sand and Gravel Ltd [496]	Support	The Rotherham Sand and Gravel Company Limited supports the allocation of MP2C Scrooby North		Support noted	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2d Scrooby South</i>					
29246 - Rotherham Sand and Gravel Ltd [496]	Support	The Rotherham Sand and Gravel Company Limited supports the allocation of MP2d Scrooby South		Support noted	
<i>MP2f Besthorpe South</i>					
30015 - Geoff Sawle [2783]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The proposed Besthorpe south allocation lies immediately adjacent to our property. We have major concerns with the proximity/closeness to our home due to the impact this will have on my wife's current health problems. Over the years since her operation she has constantly been troubled by chest/ lung infections which annually appear to be worse. To say we are both worried/concerned is an understatement, and even more worried / concerned re the proposed workings. The impact the dust pollution could have on my wife's health is unthinkable.</p>		<p>Objection not accepted. The site allocations contained in the minerals plan are in principle suitable for future minerals development. As a result the allocations shows the extent of the ownership of the mineral rights rather than the area to be worked. The extraction area would be smaller to provide adequate stand offs and screening from sensitive receptors such as residential properties.</p> <p>Detailed guidance on noise and dust is set out in the National Planning Practice Guidance. Its overarching aim is to ensure that unavoidable noise and dust emissions are controlled, mitigated or removed at source. This approach is reflected in Policy DM1: 'Protecting Local Amenity' of the Preferred Approach document.</p> <p>Any planning application for a new quarry proposal would have to include a detailed noise and dust assessment which would include measures to limit dust and noise at nearby sensitive locations.</p>	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2m Barnby Moor</i>					
29678 - Joyce Doyle [2736]	Object	<p>It is important that the criteria used in choosing sites is based purely on the evidence of the Sustainability Appraisal score, than purely on the proximity to how close the site is from the market it serves. As the aim of the Mineral Local Plan specifically is to meet the mineral needs of the County, then the Sustainability Appraisal reflected in its score should be the first priority. The sites in the Idle Valley and those in particular on the A638 have got the worse Sustainability Appraisal scores of all the sites submitted by the Mineral Local Plan compared to those quarries in the Newark and the Notts area.</p> <p>The sites which have been allocated into the Mineral Local Plan from the Idle Valley area all reflect a negative Sustainability Appraisal score. However there is one site (Sturton-le-Steeple) within the Idle Valley which would if allocated into the Mineral Local Plan sufficiently meet the mineral needs of the County. This site requires less mitigation as it has less adverse consequences than other sites proposed, it's Sustainability Appraisal Score is -8. and has an output of 500,000 tonnes per annum and can produce more than Barnby Moor and Botany Bay combined.</p> <p>Concern regarding the safety issues regarding the increase in HGV traffic this will generate, there will be HGV movements in and out of the proposed quarry site every fifteen minutes so the increase of HGV traffic to the A638 will significantly be increased not only affecting our village but also those adjoining villages north of Barnby Moor and those who reside in Bawtry.</p> <p>We do not believe that the plan should depart from national policy in using high quality best and versatile agricultural land in the use of quarrying.</p>		<p>Objection not accepted. The Sustainability Appraisal is a method of assessing sites against a set list of criteria which can then be used in combination with other factors to identify the suitability of sites. Those factors include the location of the mineral and the ability of the mineral to be worked within the Plan period. Sand and gravel is worked in three areas within Nottinghamshire, one of which is the Idle Valley. The Idle valley supplies the local markets of North Nottinghamshire, Doncaster and South Yorkshire. The allocation process therefore needs to take this into account, as selecting sites Near Newark or near Nottingham would result in increased transport distances and cost as well as greater pollution.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29159 - Ranskill Parish Council (Clerk to the Parish Council) [907]	Object	The Parish Council's comments are of a more general nature and not specific to the Plan and its soundness.	<p>The Parish Council wishes to express its concern and believes that more detailed consideration should be given to:</p> <ul style="list-style-type: none"> <li>- the number of vehicle journeys emanating from the two new quarrying sites at Barnby Moor and Botany Bay.</li> <li>- the additional traffic on the roads that these journeys will generate and the times of day these journeys will occur.</li> <li>- and the need to ensure that lorries are sheeted to avoid debris falling onto roads.</li> </ul>	<p>Objection not accepted. Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. As part of the wider assessment work, a strategic transport assessment and a further addendum was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the proposals. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29130 - KN Lane [2754] 29131 - Derek Kitson Architectural Technologist Ltd (Derek Kitson) [2489]	Object	<p>Two representations questioning whether part of the application have been fully justified, in particular:</p> <p>1. The small slither of land shown blue on the attached plan should be included in the allocation and was proposed previously. This northern boundary of your suggested allocation is a nominal line without clear boundary definition whereas the proposed nominal extension takes the allocation clearly to a hedge and an identifiable boundary.</p> <p>2. The land shown blue on the attached plan should be included (as proposed previously); it would provide a clear and identifiable boundary (unlike the current nominal line).</p> <p>3. The allocation shows extraction to the edge of A6387 between The Woodlands, Fieldside and Woodholme. The hatched green area on the attached plan should not be included due to the impact on these residential properties. The boundary should be reduced to the existing boundary which runs north south and aligns to the back edge of College Farm with the southern extent of the suggested allocation (again, as previously suggested). These dwellings appear not to have been considered in the Environment and Cultural Designations section (they form part of the landscape character). Excavation so close to these properties is inconsistent with paragraph 143, point 6 of the NPPF regarding impacts on human health. The suggested buffer would minimise such impacts and be more consistent with the NPPF.</p> <p>4. A small commercial fishery lies adjacent to the north west extent of the allocation. The impact on this is not considered in the Water and Flooding section. Any water loss could have a seriously detrimental effect on the viability and fish stocks in the existing ponds.</p>	<p>- The northern slither of land that has already been stripped ready for excavation should be included. This would ensure that this part of the allocation was identified and located by a known boundary situation.</p> <p>- The area abutting the A638 between The Woodlands, Fieldside and Woodholme should be withdrawn back to the inline boundary. This would ensure that the proposal did not create unacceptable levels of disturbance during both the quarrying and the restoration operations to these dwellings and would make it more compliant and consistent with policies within the NPPF.</p>	<p>Objection partially accepted. The red line boundary shows the full extent of the land/mineral rights under the control of the minerals operator and this forms the basis of the allocation. However, the proposed extraction area put forward by the operator covers a smaller area of the site which includes stand-offs to the properties along the A638. As part of any planning application for the proposed quarry, detailed assessment work would be required to assess any impact on residential properties close to the proposed quarry. This would inform the final extent of the extraction area as well as the detailed restoration plan. The Barnby Moor Development Brief in Appendix 3 will be amended to include potential impacts on the fishing ponds to the north. If the relevant landowner had wished to put forward additional areas of land for allocation in the emerging plan, discussions with the relevant mineral operator should have been undertaken. Any proposed sites put forward without a mineral operator to work the area, were not considered deliverable.</p>	<p>Amend Site Allocation Development Brief for MP2m Barnby Moor to make reference to the potential impacts on the fishing lakes to the north of the site.</p>

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29923 - Peter Doyle [2788]	Object	<p>Considerable concern regarding the safety issues regarding the increase in HGV traffic generated by the Barnby Moor site in transporting material to Auckley plant.</p> <ul style="list-style-type: none"> <li>- - Avoiding Barnby Moor village is not the only issue; conflict with pig rearing farm/residential properties to north of site</li> <li>- Impact on villages north on A638 (particularly Bawtry which gets very busy and sometimes gridlocked)</li> <li>- Only two routes to Auckley - via Station Road pass school or A638 pass Yorkshire Caravans (horrendous accidents)</li> </ul>	<p>The route to be taken to the Auckley Plant will be required to use the A638. We do not believe this journey can be undertaken without it creating an unacceptable impact on the environment and local amenity. We believe this makes the plan ineffective.</p>	<p>Objection not accepted. Most mineral is transported by road, as this is often the most flexible way of serving a diverse range of markets. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>As part of the wider assessment work, a strategic transport assessment was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the site.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29700 - J Mann MP [792]	Object	<p>My concern is directly in relation to sites MP2m (Barnby Moor) and MP2n (Botany Bay). It is important that the effect of any increase in traffic volume is fully assessed so that the safety and wellbeing of my constituents, particularly those in the rural villages who are closest to the sites, is fully taken into account.</p> <p>The GEART rule 1 guidelines indicate that a 30% increase in HGV movements requires a separate assessment of the impacts. The County Councils Transport Assessment states that there are between 300-500 two way HGV movements on this road per day. My concern is that these two sites are being considered separately, therefore the separate impact of these two sites would represent an increase of less than 30% and thus not needing further assessment under GEART rule 1.</p> <p>However, as the quarries would use the same road (the A638) and are located very close to each other, they should be considered jointly, therefore the overall increase in HGV traffic would be 39.3% (118 HGV movements). According to this calculation, under GEART rule 1, further assessment is required.</p> <p>The GEART rules also suggest that "the average or total daily traffic flows provide insufficient information for any real understanding of the environmental effects, and the analysis needs to be presented for much more specific time periods". (P12, GEART). The Strategic Transport Assessment explains the effect of the traffic flow per day on an averaged out basis and does not detail the timings of the movements. It appears therefore that the GEART rules have not been adhered to a more detailed traffic assessment needs to be undertaken.</p>	Further traffic assessments need to be undertaken according to the GEART rules in order to rectify the two points raised.	<p>Objection not accepted. Most mineral is transported by road, as this is often the most flexible way of serving a diverse range of markets. As part of the wider assessment work for the minerals plan, a county wide strategic transport assessment was commissioned to assess the wider impacts of the increase in HGV movements from proposed allocations. This didn't raise any significant issues related to the Barnby Moor or Botany Bay proposals.</p> <p>As part of any detailed planning application for minerals development, a site specific transport assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>The proposals have been put forward by two different operators and are currently expected to overlap for approximately 5 years. However the dates put forward are only estimates and could change depending on economic demand at the time. As the mineral extracted from the Barnby Moor proposal will be unprocessed, the majority of HGV traffic will travel north to the company's existing processing plant. The Botany Bay proposal is expected to serve a wider market and therefore the HGV traffic is likely to go north and south along the A638. Levels of HGV traffic would be considered as part of the site specific transport assessments.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29614 - Auckley Parish Council (Mrs Marjorie Caygill) [4541]	Object	<p>Members of Auckley Parish Council have concerns that there are no details of vehicular movements and designated routes to the various treatment and distribution plants - particularly whether there will be any movements to the Hanson Plant on Hurst Lane, Auckley.</p> <p>Drivers travelling to the Hanson Plant have to pass two schools, and the road infrastructure is not adequate to cope with current traffic, and additional HGV's will create serious traffic problems in the village.</p>		<p>Objection not accepted. Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. As part of the wider assessment work, a strategic transport assessment and a further addendum was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the proposal. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p>	
29704 - Hanson Aggregates North (Mr Ben Ayres) [1021]	Support	<p>Hanson Quarry Products Europe Limited supports the following elements of the Minerals Local Plan:</p> <ul style="list-style-type: none"> <li>- Policy MP2, parts 1.b and 2.2</li> <li>- Site allocations MP2m and MP2o</li> <li>- Policies Map Insets 5 and 13</li> </ul>	n/a	Support noted	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2n Botany Bay</i>					
29160 - Ranskill Parish Council (Clerk to the Parish Council) [907]	Object	The Parish Council's comments are of a more general nature not specific to the Plan and its soundness.	The Parish Council wishes to express its concern and believes that more detailed consideration should be given to: - the number of vehicle journeys emanating from the two new quarrying sites at Barnby Moor and Botany Bay. - the additional traffic on the roads that these journeys will generate and the times of day these journeys will occur. - and the need to ensure that lorries are sheeted to avoid debris falling onto roads.	Objection not accepted. Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. As part of the wider assessment work, a strategic transport assessment and a further addendum was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the proposals. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29701 - J Mann MP [792]	Object	<p>My concern is directly in relation to sites MP2m (Barnby Moor) and MP2n (Botany Bay). It is important that the effect of any increase in traffic volume is fully assessed so that the safety and wellbeing of my constituents, particularly those in the rural villages who are closest to the sites, is fully taken into account.</p> <p>The GEART rule 1 guidelines indicate that a 30% increase in HGV movements requires a separate assessment of the impacts. The County Councils Transport Assessment states that there are between 300-500 two way HGV movements on this road per day. My concern is that these two sites are being considered separately, therefore the separate impact of these two sites would represent an increase of less than 30% and thus not needing further assessment under GEART rule 1.</p> <p>However, as the quarries would use the same road (the A638) and are located very close to each other, they should be considered jointly, therefore the overall increase in HGV traffic would be 39.3% (118 HGV movements). According to this calculation, under GEART rule 1, further assessment is required.</p> <p>The GEART rules also suggest that "the average or total daily traffic flows provide insufficient information for any real understanding of the environmental effects, and the analysis needs to be presented for much more specific time periods". (P12, GEART). The Strategic Transport Assessment explains the effect of the traffic flow per day on an averaged out basis and does not detail the timings of the movements. It appears therefore that the GEART rules have not been adhered to a more detailed traffic assessment needs to be undertaken.</p>	Further traffic assessments need to be undertaken according to the GEART rules in order to rectify the two points raised.	<p>Objection not accepted. Most mineral is transported by road, as this is often the cheapest and most flexible way of serving a diverse range of markets. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>As part of the wider assessment work, a strategic transport assessment was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the site.</p> <p>The two quarries are currently expected to overlap for 5 years however there is no guarantee that this will happen as the individual companies will make decisions as to when to open the sites. Although there could be some overlap in terms of traffic the Botany Bay site is expected to serve a wider market and therefore the HGV traffic is likely to go north and south along the A638.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
MP2o Coddington					

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29809 - Premji Patel [3754] 29810 - Mrs Sheila Tilley [4507] 29811 - Sharon Patel [4506]	Object	A number of representations made on this policy covered a range of similar issues, as follows: - Impact of additional HGV traffic - Impact from noise and dust - Impact from quarry at weekends - Amenity impacts - Impact of light pollution	Remove the allocation from the Plan	<p>Objection not accepted. The site allocations are those that in principal are suitable for minerals development. As part of the evidence gathering and site selection process, a number of strategic assessments have been completed. It is however worth noting that detailed site specific assessment work would be required as part of any planning application to assess any potential amenity or environmental impacts such as noise, dust and lighting which would inform the final working and restoration of the quarry.</p> <p>Minerals development will inevitably have short term impacts on the existing natural environment, however it is one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets. The overarching aim of the Minerals Local Plan as set out in policy SP2 is biodiversity led restoration. Detailed restoration plans for any quarry proposal would be required at the planning application stage and this is set out in Policy DM11 - 'Restoration, after-use and after care' of the Submission Draft document.</p> <p>Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. A strategic transport assessment and a further addendum (using more recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the site. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>The exact operating details of any quarry</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30029 - Mr P Arkley [3817]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Looking at the plan for the area outlined for the Coddington Quarry (MP2o), there is nothing mentioned regarding what will happen to:</p> <ol style="list-style-type: none"> <li>1. The stream that runs through the proposed site (west to east)</li> <li>2. Two lots of electric power supplies which also run through the site, in both pylon and pole forms (north to south)</li> <li>3. (not shown on plan) the oil pipe line possibly running across the site (north to south)</li> <li>4. (not shown on plan) the gas pipe line running across the site (north to south)</li> </ol> <p>Both 3 and 4 were marked visible as they cross Beckingham Road</p> <p>5. Where will the entrances be to the quarry, and additional roads, to the quarry.</p>	<p>Clarification is definitely required as to what is proposed to be done about addressing these issues. I.e. will some or all of the above mentioned need a re-route plan. If a re-route plan has been submitted what will be the necessary alterations required, also what will be the disruptions and impact caused to the Coddington residents while the work is carried out.</p> <p>If the oil, gas and electrical supplies are to be left as they are, what health and safety plans are being put into place., i.e. oil spillage, gas pipes cracking, and electrical pylons and poles shifting, all due to possible land movements. That's if the quarry gets the go ahead.</p>	<p>would be finalised at the planning application stage.</p> <p>Objection not accepted. The site allocations are those that in principal are suitable for minerals development. As part of a planning application, detailed plans would be submitted regarding the working of the site, standoffs from any existing infrastructure (pipe lines, overhead electricity cable) and the location of the site access.</p>	
29825 - Mrs Jackie Armstrong [2881]	Object	<p>The AMES (Areas of Multiple Environmental Sensitivity) analysis has used a 1989 inappropriate boundary to evaluate allocation Coddington MP2o, which has artificially stripped it of all its village context and heritage associations (although cropmarks, finds and information indicate a high potential for non-designated archaeology. This has falsely devalued it and this should be recognized and corrected.</p> <p>If the site is worked, restoration is likely to produce very little land-surface, with little likelihood of recovering either the high quality agricultural land or opportunity for heritage mitigations.</p>	<p>NCC should acknowledge that The AMES (Areas of Multiple Environmental Sensitivity) analysis has used a 1989 inappropriate boundary to evaluate allocation Coddington MP2o, which has artificially stripped it of all its village context and heritage associations. This has falsely devalued the site, whose rating should be corrected along with all subsequent scores resulting from it.</p>	<p>Objection not accepted. The County Council's Landscape and Reclamation Team was commissioned to complete an Areas of Multiple Environment Sensitivity report in order to identify those areas of landscape that may be considered to be of highest value with respect to landscape character, biodiversity and the historic environment. The outcomes of the study would be used to inform development of detailed planning applications rather than in selecting site specific allocations.</p> <p>As part of a planning application for the site, a range of detailed assessment documents would have to be completed. The outcomes of these assessment documents would influence the working and restoration of the quarry. It is therefore not considered that the area around Coddington needs to be amended.</p>	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29663 - Dr Paul Angelides [7833] 29665 - Dr Sree Thamburaja [7834] 29667 - Mark Stephens [7835] 29669 - Steve Grundy [7836] 29671 - Paul Collins [7837] 29673 - Sharon Collins [7838] 29675 - Annette Dankowski [7839]	Object	A number of representations made on this policy covered a range of similar issues, as follows: - Impact on health of residents - Impact of additional HGV traffic - Adverse ecological and heritage impacts - Not been appropriately justified why alternative sites have been discounted	Remove the allocation from the Plan	<p>Objection not accepted. The site allocations are those that in principal are suitable for minerals development. As part of the evidence gathering and site selection process, a number of strategic assessments have been completed. It is worth noting that detailed site specific assessment work would be required as part of any planning application to assess any potential amenity or environmental impacts such as noise, dust as well as ecological and heritage impacts. The outcome of these assessments would inform the final working and restoration of the quarry. Minerals development will inevitably have short term impacts on the existing natural environment, however it is one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets. The overarching aim of the Minerals Local Plan as set out in policy SP2 is biodiversity led restoration. Detailed restoration plans for any quarry proposal would be required at the planning application stage and this is set out in Policy DM11 - 'Restoration, after-use and after care' of the Submission Draft document.</p> <p>Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. A strategic transport assessment and a further addendum (using more recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the site. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29110 - Mr Ian Clarke [7646] 29141 - Newark Town Council (Mr Alan Mellor) [1573] 29200 - Mr Graham Collyer [2879] 29242 - Frances Overbury [3037] 29260 - Sarah Webb [3553] 29373 - Wg Cdr Mike Douglass [7668] 29414 - Mr. Christopher Parrett [3469] 29473 - Mrs Jackie Armstrong [2881] 29483 - Mrs Celia Smallwood [2893] 29497 - Mrs Celia Smallwood [2893] 29509 - Mr Kevin Sims [7725] 29613 - Jamie Primett [7832] 29617 - Michael Bassey [3323] 29716 - Alan Phillips [3342] 29717 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719] 29771 - Coddington Parish Council (Linda Cox) [7846] 29805 - Barnby in the Willows Parish Council (Mrs Yvette Wellard) [3548] 29819 - Stephen Mulliss [7849] 29861 - Marilyn A Harrison [3490] 29862 - John Coddington [7855] 29863 - Pamela Coddington [3872]	Object	A number of representations made on this policy covered a range of similar issues, as follows: - Impact of additional HGV traffic - Proximity to properties - Inappropriate size and scale - Impact from noise and dust - Impact on wildlife and Stapleford Woods - Visual impact - Impact on water table - Better sites available that are closer to the markets served - High risk of flooding - Impact of archaeology - Loss of agricultural land - Conservation area will be affected - Impact on house prices	A range of similar suggested changes were put forward, as follows: - Further site specific information should be included in the Plan regarding the possible rerouting of features such as the stream and the buried infrastructure crossing the site. - An access road should be built from the Dixon Mastercare roundabout to the quarry to limit congestion on the A17. - The site should be removed from the Plan and more sustainable locations found further from residential areas.	Objection not accepted. Detailed guidance on noise and dust is set out in the National Planning Practice Guidance. Its overarching aim is to ensure that unavoidable noise and dust emissions are controlled, mitigated or removed at source. This approach is reflected in Policy DM1: 'Protecting Local Amenity' of the Submission Draft document.  Any planning application for a new quarry proposal would have to include a detailed noise and dust assessment which would include measures to limit dust and noise at nearby sensitive locations.  Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. As part of the wider assessment work, a strategic transport assessment and a further addendum (using more recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the site. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.  Minerals development will inevitably have short term impacts on the existing natural environment, however it is one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets. The overarching aim of the Minerals Local Plan as set out in policy SP2 is biodiversity led restoration. Detailed restoration plans for any quarry proposal would be required at the planning application stage and this is set out in Policy DM11 - 'Restoration, after-use and after care' of the Submission	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29865 - Faith Humphries [7857] 29921 - Kathy White [7879] 29943 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719] 29944 - Mrs Susan Bell [7705] 29957 - Mrs Doreen Wesson [7676] 29958 - Gerald Burgess [7883] 29961 - Mr Robert Jones [7680] 29962 - Miss Hazel Knight [7687] 29970 - Michael Bassey [3323] 29971 - Faith Humphries [7857] 29972 - Mrs Susan Bell [7705] 29973 - Paul Jeal [7704] 29976 - Jill Grummitt [7887] 29977 - BG Wright [3489] 29978 - DJ Hobbs [7888] 29979 - Alan M Waddington [7889] 29981 - Mrs G Worsdall [7891] 29983 - Mr John Evans [7893] 29984 - John Joseph Wilson [7894] 29985 - Anne Adams [3626] 29986 - Mr Michael Bates [7706] 29987 - Christina Bryan [7895] 29988 - TS Burch [7896] 29989 - PS Davies				<p>Draft document.</p> <p>Whilst it is important to protect our highest quality agricultural land from being lost to other development, minerals such as sand and gravel can only be worked where they are found and provide the basis for construction and manufacturing. The restoration of quarries can include a return back to agricultural land however this is very much dependent on the availability of overburden or suitable fill at individual sites to return the site back to previous ground levels.</p> <p>National guidance states that sand and gravel development is 'water compatible' and allowed to take place in areas of flood risk. At times of flood, active sand and gravel sites are allowed to flood maintaining the role of the natural flood plain before being pumped out once the flood water has subsided. Licences for the discharge of water into water courses would be required from the Environment Agency as part of a detailed planning application.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 4: Minerals Provision Policies

MP2: Sand and gravel provision, MP2o Coddington

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
[2480]					
29992 - Mrs Greta Johnson [2724]					
29994 - Mark Mackin [7898]					
29996 - Patrick Roche [7899]					
29998 - Mr Toogood [7901]					
29999 - Stig Wallinder [3814]					
30000 - Kathy White [7879]					
30001 - Frances Overbury [3037]					
30002 - Mrs Celia Derbyshire [7709]					
30003 - Michael Overbury [3870]					
30004 - Mr SA Hambidge [7902]					
30006 - Miss Lysette Spit [7731]					
30017 - Newark Air Museum (Mr Howard Heeley) [3485]					
30028 - Mr Alan Milne [7761]					
30031 - John W Marshall [3877]					
30032 - Sally Briggs-Price [7908]					

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30086 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>As highlighted in our previous responses to the proposed allocation, NWT has concerns about allocations that would either directly or indirectly damage protected sites or species. To this end, all statutory and non-statutory protected sites should be removed from within the proposed allocation boundary, and a buffer zone should be left between the proposed quarry and any LWS in close proximity. Beyond this, it is not possible at an allocation stage to ascertain what indirect impacts may occur on habitats or species, as this requires detailed EIA. Throughout the various stages of the allocation consultation process for the last 3 years, NWT has sought to ensure that LWS were excluded from the draft allocations, and thus we strongly welcome the exclusion of LWS from virtually all the new allocations.</p> <p>The allocation boundary still includes the Moor Brats Drain LWS and also extends up to the boundary of the Langford Moor LWS. NWT therefore object to this allocation.</p>		<p>Objection partially accepted. The red line boundary shows the full extent of the allocation rather than the extent of the minerals working. Moor Brats drain LWS is included within the allocation area and Langford Moor LWS also bounds the allocation to the north east. As part of any planning application for the proposed quarry, detailed assessment work would be required to assess any impacts on the LWS. This would inform the final extent of the extraction area as well as the detailed restoration plan. The Coddington development brief in Appendix 3 highlights the potential impacts on Moor Brats Drain LWS. It is noted that Langford Moor LWS is not specifically noted in the development brief however this will be amended.</p>	<p>Amend Site Allocation Development Brief for MP20 Coddington to include reference to Langford Moor LWS in the list of other LWSs.</p>



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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29690 - Tarmac Ltd [580]	Object	<p>The Council's overall SA score for Coddington (i.e. taking account of operational and long-term impacts) is -9. By contrast, the overall score for North Road is -6. As such, the North Road site has been assessed as a more sustainable option than Coddington according to the Council's own SA scores. Tarmac's recommended SA scores indicate an even greater discrepancy between the sustainability of the two sites.</p> <p>The MLP indicates that the North Road site has not been allocated due to deliverability concerns (rather than concerns regarding the operational/ long-term sustainability of the site). As set out earlier in this statement it is considered that, in this respect, the Council's site selection process is unfounded and unjustified.</p> <p>In light of the above, Tarmac consider that the North Road site should be allocated ahead of the Coddington site. The Council's current approach (i.e. the proposed allocation of Coddington ahead of North Road Quarry) is fundamentally flawed as it is not based on sound evidence</p>		<p>Objection not accepted. The North Road quarry has been assessed through the Sustainability Appraisal and does 'score' higher than some of the other allocated sites, however the SA is not the only consideration when assessing potential allocations. The North Road quarry (formally Home Farm) is not considered deliverable within the plan period given the company's existing permitted quarries at Langford Lowfields and Besthorpe, permitted but unworked/mothballed quarries at Sturton Le Steeple and Girton as well as the site allocations included in the emerging minerals plan.</p> <p>A variety of start dates for the proposed quarry have also been supplied by Tarmac at different stages of the plan making process.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29750 - Mrs Jackie Armstrong [2881]	Object	<p>Site restoration for Coddington should be historically appropriate to the location, and not create landscape inappropriate for the area. The Parish has less than 0.17% open water so a mainly water restoration of 126Ha is not compatible with the Landscape Character Policy PZ recommendation 'conserve and create', nor with Policy DM12, Paragraph 7.</p> <p>As a high proportion of the site is Grade 2 and 3a, Best and Most Versatile Land, a significant area of land surface should be restored as agricultural land. A restoration based solely on biodiversity and water is not compatible with DM12, Paragraphs 6 and 7.</p>	<p>The importance of best and most versatile land (BMVL) must be considered when evaluating the impacts of working any allocations with significant proportions of BMVL, in the selection of sites, and in determining the most desirable and optimal restoration schemes for allocated sites.</p> <p>Remove from the MLP sites with high proportions of best and most versatile land, including Coddington MP2o, which cannot reasonably expect to be restored to a similar high proportion of agriculture. Site selection should give priority to include sites in the MLP where it is practicable to restore BMVL.</p> <p>Remove Coddington MP2o site allocation from the MLP, as it is unsuitable for this endangered Notts Sandlands landscape.</p>	<p>Objection not accepted. At present the proposed restoration of the site is likely to be a mix of wetland and agriculture. Given the lack of fill it is not always possible to return worked out quarries totally back to agriculture.</p> <p>Minerals sites are also a key opportunity to increase biodiversity. As part of a detailed planning application a restoration scheme would be submitted which would take account of detailed assessment work such as the agricultural land quality and the extent of the final area to be worked.</p>	

### MP2p Flash Farm

29874 - Councillor Sue Saddington [1195]	Object	See Rep No. 29702 (Policy MP2)	See Rep No. 29702 (Policy MP2)	See response to Rep No. 29702 (Policy MP2)
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# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29116 - Fiskerton Cum Morton Parish Council (Mr R J Aston) [759] 29132 - Mr Bob Galley [7686] 29136 - Gill Rowles [7692] 29142 - Newark Town Council (Mr Alan Mellor) [1573] 29166 - Helen Rushby [7730] 29188 - Mrs Linda White [7642] 29243 - Mr Martin Smith [7727] 29251 - Mr David Walton [7745] 29277 - Dr Philip Barron [7749] 29313 - Mrs amanda armstrong [7755] 29359 - Rachel Bradey [3623] 29397 - John Allan [3617] 29422 - Tony Warwick [3331] 29438 - Mr Geoffrey Smith [3533] 29453 - Dr Valerie Willcocks [7774] 29492 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29549 - Mr John Burbidge [7826] 29569 - Miss Frances Snell [7759] 29583 - Mr Ian Bradey [7824] 29585 - Dr Judith Mills [7829] 29611 - Janine Keel [3613] 29619 - Caunton Parish Council (C	Object	A number of representations made on this policy covered a range of similar issues, as follows: - Impact of dewatering on surrounding land - Increase in HGV traffic - Impact on Kelham Bridge - Impact on the footpath running across the site - Impact on wildlife - Noise and air pollution - A bypass should be built to avoid Kelham Bridge - High levels of traffic already using the A617 - Existence of more suitable sand and gravel sites elsewhere - No clear need for the site. Overall demand for sand and gravel is lower than stated - Risk of additional flooding - Recycled aggregate data from the Waste Local Plan should be included	A range of similar suggested changes were put forward, as follows: - The Plan should take account of 2015 traffic data and the most recent aggregates sales data - The Plan should consider the full life cycle impact on local residents - Provide a bypass of the A617 through Kirklington, Hockerton and Kelham, together with a new bridge over the River Trent at Kelham - Remove the allocation from the Plan	Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).  The data contained in the County Council's 2013 Local Aggregates Assessment was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.  It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.  Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates that the 70% figure for construction and demolition waste is currently being met or exceeded through on site sorting / recycling and the lack of demand for additional facilities for construction and demolition waste.  Recycled aggregates provide a valuable	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
Millward) [2315] 29714 - Norwell Parish Council (Mrs C Millward) [810] 29737 - Mr Adrian Hatton [2828] 29749 - Hockerton Parish Meeting (Mr Andrew Hall) [883] 29751 - Lindy Wilson [3087] 29752 - Norma Burke [3766] 29768 - Craig Black [3612] 29784 - Robert Parkes [3326] 29808 - Ralph Davies [3075] 29824 - Liz Laine [3303] 29827 - Kelham Hall Limited (Jonathan Pass) [7854] 29866 - John Redhead [7858] 29867 - Mr Nicholas Pearson [7700] 29925 - Margaret Anne Miller [7880] 29926 - Margaret Anne Miller [7880] 29927 - Margaret Anne Miller [7880] 29946 - John Gillespie [7881] 29956 - Mr Tim Barbary [7670] 29959 - Swe Khin- Htun [7884] 29960 - Mr. & Mrs. Douglas &Maureen Townsend [7681] 29963 - Jane Holt [7885] 29964 - Nicola Gilroy [3767] 29965 - Rose Hayes [7886]				<p>source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and the Minerals Products Association that further significant growth is likely to be limited due to the high levels that are already being recycled along with changing construction methods which are likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p> <p>Detailed guidance on noise and dust is set out in the National Planning Practice Guidance. Its overarching aim is to ensure that unavoidable noise and dust emissions are controlled, mitigated or removed at source. This approach is reflected in Policy DM1: 'Protecting Local Amenity' of the Submission Draft document.</p> <p>Any planning application for a new quarry proposal would have to include a detailed noise and dust assessment which would include measures to limit dust and noise at nearby sensitive locations.</p> <p>Most mineral is transported by road, as this is the most flexible way of serving a diverse range of markets. As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p>	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29966 - Mrs Kate Kilby [7708] 29969 - David Moodie [7892] 29980 - Eleanor Brettle [7890] 29990 - Madeline Gill [7897] 29993 - Mrs Greta Johnson [2724] 29995 - John Redhead [7858] 29997 - LW Rodgers [7900] 30005 - Mr Simon Pennelegion [7717] 30016 - Upton Parish Council [618] 30018 - Mrs Joanna Wilson [3674] 30019 - Penny Green [7904] 30020 - David Wilson [7905] 30021 - Mrs Susan Bosworth [7795] 30025 - Kate Turner [7906] 30026 - Di Collington [7907] 30027 - Mr Neil Wright [3026] 30030 - John Peterson [7673]				<p>As part of the wider assessment work, a strategic transport assessment and a further addendum (containing the most recent traffic and accident data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the site.</p> <p>Minerals development will inevitably have short term impacts on the existing natural environment, however it is one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets. The overarching aim of the Minerals Local Plan as set out in policy SP2 is biodiversity led restoration. Detailed restoration plans for any quarry proposal would be required at the planning application stage and this is set out in Policy DM11 - 'Restoration, after-use and after care' of the Submission Draft document.</p> <p>Whilst it is important to protect our highest quality agricultural land from being lost to other development, minerals such as sand and gravel can only be worked where they are found and provide the basis for construction and manufacturing. The restoration of quarries can include a return back to agricultural land however this is very much dependent on the availability of overburden or suitable fill at individual sites to return the site back to previous ground levels.</p> <p>National guidance states that sand and gravel development is 'water compatible' and allowed to take place in areas of flood risk. At times of flood, active sand and gravel sites are allowed to flood maintaining the role of the natural flood plain before being pumped out once the flood water has subsided. Licences for the discharge of water into water courses would be required from the Environment Agency as part of a detailed planning application.</p> <p>The vegetation along the A617 was cut back as part of standard highway maintenance and</p>	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29691 - Tarmac Ltd [580]	Object	<p>The Council's overall SA score for Flash Farm (i.e. taking account of operational and long-term impacts) is -9. By contrast, the overall score for North Road is -6. As such, the North Road site has been assessed as a more sustainable option than Flash Farm according to the Council's own SA scores. Tarmac's recommended SA scores indicate an even greater discrepancy between the sustainability of the two sites.</p> <p>The MLP indicates that the North Road site has not been allocated due to deliverability concerns (rather than concerns regarding the operational/ long-term sustainability of the site). As set out earlier in this statement it is considered that, in this respect, the Council's site selection process is unfounded and unjustified.</p> <p>In light of the above, we consider that the North Road site should be allocated ahead of the Flash Farm site. The Council's current approach (i.e. the proposed allocation of Flash Farm ahead of North Road Quarry) is fundamentally flawed as it is not based on sound evidence.</p>		<p>was not associated with the proposed Flash Farm allocation contained in the minerals plan.</p> <p>Objection not accepted. All sites were scored consistently using the framework set out in the Sustainability Appraisal Report, which included a set of decision making criteria for each objective. In terms of the range of factors which determined scores against each objective, wherever possible information that was measurable or could be categorised was used. Where this was not possible, the approach taken was to consider the relevant information available on the range of variables across all the sites assessed and apply the most consistent means of scoring possible. The appraisal was based on the information available at the time, however at the planning application stage a wide range of detailed assessments would be carried out to ensure that the proposal is considered acceptable. The Sustainability Appraisal document forms part of the evidence gathering and site selection process, however other considerations such as deliverability, location and contribution of mineral during the Plan period are taken into account when identifying a suitable mix of sites to meet demand over the Plan period.</p>	
29884 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29859 - Mick George (Mr John Gough) [2752]	Support	Mick George supports the inclusion of the Flash Farm proposal as an allocation in the Submission Draft document.	<p>We do consider that the plan provision for sand and gravel should be maintained at an appropriate level and that the present level may not make adequate provision for the level of demand within the County. Taking account of new development within Nottinghamshire (and to a lesser degree South Yorkshire and Derbyshire), the proposed level of mineral provision within the Plan should not be reduced and possibly increased to allow for future growth which is currently lacking.</p>	<p>Support noted. With reference to the concerns regarding under provision, national guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. The data used in the LAA is collated by the East Midlands Aggregate Working Party based on sales data supplied by the minerals industry.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, and used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves. Currently the average 3 year sales figures remain significantly below the average 10 year sales average.</p> <p>Depending on future local economic conditions, housing completions are expected to increase over the life of the Plan period, however there is some uncertainty regarding the potential achievement of the planned housing completion rates. The average sales data contained in the LAA takes account of a period of higher house building as well as the period of recession.</p> <p>It is also important to note that whilst house building uses a significant amount of aggregates, the Minerals Product Association estimate that new house building only makes up approximately 20% of overall aggregate use and therefore is only part of the equation when</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>considering future demand.</p> <p>The Rotherham and Doncaster LAA states that there are limited sand and gravel resources remaining in the area and that current permitted reserves may not be adequate to cover the proposed plan period.</p> <p>Given that Nottinghamshire has traditionally supplied sand and gravel to these areas any future demand is unlikely to be completely new demand that Nottinghamshire would have to meet on top of the existing supply. In the short to medium term, output from the Idle Valley/north Nottinghamshire will be maintained at current levels from existing permitted reserves and site allocations proposed in the draft minerals plan.</p> <p>A permitted but unused quarry at Sturton Le Steeple with an estimated output of 500,000 tonnes per annum has yet to be worked by the operator presumably due to lack of demand. If opened this quarry would provide a valuable long term source of sand and gravel to supply North Nottinghamshire and the Rotherham and Doncaster markets.</p> <p>Given the level of uncertainty regarding demand towards the end of the Plan period it is not considered necessary to identify a 7 year landbank beyond the Plan period as this would require a significant level of extra provision that may not be required. Annual monitoring will be undertaken through the LAA and the annual monitoring report to monitor the effectiveness of the Local Plan. If it becomes clear that further reserves are required, then an early review of the relevant part of the Plan would be necessary.</p>	



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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29772 - . Latham Family [7847]	Support	<p>The landowners at Flash Farm continue to support the inclusion of the site in the Nottinghamshire Minerals Local Plan review. The site is considered wholly suitable for future extraction as it can be worked in an environmentally sustainable manner and without significant environmental impact. The site has the benefit of proven sand and gravel reserves of a high quality and will make a valuable contribution to the needs of the County in the provision of a high quality construction aggregate during the Plan Period.</p> <p>Further the site is being promoted by an independent mineral operator with considerable experience in the processing of sand and gravel. Additionally, the operator has only one Site/within the County of Nottinghamshire and this will ensure that the site is brought on stream during the relevant period and will not be "land banked" which does often occur with larger mineral operators who have more than one operational unit within one area of the region/country.</p>		Support noted	

### MP2r Shelford

29109 - Brian Waterfield [5656]	Object	<p>I cannot believe that mineral extraction is justified so close to dwellings in Shelford if the boundary of the area designated on the map is correct.</p> <p>This will surely destroy Shelford for its residents.</p>	<p>The boundary of the designated area should be altered from that shown on the map to allow much greater distance from the neighboring residential &amp; farming properties on the grounds of noise &amp; visual impact.</p>	<p>Objection not accepted. Site allocations contained in the Minerals Local Plan are in principle suitable for future minerals development. The red line boundary is the extent of the ownership of the land/ rights to work the mineral. The extraction area would be smaller and include standoffs from sensitive locations such as residential properties. As part of a planning application, detailed assessment work covering a wide range of amenity and environmental issues such as noise and dust would be undertaken. The outcome of this assessment work would inform the extent of the final working area and the restoration proposals.</p>	
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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29293 - Mr Stephen Marsh [7750]	Object	The Strategic Traffic Assessment used to determine the traffic impacts of the various sites considered for inclusion in the Submission Draft version of the Nottinghamshire Minerals Local Plan is not based on robust credible evidence to support the choices that have been made in the Plan. My more detailed representation is being sent separately as it is over 100 words and was rejected by your system.	It is difficult to suggest what changes should be made to the Plan without credible evidence on which to suggest those changes. What is needed is a much more robust traffic assessment for the Shelford West site and any other similar sites based on credible evidence. The combined effect of the quarry traffic and traffic from Seven Trent's Stoke Bardolph Energy Crop Anaerobic Digestion Plant needs to be assessed, again on clearly credible evidence. Consultees should then be provided with the conclusions of that traffic assessment so they might have the opportunity to review the conclusions they previously drew on fallacious information so the inspector at the examination of the plan can have confidence in the consultation responses. The council and/or the inspector should then review the previous decision taken with respect to the Shelford West site and consider whether it should remain in the Plan or be replaced with another less damaging alternative. For this to be robust, the practicality and willingness of the developer of the Shelford West site to undertake mitigating measures needs to be determined to reduce as necessary the impact of the site on Burton Joyce and Bulcote. These measures might include some or all of the following: (i) Ascertaining with the developer his willingness to enter into a credible and legally binding traffic routing agreement that limits the traffic that would pass through the villages. (ii) Limiting the amount of sand and gravel that can be taken by road and ensuring that the prospect of transporting material by barge turns into a reality and is not used as a "Trojan Horse" simply to get the site allocated in the Plan. (iii) Seeking a commuted sum or similar undertaking to ensure that the road surface through Burton Joyce does not	Not accepted. As part of the wider assessment work, a strategic transport assessment and a further addendum (containing the most recent traffic and accident data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the shelford proposal. As part of any planning application for minerals development, a site specific transport assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements and dilapidation surveys at certain section of road could be put in place if this is relevant to the application.	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
			deteriorate as it has done so often in the past, particularly at the traffic islands where the damaging effect of heavy axle loads is intensified due to the concentration of the damaging forces on such a narrow width. (iv) Ascertaining with the developer his willingness to enter into a planning agreement which might help to alleviate the impact of the HGVs through Burton Joyce, including the provision of noise/visual screens where residents' rear gardens lie just feet from where the quarry lorries will pass.		

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29630 - Shelford Parish Council [7840] 29632 - Shelford Parish Council [7840] 29633 - Shelford Parish Council [7840] 29636 - Shelford Parish Council [7840] 29638 - Shelford Parish Council [7840] 29640 - Shelford Parish Council [7840] 29642 - Shelford Parish Council [7840] 29644 - Shelford Parish Council [7840] 29647 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29649 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29651 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29654 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29656 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29658 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29660 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392] 29662 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	Shelford Against Gravel Extraction and Shelford Parish Council submitted representations covering: - Sustainability Appraisal is subjective and inappropriate - Cumulative impact of Shelford East not taken into account - Transport issues including the impact of HGV traffic on road safety, pollution, congestion on the A6097 and damage to the road - Impact on the historic environment - Impact on landscape character - The loss of agricultural land - Increased flood risk - Impacts on wildlife - Proximity of workings to village - impact on residential amenity - Demand forecast for sand and gravel is over stated	A range of similar suggested changes were put forward, as follows: - Sustainability Appraisal should be replaced with more objective assessment - Cumulative impacts of both Shelford West and East should be considered together - Further assessment work needed in relation to the historic environment, landscape character, flooding, future sand and gravel demand and traffic movements including the viability of barging	Objection not accepted. The Sustainability Appraisal document forms part of the evidence gathering and site selection process. However, other considerations such as deliverability, location and contribution of mineral during the Plan period are taken into account when identifying a suitable mix of sites to meet demand over the Plan period.  Although minerals can only be worked where they are found there is no certainty regarding the viability, scale or location of extensions to quarries, particularly to those that are only proposed allocations that have yet to secure planning permission. The Shelford East proposal put forward by Brett Aggregates is not being considered as it would not be operational until the end of the plan period. If a planning application for the Shelford East proposal was put forward in the future it would be assessed against the relevant minerals local plan at the time and would take into account issues such as possible cumulative impacts.  The site allocations are in principal are suitable for minerals development. As part of the evidence gathering and site selection process, a number of strategic assessments have been completed. It is however worth noting that detailed assessment work would be required as part of any planning application including assessments of the historic environment and the potential impacts on the existing landscape. The outcome of these assessments would inform the final quarry proposals including the extent of working and the restoration scheme.  A Strategic Flood Risk Assessment has been completed as part of the minerals plan evidence base which doesn't raise any significant issues relating to the Shelford site. A further detailed site specific flood risk assessment would need to be undertaken by the developer in consultation with the Environment Agency should a detailed planning application be submitted for the site. At times of flood active sand and gravel sites are allowed to flood, maintaining the role of the	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>natural flood plain before being pumped out once the flood water has subsided. In many cases mineral workings can provide temporary flood storage capacity reducing the potential for wider flooding.</p> <p>As part of the wider assessment work, a strategic transport assessment and a further addendum (containing the most recent traffic and accident data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the site.</p> <p>As part of any planning application for minerals development, a Transport Assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green</p>	

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				field sites.	
				It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.	
29115 - East Bridgford Parish Council (Mr Philip	Object	East Bridgford Parish Council believes that insufficient weight has been given to the increase in traffic on the A6097 since the development of the A46 and predictable increases in traffic by 2030	Lorry access on to the A6097 should not be allowed, especially between Gunthorpe BRidge and East bridgford traffic lights	Objection not accepted. Site allocations contained in the Minerals Local Plan are suitable in principle for future minerals development. As part of the evidence gathering and site selection process, a strategic transport assessment and further addendum (using the most recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the Shelford proposal. As part of any detailed planning application for minerals development, a site specific transport assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location and design of the site access on to the A6097 and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.	
29885 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29779 - Roger Fell [2474] 29807 - Campaign to Protect Rural England Nottinghamshire Branch (Mr Frederick Cook) [2833] 29868 - Rt Hon K Clarke QC MP [890] 29928 - Bulcote Parish Council (Mr Roger Aston) [880] 29929 - Burton Joyce Parish Council (Mrs Jackie Dawn) [896] 29930 - Burton Joyce Parish Council (Mrs Jackie Dawn) [896] 29932 - Burton Joyce Parish Council (Mrs Jackie Dawn) [896] 29933 - Burton Joyce Parish Council (Mrs Jackie Dawn) [896] 29934 - Burton Joyce Parish Council (Mrs Jackie Dawn) [896] 29982 - Mr David Miller [1247] 30022 - Heather Brown [7414] 30023 - Raymond Brown [7410] 30024 - Richard Brown [7411]	Object	A number of representations made on this policy covered a range of similar issues, as follows: - Transport issues including the impact of HGV traffic on road safety, pollution, congestion on the A6097 and damage to the road - Loss of local amenity such as the loss of the Trent Valley Way footpath, horse riding routes, the local history trail, local angling and nature watching - Impact on local pubs and restaurants - Industrialisation of the landscape and loss of the historic view across the Trent Valley - Loss of agricultural land - Increase flood risk - Impacts on wildlife - Proximity to village - impact on residential amenity - Impact on tourism - No clear need for the site. Demand forecast for sand and gravel is over stated - Views of local people not being considered	Remove the allocation from the Plan	Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).  The data contained in the County Council's 2013 Local Aggregates Assessment was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.  It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.  Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and the Minerals Products Association that further significant growth is likely to be limited due to the high levels that are already being recycled along with changing construction methods which are likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales	

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				<p>of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p> <p>Site allocations are in principle suitable for future minerals development. Any planning application for a new quarry proposal would have to include a wide range of detailed assessments covering amenity and environmental issues such as noise, dust, flood risk and protection and enhancement of biodiversity and the historic environment and the location of infrastructure such as the conveyor. The outcomes from the assessments would influence the final extent of extraction and the restoration scheme. The exact detail regarding the barging of material along the River Trent would also be incorporated as part of the planning application.</p> <p>In order to meet the identified demand, a geographical spread of site specific allocations made up 10 extensions to existing permitted quarries and 5 new greenfield sites have been identified. These will serve the three main markets of Greater Nottingham, Central Nottingham (including Newark) and the Idle Valley in North Nottinghamshire. All of the allocations have proposed access on to the 'A' road Network. Detail regarding the site selection methodology is not required in the Minerals Local Plan and this is set out in a site selection background paper as part of the evidence base.</p> <p>As part of the wider assessment work, a strategic transport assessment and a further addendum (containing the most recent traffic and accident data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the shelford proposal.</p> <p>As part of any planning application for minerals development, a site specific transport</p>	



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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location of the site access, road layout, and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>Minerals development will inevitably have short term impacts on the existing natural environment; however it is one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets. The overarching aim of the Minerals Local Plan as set out in policy SP2 is biodiversity led restoration. Detailed restoration plans for any quarry proposal would be required at the planning application stage and this is set out in Policy DM11 - 'Restoration, after-use and after care' of the Submission Draft document.</p> <p>A Strategic Flood Risk Assessment has been completed as part of the minerals plan evidence base which doesn't raise any significant issues relating to the shelford site. A further detailed site specific flood risk assessment would need to be undertaken by the developer in consultation with the Environment Agency should a detailed planning application be submitted for the site. At times of flood active sand and gravel sites are allowed to flood, maintaining the role of the natural flood plain before being pumped out once the flood water has subsided. In many cases mineral workings can provide temporary flood storage capacity reducing the potential for wider flooding.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29692 - Tarmac Ltd [580]	Object	<p>The Council's overall SA score for Shelford (i.e. taking account of operational and long-term impacts) is -6. This is equal to the score given by the Council to North Road. However, our recommended SA scores indicate that the North Road site is substantially more sustainable than the Shelford site (i.e. our assessment scores are +15 in respect of North Road compared to -11 in respect of Shelford). The MLP indicates that the North Road site has not been allocated due to deliverability concerns (rather than concerns regarding the operational/ long-term sustainability of the site). As set out earlier in this statement it is considered that, in this respect, the Council's site selection process is unfounded and unjustified.</p> <p>9.46 Based on the lack of robust evidence (particularly in terms of the proposed transportation of 180,000 tonnes of materials per annum to Colwick by barge) there are significant question marks over the deliverability of the Shelford site as proposed.</p> <p>In light of the above, Tarmac consider that the North Road site should be allocated ahead of the Shelford site. The Council's current approach (i.e. the proposed allocation of Shelford ahead of North Road Quarry) is fundamentally flawed as it is not based on sound evidence.</p>		<p>Objection not accepted. All sites were scored consistently using the framework set out in the Sustainability Appraisal Report, which included a set of decision making criteria for each objective. In terms of the range of factors which determined scores against each objective, wherever possible information that was measurable or could be categorised was used. Where this was not possible, the approach taken was to consider the relevant information available on the range of variables across all the sites assessed and apply the most consistent means of scoring possible. The appraisal was based on the information available at the time, however at the planning application stage a wide range of detailed assessments would be carried out to ensure that the proposal is considered acceptable. The Sustainability Appraisal document forms part of the evidence gathering and site selection process, however other considerations such as deliverability, location and contribution of mineral during the Plan period are taken into account when identifying a suitable mix of sites to meet demand over the Plan period.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30087 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>As highlighted in our previous responses to the proposed allocation, NWT has concerns about allocations that would either directly or indirectly damage protected sites or species. To this end, all statutory and non-statutory protected sites should be removed from within the proposed allocation boundary, and a buffer zone should be left between the proposed quarry and any LWS in close proximity. Beyond this, it is not possible at an allocation stage to ascertain what indirect impacts may occur on habitats or species, as this requires detailed EIA. Throughout the various stages of the allocation consultation process for the last 3 years, NWT has sought to ensure that LWS were excluded from the draft allocations, and thus we strongly welcome the exclusion of LWS from virtually all the new allocations.</p> <p>NWT were given to understand that all LWS would be removed from this allocation boundary, however the map shows that Swallow Plantation LWS is now within the boundary and also that it extends up to the edge of Shelford Carr LWS. NWT therefore object to this allocation.</p>		<p>Objection not accepted. The red line allocation boundary shows the full extent of the allocation and includes Swallow plantation Carr LWS to the south. Shelford Carr LWS also bounds the allocation to the north east. However, the proposed extraction area put forward by the operator covers a smaller area of the site which includes a stand-off to Swallow Plantation. The extraction area is also some distance from the Shelford Carr LWS. As part of any planning application for the proposed quarry, detailed assessment work would be required to assess any impact on the LWS. This would inform the final extent of the extraction area as well as the detailed restoration plan. The Shelford Development Brief in Appendix 3 highlights the potential impacts on the LWS.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29968 - Rushcliffe Borough Council (Mr Richard Mapletoft) [969]	Object	<p>The Borough Council do not believe that, although the extraction itself is considered appropriate in Green Belt terms the Council considers the wharf, conveyer and HGV loading area/processing plant as inappropriate as they are likely to detract from the Green Belt's openness and conflict with the purposes of including the land within it. In accordance with the NPPF, as inappropriate development, these elements require very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Substantial weight is given to any harm to the Green Belt and as there is no justification for allocating the site with the Green Belt the Council considers the site to be contrary to Green Belt policy as set out in the NPPF.</p> <p>Rushcliffe Borough Council believes the significant effects identified within the SA justify a re-appraisal of the site against reasonable alternatives when considering 'Avoid, mitigate or compensate'.</p> <p>The Borough Council do not believe that the site allocation is justified due to the concerns regarding the SA, the absence of an assessment of the transportation infrastructure on the openness and purposes of the Green Belt, and non-compliance with the NPPF's policy of avoiding effects rather than mitigating or, as a last resort, compensating.</p>	Until concerns regarding the SA and site selection process have been resolved Rushcliffe Borough Coun	<p>Objection not accepted. It is acknowledged that sand and gravel extraction is considered appropriate in the Green Belt. However, given that the site allocations are in principle suitable for development, no exact details are provided in terms of the associated infrastructure such as conveyors or processing plant. As part of a detailed planning application, detailed work would have to be undertaken by the applicant to identify the most suitable locations for the associated infrastructure to ensure that the openness of the Green Belt was not impacted. Minerals development and the associated infrastructure is temporary in nature and once extraction has ceased the quarry would be fully restored.</p> <p>With regard to the sustainability appraisal refer to the response provided for representation 29967.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29795 - Cllr Mrs K Cutts [6747]	Object	<p>Object to the inclusion of the site for the following reasons:-</p> <ul style="list-style-type: none"> <li>* Use of outdated sand and gravel requirement figures.</li> <li>* Use of outdated traffic figures.</li> <li>* Does not address the inadequacy of the Lowdham roundabout to deal with extra traffic.</li> <li>* Unstable (raised) land for position of the proposed screening plant.</li> <li>* Previous undermining of the carriageway on the A6097 due to a storm has not been considered by the highways authority.</li> <li>* The proposal to remove one third of the material produced from Shelford West by barge has not been properly examined, in particular the effect of offloading onto Mile End Road.</li> <li>* No proper solution has been proposed to protect the mineral extraction site from the River Trent during extreme rainfall.</li> <li>* The proposed conveyor belt system to move the aggregate over a mile across the village of Shelford is detrimental to the health and wellbeing of residents.</li> <li>* The current proposal is an afterthought which I consider to be inadequate and unworkable.</li> <li>* An extraction site at Barton-in-Fabis was part of the proposed Plan and this site appears to be suitable, since it is well away from properties and the proposed screening plant would be immediately adjacent to the A453 and in the vicinity of proposed significant future developments.</li> <li>* Query the appropriateness of the SA undertaken by officers.</li> <li>* Insufficient account has been taken of the archaeological features in Shelford.</li> <li>* The adverse impact on the surrounding villages of extra HGV vehicle movements, noise and dust associated with gravel extraction including the conveyor belt system for moving material across the valley.</li> <li>* Loss of mature landscape and productive farm land including loss of jobs.</li> <li>* The potential impact of flooding on the</li> </ul>	<ul style="list-style-type: none"> <li>* Use the latest extraction figures available (2004-13) to project future aggregate requirements.</li> <li>* Use the latest traffic data available to truly reflect the likely impact of any development at Shelford West on the A6097, Gunthorpe Bridge, Lowdham traffic island and Mile End Road and Colwick Loop Road.</li> <li>* Include and take into account the local GP's concern about the potential impact on residents' health of the mile-long conveyor belt system proposed.</li> <li>* Undertake a proper investigation of the stability of the ground beneath the A6097.</li> <li>* Re-examine the justification for the removal of the Barton-in-Fabis and Little Carlton sites.</li> <li>* Provide a more publicly accessible and less technical response form.</li> </ul>	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the plan period to 2030 as this was the most up to date data available at the time. The 10 year average (2002-11) also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the plan period, particularly if growth increases over the plan period. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>Using the data contained in the 2013 LAA, 49.02 million tonnes of sand and gravel is required over the plan period to 2030. Once sand and gravel reserves contained in existing quarries with planning permission are taken into account, it leaves a shortfall over the plan period of 29.71 million tonnes that will need to be met through extensions to existing sites and new greenfield sites.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>The site allocations are in principle suitable for future minerals development. As part of the evidence gathering and site selection process, a number of strategic assessments have been</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
		whole area requires independent assessment and modelling by the Environment Agency.		<p>completed. Any planning application for a new quarry proposal would have to include a wide range of detailed assessments covering amenity and environmental issues such as noise, dust, flood risk and protection and enhancement of biodiversity and the historic environment. The outcomes from the assessment work would inform the final extraction area and restoration proposals.</p> <p>A strategic transport assessment and a further addendum (using the most recent data) was commissioned to assess the wider impacts of the increase in HGV movements. This didn't raise any significant issues related to the Shelford proposal.</p> <p>As part of any planning application for minerals development, a site specific transport assessment would be required and measures would be put in place to minimise the impact of the HGV traffic. This would include detailed designs regarding the location and design of the site access on to the A6097 and any improvements that were deemed necessary on safety grounds in the vicinity of the site. Conditions such as lorry routing agreements could be put in place if this is relevant to the application.</p> <p>National guidance states that sand and gravel extraction is 'water compatible' and allowed to take place in areas of flood risk. At times of flood, active sand and gravel sites are allowed to flood maintaining the role of the natural flood plain before being pumped out once the flood water has subsided. A county wide strategic flood risk assessment has been completed as part of the minerals local plan evidence base and details have been incorporated in the water and flooding section of the Shelford allocation development brief. A site specific flood risk assessment would need to be undertaken by the developer in consultation with the Environment Agency should a detailed planning application be submitted for the site.</p> <p>The original Shelford proposal put forward by the operator was not considered deliverable as</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>the site access was proposed to be on to narrow local roads. As a result, the operator put forward a revised proposal that included access directly on to the A6097 as well as barging a proportion of the sand and gravel along the River Trent. Because of these revisions the proposal was considered deliverable and was included as a draft allocation.</p> <p>The Barton in Fabis proposal was not included in the draft plan as more suitable sites were identified through the evidence gathering process (including the Sustainability Appraisal) to meet expected demand over the plan period. Detailed information was included in the Sustainability Appraisal report and the site selection background paper.</p> <p>The Sustainability Appraisal document forms part of the evidence gathering and site selection process. It was completed in house following national guidance and good practice by officers not involved in the drafting of the minerals plan. Along with the Sustainability Appraisal document other considerations such as deliverability, location and contribution of mineral during the Plan period are taken into account when identifying a suitable mix of sites to meet demand over the Plan period.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2 Justification</i>					
29730 - Mr Adrian Hatton [2828]	Object	<p>Para 4.16 - justification argument takes no account of recycled materials and does not justify expected 70% growth in demand to need apportioned amounts of sand and gravel.</p> <p>Para 4.51 - Presumes opening of Flash Farm in 2016 - new MLP will not have been examined for soundness by that time and therefore, given adequate landbank reserves currently in place, that presumption of grant of Planning Permission for new quarry to be opened in 2016 is therefore not appropriate and in direct contravention of MLP process.</p>	<p>Para 4.16 Justification of how 70% growth to make use of apportioned sand and gravel must be made available - or more realistic and achievable growth figures used.</p> <p>Para 4.51 - Proposal for opening of new quarries, such as Flash Farm, ahead of adoption of MLP should be removed. Operators should not be given inferred approval to apply for PP ahead of adoption of MLP and NCC should be wary of opening themselves to commercial repercussion should an operator deem them to have granted implicit permission to develop a site outside of MLP and subsequently, on examination, for that site to have been found not to be required.</p>	<p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and the Minerals Products Association that further significant growth is likely to be limited due to the high levels already being recycled along with changing construction methods which are likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p> <p>The Plan has to identify a steady and adequate supply of minerals over the Plan period to 2030 based on past sales. Aggregate sales are closely linked to economic activity and can quickly increase if demand from the construction sector increases. If economy activity remains low those sites allocated in the Plan are unlikely to be opened as the mineral operators are unlikely to invest large sums of money in sites that are not required.</p> <p>The estimated start dates are put forward by the operators and included in the delivery schedule to show how provision over the Plan period could be met. A detailed planning application would have to be submitted and approved before any work on the quarry could begin.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29234 - Mr Martin Smith [7727] 29250 - Mr David Walton [7745] 29339 - Michael Staff [3695] 29360 - Rachel Bradey [3623] 29382 - Kirklington Parish Council (Helen Cowlan) [879] 29398 - John Allan [3617] 29493 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29510 - Mrs Deborah Cassidy [7818] 29584 - Mr Ian Bradey [7824]	Object	The MLP uses an annual allocation figure of 2.58 million tonnes, and this overestimates demand. No information has been provided to show what the growth predictions are based on. The current proposals for demand would require an unrealistically high growth in sales to be achieved, especially when compared to the downward trend of lower sales. Most recent figures from LAA 2015 should be used to calculate predicted requirements. Justification does not build in numerical findings and targets shown in NCC Waste Core Strategy which with national policy objectives are dramatically increasing the amount of recycled aggregates. Over inflation of demand means that gravel requirements could be met by maximising the use of existing sites, and new sites would not be required.	Up to date and accurate estimates of demand should be used. The 10 year average and growth predictions should be justified. Flash Farm site should be removed from the Minerals Local Plan.	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment (LAA) was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average 2002/11 also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases over the Plan period. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>National guidance also states that the average 3 year sales figures should be included in the LAA, however this figure should be used to identify the general trend of demand as part of any consideration of whether it might be appropriate to identify additional reserves.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of under provision if economic activity and growth increases during the Plan period.</p> <p>Construction and demolition waste is made up of a wide range of different materials including brick, metal, wood, glass and plastic. Some of this material can be recycled and reused as a replacement for primary aggregate, however a proportion of the waste such as metal, wood or plastic cannot be used as a recycled aggregate. The Waste Local Plan estimates that the 70% figure for construction and</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
				<p>demolition waste is currently being met or exceeded through on site sorting / recycling and due to the lack of demand for additional facilities for construction and demolition waste.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological survey and Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29757 - Brett Aggregates Limited [69]	Object	<p>Brett support the recognition that the proposed allocation of the Shelford site gives to the need to balance geographically the extraction of sand and gravel with proposed developments in the County. It is proposed that extracted material which will be destined for the road network will be transported to a processing plant alongside the A6090. Any material which will be barged along the River Trent will need to be processed at the extraction site. This will be achieved by the use of mobile screening plant. This is contrary to what is stated at para. 4.52.</p> <p>The reason why the aggregate is to be screened on site rather than at Colwick wharf is that the screening process produces silt. There is no facility to store silt at Colwick wharf and it is needed for restoration of voids which will be created as extraction proceeds. For this reason para 4.52 should be amended as suggested in order that the Plan is effective.</p>	<p>Para 4.52 should be amended as follows in order that the Plan is effective.</p> <p>.....Output from the site would be 500,000 tonnes per annum with 180,000 of that going by barge along the River Trent to a processing plant wharf at Colwick Industrial Estate.</p> <p>The site ..... Colwick Industrial estate does offer good opportunities for use of the aggregate in both existing higher level processes such concrete batching and the potential for the introduction of new plant.</p>	<p>Objection partially accepted. Amendment to be made to the text.</p>	<p>Amend paragraph 4.52 to read: 'Output from the site would be 500,000 tonnes per annum with 180,000 of that going by barge along the River Trent to a wharf at Colwick industrial estate. It is expected this will supply concrete batching plants in the area.'</p>
30035 - Highways England (Trevor Murrain) [7614]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>HE notes that high traffic levels are acknowledged in the Local Plan around the A1/A46/A17. It also notes that 'HE' is referred to as stating that "a major highways improvement scheme for the area could begin between 2020 and 2025, although an exact start date and predicted build time has yet to be confirmed". HE is able to confirm that this scheme, the A46 Newark Northern Bypass, has been included in the government's RIS for commencement in the RIS 2 period (2020-2025). In addition, HE is seeking to deliver short term measures to address safety issues on the A46 and A1 at Newark. Nevertheless, the traffic impacts of minerals developments that impact on the A46 and A1 in the Newark area will need detailed consideration through the development management process.</p>		<p>Comments noted. Changes to be made to text to reflect comments made.</p>	<p>MP2 Justification Text - Paragraph 4.49 replace paragraph starting 'Highways England have stated...' with the following: 'A major highways improvement scheme for the area, the A46 Newark Northern Bypass, is included in the government's Road Investment Strategy to be commenced in the period 2020-2025. The minerals operator has stated that the estimated start date for the Coddington proposal is likely to be during this time. Highways England is also seeking to deliver shorter term measures to address safety issues on the A46 and A1 at Newark.'</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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Table 3 Contributions to the sand and gravel shortfall over the plan period

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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Table 3 Contributions to the sand and gravel shortfall over the plan period

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29189 - Mrs Linda White [7642] 29371 - Councillor Kevin Doyle [7086] 29399 - John Allan [3617] 29494 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29537 - mr john watchman [7785] 29586 - Mr Ian Bradey [7824]	Object	No evidence is given to show what economic growth predictions support the demand through the plan period. If current available figures were used this demand can be met from existing locations without the requirement to use new green field sites. Increases in recycled and secondary aggregates coupled with new building techniques and materials which are not so mineral dependent means there less need than estimated. Historically the demand for minerals has been regularly below the estimated expectations. There is not the need for further quarrying especially in sensitive areas close to residential development as the Shelford site MP2 r.	Justify current growth forecast. Recalculate estimates of future sand and gravel requirements using more recent data. Remove Shelford and Flash Farm allocations.	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average (2002/11) also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases during this time. If demand for minerals remain low, the allocations identified in the Plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p> <p>Recycled aggregates provide a valuable source of material minimising the need for primary aggregates. Nationally it is estimated that recycled aggregates contribute about 29% of total aggregate sales, three times higher than the European average. However it is acknowledged by the British Geological Survey and the Minerals Products Association that significant future growth is limited due to the high levels already being recycled along with changing construction methods which are also likely to reduce the availability and quality of these materials in the future. The 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>Site Information</i>					
30083 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Scrooby (SGf) extensions - MP2d - Justification Text:</p> <p>The current extension application and the future extension application should both result in biodiversity-led restoration, focusing particularly on the potential for species-rich grasslands and small ponds, rather than commercial fishing ponds that have little or no wildlife value. This should be reflected in the text.</p>	Add reference to restoration focusing particularly on the potential for species-rich grasslands and small ponds, rather than commercial fishing ponds.	of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.	
30080 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Besthorpe Quarry - Justification Text (SGh):</p> <p>For accuracy (and to be consistent with the reference in the Langford Lowfields section) the text for Besthorpe Quarry (SGh) the text should note that "this site is predominantly being restored to wetland habitats and is being (and will be managed in the future) by the Nottinghamshire Wildlife Trust".</p>	Add text to state that this site is predominantly being restored to wetland habitats and is being (and will be managed in the future) by the Nottinghamshire Wildlife Trust.	Objection not accepted. As part of a planning application for either of the allocations, a detailed restoration scheme would be included. The site allocation development briefs for Scrooby North and Scrooby South set out the relevant types of habitats that could be included as part of the restoration scheme included in a detailed planning application.	Objection accepted. Amendment to the text to be made.
					Amend Besthorpe Quarry Site Information (MP2) text as follows: 'The site is predominantly being restored to wetland habitats and is being managed by the Nottinghamshire Wildlife Trust.

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29249 - Mr David Walton [7745]	Object	The MLP looks at mineral development within the County over the next 14 years to 2030. When the County's average annual sales are calculated, it gives predicted demand of 36.12m tonnes using 2002-2011 data, and 31.36m tonnes using 2004-2013 data. Using more up to date figures clearly demonstrates a demand which is at least 4.76m tonnes less than currently proposed, and therefore negates the need for Flash Farm to be used at all - especially as there are a number of sites currently in operation or in reserve which have not yet been used to capacity, if at all,	remove flash farm	<p>Objection not accepted. National guidance sets out the requirement for Mineral Planning Authorities to calculate their own aggregate apportionments based on the past 10 year average sales and other important local considerations, through the production of an annual Local Aggregates Assessment (LAA).</p> <p>The data contained in the County Council's 2013 Local Aggregates Assessment was used to identify expected demand over the life of the Plan period to 2030 as this was the most up to date data available at the time. The 10 year average (2002/11) also takes account of a period of growth and a period of recession and therefore is a robust methodology in order to provide a steady and adequate supply of minerals over the Plan period, particularly if growth increases during this time. If demand for minerals remain low, the allocations identified in the plan are unlikely to be worked as mineral operators will not invest large sums of money setting up new green field sites.</p> <p>It is not considered appropriate to use the most recent 10 year average sales data as it is heavily influenced by the recession and projecting this forward to identify demand over the Plan period could run the risk of not providing a steady and adequate supply of minerals particularly if economic activity and growth increases during this period.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30081 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Sturton le Steeple - Justification Text (SGd)</p> <p>The current approved restoration for this site is to entirely biodiversity habitats, as agreed between NCC, NWT and the Applicant during the planning application process. This site contains the most southerly peats that will be worked in the County, providing an opportunity for the re-creation of rare fen habitats, and so will make a substantive contribution to the restoration of some of the scarcest habitat types. Therefore NWT do not agree with the description in the text that this site would be restored to "agriculture and nature conservation", the reference to agriculture should be removed.</p>	Remove reference to agriculture in restoration proposals.	Objection accepted. Amendment to be made to the text.	Amend Sturton le Steeple Site Information (MP2) text as follows: The quarry will be restored to a combination of nature conservation including wetland, agriculture and forestry.
30085 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Girton (SGi) - Justification Text:</p> <p>The extension of time application for this site is currently out for scoping consultation. In our view the substantive extension of time requires a review of the (elderly) approved restoration scheme and that it should be amended to ensure that the restoration is entirely to priority floodplain habitats in accordance with the principle of biodiversity-led restoration encompassed in this Local Plan. The text should reflect this.</p>	Add reference to the need to biodiversity led restoration in relation to the current scoping application.	Objection not accepted. It is not considered necessary to include the current planning application for an extension of time to Girton quarry within the Minerals Local Plan. Under the existing permission, the quarry will be restored back to agriculture and wetland conservation. This sets out what the existing situation is but does not preclude future applications revisiting the restoration scheme.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30082 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Scrooby (SGf) extensions - MP2c - Justification Text:</p> <p>The current extension application and the future extension application should both result in biodiversity-led restoration, focusing particularly on the potential for species-rich grasslands and small ponds, rather than commercial fishing ponds that have little or no wildlife value. This should be reflected in the text.</p>	Add reference to restoration focusing particularly on the potential for species-rich grasslands and small ponds, rather than commercial fishing ponds.	Objection not accepted. As part of a planning application for either of the allocations, a detailed restoration scheme would be included. The site allocation development briefs for Scrooby North and Scrooby South set out the relevant types of habitats that could be included as part of the restoration scheme included in a detailed planning application.	
30084 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>MP2f Besthorpe South - Justification Text:</p> <p>NWT would expect to see specific reference to the need to investigate the possibility for floodplain reconnection in this area, in relation to this allocation.</p>	Add reference to the need to investigate the possibility for floodplain reconnection in this area.	Objection not accepted. It is not considered necessary to include a reference to the potential for flood plain reconnection in this section as it is already set out in the Besthorpe South site allocation development brief (Appendix 3).	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP3a Bestwood 2 East</i>					
30088 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust object to the allocation of Bestwood 2 East as it would destroy a substantial area of the Longdale Plantation SINC, contrary to the protective policies proposed in this Plan and to the protection that should be afforded to important habitats as stated in the NPPF.</p>		<p>Objection not accepted. Minerals are essential to support economic growth and our quality of life by providing the raw materials to maintain and create infrastructure such as roads, buildings and other goods. National guidance states that Minerals Planning Authorities should provide an adequate and steady supply of minerals to assist in economic growth both locally and nationally by identifying adequate reserves through the Minerals Local Plan process.</p> <p>Minerals development will inevitably have short term impacts on the existing natural environment; however it is one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets. Detailed restoration proposals submitted as part of any planning application would have to be in line with the Plan's biodiversity led restoration approach as set out in policy SP2 and policy DM11: Restoration, after-use and after-care. As the proposed allocation is an extension to the existing Bestwood 2 quarry the restoration would increase the areas of habitat created by the existing site.</p> <p>As part of the planning application process the location of the site within the LWS would need to be considered along with any other ecological impacts.</p>	
<i>MP3c Scrooby Top North</i>					
29247 - Rotherham Sand and Gravel Ltd [496]	Support	The Rotherham Sand and Gravel Company Limited supports the allocation of MP3C Scrooby Top North		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>Site Information</i>					
30089 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Paragraph 4.61: Carlton Forest (SSc):</p> <p>The text in this paragraph is inaccurate, as the approved restoration scheme for Carlton Forest Quarry is to woodland and acid grassland, not to agriculture. This is factually important and should be changed.</p>	Amend restoration text to woodland and acid grassland, not to agriculture.	Objected accepted. Amendment to be made to the text.	Carlton Forest Site Information (MP3) to be amended as follows: 'The quarry will be restored to woodland and acid grassland.'
<i>MP4: Limestone provision</i>					
29693 - Tarmac Ltd [580]	Support	<p>Tarmac support the Council's approach to ensuring adequate supply of limestone during the Plan period (i.e. extraction of remaining reserves at Nether Langwith) as set out at Policy MP4.</p> <p>As stated in the policy's supporting text '...current permitted reserves at Nether Langwith Quarry are adequate to cover the Plan period. The quarry was expected to have sufficient reserves until 2017 at a planned output of 250,000 tonnes per annum, however actual output has been much lower...'. A Planning Application is currently being prepared for an extension of time in respect of the completion of extraction operations at Nether Langwith - this is expected to be submitted before the end of the year.</p>		Comments noted	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 4: Minerals Provision Policies

MP4: Limestone provision

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30090 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>NWT notes that there is only a proposal for an extension of time at Nether Langwith, rather than site area. NWT welcomes that the text now reflects our request in our previous response that given the exceptional importance and rarity of the Magnesian limestone habitats in this area, the justification text should recognise that the future extension of time application would be an appropriate opportunity to ensure that the restoration scheme is in accordance with the biodiversity-led approach and will contribute the re-creation of calcareous habitats. As this site does not have a restoration brief it is necessary that it is stated either within the Policy or within a Brief. The new text refers specifically to the need to review the restoration in line with the biodiversity-led approach, so we can withdraw our objection to this policy.</p>		Support noted	

### MP5: Secondary and recycled aggregates

29881 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)
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# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29444 - Michael Staff [3695] 29495 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29587 - Mr Ian Bradey [7824] 29731 - Mr Adrian Hatton [2828]	Object	<p>A number of representations made covered a range of similar issues, as follows:</p> <ul style="list-style-type: none"> <li>- No provision made in the Plan for the increasing use of recycled aggregates</li> <li>- Nottinghamshire Waste Local Plan is not an integral part of the Plan, making accurate recycled aggregate forecasts impossible</li> <li>- Crushing and processing material on greenfield sites is a noisy and dusty operation</li> <li>- Data shows that annual production of inert fill is minuscule to the quantities required</li> <li>- No information on the quantities of recycled aggregates are included in the policy</li> </ul>	<p>A range of similar suggested changes were put forward, as follows:</p> <ul style="list-style-type: none"> <li>- Quantified and growing importance of secondary and recycled aggregates need to be built into the policy</li> <li>- Remove the Flash Farm allocation</li> </ul>	<p>Objection not accepted. The Minerals Local Plan supports development proposals which will increase the supply of secondary and or recycled aggregates through Policy MP5: Secondary and Recycled Aggregates. Any planning application for facilities producing recycled aggregate would need to take account of the policies contained in both the Nottinghamshire and Nottingham Waste Local Plan and the Nottinghamshire Minerals Local Plan. As part of the detailed planning application a wide range of assessment work would be required that covered environmental and amenity issues such as noise and dust. The outcome of the assessment work would inform the working and restoration of the site.</p> <p>Local data for alternative aggregates is very limited and often based on estimates, however the 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p> <p>It is acknowledged by the British Geological Survey and the Minerals Products Association that further significant growth is likely to be limited due to the high levels that are already being recycled along with changing construction methods which are likely to reduce the availability and quality of these materials in the future. Sales of recycled aggregates also follow the wider economic demand for aggregates and the amount produced varies as a result. Given the lack of reliable local data it is not possible to forecast future demand for secondary and recycled aggregates.</p>	
29847 - National Trust (Kim Miller) [2987]	Support	The use of secondary and recycled aggregates in order to conserve natural resources and reduce waste is supported.		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29290 - AKS Community Action Group (Mrs Linda White) [7742]	Support	Support the policy of increasing the contribution of secondary and recycled minerals where it can be demonstrated that negative impacts are less than would be suffered than by relying on primary minerals		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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MP5 Justification



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29169 - Helen Rushby [7730] 29190 - Mrs Linda White [7642] 29292 - AKS Community Action Group (Mrs Linda White) [7742] 29340 - Michael Staff [3695] 29496 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781] 29541 - mr john watchman [7785] 29589 - Mr Ian Bradey [7824]	Object	<p>A number of representations made on this policy covered a range of similar issues, as follows:</p> <ul style="list-style-type: none"> <li>- Nottinghamshire Waste Local Plan is not an integral part of the Plan making accurate recycled aggregate forecasts impossible</li> <li>- No information on the quantities of recycled aggregates are included in the policy</li> <li>- There is no statement about the impact of landfill taxes on the collapse in tonnages going to landfill</li> <li>- Data shows that annual production of inert fill is minuscule to the quantity required</li> <li>- Crushing and processing material on greenfield sites is a noisy and dusty operation</li> <li>- There is no duty to use other sources of mineral before considering extracting virgin materials, which are a limited resource and as such should be safeguarded.</li> </ul>	<p>A range of similar suggested changes were put forward, as follows:</p> <ul style="list-style-type: none"> <li>- Justification text needs to explain the fundamental change to the secondary and recycled market as a result of Government landfill taxes</li> <li>- Expanding contribution of recycled minerals should be built into the Plan</li> <li>- Quantified data should be used to provide new forecasts for primary aggregates</li> <li>- There should be a commitment to align the Waste Local Plan and the Minerals Local Plan together</li> <li>- Remove Flash Farm allocation</li> </ul>	<p>Objection not accepted. The Minerals Local Plan supports development proposals which will increase the supply of secondary and or recycled aggregates through Policy MP5: Secondary and Recycled Aggregates. Any planning application for facilities producing recycled aggregate would need to take account of the policies contained in both the Nottinghamshire and Nottingham Waste Local Plan and the Nottinghamshire Minerals Local Plan. As part of the detailed planning application a wide range of assessment work would be required that covered environmental and amenity issues such as noise and dust. The outcome of the assessment work would inform the working and restoration of the site.</p> <p>Local data for alternative aggregates is very limited and often based on estimates, however the 10 year sales average for each of the aggregate minerals take account of sales of both primary and recycled aggregates. Therefore estimates of future requirements set out in the LAA already take account of the proportion being met from alternative aggregates and represent the amount of additional primary aggregate needed.</p> <p>The increasing landfill tax has played a role in reducing the amount of material being disposed of to landfill, however as a result of the recession overall disposal levels fell significantly from approximately 2007. More recent data suggests disposal levels have started to increase as the economy improves.</p> <p>It is acknowledged by the British Geological Survey and the Minerals Products Association that further significant growth is likely to be limited due to the high levels that are already being recycled along with changing construction methods which are likely to reduce the availability and quality of these materials in the future. Sales of recycled aggregates also follow the wider economic demand for aggregates and the amount produced varies as a result. Given the lack of reliable local data it is not possible to forecast future demand for secondary and recycled</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP6: Brick clay provision</i>					
30092 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>MP6: Dorket Head (BCb) Brick-clay Provision:</p> <p>Given the long expected continued working life of this quarry, the Trust expect to see specific reference to the need to review its restoration scheme at the appropriate time (presumably during a ROMP) to ensure that they are in accordance with the biodiversity-led approach.</p>	Add reference for the need to review its restoration scheme at the appropriate time.	<p>aggregates. Unlike primary aggregate forecasting there is no national guidance as to how future demand would be quantified.</p> <p>Objection not accepted. If the operator were to resubmit new restoration proposals then these would be considered, taking into account the most up to date Minerals Local Plan. As and when a ROMP is completed for the site, it will be completed in line with the most recent adopted local and national policies.</p> <p>Therefore, if this Minerals Local Plan is adopted at the time of a review, the strategies and policies contained within it, including that on biodiversity-led restoration will be applied.</p>	
29151 - KIRTON PARISH COUNCIL (MRS KAREN WILDGUST) [7714]	Object	<p>The definition of the ridge line, which the Planning Inspectors report 2004 felt was significant, is not clearly defined. It is not clear how the ridge line will protect residential properties in the village. Some properties appear to be less than 250m away from proposed workings. The allocation would deviate from Strategic Objective Policies SO5, SO6 and SO7. The allocation would deviate from Strategic Policies SP2 and SP6. The Development Management Policies DM1/5 would not protect residential properties in Kirton from visual intrusion, noise, dust and mud.</p>	<ol style="list-style-type: none"> <li>1. A clear definition of the ridge line and how this would protect properties.</li> <li>2. A reasonable distance should be maintained between the quarry and Kirton to protect the village in accordance with Strategic Objective Policies 5, 6 and 7 and Strategic Policies 2 and 6.</li> <li>3. A reasonable distance should be maintained between the quarry and any residential properties so that Development Management Policies can be strictly adhered to.</li> </ol>	<p>Objection not accepted. The site allocations contained in the minerals plan are in principle suitable for future minerals development. The red line boundary identifies the extent of the landownership and or mineral rights under the control of the operator as opposed to the full extent of the extraction area. As part of any planning application detailed assessment work would be undertaken by the applicant. The outcome of the assessment work would inform the final extraction area and restoration scheme included in the planning application.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP6a Kirton West</i>					
29331 - Mr AS Wallace [2596]	Object	Despite the planning Inspector's previous rejection, the company are still proposing to go ahead . Our concerns are the same even after 12 years. Noise pollution:dust pollution;visual impact. 250 metres is risible as the present activities cause noise and dust clouds especially in southerly prevailing winds is at a distance of approx 1000 metres. Dust suppression was not observed on several inspections.Noise monitoring has been very intermittent,is taken at 15 minute intervals and was in unrealistic locations picking up the traffic noise on A6075 and therefore unrepresentative of site noise. One of the three recent test boreholes is only 200 metres from our boundary	Do not proceed with extraction which encroaches on the village environment	Objection not accepted. The site allocation identifies the extent of the landownership as opposed to the full extent of the extraction area. As part of any detailed planning application assessment work would be undertaken and appropriate standoffs would be incorporated into the design etc.	
29152 - KIRTON PARISH COUNCIL (MRS KAREN WILDGUST) [7714]	Object	The definition of the ridge line, which the Planning Inspectors report 2004 felt was significant, is not clearly defined. It is not clear how the ridge line will protect residential properties in the village. Some properties appear to be less than 250m away from proposed workings. The allocation would deviate from Strategic Objective Policies SO5,SO6 and SO7. The allocation would deviate from Strategic Policies SP2 and SP6. The Development Management Policies DM1/5 would not protect residential properties in Kirton from visual intrusion, noise, dust and mud.	1. A clear definition of the ridge line and how this would protect properties. 2. A reasonable distance should be maintained between the quarry and Kirton to protect the village in accordance with Strategic Objective Policies 5,6 and 7 and Strategic Policies 2 and 6. 3. A reasonable distance should be maintained between the quarry and any residential properties so that Development Management Policies can be strictly adhered to	Objection not accepted. The site allocation identifies the extent of the landownership as opposed to the full extent of the extraction area. As part of any detailed planning application assessment work would be undertaken and appropriate standoffs would be incorporated into the design etc	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30091 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Given the long expected continued working lives of this quarry, the Trust expect to see specific reference to the need to review its restoration scheme at the appropriate time (presumably during a ROMP) to ensure that they are in accordance with the biodiversity-led approach.</p>	Add reference for the need to review its restoration scheme at the appropriate time.	<p>Objection not accepted. If the operator were to resubmit new restoration proposals then these would be considered, taking into account the most up to date Minerals Local Plan. As and when a ROMP is completed for the site, it will be completed in line with the most recent adopted local and national policies.</p> <p>Therefore, if this Minerals Local Plan is adopted at the time of a review, the strategies and policies contained within it, including that on biodiversity-led restoration will be applied.</p>	

### MP8 Justification

30093 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Para 4.89 needs to be updated, as extraction has now ceased at Ratcher Hill Quarry, and started at Two Oaks Farm Quarry. NWT does not object in principle to the policy regarding Two Oaks Farm Quarry, as it is already approved. Specific note should be made however that given the life of the Quarry and the potential changes in external circumstances, that the ROMP should enable a review of the restoration proposals in accordance with the biodiversity-led approach. In the absence of a restoration brief, the text should therefore state that:</p> <p>"The principle of biodiversity-led restoration underpins this MLP, therefore the creation of priority biodiversity habitats will be the primary restoration aim for all mineral sites, allocations and extensions. With the long expected life of this Quarry, the restoration scheme should be reviewed under the ROMP, to ensure that it meets these biodiversity aims."</p>	<p>Add further text to Two Oaks Farm to state:</p> <p>"The principle of biodiversity-led restoration underpins this MLP, therefore the creation of priority biodiversity habitats will be the primary restoration aim for all mineral sites, allocations and extensions. With the long expected life of this Quarry, the restoration scheme should be reviewed under the ROMP, to ensure that it meets these biodiversity aims."</p>	<p>Objection not accepted. If the operator were to resubmit new restoration proposals then these would be considered, taking into account the most up to date Minerals Local Plan.</p> <p>As and when a ROMP is completed for the site, it will be completed in line with the most recent adopted local and national policies.</p> <p>Therefore, if this Minerals Local Plan is adopted at the time of a review, the strategies and policies contained within it, including that on biodiversity-led restoration will be applied.</p>	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP9: Industrial dolomite provision</i>					
30065 - Historic England (East Midlands) (Consultation Services) [7609]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Plan considers Industrial Dolomite as a mineral of international importance. Support for extraction through MP9 is likely to lead to substantial harm to a heritage asset of the highest importance and may prevent the property's inscription as a World Heritage Site (WHS). We are concerned that MP9 creates, in effect, an allocation at Holbeck whilst failing to apply proper weight to the likely harm to the significance of the Scheduled Monument as well as Welbeck Abbey's Registered Park and Garden. The Dolomite policy relies upon a poorly articulated and demonstrated concept of international importance and balances this against the harm to the monument in an unsound manner.</p>		Objection not accepted. Policy MP9 supports proposals for industrial dolomite where a need can be demonstrated, however the minerals plan needs to be read as a whole and any planning application would have to be in line with the Development Management proposals including but not limited to DM6 Historic Environment.	
30063 - Derby and Derbyshire Development Plans Joint Advisory Committee (Committee Representative) [7910]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>In view of the potential extensions to Whitwell Quarry in Derbyshire that could extend the life of the site to 2033, Policy MP9 is sufficiently flexible to make adequate provision for the future supply of dolomitic industrial limestone from the quarry should a need be demonstrated. However the justification text for DM9 should be amended to take account of the latest information available on the expected life of Whitwell quarry. Additionally, DM6 is considered adequate to protect heritage assets from the impact of mineral working. In terms of 'duty to cooperate' this approach is considered to be compatible with the approach being developed in the Derbyshire and Derby Minerals Local Plan to ensuring the supply of dolomitic industrial limestone from Whitwell Quarry</p>		Support noted	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Chapter 4: Minerals Provision Policies

MP9: Industrial dolomite provision

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30060 - Derbyshire County Council (Mr Rob Murfin) [1041]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>It is welcomed that the Local Plan Submission Draft no longer indicates an intention to allocate an extension to the Whitwell Quarry site on land to the south of Creswell Craggs near Holbeck. Through work with DCC, it has been determined that:</p> <ul style="list-style-type: none"> <li>* the working life of Whitwell Quarry, with current planning permission, will extend to 2025; and</li> <li>* this timeframe may be further extended beyond the 2030 end date of the Nottinghamshire Minerals Local Plan through potential extensions at the site, dependent on demonstrable need and other relevant planning considerations.</li> </ul> <p>This approach is welcomed given the landscape and historic sensitivities associated with the site and the fact that any future application to work these potential site extensions would need to be supported by a Heritage Impact Assessment to determine the level of harm that might be incurred on Creswell Craggs and its setting. The potential for assessing impacts on the historic environment is adequately addressed through Policy DM6: Historic Environment.</p>		Support noted	
29694 - Tarmac Ltd [580]	Support	<p>Tarmac support the Council's approach to industrial dolomite provision as set out at Policy MP9 (i.e. support for extraction where a need can be demonstrated). In this regard, it is noted that the Industrial Dolomite resource at Holbeck is safeguarded under Development Management Policy DM13. Tarmac welcome the safeguarding of this industrial mineral resource in accordance with national policy.</p>		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP9 Justification</i>					
29424 - Creswell Heritage Trust (Mr Roger Shelley) [2978]	Object	Policy MP9 needs to reflect the importance of safeguarding the protection of the heritage site of Creswell Crag.	<p>Paragraph 4.92 Needs a new third sentence, suggested 'This needs to be understood in the context of ensuring adequate protection to the Creswell Crag Scheduled Ancient Monument.' Modify final sentence 'Given the scarcity of the resource and the international market it supplies, it would be important to work with Derbyshire County Council in relation to the existing site at Whitwell Quarry, if it is considered that the supply of this industrial mineral can be achieved without compromising the heritage asset.'</p> <p>Paragraph 4.93. First sentence 'Existing permitted reserves at Whitwell quarry in Derbyshire are expected to be worked out by 2025, however the mineral operator has indicated that further reserves will be needed before this date to maintain future production.'</p> <p>Paragraph 4.94. Final sentence 'Any proposal would require careful consideration of the potential impacts on the historic environment and its wider setting, and the economic and social benefits provided by this key visitor attraction.'</p>	Not accepted. Any planning application for minerals development would need to take account of the policies contained within the Minerals Local Plan including Policy DM6 'Historic environment'. Detailed assessment work would also be required which would inform the final extraction area and restoration scheme. Existing permitted reserves at Holbeck are adequate until 2025, however given the nature of extraction (to maintain different grades of mineral) further reserves will be required before the exhaustion of the remaining mineral.	
<i>MP10: Building stone provision</i>					
29848 - National Trust (Kim Miller) [2987]	Object	The justification of policy MP10 suggests that 'criterion 2 in policy MP10 will be used to assess future applications at other sites. This will ensure any proposed developments will need to demonstrate both a need for the mineral...'. However, the policy wording does not require applicants to demonstrate a need. Nor does it require investigations to demonstrate that the stone resource is of a sufficient quality and quantity to justify extraction.	We therefore request the following changes to policy MP10 to ensure that appropriate safeguards are in place: "2. Proposals for the extraction of building stone outside the permitted site identified above will be supported where it can be demonstrated that there is a need for extraction of building stone that will be primarily for non-aggregate use, and that the identified resource is of appropriate quantity and quality for the proposed use."	Objection partially accepted. The justification text will be amended to clarify the position regarding unallocated sites, however it is not considered necessary to amend the policy text. As part of a detailed planning application, evidence would have to be submitted to set out the end use of the mineral and the quantity available.	Amend justification text of MP10 to read: 'To date no other sites have been put forward, however demand for specific building stone could drive the need to develop a new quarry. In this instance criterion 2 in policy MP10 will be used to assess future applications at other sites to ensure that the specialised resource is not used for aggregate purposes. This is in line with national requirements to make the best use of the limited resources to secure long-term conservation'.

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30094 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>As this site does not have a restoration brief, it should be specifically stated that a future ROMP will enable a review of the restoration provision for this site and thus an opportunity to ensure that the proposed restoration is fit for purpose in fulfilling the aims of creating and restoring priority biodiversity habitats.</p>	<p>Add further text to state that a future ROMP will enable a review of the restoration provision for this site and thus an opportunity to ensure that the proposed restoration is fit for purpose in fulfilling the aims of creating and restoring priority biodiversity habitats.</p>	<p>Objection not accepted. The County Council do not feel that it is necessary to add further text with regards to the required review of minerals permissions (ROMP), these are undertaken every 15 years (as required nationally) and when carried out, will reflect the most recent adopted local and national policies. Therefore, if the Minerals Local Plan is adopted by the time a review of a permission is carried out, the strategies and policies contained within the Local Plan will be considered relevant.</p>	

### MP11: Coal

30095 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust does not object in principle to the proposed policy, but whilst there is mention of local or community benefits, there is no specific mention of biodiversity benefits in the policy. For consistency this should be remedied through: MP 11 add as 1c) "The principle of biodiversity-led restoration underpins this MLP, therefore the creation of priority biodiversity habitats will be the primary restoration aim for all coal extraction, tipping and reworking developments."</p>	<p>Add text to Policy MP 11 as 1c): "The principle of biodiversity-led restoration underpins this MLP, therefore the creation of priority biodiversity habitats will be the primary restoration aim for all coal extraction, tipping and reworking developments."</p>	<p>Objection not accepted. The Plan should be read as a whole and any planning application would have to be in line with Policy SP3 - Biodiversity led restoration and DM4 - Protection and enhancement of biodiversity and geodiversity.</p>	
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<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
30009 - The Coal Authority (Rachael Bust) [2853]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>We agree that the criteria based policies in MP11 are the most appropriate in light of current market circumstances. We support the continued broadly positive and supportive approach towards coal recovery from tip washing. It can be a useful source of coal and a method of removing mining legacy instability in some tips and/or allowing them to be re-engineered into less artificial landforms. The policy is considered to be flexible enough to cater for small scale prior extraction surface coal proposals, as well as more major stand-alone surface coal extraction. Policy MP11 achieves the appropriate balanced approach towards coal extraction as required by paragraph 149 of the NPPF. It also supports the objectives of paragraph 147 of the NPPF.</p>		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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MP12: Hydrocarbon Minerals

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29812 - Nottingham Friends of the Earth (Mr Nigel Lee) [1261]	Object	<p>The County Council has failed to give adequate consideration to the many representations arguing for a specific policy to control unconventional hydrocarbons. This means that the statement in 4.115 that "It is considered that there is no justifiable reason in planning policy terms to separate shale gas from other hydrocarbon development" is unsound in that it fails to take account of available evidence.</p> <p>It should be noted that UK government policy and guidance on high-volume hydraulic fracturing is based on out of date research, such as the Royal Society/Royal Academy of Engineering review (July 2012) and a report by Public Health England (although this was published in June 2014 it was not significantly changed from a 2013 draft which was based on evidence available upto 2012). This ignores more than 80% of the peer reviewed scientific literature on the environmental and health impacts of shale gas development which has been published since 2012.</p> <p>It should also be noted that there is a legal requirement for Plan policies to reduce climate emissions. While this requirement is reflected in Policy SP4 (Climate Change) it should also be emphasised explicitly in any policy on unconventional hydrocarbons.</p> <p>The Minerals Local Plan should also explicitly recognise the existing risk of minor earthquakes due to past coal mining activities, particularly in a wide area around Ollerton.</p>	<p>Suggested amendments to supporting text:</p> <p>(1) Delete first sentence of para 4.115: "It is considered that there is no justifiable reason in planning policy terms to separate shale gas from other hydrocarbon development". Replace with:</p> <p>Where there is a potential to extract hydrocarbons which are bound into underground rock structures (including shale gas, tight oil and coal bed methane), additional issues will have to be considered, including:</p> <p>* Definition of site boundary must include (in 3-D) the full extent of any horizontal drilling underground. (As required by TCPA 1990 s55(1) which defines "development" to include "... building, engineering, mining or other operations in, on, over or under land ...")</p> <p>* The Water Framework Directive requires a precautionary approach, particularly to protect groundwater from all contamination (<a href="http://ec.europa.eu/environment/water/water-framework/info/intro_en.htm">http://ec.europa.eu/environment/water/water-framework/info/intro_en.htm</a>). Particular care will be required to protect Sherwood sandstone aquifers used for drinking water and agriculture, and particularly in the former coal mining areas which are already subject to minor earthquakes.</p> <p>* Hydraulic fracturing increases the risk of inadvertent venting of methane (which is a powerful greenhouse gas) contrary to the requirements of Policy SP4 (Climate Change) and PCPA 2004 (s19(1A)). There is also a risk of venting carcinogenic gases such as benzene and toluene, as well as radon which is radioactive, which may be a direct threat to public health. A precautionary approach will therefore be taken to any proposal which may involve hydraulic fracturing.</p> <p>(2) Add after para 4.118: Planning Practice Guidance (Reference ID: 27-112-20140306) advises minerals</p>	<p>Not accepted. National guidance states that when planning for onshore oil and gas development, including unconventional hydrocarbons, Minerals Planning Authorities should clearly distinguish between the three phases of development (exploration, appraisal and production). There is no requirement to have separate policies for differing types of hydrocarbon development.</p> <p>As part of any planning application for hydrocarbon development, detailed assessment work would be required that would inform the final proposals put forward. The operator would also have to seek the relevant permits from the other regulatory bodies involved such as the Environment Agency and the Health and Safety Executive.</p> <p>Policy SP4 reflects the need to reduce climate emissions however it is not necessary to repeat this in Policy MP12 as the plan should be read as a whole.</p> <p>It is not considered relevant to make reference to minor earthquakes relating to past coal mining activities in Policy MP12.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			<p>planning authorities that "before granting planning permission they will need to be satisfied that these issues can or will be adequately addressed by taking the advice from the relevant regulatory body: ...Mitigation of seismic risks...Well design and construction...Well integrity during operation...Operation of surface equipment on the well pad...Mining waste...Chemical content of hydraulic fracturing fluid...Flaring or venting...Final off-site disposal of water...Well decommissioning/abandonment..."</p> <p>Planning conditions will be used to ensure these issues are adequately addressed, particularly to protect ground and surface water and to minimise the impact on the causes of climate change for the lifetime of the development as required by Policy SP4 (Climate Change).</p> <p>(3) Underground coal gasification: add after para 4.110:</p> <p>This technology has been tried in the 1950s in the UK - prompting questions in parliament about 'noxious fumes over a wide area':</p> <p><a href="http://hansard.millbanksystems.com/commons/1955/nov/28/underground-gasification-experiments">http://hansard.millbanksystems.com/commons/1955/nov/28/underground-gasification-experiments</a></p> <p>More recently a pilot facility operated in Queensland Australia by Cougar Energy was shut down due to potentially carcinogenic pollution including benzene and toluene emissions. Another UCG facility operated by Linc Energy was found to have contaminated hundreds of square kilometres of agricultural land in South East Queensland:</p> <p><a href="http://www.abc.net.au/news/2015-08-10/linc-energy-secret-report-reveals-toxic-chemical-risk/6681740">www.abc.net.au/news/2015-08-10/linc-energy-secret-report-reveals-toxic-chemical-risk/6681740</a></p> <p>Gasification of coal is the process which used to be operated at gas works and coking works. In many cases the resulting contamination is still being cleared up. The Minerals Planning Authority will wish to ensure that</p>		

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			underground gasification is not allowed to create new contamination.		
			<p>Suggested addition to Policy MP12:</p> <p>Planning permission for hydraulic fracturing or for shale gas, coal bed methane or tight oil operations (including test drilling and extraction) will not be granted unless:</p> <p>(a) it has been demonstrated that all reasonable scientific doubt that there is any risk of adverse impacts has been eliminated;</p> <p>(b) the proposal will not compromise the Council's duties in relation to climate change mitigation; and</p> <p>(c) it does not give rise to any unacceptable impacts on the environment or residential amenity.</p> <p>Any application for hydraulic fracturing or for shale gas, coal bed methane or tight oil operations (including test drilling and extraction) must demonstrate by appropriate evidence and assessment that reasonable scientific doubt can be excluded as to adverse impacts of the proposed development alone or in combination with other developments:</p> <ul style="list-style-type: none"> <li>* on the quality and quantity of water resources, including groundwater and water courses;</li> <li>* on air quality (including through emissions of methane and sulphur);</li> <li>* on seismic activity;</li> <li>* on local communities;</li> <li>* on greenhouse gas emissions and climate change.</li> </ul>		

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30096 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust notes the clear intent that hydrocarbon development would not be permitted unless it can be demonstrated that there would be no unacceptable environmental impact. Hydrocarbon developments are almost unique, in that their primary output contributes to increases in greenhouse gases and hence climate change, NWT therefore expects this to be stated in the text and also suggests a note in the text that this is contrary to the principles of sustainable development at a National and County policy Level.</p> <p>The Trust welcome that the revised text in the restoration section (5) of this policy no longer makes the assumption that all sites would be restored back to their original use. In many cases, where the footprint of the development is very small, this may be appropriate, however the Policy should not preclude restoration to biodiversity habitats on suitable sites.</p> <p>There remains an issue, however, that whilst each small-scale hydrocarbon development may only result in low level habitat and landscape degradation, there is the potential for a cumulative effect of a number of small scale developments both spatially and over time. The unique nature of hydrocarbon developments for this type of cumulative effect is not explicitly recognised in DM8. This should therefore be amended in MP12 as follows: 5. All applications for hydrocarbon development will be accompanied with details of how the site will be restored, once the development is no longer required, in order to achieve biodiversity outputs and particularly where cumulative impacts of several small sites may occur."</p>	Amend Policy MP12 (5) as follows: "All applications for hydrocarbon development will be accompanied with details of how the site will be restored, once the development is no longer required, in order to achieve biodiversity outputs and particularly where cumulative impacts of several small sites may occur."	Not accepted. Policy SP4 reflects the need to reduce climate emissions however it is not necessary to repeat this in Policy MP12. The restoration of any well site is an important part of the overall project and this is specified in part 5 of the MP12. The plan needs to be read as a whole and so any potential cumulative impacts would be assessed through policy DM8: 'Cumulative impact' on a case by case basis. It is therefore not considered necessary to add the additional text to section 5.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29854 - Mr Brian Davey [2763]	Object	<p>The document is unsound as (a) it does not properly into account the scale that unconventional hydrocarbons would have to be developed at in order to have any chance of being economic; (b) it does not take into account up to date information from peer reviewed academic research on health and environmental impacts of unconventional gas development and (c) it does not take into account the evidence that regulation would be incapable of making this industry safe and therefore precautionary principles should apply.</p>	<p>The first paragraph of paragraph para 4.115 should be deleted and replaced with a text that explicitly spells out how the many dangers associated with unconventional gas field development are to be addressed.</p> <p>Suggested addition to Policy MP12: Planning permission for hydraulic fracturing or for shale gas, coal bed methane or tight oil operations (including test drilling and extraction) will not be granted unless:</p> <p>(a) it has been demonstrated that all reasonable scientific doubt that there is any risk of adverse impacts has been eliminated. The evidence on this should be the peer reviewed scientific literature;</p> <p>(b) the proposal will not compromise the Council's duties in relation to climate change mitigation; and</p> <p>(c) it does not give rise to any unacceptable impacts on the environment or residential amenity.</p> <p>(d) It has been demonstrated that Environment Agency and the Health and Safety Executive are able to dramatically increase their track record of enforcing their conditions and are prepared to shut down operations that do not abide by conditions, refusing any subsequent permissions to the companies concerned.</p> <p>Any application for hydraulic fracturing or for shale gas, coal bed methane or tight oil operations (including test drilling and extraction) must demonstrate by appropriate evidence and assessment that reasonable scientific doubt can be excluded as to adverse impacts of the proposed development alone or in combination with other developments:</p> <ul style="list-style-type: none"> <li>* on the quality and quantity of water resources, including groundwater and water courses;</li> <li>* on air quality (including through emissions of methane and sulphur);</li> <li>* on seismic activity;</li> <li>* on local communities;</li> </ul>	<p>Objection not accepted. There is Government support and guidance for the extraction of hydrocarbons (including shale gas) as they remain an important part of the UK's energy mix whilst we are in transition to low carbon energy supplies. The Government has stated that "there is a pressing need to establish, through exploratory drilling, whether or not there are sufficient recoverable quantities of unconventional hydrocarbons present to facilitate economically viable full scale production".</p> <p>The National Planning Policy Framework requires all Minerals Planning Authorities to identify and include policies for extraction of mineral resource of local and national importance in their area which include both conventional and unconventional hydrocarbons (including Shale Gas and Coal Bed Methane).</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			* on greenhouse gas emissions and climate change.		
30056 - IGas Energy [7911]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>We do not believe that the approach being taken in the MLP in relation to hydrocarbons in section MP12 is positively prepared.</p> <p>The MLP acknowledges there are potentially significant shale gas resources within Nottinghamshire but fails to make reference to the potential benefits of a shale gas industry within the UK or Government support within NPPF or recent Government statements.</p> <p>The MLP makes the claim that shale gas extraction "is a very intensive activity" yet fails to back up this statement with evidence. The footprint and environmental impacts of shale gas extraction is very small in comparison to most mineral extraction.</p> <p>A couple of points of clarity: Amend para 4.117 to correctly define PEDLs. At para 4.118, the first bullet point makes reference to DECC who issue PEDLs. This function has now transferred to the Oil and Gas Authority.</p>		<p>Objection partially accepted. It is not considered appropriate to make reference to the potential benefits or otherwise of the shale gas industry in the Minerals Local Plan. The reference to 'intensive activity' relates to the depth of the drilling and amount of water required to extract the gas as opposed to the footprint of the development.</p>	<p>Amend Paragraph 4.117 to state: 'A UK Petroleum Exploration and Development Licence (PEDL) allows a company to pursue a range of oil and gas exploration activities, subject to necessary drilling/development consents and planning permission'.</p> <p>Amend Paragraph 4.118 to reflect the change from DECC to the Oil and Gas Authority.</p>



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29342 - Hucknall Branch Labour Party (Kath Cooper) [7776]	Object	<p>The following motion was passed by Hucknall Branch Labour Party on Wednesday 2nd March 2016:</p> <p>"This branch recognises the huge environmental and socio-economic pressures that fracking will put on communities in Nottinghamshire. We therefore call on Nottinghamshire County council to make it policy to</p> <ul style="list-style-type: none"> <li>* oppose and campaign against this very damaging method of gas extraction, and, simultaneously,</li> <li>* campaign for the development of a coherent energy policy in the county and country as a whole, that minimises as far as possible any negative impact on the environment and its communities."</li> </ul>	<p>The following motion was passed by Hucknall Branch Labour Party on Wednesday 2nd March 2016:</p> <p>"This branch recognises the huge environmental and socio-economic pressures that fracking will put on communities in Nottinghamshire. We therefore call on Nottinghamshire County council to make it policy to</p> <ul style="list-style-type: none"> <li>* oppose and campaign against this very damaging method of gas extraction, and, simultaneously,</li> <li>* campaign for the development of a coherent energy policy in the county and country as a whole, that minimises as far as possible any negative impact on the environment and its communities."</li> </ul>	<p>Objection not accepted. There is Government support and guidance for the extraction of hydrocarbons (including shale gas) as they remain an important part of the UK's energy mix whilst we are in transition to low carbon energy supplies. The Government has stated that "there is a pressing need to establish, through exploratory drilling, whether or not there are sufficient recoverable quantities of unconventional hydrocarbons present to facilitate economically viable full scale production".</p> <p>The National Planning Policy Framework requires all Minerals Planning Authorities to identify and include policies for extraction of mineral resource of local and national importance in their area which include both conventional and unconventional hydrocarbons (including Shale Gas and Coal Bed Methane).</p> <p>Policy MP12: 'Hydrocarbon minerals' only supports applications for hydrocarbon minerals where they give rise to any unacceptable impacts on the environment or residential amenity.</p>	
29612 - Egdon Resources Plc [1777]	Object	<p>Egdon largely supports proposed Policy MP12 'Hydrocarbon Minerals' within the Nottinghamshire Local Plan and consider parts 1 'Exploration', 2 'Appraisal', 3 'Extraction' and 5 'Restoration of the policy to be sound.</p> <p>Edgon considers that part '4' of Policy MP12 is not sound as it is not consistent with national policy. The current wording of part '4' could potentially place unnecessary restrictions on operators of hydrocarbon licences in Nottinghamshire and hinder hydrocarbon extraction contradicting guidance in the NPPF, PPG and national energy policy.</p>		<p>Objection accepted. Point four 'Where proposals for hydrocarbon development coincide with areas containing other underground mineral resources, evidence must be provided to demonstrate that their potential for future exploitation will not be unreasonably affected' will be removed.</p>	<p>Remove point 4 of MP12: 'Where proposals for hydrocarbon development coincide with areas containing other underground mineral resources, evidence must be provided to demonstrate that their potential for future exploitation will not be unreasonably affected'</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29818 - Ashfield District Council (Stuart Wiltshire) [7848]	Object	Whilst Ashfield District Council supports the County Council's approach to managing and guiding Minerals development and extract across Nottinghamshire, Ashfield District Council wishes to highlight that it remains very concerned about the potential for Fracking in the north of the District and does not support this method of minerals extraction. The Council acknowledges that the Minerals Local Plan contains Development Management Policies, which will help manage any future proposals and stresses the importance of applying these in a rigorous manner in consultation with relevant stakeholders.		<p>Objection not accepted. There is Government support and guidance for the extraction of hydrocarbons (including shale gas) as they remain an important part of the UK's energy mix whilst we are in transition to low carbon energy supplies. The Government has stated that "there is a pressing need to establish, through exploratory drilling, whether or not there are sufficient recoverable quantities of unconventional hydrocarbons present to facilitate economically viable full scale production".</p> <p>The National Planning Policy Framework requires all Minerals Planning Authorities to identify and include policies for extraction of mineral resource of local and national importance in their area which include both conventional and unconventional hydrocarbons (including Shale Gas and Coal Bed Methane).</p> <p>Policy MP12: 'Hydrocarbon minerals' only supports applications for hydrocarbon minerals where they give rise to any unacceptable impacts on the environment or residential amenity.</p>	
29793 - Mr J Potter [2108]	Object	MP12 , 'fracking' concerns, for example, re countryside visuals.		Objection not accepted. Any planning application for minerals development would be assessed against the policies contained within the Minerals Local Plan, this would include Policy DM5 landscape character.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30010 - The Coal Authority (Rachael Bust) [2853]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>We welcome the broadly supportive approach towards the provision of remediating the treatment of mine gas which is a relevant locally distinctive public safety issue.</p> <p>We welcome the broadly supportive approach towards the facilitation of proposals to use CBM. The Plan needs to remain flexible given the emerging nature of the technology and the broad nature of the current licensed areas. The PEDL licensed areas are broad in nature and just reflect arbitrary sub-divisions of the overall potential resource. They do not necessarily represent the full extent of CBM and only offer a starting point. Policies should facilitate potential extraction both within and outside the current PEDL licence areas. The plan is considered to allow for this flexibility.</p>		Support noted	
<hr/>					
<i>MP12 Justification</i>					
29122 - Alkane Energy UK Limited [7638]	Support	<p>The references to mine gas extraction is welcome. As the Council is aware, our client has a number of facilities within Nottinghamshire which extract mine gas and use it as a fuel to generate electricity, on site. Our client is in the process of formulating plans to carry out some further mine gas extraction and power generation schemes within Nottinghamshire, over the next few years.</p>		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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### Chapter 5: Development Management Policies

#### Chapter 5: Development Management Policies

30061 - Derbyshire County Council (Mr Rob Murfin) [1041]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE
		<p>Social and Environmental Impacts</p> <p>The emerging plan provides a sufficient policy context for assessing social and environmental impacts associated with mineral extraction. Whilst there are specific development management policies addressing most environmental issues, and the overall restoration policy (DM12) is relatively inclusive for environmental issues, it may be more helpful if there was less emphasis on a biodiversity-led restoration. This would enable the overall outcomes for social and environmental enhancement to be maximised. For example, there are likely to be conflicts between recreational and wildlife objectives, and it is difficult to appreciate how the visual dimension of the landscape would be considered so that restored sites do not conflict with the established character of the wider landscape.</p>

Objection not accepted.

Mineral extraction sites can provide the greatest potential for biodiversity gain both nationally and locally. Opportunities, in the past, to deliver new habitats has been lost when considering the restoration of permitted development sites. It is a County Council priority to reverse this and therefore Biodiversity-led restoration is seen as a strategic priority for the County Council.

In various parts of the plan (Strategic Policies, Development Management Policies and Site Restoration Briefs) biodiversity-led restoration may not always be appropriate.

#### DM1: Protecting local amenity

29732 - Mr Adrian Hatton [2828]	Object	MLP over estimates requirement for sand and gravel with consequent increased impact on local communities.	Re assess requirement for sand and gravel using latest available figures - consider removal of new sites from plan to reduce impact of increased HGV on road networks - particular around A617/A1/A46 focus area.
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Objection not accepted. The County Council's response to objections regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.

Adequate sand and gravel reserves to meet the expected demand over the plan period been identified through the site allocation process. The County Council maintains that it has used the most appropriate figures in determining the level of demand and so do not consider that any change to the allocations on this basis is needed or appropriate.

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29882 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	
29519 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The visual impact of the flash farm site would be immense resulting from its elevated position over the surrounding villages of Kelham and Averham, more so of recent now Notts County Council has seen fit to recently remove the woodland bordering the A617 which could have screened the Flash farm site to some extent. The increase in noise and air pollution as a result of the proposal and the additional road traffic will impact on the surrounding residents and their health. The Trent valley already has a higher than average occurrence of respiratory conditions, eg asthma.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29328 - Miss Myra Ng [7757]	Object	I live just over 400 metres from the proposed site so the huge negative is unavoidable. I am particularly concerned about the air pollution which is potentially life threatening. There is definite detriment to health as I will not be able to avoid breathing in the particulate matter. Added to this the constant noise, visual impact, traffic and general disturbance. Living in the area will be highly stressful. The destruction of the countryside on my doorstep is also devastating. Significant financial implications arise from the area no longer being a desirable location.	Nothing can be done if the pit goes ahead apart from myself being forced to relocate and lose out financially as my property is worth far less on the edge of a pit. I stretched to my limit to buy this property not long ago because of the location. I would not have bought here had I known the potential proximity of the pit. I understand the need for resources and the reasons why this site is being proposed, but I don't want to live on the edge of it for health and other negative impacts the pit will enforce on me.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies.	
29542 - Mr John Watchman [7785]	Object	The best way to protect local amenity is not to exploit unnecessary sites. I believe that if latest available data from the LAA 2015 (or 2016 if it is available) and recycling figures from the NCC Waste Core Strategy is utilised it will show that the greenfield sites are not required.	Greenfield sites are unnecessary in the immediate/ middle term and this is the best way of protecting local amenity.	Objection not accepted. The County Council's response to objections regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.  Adequate sand and gravel reserves to meet the expected demand over the plan period been identified through the site allocation process. The County Council maintains that it has used the most appropriate figures in determining the level of demand and so do not consider that any change to the allocations on this basis is needed or appropriate.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29364 - Mrs Jackie Armstrong [2881]	Object	Drove Lane/A17 staggered junction next to Coddington MP2o is a dangerous undersigned junction needing manual management during events at Newark Showground. The accident statistics are worse than stated in the STA Addendum, and include two separate lorry-related fatalities of a child cyclist and a car driver. Traffic flows already intimidate all classes of road user - pedestrians/cyclists from Coddington are intimidated by the traffic volumes, accident record, and crossing design, and are effectively severed from leisure amenities and public rights of way North of the A17. Adding a further junction and 200 HGVs/day within 500m is highly irresponsible.	Inclusion of Coddington MP2o is not sound with regard to Policy DM1 Protecting Local Amenity and does not take account of severance (GEART P.20) from amenities due to the intimidation of pedestrians and cyclists.  Remove Coddington MP2o from the Minerals Local Plan, until substantial local infrastructure and safety improvements have been delivered, including a safe pedestrian and cyclist crossing - such as a pelican crossing with a central refuge, and all the transport issues resolved.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29590 - Mr Ian Bradey [7824]	Object	The visual impact of the flash farm site would be immense resulting from its elevated position over the surrounding villages of Kelham and Averham, more so of recent now Notts County Council has seen fit to recently remove the woodland bordering the A617 which could have screened the Flash farm site to some extent. The increase in noise and air pollution as a result of the proposal and the additional road traffic will impact on the surrounding residents and there health.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29291 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719] 29318 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719] 29319 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	The information and assessment carried out for Coddington in the Strategic Transport Assessment is inaccurate.	NCC should acknowledge that the export routes for all material from the proposed Coddington quarry passes through two severe accident blackspots on Newark bypass and take these into account in their safety analysis of site MP2o in the STA and the Addendum. As a minimum this should include the large number of traffic volume and congestion related accidents at the A17 / A46 / A1 roundabout as this is the main export route for the site and the first major junction encountered. For exports to Nottingham and Mansfield, the Cattle Market roundabout is also a major accident blackspot and will interact with Southbound exports from Flash Farm. Site MP2o should be removed from the MLP until there are definitive funded proposals for resolving these severe transport issues.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29764 - Craig Black [3612]	Object	The justification that any adverse impacts on the amenity are avoided and/or adequately mitigated has not been suitably addressed and is indeed woolly i.e. The exact process and the precise measures to mitigate adverse impact have not been detailed with regard to 1.Dust 2.Noise 3.Discharge of contaminantrs into air water and land 4.Visual effect and impact on the countryside. 5.Discharge of water	Review the justification and provide details of exactly what protections will be put in place to protect the local amenity.	Objection not accepted. Impacts may vary according to location and scale of working. As explained in the justification text the specific measures required will therefore need to be determined on a case by case basis. The plan should be read as a whole and examples of the types of measures which may be required in respect of the impacts listed are set out in paragraphs 5.10 - 5.16 of the justification text which accompanies policy DM1. This includes measures such as site-specific noise limits, the use of dust suppression equipment, and controls over site design and layout for example.	
29129 - Mr Lawrence Hardy [7683]	Object	Road Traffic Impact Upon The A.6097 for both Air and Noise Pollution.	Items for inclusion in the Section 106 Agreement.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29814 - Nottingham Friends of the Earth (Mr Nigel Lee) [1261]	Support	Further to comments made on the Preferred Approach and amendments made, we would like to support the following policies: Policy SP4 - Climate Change Policy DM1: Protecting Local Amenity Policy DM2: Water Resources and Flood Risk Policy DM4: Protection and Enhancement of Biodiversity and Geodiversity Policy DM8: Cumulative Impact		Support noted	

### DM1 Justification

29195 - Helen Rushby [7730]	Object	The site at Flash Farm is approx 500-600 mtrs from the primary school at Averham and the villages of Averham and Kelham. The visual intrusion, noise, dust, air emissions and increased transport in the form of HGVs and diesel emissions will all have a significant negative effect on the immediate local area and the health of the residents and children attending the school. The school and its playground is located adjacent to the A617. This will particularly affect people with respiratory conditions and asthma, already high in the Trent valley.	A full impact assessment for each of these health related areas needs to be carried out before this site is included in the plan including the impact on the health of local residents and schoolchildren over the long period this site is intended to be in operation should be carried out before this site is included as a new site in the plan. If an application is to be submitted the potential site operator should be required to introduce additional measures to mitigate all of these health issues to the surrounding area and not just the site.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29383 - Kirklington Parish Council (Helen Cowlan) [879]	Object	With consideration to 5.16 - Transport policy assessments are at a very high level and look only at vehicle volumes/movements. No consideration has been given to associated problems. Noise surveys carried out in Kirklington and Hockerton on the A617, have shown that existing noise levels already exceed World Health Organisation (WHO) recommendations, and additional HGV traffic will exacerbate this further (along with any air pollution).	*Remove Flash Farm from the MLP	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29520 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The visual impact of the flash farm site would be immense resulting from its elevated position over the surrounding villages of Kelham and Averham, more so of recent now Notts County Council has seen fit to recently remove the woodland bordering the A617 which could have screened the Flash farm site to some extent. The increase in noise and air pollution as a result of the proposal and the additional road traffic will impact on the surrounding residents and there health. The Trent valley already has a higher than average occurrence of respiratory conditions, eg asthma.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29191 - Mrs Linda White [7642]	Object	Visual impact of workings on approach to historic Kelham will be significant Transport from Flash Farm site will impact negatively on local amenity as highway is already overloaded and noise and particulate emissions are very high and at unacceptable levels for health	Reconsider inclusion of Flash Farm as preferred site following full assessment of local amenity impact	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29227 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The MLP puts forward Flash Farm despite the current conditions on the A617. Roadside communities already suffer from noise, vibration and noxious emissions at health endangering levels as well as difficulties entering and exiting their properties due to traffic volume. The site is about 0.5km from a school and similar distance from houses in Averham, Kellham and Staythorpe, causing concern about airborne silica particles that are known to have a particularly injurious effect on health	Flash Farm to be removed from the list of preferred sites on the basis of local impact and strategic issues that are identified in our responses to other parts of this document	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29445 - Michael Staff [3695]	Object	<p>The development of Flash Farm will have a significant impact on the local amenity of Averham and Kelham in particular. Visual intrusion will be obvious for all to see especially now that council sanctioned removal of trees and bushes has just taken place.</p> <p>Dust and mud will inevitable be deposited on the A617.</p> <p>Floodlighting will be detrimental to the area.</p> <p>The latest A617 traffic survey undertaken by the NCC dated February 2016 indicates that traffic is at an all time high. The pinch point at Kelham bridge where 2 HGV's cannot even pass at the same time will become worse</p>	Remove Flash Farm from the plan from a local amenity point of view as well as the evidence that it is not required.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29207 - Tim Harrison [3311]	Object	<p>Noise levels and pollution caused by current traffic densities exceed Control of Road Traffic Noise (CRTN) and World Health Organisation (WHO) standards in both Kirklington and Hockerton.</p> <p>Properties backing up to the side of the A617 through Averham and Hockerton and Kirklington are already affected by vibration from lorries. House entrances and side roads, many on blind bends and crests, are made dangerous to residents and other road users by the large volume of traffic now. Pavements are narrow, and hazardous, especially on bends.</p> <p>Kirklington has a school at its centre; the entrance is totally blind to traffic from Newark.</p>	Remove Averham Flash Farm from the Plan on the grounds that additional associated traffic will contribute to, or be put at risk from, pollution or other sources of nuisance or intrusion which could adversely affect local amenity, particularly in relation to sensitive receptors.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29450 - Dr Valerie Willcocks [7774]	Object	HGV lorries from the Flash Farm site will add to the present traffic overload, particularly affecting Averham & Kelham villagers. Averham Primary School is approximately 500 mtrs from the Flash Farm site. Additional HGVs will increase noise, dust, and particulate emissions. This will not only have a significant negative effect on the health of the villagers and schoolchildren, but also on those suffering from respiratory conditions such as asthma. Noise levels and pollution caused by current traffic densities already exceed Control of Road Traffic Noise (CRTN) and World Health Organisation (WHO) standards at various places along the A617.	The potential site operator should be required to introduce the highest quality measures to ensure that the health hazards do not negatively impact on the surrounding villages. Regular reviews of the impact on health issues should be undertaken by the site operator.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29591 - Mr Ian Bradey [7824]	Object	The visual impact of the flash farm site would be immense resulting from its elevated position over the surrounding villages of Kelham and Averham, more so of recent now Notts County Council has seen fit to recently remove the woodland bordering the A617 which could have screened the Flash farm site to some extent. The increase in noise and air pollution as a result of the proposal and the additional road traffic will impact on the surrounding residents and there health.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29253 - Mr David Walton [7745]	Object	Identify the risks to using the A617 which is not a suitable road for such a vast increase in haulage traffic. The proposal will create significant risks to the villages along the A617 corridor	Remove flash farm	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29425 - Tony Warwick [3331]	Object	The noise levels and pollution (especially diesel emissions) caused by the current traffic densities are already too high in both Kirklington and Hockerton. Respiratory problems and asthma is already high in this area. Pavements in villages are narrow and hazardous especially on bends. The entrance to the Wings school is totally blind. Other houses have entrances on blind bends and crests. Road surfaces are broken up by the HGV traffic. Repairs are inadequate. Pot holes are potentially damaging to vehicles and present a danger.	Remove Flash farm from plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29113 - National Farmers' Union (Paul Tame) [1564]	Support	The NFU support paragraph 5.9 which clearly indicates that new mineral development should mitigate against adversely affecting farming neighboring the mineral development, because of noise, dust and other factors.		Support noted	

### DM2: Water resources and flood risk

29229 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The site at Flood Farm and the area between Flash Farm and Kelham is shown at risk from flooding from surface water on the Environment Agency website. The water table would alter during the extraction processes. Waste water if fed into local becks/streams would increase their volume. High water levels prevent emptying into the Trent. Potential for increased flood risk at Kelham and Averham ,where both areas can already experience field flooding, road closures due to surface flooding on A617 and threats to housing at periods of high rainfall. Dewatering of site may impact on health of Kelham Woods	Sites with potentially complex water management issues and in areas already at risk of flooding should not be included in the plan without robust site specific investigation	Objection not accepted. A Strategic Flood Risk Assessment (SFRA) was completed to support the development of the Plan and the site allocation process (see Flood Risk Assessment Background Paper for more details). The SFRA followed national guidance and included consideration of the impact of climate change on flooding. The site specific flood risk assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time. The County Council is satisfied that these elements ensure that a comprehensive assessment of flood risk will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29695 - Tarmac Ltd [580]	Object	<p>In Tarmac's view some of the criterion contained in Policy DM2 are undeliverable and unenforceable whilst other parts of the policy are not justified/ consistent with national policy.</p> <p>Water resources, criterion D.</p> <p>It is not clear from the MLP how this objective can be practically delivered or enforced.</p> <p>Flooding, criterion 3.</p> <p>Statement appears contradictory as in cases where 'risks can be fully mitigated' the proposal would not 'increase flood risk to local communities'. As such, the purpose/ intent of this statement is unclear and it is recommended that the policy is re-worded.</p> <p>Flooding criterion 5.</p> <p>Appears disproportionate and out of accord with national policy. Examples include: NPPF (para 103) PPG (Para 79), (para 51)</p> <p>It is clear from PPG guidance that SuDS are not always appropriate or practicable in respect of minerals development - as such we consider that criterion 5. is not justified. It is recommended that criterion 5. of Policy DM2 is amended so that it is reflective of the national policy position.</p>		<p>Objection not accepted.</p> <p>The need to take flood risk and water management into consideration is referenced throughout the NPPF with supporting guidance in the NPPG.</p> <p>Some parts of Nottinghamshire are constrained by the capacity of water. Depending on the location and type of mineral extraction, it would be for the operator to identify, through the Environmental Impact Assessment (EIA) scoping process, the site specific constraints at the planning application stage and address these as part of their EIA.</p> <p>In line with the NPPF (and other national guidance) the Minerals Local Plan is required to contain policies on Flood Risk management taking advice from the Environment Agency and utilising the Strategic Flood Risk Assessment. The wording contained in Policy DM2 (criterion 3) is in-line with policy and advice.</p> <p>In terms of SuDS, the policy does allow for exceptions where minerals development is not appropriate or practicable. Policy DM2 criterion 5 has been amended (see representation 29550) so that it now reads: 'Minerals development should include Sustainable Drainage systems (SuDS) to manage surface water drainage unless it can be shown that it is impractical to do so'.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29938 - Burton Joyce Village Society [7122]	Object	DM2 & vision Statement. Flood risks. Existing Flood Risk Assessments are clearly obsolete in view of current conditions and climate change. as illustrated by recent events in Cumbria. and a little earlier in the west of England. While in "nonnal" times gravel extraction on the Right Bank of the Trent would not increase flooding dangers to Burton Joyce on the Left Bank, the course of the Trent is historically unstable just in this area. and weakening the solidity of the bank by quarrying could in severe conditions cause the river to wash away its existing banks causing flooding on the Burton Joyce side, much of which is a level 3 flood risk area.	Further research into flood risks in exceptional conditions. Overall, reversion to 2013 Draft Plan, excluding site MP2r entirely.	Objection not accepted. A Strategic Flood Risk Assessment (SFRA) was completed to support the development of the Plan and the site allocation process (see Flood Risk Assessment Background Paper for more details). The SFRA followed national guidance and included consideration of the impact of climate change on flooding. The site specific flood risk assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time, including calculations for climate change. The County Council is satisfied that these elements ensure that a comprehensive assessment of flood risk will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
29550 - Lowland Derbyshire & Nottinghamshire Local Nature Partnership (Rosy Carter) [2670]	Object	We consider that the approach to Sustainable Urban Drainage Systems - as set out in section 5 of DM2- is potentially inconsistent with national policy.  Planning Policy Guidance paragraph 79 states: "Sustainable drainage systems may not be practicable for some forms of development (for example, mineral extraction)"  On the basis of this, the test for whether SUDS are required should be based on practicality rather than acceptability.	We suggest that section 5 is reworded to:  "Minerals development should include Sustainable Drainage Systems (SuDS) to manage surface water drainage unless it can be shown that it is impractical to do so"	Objection accepted. The proposed alteration to the policy wording is accepted as this would improve consistency with the Planning Practice Guidance.	Amend bullet point 5 of Policy DM2 to read:  'Minerals development should include Sustainable Drainage Systems (SuDS) to manage surface water drainage unless it can be shown that it is impractical to do so'.

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29430 - Andrew Fereday [7756]	Object	Flash Farm is adjacent to areas that are classed as either Flood Zone 2 having a Medium Probability or Flood Zone 3, a High Probability of flooding (National Planning Policy Framework). The potential change of use has the potential to increase flood risk elsewhere. It is unlikely that Mission Dyke has sufficient capacity to absorb surplus water from mineral extraction, and may become a source of flooding to nearby houses.	Alternative site to be selected where there is no risk of flooding to adjacent residential areas	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29883 - Councillor Bruce Laughton [1073]	Object	See Rep No. 29875 (Policy MP2)	See Rep No. 29875 (Policy MP2)	See response to Rep No. 29875 (Policy MP2)	
29498 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Flash Farm is adjacent to areas that are classed as either Flood Zone 2 having a Medium Probability or Flood Zone 3, a High Probability of flooding (National Planning Policy Framework). Potentially this can increase flood risk elsewhere. It is unlikely that Mission Dyke has sufficient capacity to absorb surplus water from mineral extraction, and may become a source of flooding to nearby houses.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29588 - Dr Judith Mills [7829]	Object	The inclusion of Flash Farm in the Plan potentially increases the flood risk to Kelham, especially in Home Farm Close which is connected to Mission Dyke which is unlikely to have sufficient capacity to absorb surplus water from mineral extraction	Remove Flash Farm from the Plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29758 - Brett Aggregates Limited [69]	Object	Policy DM2 states that proposals for mineral development should demonstrate no risk to polluting ground or surface water. It is not possible to demonstrate no risk and this should be amended to "no significant risk".  This amendment is needed for the Plan to be effective.	It is not possible to demonstrate no risk and this should be amended to "no significant risk".	Objection partially accepted.  It is agreed that it would not be possible to demonstrate no risk and as such an amendment is proposed to insert the word 'unacceptable'.	Amend Policy DM2 as follows:  "1c) There are no unacceptable risks of polluting..."
29801 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29192 - Mrs Linda White [7642]	Object	Flash Farm is in a flood risk area and mineral extraction will need complex management of water to avoid local flooding. Plans shown by the developer indicated that excess water will be pumped into existing watercourses that currently act as storm drains in parts of Kelham and which can already flood at high river and rain levels. Localised flooding may lead to damage to the road and or road closure as well as damage to housing	A robust plan for the management of water at the site to be devised and put down as a duty to the developer, before any work on the site can be done. Specific plans for periods of high water levels in the Trent need to be included	Objection not accepted. A Strategic Flood Risk Assessment (SFRA) was completed to support the development of the Plan and the site allocation process (see Flood Risk Assessment Background Paper for more details). The SFRA followed national guidance and included consideration of the impact of climate change on flooding. The site specific flood risk assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time. The County Council is satisfied that these elements ensure that a comprehensive assessment of flood risk will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29765 - Craig Black [3612]	Object	National guidelines dictate that inappropriate development in the flood plain should be avoided and no amount of mitigation would make this acceptable. Quarry workings will affect the water table levels causing them to increase and decrease throughout the seasons. High water levels together with heavy rainfall and high river levels, could result in flooding, particularly in Kelham with water discharge on its way down the Mission drain to the River Trent. Flooding has the potential to necessitate road closures which have occurred on a number of occasions without the additional discharge from the quarry.	Remove Flash Farm as a proposed site.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29733 - Mr Adrian Hatton [2828]	Object	Preferred sites are included in plan without site specific information to address impact re DM 2 - e.g. Flash Farm MP2p is dependant on use of existing drainage to dispose of surplus water - Mission drain and Pingley dyke are the only two watercourses available to use and would result in increased flooding risk to Kelham and Averham residences.	Preferred sites are included in plan without Site specific information to address impact re DM 2 - e.g. Flash Farm MP2p is dependant on use of existing drainage to dispose of surplus water - Mission drain and Pingley dyke are the only two watercourses available to use and would result in increased flooding risk to Kelham and Averham residences.	Objection not accepted.  The National Planning Policy Framework (and supporting guidance) required Local Planning Authorities to undertake Strategic Flood Risk Assessments and use their findings in the plan making process. A Level 1 Strategic Flood Risk Assessment has been prepared for the County Council by AECOM to inform and support the preparation of the Minerals Local Plan.  At the planning application stage, operators would be required to undertake a site specific Flood Risk Assessment in accordance with the National Planning Policy Framework and appropriate guidance.	
29634 - Shelford Parish Council [7840] 29653 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	The choice of the Shelford West site is a high risk strategy which has implications for other villages on the north western bank and downstream of Shelford. This risk has not been properly assessed since data sets that have been used are inaccurate and out of date	A more up to date and accurate flood risk assessment for Shelford West needs to be prepared taking into account plans for flood alleviation on the Trent flood plain.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
29592 - Mr Ian Bradey [7824]	Object	Flash Farm is adjacent to areas that are classed as either Flood Zone 2 having a Medium Probability or Flood Zone 3, a High Probability of flooding (National Planning Policy Framework). Potentially this can increase flood risk elsewhere. It is unlikely that Mission Dyke has sufficient capacity to absorb surplus water from mineral extraction, and may become a source of flooding to nearby houses.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29215 - Environment Agency (Mr Andrew Pitts) [2714]	Support	We welcome an support this policy which will promote a sustainable approach to minerals development by considering two key important environment aspects, water resources and flood risk management.		Support noted	

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30097 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  NWT welcomes that further to our previous submissions, this policy now reflects more positively the contribution that mineral working could make to sustainable flood risk management, such as floodplain storage and reconnection. We can therefore withdraw our objection to this policy.		Support noted	
29815 - Nottingham Friends of the Earth (Mr Nigel Lee) [1261]	Support	Further to comments made on the Preferred Approach and amendments made, we would like to support the following policies: Policy SP4 - Climate Change Policy DM1: Protecting Local Amenity Policy DM2: Water Resources and Flood Risk Policy DM4: Protection and Enhancement of Biodiversity and Geodiversity Policy DM8: Cumulative Impact		Support noted	

### DM2 Justification

29593 - Mr Ian Bradey [7824]	Object	Flash Farm is adjacent to areas that are classed as either Flood Zone 2 having a Medium Probability or Flood Zone 3, a High Probability of flooding (National Planning Policy Framework). Potentially this can increase flood risk elsewhere. It is unlikely that Mission Dyke has sufficient capacity to absorb surplus water from mineral extraction, and may become a source of flooding to nearby houses.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29451 - Dr Valerie Willcocks [7774]	Object	Flash Farm is situated in a flood risk area, and mineral extraction will need complex management of water to avoid local flooding. Plans shown by the developer indicate that excess water will be pumped into existing watercourses that now act as storm drains in part of Kelham. These already flood at high river and excess rainfall. At present localised flooding leads to road closures and traffic diversions.	The developer must produce a robust plan for the management of water at the site before work at the site begins. This should include plans for high water levels in the Trent.	<p>Objection not accepted. A Strategic Flood Risk Assessment (SFRA) was completed to support the development of the Plan and the site allocation process (see Flood Risk Assessment Background Paper for more details). The SFRA followed national guidance and included consideration of the impact of climate change on flooding. The site specific flood risk assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time. The County Council is satisfied that these elements ensure that a comprehensive assessment of flood risk will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
29165 - Helen Rushby [7730]	Object	The site at Flood Farm and the area between Flood Farm and Kelham shows as at high/med/low risk from flooding from surface water on the Environment Agency website. The altering of the water table, use of water during the extraction processes and it being added to local beck/stream increasing the water flow in the area could create a problem locally. Potential for increased flooding at Kelham and Averham as both areas currently experience field flooding, road closures due to surface flooding on A617 and threats to housing at periods of high rainfall.	A more comprehensive hydrology survey should be carried out on the proposed site and the surrounding area to ensure the working of the site at Flash farm does not present an increased risk to the local area. If the risk is in any way increased all alternatives should be considered before this site which is near a main road and villages - both of which could be affected. This site should not be included in the plan at this stage pending further investigation and evidence risks can be fully mitigated.	<p>Objection not accepted. A Strategic Flood Risk Assessment (SFRA) was completed to support the development of the Plan and the site allocation process (see Flood Risk Assessment Background Paper for more details). The SFRA followed national guidance and included consideration of the impact of climate change on flooding. The site specific flood risk assessments that are required to be completed at the planning application stage will follow the most recent guidance and use the most up to date data available at the time. The County Council is satisfied that these elements ensure that a comprehensive assessment of flood risk will have been completed before any mineral working can take place and so it is not considered that any further research is needed at this stage.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29499 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Flash Farm is adjacent to areas that are classed as either Flood Zone 2 having a Medium Probability or Flood Zone 3, a High Probability of flooding (National Planning Policy Framework). Potentially this can increase flood risk elsewhere. It is unlikely that Mission Dyke has sufficient capacity to absorb surplus water from mineral extraction, and may become a source of flooding to nearby houses.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29759 - Brett Aggregates Limited [69]	Object	The background document Flood Risk Assessment is clear that the sequential test has been undertaken in respect of the site allocation selection process. This is not made clear in the Plan. Consequently in order for the plan to be effective and justified para 5.26 should be amended by the addition of the following sentence:- "The site selection process took into account the sequential test with respect to sites proposed for each mineral type."	Para 5.26 should be amended by the addition of the following sentence:- "The site selection process took into account the sequential test with respect to sites proposed for each mineral type."	Objection accepted.  The County Council agrees that additional text is required to clarify the position in terms of site allocations and the sequential text. As such additional text is proposed.	Amend the end of paragraph 5.26 as follows:  As such, minerals development can be permitted within Flood Zones 1, 2 and 3a. Sand and gravel quarries are also appropriate in Flood Zone 3b subject to meeting additional criteria. The site selection process for the site allocations identified within the Local Plan has taken account of the Sequential Test, the purpose of which is to steer new development to areas with the lowest probability of flooding.

### DM3: Agricultural land and soil quality

29760 - Brett Aggregates Limited [69]	Object	<p>There is a tension in the Plan between the stated aim to prioritise biodiversity led restoration (Policy SP3), the protection of best and most versatile agricultural land (Policy DM3) and the support for proposals for recycled and secondary aggregates (Policy MP5).</p> <p>Policy DM3 should be modified to acknowledge that the Site Selection process for the Plan has taken into account the loss of best and most versatile land. In order to resolve this conflict and for the Plan to be effective in delivering the allocations proposed section 1 of the policy should be amended as suggested.</p>	<p>Section 1 of the policy should be amended as follows:-</p> <p>"Proposals for minerals development located on best and most versatile agricultural land (grades 1,2 and 3a) and outside allocations made in this plan will only be supported where it can be demonstrated that : ....."</p>	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed. The site selection process for the allocations have already considered Agricultural Land Quality and Biodiversity (amongst other topics),</p>	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29594 - Mr Ian Bradey [7824]	Object	Flash Farm forms part of a productive dairy farm unit and restoration of the land would not return it to current land quality sufficient to sustain current production levels. The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the plan is unsustainable.	remove site MP2p (Flash Farm) from the draft minerals plan	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Agricultural land has been considered within the Sustainability Appraisal when considering future site allocations.  It may be useful to note that the National Farmers Union (NFU) have provided support for this policy.	
29791 - Mr J Potter [2108]	Object	SO8 /DM3 1.b., I question, why only the long-term potential, because unadulterated agricultural land is a finite resource too.		Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Agricultural land has been considered within the Sustainability Appraisal when considering future site allocations.  It may be useful to note that the National Farmers Union (NFU) have provided support for this policy.	
29193 - Mrs Linda White [7642]	Object	Flash Farm is a greenfield site that is in current agricultural use for grazing. It is capable of producing other crops including biomass crops which would contribute to energy production. The developer's proposal shown to residents included return to agriculture via infill. Amounts of available inert landfill would, from NCC stats, appear to be less per annum than this project would require, so it is unlikely that this productive land would ever be restored to agriculture.	Removal of Flash Farm, an agriculturally productive greenfield site, from the plan, especially as up to date calculation would infer that the plan overestimates the amounts of new aggregates needed	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Agricultural land has been considered within the Sustainability Appraisal when considering future site allocations.  It may be useful to note that the National Farmers Union (NFU) have provided support for this policy.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29924 - Peter Doyle [2788]	Object	<p>The Plan should not depart from national policy in using high quality best and versatile agricultural land for quarrying. Meeting the mineral needs of the county can be achieved by selecting the most sustainable sites (using SA scores) rather than choosing those closest to markets.</p> <p>The sites in the Idle Valley are reflective in the SA score of their unsuitability and therefore it would not be justified to depart from national policy to use this valuable resource of high quality best and most versatile agricultural land for this purpose.</p>	There are sites in the Nottinghamshire and Newark area which have demonstrated their suitability but have been withdrawn. We feel these sites should be re-assessed as it would be beneficial for the County to make these sites operational.	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Agricultural land has been considered within the Sustainability Appraisal when considering future site allocations.</p> <p>It may be useful to note that the National Farmers Union (NFU) have provided support for this policy.</p>	
29281 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The plan includes new greenfield sites such as Flash Farm that are currently in agricultural use. They have the potential for continued food production and the production of bio-mass, both products that provide vital resources. Reinstatement plans do not call for automatic restoration, and so development of this land will result in its potential to continue to provide important resources to be lost for ever. As there is no demonstrated need for the minerals from these sites on the basis of demand or uniqueness of products, they should be removed from the plan	Greenfield sites currently in agricultural use only to be considered for gravel extraction as last resort	<p>Objection not accepted. Both minerals and agricultural land are finite resources and so the two resources need to be managed sustainably. The site allocations that are made in the Plan have been subject to a site allocation process, which included consideration of a wide range of factors, including the impact on agricultural land. The details of restoration for Flash Farm are set out in the site allocation development brief (Appendix 5) and, in line with policies in the Plan regarding biodiversity-led restoration strategy and the protection of agricultural soils, includes the creation of habitats that will conserve the best and most versatile agricultural soils.</p> <p>In terms of the need for the minerals, the County Council's response to objections regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1. Adequate sand and gravel reserves to meet the expected demand over the plan period have been identified through the site allocation process. The County Council maintains that it has used the most appropriate figures in determining the level of demand and so do not consider that any change to the allocations on this basis is needed or appropriate.</p>	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29400 - John Allan [3617]	Object	Flash Farm forms part of a productive dairy farm unit and restoration of the land would not return it to current land quality sufficient to sustain current production levels. The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the plan is unsustainable.	use existing sites.	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Agricultural land has been considered within the Sustainability Appraisal when considering future site allocations.  It may be useful to note that the National Farmers Union (NFU) have provided support for this policy.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30098 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust welcome that the text in this policy has been slightly amended to go some way in meeting reflect our previous concerns , however, we still consider that the potential of the restoration of minerals sites to high priority habitats is not fully reflected in this policy.</p> <p>Whilst recognising the importance of B&amp;MV land as a resource, the area of land affected by the proposed mineral allocations is small (0.5% of the farmed land in the County) and not all of this is B&amp;MV, hence it is important to consider it in context. In some cases it may be possible to move soils to put them to better agricultural use elsewhere, as is now mentioned in the text.</p> <p>NWT note the recognition in the justification text that agricultural land may include wildlife features, which is correct, however this does not recognise the transformative potential of mineral site restoration with regard to the creation of priority habitats, where it may not be possible to otherwise do this on land in intensive agricultural use, as explained in our response to SO8. For this reason the use of mineral sites to achieve national biodiversity targets, paid for by the private sector, is the most effective way to deliver this critically important public benefit.</p>	<p>NWT expect to see the following amendment to the Policy text:</p> <p>c. Alternative land of lower agricultural value has considerations which outweigh the adverse impact upon agricultural land quality, such as the re-creation of priority biodiversity habitats.</p>	<p>Objection not accepted.</p> <p>The County Council considers that the policy is in line with the NPPF and as the justification text aims to provide the appropriate balance between restoration to predominantly agricultural use whilst considering biodiversity enhancement/habitat creation the Council do not consider it necessary to amend the policy to highlight one particular consideration when others also exist.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29500 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Flash Farm forms part of a productive dairy farm unit and restoration of the land would not return it to current land quality sufficient to sustain current production levels. The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the plan is unsustainable.	Flash Farm, site MP2p should be removed from the local minerals plan.	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Agricultural land has been considered within the Sustainability Appraisal when considering future site allocations.  It may be useful to note that the National Farmers Union (NFU) have provided support for this policy.	
29463 - Mrs Jackie Armstrong [2881]	Object	Notts MLP DM3: Agricultural land and soil quality 5.43 (relocating soils from Best and Most Versatile Agricultural Land (BMVL) which are surplus to requirement for a specific chosen restoration method), does not comply with the requirements of NPPF Paragraph 143 to safeguard the long term potential of BMVL and conserve soil resources. The argument is flawed because factors in soil quality are site and location specific, so relocated BMVL sourced soils may not perform as well in their new environment. Transporting the soils in HGVs also has environmental and traffic impacts.	Acknowledge in all relevant places that best and most versatile land is site specific and any disturbance of soils from best and most versatile land (BMVL) can affect their quality. This must be considered when evaluating the impacts of working any allocations with significant proportions of BMVL, and in determining the most desirable and optimal restoration schemes for such sites.  Remove from the MLP sites with high proportions of best and most versatile land, including Coddington MP2o, which cannot reasonably expect to be restored to a similar high proportion of agriculture. Site selection should give priority to include sites in the MLP where it is practicable to restore BMVL in situ.	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed. The NPPF requires the County Council to "put in place policies to ensure...", in light of this the County Council is of the opinion that Policy DM3 provides the appropriate policy criteria to assess any future planning applications against.  It may be useful to note that the National Farmers Union (NFU) have provided support for this policy.	
29114 - National Farmers' Union (Paul Tame) [1564]	Support	The NFU support Policy DM3 on the best and most versatile agricultural land which allows it to be developed for minerals, but only if one of three criteria are met.  In paragraph 5.40, it will be rare for grazing marsh to be compatible with commercial livestock systems because grazing marsh holdings tend to have small or negative gross margins, so be careful what you claim for wet agricultural land!		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM3 Justification</i>					
29314 - Mrs amanda armstrong [7755]	Object	Flash Farm is grade 3 agricultural land and the policy is that mineral development should only occur on this grade of land if no alternative is available. There are existing sites with further resources which could be exploited without using Flash Farm	Remove Flash Farm from the plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29501 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Flash Farm forms part of a productive dairy farm unit and restoration of the land would not return it to current land quality sufficient to sustain current production levels. The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the plan is unsustainable.	Flash Farm, site MP2p should be removed from the local minerals plan.	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Agricultural land has been considered within the Sustainability Appraisal when considering the site allocations.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29595 - Mr Ian Bradey [7824]	Object	Flash Farm forms part of a productive dairy farm unit and restoration of the land would not return it to current land quality sufficient to sustain current production levels. The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the plan is unsustainable.	remove site MP2p (Flash Farm) from the draft minerals plan	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Agricultural land has been considered within the Sustainability Appraisal when considering the site allocations.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM4: Protection and enhancement of biodiversity and geodiversity</i>					
29792 - Mr J Potter [2108]	Object	DM4 , it should be borne in mind that some in the-wildlife-business perhaps have other-interest(s) in this; quite different to just intrinsic appreciation of countryside & Nature.		Not accepted. Minerals development will inevitably have short term impacts on the existing natural environment, however it is one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets. The overarching aim of the Minerals Local Plan as set out in policy SP2 is biodiversity led restoration. As part of a detailed planning application the applicant would need to take account of policy DM4 'Protection and enhancement of biodiversity and geodiversity' and Policy DM11 - 'Restoration, after-use and after care' of the Minerals Local Plan.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30099 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust supports the principles and aims of this policy, however for the purposes of absolute clarity, and to ensure soundness and compliance with other relevant policies and guidance, there are amendments in the wording which we would recommend. The text is unclear as to how the need for a development might be determined as outweighing the adverse impacts that might result for biodiversity from a particular mineral scheme. This is pertinent, as substantial gain in LBAP priority habitats that are appropriate for that area would in most cases need to be achieved to offset such impacts.</p> <p>There is inconsistency between DM1 and DM4, in that DM1 specifically lists potential impacts that should be considered in order to avoid adverse effects on amenity. To be consistent, an equivalent list should be provided in either the policy or justification text of DM4.</p> <p>Para 5.57 needs updating to reflect the fact that BOM mapping has now been undertaken for more than two thirds of the County, including for areas affected by other types of mineral development than sand and gravel extraction in the Trent Valley. The outputs of the BOM mapping are therefore relevant to restoration schemes for many different mineral types.</p>	<p>Amend as follows: "1....a) there will be no significant adverse impacts, either direct or indirect, on... This should be repeated for 1b,c, and d.</p> <p>Update paragraph 5.57 to reflect the fact that BOM mapping has now been undertaken for more than two thirds of the County, including for areas affected by other types of mineral development than sand and gravel extraction in the Trent Valley.</p>	<p>Partially accepted. The plan should be read as a whole and therefore it is not considered necessary to repeat the list of potential impacts set out in Policy DM1 within either policy DM4 or the justification text as the policies should be read in combination. Policy DM1 sets out a range of possible impacts that may need to be considered but this is not intended to be exhaustive and any application would have to be determined on its merits and take account of individual site circumstances.</p> <p>It is accepted that the text in paragraph 5.57 should be updated to reflect more recent mapping that has been carried out.</p>	<p>Amend Paragraph 5.57 to read 'Biodiversity Opportunity Mapping has been substantially completed for approximately two-thirds of Nottinghamshire, including the Trent Valley. Complementary work on Areas of Multiple Environmental Sensitivity has also been completed for the Trent Valley. Both studies should be used to help inform proposals for mineral working and restoration.'</p>
29194 - Mrs Linda White [7642]	Object	<p>Protecting biodiversity can also include leaving land as it now is. Flash Farm and Kelham Woods and Hills currently support a wide range of birds, small mammals, plants and insects. If the development goes ahead they will lose their habitat to be replaced by a habitat that is currently not available in that place. Why is one habitat worth more than the other to the planners?</p>	<p>Consideration of the value of the habitat as it currently is, not what it could be transformed into</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29816 - Nottingham Friends of the Earth (Mr Nigel Lee) [1261]	Support	Further to comments made on the Preferred Approach and amendments made, we would like to support the following policies: Policy SP4 - Climate Change Policy DM1: Protecting Local Amenity Policy DM2: Water Resources and Flood Risk Policy DM4: Protection and Enhancement of Biodiversity and Geodiversity Policy DM8: Cumulative Impact		Support noted	
29849 - National Trust (Kim Miller) [2987]	Support	This policy is supported, in particular the commitment to securing enhancements through development.		Support noted	
29213 - Environment Agency (Mr Andrew Pitts) [2714]	Support	We fully support Policy DM4. These are precisely the type of policies the Plans needs to help support national and local biodiversity targets		Support noted	

### DM4 Justification

29455 - Dr Valerie Willcocks [7774]	Object	Flash Farm and Kelham Woods and Hills currently support a wide range of birds, small animals, plants and insects. Their habitat will be lost if the Plan is accepted.	Consider the value of the habitat as it is and not what it could be transformed into.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.
29230 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Gravel extraction at Flash Farm will cause damage to Kelham Woods by limiting its water supply thus altering the wider landscape character Ref. NCC minerals local plan proposed sites -comparison and analysis document	Impact on the area surrounding the proposed sites needs to be considered in terms of protection and enhancement of existing biodiversity	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.
29315 - Mrs amanda armstrong [7755]	Object	Ancient woodland is stated in para 5.49 as being considered irreplaceable. There are ancient woodlands in the vicinity of Hockerton, Winkburn and Kirklington all of which are close to the A617 and therefore any increase in heavy traffic whose emissions may affect should woodland should be avoided. Extraction from Flash Farm would increase HGV traffic on the A617	remove Flash Farm as a potential site	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM5: Landscape character</i>					
29941 - Burton Joyce Village Society [7122]	Object	DM5. Environmental Issues. Much of the built-up area of Burton Joyce is within 300 m of the proposed extraction site, and effectively the whole village centre within 500m. The prevailing winds mean that noise and dust pollution here would be a severe problem. We understand that "dry" extraction is intended for the Shelford site, thus requiring noisy pumping machinery to be kept running for 24 hours a day, seven days a week. The Nelson Field, an important Local Green Space for Burton Joyce, is immediately across the Trent from the proposed site and its amenity value would be effectively destroyed.	Reversion to the 2013 Draft Plan. excluding site MP2r entirely.	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Landscape Character has been considered within the Sustainability Appraisal when considering site allocations.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
29502 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Notts County Council has seen fit to recently remove the only sight barrier, namely the woodland bordering the A617, that could have screened the Flash farm site. The area around Flash Farm is idyllically rural, not industrial, and sits well within the historic buildings and conservation areas within the local vernacular. Extraction, even with subsequent restoration (unlikely due to limited supply of inert infill), would disrupt or even destroy this landscape.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29637 - Shelford Parish Council [7840]	Object	Policy states that there should be no adverse impact on the character and distinctiveness of the landscape.  Clearly there will be a major impact from the selection of Shelford West and our own surveys show that the view is highly valued.  Insufficient attention has been paid to this element of the selection criteria and there is no evidence to show that the impacts have been properly assessed or that the wider communities' views have been considered.  See further notes under Landscape on page 6 of Attachment A.	There needs to be further assessment of landscape impact for Shelford West and the views of the wider community need to be taken into account.	Objection not accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Landscape Character has been considered within the Sustainability Appraisal when considering site allocations.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29596 - Mr Ian Bradey [7824]	Object	<p>We broadly support the policy statement "that proposals for mineral development will be supported where it can be demonstrated that it will not adversely impact on the character and distinctiveness of the landscape" Notts County Council has seen fit to recently remove the only sight barrier, namely the woodland bordering the A617, that could have screened the Flash farm site. The area around Flash Farm is idyllically rural, not industrial, and sits well within the historic buildings and conservation areas within the local vernacular. Extraction, even with subsequent restoration would disrupt or even destroy this landscape.</p>	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
30057 - IGas Energy [7911]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Policy DM5: Landscape Character. Part 1 is not sound. It is not consistent with national policy seeking to place a weight on the impacts upon landscape character comparable to that of nationally designated landscapes of which there are none in Nottinghamshire. NPPG recommends that Plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. The PPG continues by recognising that landscape character assessments can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood plan-making. Policy DM5 as currently worded does not provide any clarification to the degree of adverse impact that may be allowable and the tests that follow are not proportionate to the status of landscapes within Nottinghamshire.</p>		<p>Objection not accepted.</p> <p>The County Council are of the opinion that the policy is consistent with the NPPF. The policy is worded in a way that allows for 'adequate' mitigation based on the landscape interest, which will differ from site to site. Each proposed development will be considered on a site by site basis taking into account the local landscape and visual impact assessment submitted by the applicant (paragraph 5.67). It is therefore not appropriate to provide clarity as to what degree of adverse impacts would be allowable as this would depend of the development proposed and the outcome/conclusions of the Local Landscape and Visual Impact Assessment.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29655 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	<p>Policy states that there should be no adverse impact on the character and distinctiveness of the landscape.</p> <p>Clearly there will be a major impact from the selection of Shelford West and our own surveys show that the view is highly valued.</p> <p>Insufficient attention has been paid to this element of the selection criteria and there is no evidence to show that the impacts have been properly assessed or that the wider communities' views have been considered.</p> <p>See further notes under Landscape on page 6 of Attachment A.</p>	There needs to be further assessment of landscape impact for Shelford West and the views of the wider community need to be taken into account.	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Landscape Character has been considered within the Sustainability Appraisal when considering site allocations.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.</p>	
29401 - John Allan [3617]	Object	<p>I broadly support the policy statement "that proposals for mineral development will be supported where it can be demonstrated that it will not adversely impact on the character and distinctiveness of the landscape" Notts County Council has seen fit to remove the only sight barrier, namely the woodland bordering the A617, that could have screened Flash farm site.</p> <p>The area around Flash Farm is idyllically rural, not industrial, and sits well within the historic buildings and conservation areas within the local vernacular.</p> <p>Extraction, even with subsequent restoration (unlikely due to limited supply of inert infill), would disrupt or even destroy this landscape.</p>	remove Flash Farm from the plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29196 - Mrs Linda White [7642]	Object	<p>The area around Flash Farm is rural, not industrial, and fits with the historic buildings and conservation areas onto which it borders.</p> <p>Extraction, even with subsequent restoration (unlikely due to limited supply of inert infill), would disrupt or even destroy this landscape</p>	Detailed consideration to be made of the impact of the change in the landscape that extraction would involve no the character and distinctiveness of the historically important Kelham area and consequent removal of Flash Farm from the list of preferred sites	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29696 - Tarmac Ltd [580]	Object	<p>The wording of Policy DM5 appears confused. The policy, as worded, implies that minerals developments will only be supported if they do not result in an adverse impact on the landscape and that harmful impacts can be adequately mitigated. In situations where there is no available alternative to the development and the development outweighs the landscape interest, the policy still requires that harmful impacts are adequately mitigated. It appears that the policy is seeking to place a weight on the impacts upon landscape character comparable to that of nationally designated landscapes (of which there are none in Nottinghamshire). This is not justified or consistent with national policy.</p> <p>PPG recommends that Local Plans include strategic policies for the conservation and enhancement of landscapes and that Landscape Character Assessments can help to inform such policies.</p> <p>It is proposed that the wording of Policy DM5 is changed to reflect the approach set out in PPG and to ensure a proportionate approach to the protection of landscape assets (that accords with national policy) as follows: 'Proposals for minerals development should have regard to the County Council's three Landscape Character Assessments and seek to protect and enhance valued landscapes...'</p>		<p>Objection not accepted.</p> <p>The County Council are of the opinion that the policy is consistent with the NPPF. The policy is worded in a way that allows for 'adequate' mitigation, which will differ from site to site. Each proposed development will be considered on a site by site basis taking into account the local landscape and visual impact assessment submitted by the applicant (paragraph 5.67). It is accepted that in some cases 'full' mitigation will not be appropriate and a balance will not to be made between any adverse impacts and the need/benefits of the</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29850 - National Trust (Kim Miller) [2987]	Object	This policy is supported. However, we recommend that the second criterion is expanded to incorporate landscaping and planting (i.e. during the operational period of development) as well as restoration. We suggest that the word 'policy' is deleted from criterion 2 as there may be relevant information in the assessment which does not relate to any specific policy. The landscape character within neighbouring districts may also be relevant if a site is located close to the County boundary.	The following changes are therefore proposed: "Landscaping, planting and restoration proposals should take account of the relevant landscape character policy area as set out in the Landscape Character Assessments covering Nottinghamshire (and other Counties where relevant) and..."	Support noted and objection accepted.  The County Council agree that landscaping and planting proposals should also take account of the relevant landscape character policy areas and as such will amend the policy text.	Amend Policy DM5, criterion 2 as follows:  "Landscaping, planting and restoration proposals should take account of the relevant landscape character policy area..."
29835 - Newark PAGE (Enquiries .) [2485]	Object	We consider that specific Landscape and Visual Impact Assessments should be required to accompany applications in order to ensure that impacts are adequately assessed.	Require Landscape and Visual Impact Assessments.	Objection not accepted.  This is already addressed in paragraph 5.67 of the Submission Draft document which requires all new proposals for minerals development to provide a local landscape and visual impact assessment as part of any planning application.	
30100 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Support	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  Further to the inclusion of the reference to the BOM study in part 2 of the Policy as requested in our previous response, NWT now supports this policy.		Support noted	
<b>DM5 Justification</b>					
29231 - AKS Community Action Group (Mrs Linda White) [7742]	Object	The wider impact of the Flash Farm site development, e.g. on Kelham Woods would change an area of the countryside much larger than the site itself	Assessment of sites should include impact on a wider area than just the site and its boundaries	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29597 - Mr Ian Bradey [7824]	Object	We broadly support the policy statement "that proposals for mineral development will be supported where it can be demonstrated that it will not adversely impact on the character and distinctiveness of the landscape" Notts County Council has seen fit to recently remove the only sight barrier, namely the woodland bordering the A617, that could have screened the Flash farm site. The area around Flash Farm is idyllically rural, not industrial, and sits well within the historic buildings and conservation areas within the local vernacular. Extraction, even with subsequent restoration would disrupt or even destroy this landscape.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29503 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Notts County Council has seen fit to recently remove the only sight barrier, namely the woodland bordering the A617, that could have screened the Flash farm site. The area around Flash Farm is idyllically rural, not industrial, and sits well within the historic buildings and conservation areas within the local vernacular. Extraction, even with subsequent restoration (unlikely due to limited supply of inert infill), would disrupt or even destroy this landscape.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29456 - Dr Valerie Willcocks [7774]	Object	The area around Flash Farm is rural, not industrial, and fits with historic buildings and conservation area onto which it borders. Extraction, even with subsequent restoration would disrupt even destroy this landscape.	Consideration should be given to the impact on the landscape and character that extraction would involve. In particular the impact on the historical importance of the area.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29384 - Kirklington Parish Council (Helen Cowlan) [879]	Object	Insufficient information has been provided with regard to what will be done with the site once gravel has been extracted and inert waste used to fill the site - insufficient information has been provided not only with regard to the type/amount/sourcing of the waste but also what the site will look like at the end of its 'life' / once 'restored'.	*Additional details to be provided as above	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM6: Historic environment</i>					
29802 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	
29431 - Andrew Fereday [7756]	Object	Kelham and Averham contribute greatly to the local Historic Environment including a number Grade I and Grade II listed buildings including Kelham Hall, Kelham Bridge, two listed churches and many other structures. The development of Flash Farm will adversely affect their cultural settings, as well as the ambiance of the wider landscape environment. Para 5.79 of the Justification states that the adverse effects of development can be mitigated by the use of 'careful design, buffer zones and considered restoration'. The location and proposed change of current use of Flash Farm will make all these provisions difficult to implement.	Selection of alternative site where there is no loss or detrimental effect on the historic environment	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29504 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Kelham and Averham contribute to the Historic Environment including one listed building, two listed churches and many other structures. The development of Flash Farm will adversely affect their cultural settings, as well as the ambiance of the wider landscape environment. Para 5.79 of the Justification states that the adverse effects of development can be mitigated by the use of 'careful design, buffer zones and considered restoration'. The location and current use of Flash Farm will make all these provisions difficult to implement.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29598 - Mr Ian Bradey [7824]	Object	Kelham and Averham contribute to the Historic Environment including one listed building, two listed churches and many other structures. The development of Flash Farm will adversely affect their cultural settings, as well as the ambiance of the wider landscape environment. Para 5.79 of the Justification states that the adverse effects of development can be mitigated by the use of 'careful design, buffer zones and considered restoration'. The location and current use of Flash Farm will make all these provisions difficult to implement.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29197 - Mrs Linda White [7642]	Object	Gravel workings in and near to the historic environment linked with the Civil War that runs from Newark to Southwell, including Kelham are inappropriate and do not guard nationally important sites. Spoiling of these sites through industrial developments nearby could reduce tourism and thus local prosperity	Remove Flash Farm from the list of preferred sites in line with national policy to conserve important historic assets.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29697 - Tarmac Ltd [580]	Object	In Tarmac's view Policy DM6 is currently unsound as it is not justified or consistent with national policy. We recommend that the policy is re-worded so that is consistent with the approach advocated in the NPPF.		<p>Objection accepted</p> <p>The County Council agree that the wording of the policy could be interpreted in that designated and non-designated heritage assets hold the same planning weight which was not the intention of the policy as this would indeed be inconsistent with the NPPF. In light of this the policy and justification text will be amended to add clarity on this matter.</p>	<p>Amend Paragraph 1 (a) in Policy DM6 as follows:</p> <p>There will not be an adverse impact on any designated heritage asset or a non-designated heritage asset of archaeological interest that is demonstrably of equivalent significance to a scheduled monument, and/or their settings;</p> <p>Amend Paragraph 1 (b) in policy DM6 as follows:</p> <p>b) Public benefits related to the development outweigh the harm to, or loss of, any designated heritage asset or a non-designated heritage asset of archaeological interest that is demonstrably of equivalent significance to a scheduled monument and/or their settings. Where this is the case, the harm or loss should be mitigated as far as possible.</p> <p>Add additional Paragraph above existing paragraph 2:</p> <p>Proposals directly or indirectly affecting non-designated heritage assets, except those assets listed in point 1, will be supported where it can be demonstrated that the scale of any harm or loss balanced with the significance of the heritage asset affected is outweighed by the development.</p> <p>Add further paragraph to DM6 Justification text as follows:</p> <p>"5.71 National policy recognises the importance of minimising the impacts on designated and non-designated heritage assets and their settings and requires a distinction to be made between the relative significance of the heritage assets.</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
					<p>The NPPF states that, when considering the impact of a proposed development on the significance of a designated heritage asset, 'great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. It states that substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the NPPF states that local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.</p> <p>5.72 The NPPF also requires Local Planning Authorities to take account of the effect that a planning application would have on the significance of a non-designated heritage asset when determining the application. When considering non-designated heritage assets, a balanced judgement will be required."</p>
29761 - Brett Aggregates Limited [69]	Object	This policy states that there is a need to demonstrate that there will be no adverse impacts. This will not be possible in the case of some of the allocations proposed in the Plan. In order to resolve this conflict and for the Plan to be effective in delivering the allocations proposed suggested amendments should be made to part 1 of the policy.	<p>The following amendments should be made to part 1 of the policy:</p> <p>1. "Proposals for mineral development will be supported where it can be demonstrated that:</p> <p>a. There will not be an a significant adverse impact on any designated or non designated heritage assets and/or their settings; or</p> <p>b. Public benefits related to of the development outweigh the harm....."</p>	<p>Objection partially accepted</p> <p>Policy DM6 has been amended to reflect the wording in the NPPF. The proposed changes can be found in representation 29697.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30058 - IGas Energy [7911]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Policy DM6 is not sound as it is not consistent with national policy. Part 1 of the policy is a rehash of Para 133 of the NPPF, we feel that the wording within the NPPF provides greater clarity to the approach to be taken for designated heritage assets. It should be made evident that non-designated heritage assets do not hold the same planning weight unless, as set out in para 139 of the NPPF, they are demonstrably of equivalent significance to scheduled monuments. If this is so, then non-designated heritage assets are considered subject to the policies for designated heritage assets. Para 135 sets out the correct approach for determining a planning application where a non-designated heritage asset may be impacted.</p>		<p>Objection accepted</p> <p>The County Council agree that the wording of the policy could be interpreted in that designated and non-designated heritage assets hold the same planning weight which was not the intention of the policy as this would indeed be inconsistent with the NPPF. In light of this the policy and justification text will be amended to add clarity on this matter.</p>	<p>Amend Paragraph 1 (a) in Policy DM6 as follows:</p> <p>There will not be an adverse impact on any designated heritage asset or a non-designated heritage asset of archaeological interest that is demonstrably of equivalent significance to a scheduled monument, and/or their settings;</p> <p>Amend Paragraph 1 (b) in policy DM6 as follows:</p> <p>b) Public benefits related to the development outweigh the harm to, or loss of, any designated heritage asset or a non-designated heritage asset of archaeological interest that is demonstrably of equivalent significance to a scheduled monument and/or their settings. Where this is the case, the harm or loss should be mitigated as far as possible.</p> <p>Add additional Paragraph above existing paragraph 2:</p> <p>Proposals directly or indirectly affecting non-designated heritage assets, except those assets listed in point 1, will be supported where it can be demonstrated that the scale of any harm or loss balanced with the significance of the heritage asset affected is outweighed by the development.</p> <p>Add further paragraph to DM6 Justification text as follows:</p> <p>"5.71 National policy recognises the importance of minimising the impacts on designated and non-designated heritage assets and their settings and requires a distinction to be made between the relative significance of the heritage assets.</p>



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
					<p>The NPPF states that, when considering the impact of a proposed development on the significance of a designated heritage asset, 'great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. It states that substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the NPPF states that local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.</p> <p>5.72 The NPPF also requires Local Planning Authorities to take account of the effect that a planning application would have on the significance of a non-designated heritage asset when determining the application. When considering non-designated heritage assets, a balanced judgement will be required."</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29836 - Newark PAGE (Enquiries .) [2485]	Object	We welcome and support this policy and consider it broadly compliant with NPPF paragraphs 128, 139 and 169. However, we consider that to properly reflect NPPF paragraph 169 on the likelihood of discovery of currently unidentified heritage assets, a requirement should be made for an Archaeological Assessment to accompany applications for mineral extraction to the north and west of this area, where similar crop markings are found to those in the South Muskham Archaeological Resource Area, as evidenced by the submissions of the Muskham Vale Heritage Group in response to the Issues and Options consultation, which we endorse.	Require Archaeological Assessments.	Objection not accepted.  As part of any planning application for minerals development, detailed assessment work would be undertaken to assess any potential impacts and would include site specific archaeological assessment work.	
29639 - Shelford Parish Council [7840]	Object	<p>Policy states that adverse impacts on any designated or non-designated heritage assets and/or their settings should be avoided.</p> <p>Historic England, in a previous consultation, has already recorded that there would be "significant and environmental effect on the historic environment" from the selection of Shelford West.</p> <p>Insufficient attention has been paid to this risk for an area that is rich in sites, buildings and ancient monuments.</p> <p>See further notes under Heritage on page 6 of Attachment A.</p>	Further work needs to be carried out on the risk to the historic environment by the selection of Shelford West.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29657 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	<p>Policy states that adverse impacts on any designated or non-designated heritage assets and/or their settings should be avoided.</p> <p>Historic England, in a previous consultation, has already recorded that there would be "significant and environmental effect on the historic environment" from the selection of Shelford West.</p> <p>Insufficient attention has been paid to this risk for an area that is rich in sites, buildings and ancient monuments.</p> <p>See further notes under Heritage on page 6 of Attachment A.</p>	Further work needs to be carried out on the risk to the historic environment by the selection of Shelford West.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
29851 - National Trust (Kim Miller) [2987]	Support	Policy DM6 - historic environment is generally supported.		Support noted	

### DM6 Justification

29198 - Mrs Linda White [7642]	Object	The civil war heritage is one of Nottinghamshire's greatest assets and as such every effort should be made to preserve and enhance its significant sites. The building of Newark National Civil War Centre shows the significance of this area in our country's history and NCC should do its best to preserve the record in both buildings and landscape. Kelham and the route to Southwell are very significant in this matter. National policy states that important heritage assets should be preserved	NCC to be asked to reconsider their plan in light of the historic importance of Kelham and remove Flash Farm from the list of preferred sites due to its potential negative impact on our historic assets and as the minerals available there have no particular benefits	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29316 - Mrs amanda armstrong [7755]	Object	Kelham Bridge is grade II listed. It had to be closed for several weeks in 2013 for repairs after being hit by a vehicle. There are numerous minor collisions between HGVs in the Kelham Bridge area every week as evidenced by the truck debris left in the road. Increasing the volume of HGV traffic will increase the likelihood of further accidents and damage to this listed structure. 65% of the extra vehicle movements are to travel over the bridge.	Remove Flash Farm from the plan so that HGV movements over Kelham Bridge are not increased	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29232 - AKS Community Action Group (Mrs Linda White) [7742]	Object	This plan does not recognise the contribution of the historic environment to the local economy. The Flash Farm site is close to conservation areas and significant listed buildings, some of which are used for tourism and hospitality. The current environment is little changed since the civil war and restoration otherwise would be detrimental	The impacts on the local economy of workings in the vicinity of historic sites and listed buildings should be considered when identifying suitable sites for mineral extraction	Objection not accepted.  The County Council are of the opinion that the policy, as proposed for amendment is consistent with the National Planning Policy Framework (NPPF) and would ensure that any planning application is assessed against and designated heritage asset. The Local Plan, and the policies contained within it, should be read as a whole and as such the protection of local amenity is considered within Policy DM1 of the Plan.	
29543 - mr john watchman [7785]	Object	The development of Flash Farm would undermine the efforts to maximise the local history potential of the Civil War period which has already led to the National Civil War museum in Newark and identifies Southwell, Averham and Kelham as the last places that Charles 1st enjoyed freedom. The local council is moving out of Kelham Hall to allow this grade 1 listed building to realise its massive tourism potential. A gravel pit would drastically undermine this tourist based opportunity.	Flash Farm is not required to fulfil future requirements of sand and gravel in the LMP period. It should be removed.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29599 - Mr Ian Bradey [7824]	Object	Kelham and Averham contribute to the Historic Environment including one listed building, two listed churches and many other structures. The development of Flash Farm will adversely affect their cultural settings, as well as the ambiance of the wider landscape environment. Para 5.79 of the Justification states that the adverse effects of development can be mitigated by the use of 'careful design, buffer zones and considered restoration'. The location and current use of Flash Farm will make all these provisions difficult to implement.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29457 - Dr Valerie Willcocks [7774]	Object	One of Nottinghamshire's greatest assets is the history of the Civil War. Every effort should be made to enhance and preserve its significant sites, especially with regard to buildings and landscape. Kelham and Southwell are significant in this matter. A617 accident can cause HGV lorries to be diverted along the A612. Gravel exploitation will destroy evidence of previous use, as indicated by crop marks and other finds from test digs. Industrial development could reduce tourism and thus local prosperity. Kelham Bridge is a listed structure and needs to be protected against further damage from heavy traffic.	Remove Flash Farm from the Plan due to the negative impact on the historic assets of the area.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29505 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	Kelham and Averham contribute to the Historic Environment including one listed building, two listed churches and many other structures. The development of Flash Farm will adversely affect their cultural settings, as well as the ambience of the wider landscape environment. Para 5.79 of the Justification states that the adverse effects of development can be mitigated by the use of 'careful design, buffer zones and considered restoration'. The location and current use of Flash Farm will make all these provisions difficult to implement.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29176 - Helen Rushby [7730]	Object	Crop/field markings in the area of Flash Farm indicate an area of potential archaeological interest. The local historical sites include National Civil War Centre in Newark, Kelham Hall, Averham and Kelham Churches, Southwell Mister and Sherwood Forest and the landscape itself is of historical interest. A gravel pit in the middle of all of this in clear view from the road would have a negative impact on local conservation and heritage and potentially cause travel problems between the various sites and damage tourism and its associated economy.	Properly investigate the site at Flash farm for archaeology before the site is included in the plan. Research and consider the wider impact on other sites and tourism in the area. Ensure any negative impact is justified and fully mitigated.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM7: Public access</i>					
29803 - Cllr Mrs K Cutts [6747]	Object	See Rep No. 29795 - Points raised with regards to MP2r Shelford		See response to Rep No. 29795	
<i>DM8: Cumulative impact</i>					
29837 - Newark PAGE (Enquiries .) [2485]	Object	We welcome this policy and consider it broadly compliant with NPPF paragraph 143, which specifically refers to the need to take into account cumulative impacts. However, we consider that specific criteria would be useful, such as an upper limit on the proportion of land take in a given area or parish or the extent of character change over a period as assessed by a cumulative Landscape and Visual Impact Assessment.	Require Landscape and Visual Impact Assessment.	<p>Objection not accepted.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering future site allocations. A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	
29747 - Elizabeth Stokes [7844]	Object	Not sound. Due to the weight restrictions surrounding the A617, any developments will have a huge impact on the traffic flow which is already close to saturation point at weekends, on bank holidays and at any time when there are road closures in the surrounding areas. The impact of any further large scale developments which would lead to increased traffic on the A617, particularly in the vicinity of Kelham Bridge, would cause interminable delays for all other users and an inevitable increase in road traffic accidents.	Cumulative impact - impact on preferred sites should be properly considered and traffic monitored to build a picture of current problems	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29521 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The proposed flash farm site at Averham will result in a significant increase in traffic volumes in and around Newark, with the majority being Heavy Goods Vehicles, this would further exacerbate the problems with traffic congestion in the Newark area. The use of the sites will also create noise and air pollution in the surrounding villages as well as in the town of Newark and this factor has also not been properly considered within the Plan. Increased traffic through local villages Heavy traffic on the route to Newark Heavy lorries over Kelham bridge that is not suitable for lorries. Adverse impact on the local economy	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29618 - Caunton Parish Council (C Millward) [2315]	Object	<p>The parish council is of the view that the Minerals Local Plan is unsound being based on out of date gravel requirements which do not take account of the clear downward trend of gravel demand in the period 2006 to 2016.</p> <p>They also object specifically to any extraction at Flash Farm, Averham, because of the serious negative impact of the increased HGV traffic on A617 at Kelham Bridge and consequent adverse effect on traffic flow around Newark. Any more traffic congestion around Newark will almost certainly lead to significant numbers of drivers using unsuitable country lanes and driving through villages such as Caunton to bypass Newark. This will be exacerbated whenever there are road closures, which will inevitably become more numerous with the overall increase in traffic. The cumulative impact of vehicles serving gravel extraction at this site coupled with the already increased traffic around Newark following the dualling of A46 will damage the economic viability of Newark and the surrounding area.</p> <p>The parish council therefore believes that, for these reasons, the document is unjustified and ineffective in the above respects.</p>		<p>Objection not accepted.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering future site allocations. A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	
29608 - Mrs Deborah Cassidy [7818]	Object	<p>The Cumulative impact of this proposal is so great that the Flash Farm site should be removed from the list.</p>	Remove the site from the proposed list.	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29734 - Mr Adrian Hatton [2828]	Object	Cumulative impact of preferred sites not properly addressed. E.g Cumulative impact of traffic arising from several large industrial developments along A617 will incrementally increase traffic by individually acceptable amounts, but cumulatively will add up to very significant increased and unacceptable level of HGV daily movements.	Cumulative impact on some preferred sites should be properly addressed. E.g Cumulative impact of traffic arising from several large industrial developments along A617 will incrementally increase traffic by individually acceptable amounts, but cumulatively will add up to very significant increased HGV flow.	<p>Objection not accepted.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering future site allocations. A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29715 - Norwell Parish Council (Mrs C Millward) [810]	Object	<p>The parish council is of the view that the Minerals Local Plan is unsound being based on out of date gravel requirements which do not take account of the clear downward trend of gravel demand in the period 2006 to 2016.</p> <p>They also object specifically to any extraction at Flash Farm, Averham, because of the serious negative impact of the increased HGV traffic on A617 at Kelham Bridge and consequent adverse effect on traffic flow around Newark. Any more traffic congestion around Newark will almost certainly lead to significant numbers of drivers using unsuitable country lanes and driving through villages such as Norwell to bypass Newark. This will be exacerbated whenever there are road closures, which will inevitably become more numerous with the overall increase in traffic. The cumulative impact of vehicles serving gravel extraction at this site coupled with the already increased traffic around Newark following the dualling of A46 will damage the economic viability of Newark and the surrounding area and risks paralysing the area for residents and businesses.</p> <p>The parish council therefore believes that, for these reasons, the document is unjustified and ineffective in the above respects.</p>		<p>Objection not accepted.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering future site allocations. A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29433 - Holme Parish (Patricia Richards) [1835]	Object	The village of Holme, which I represent, faces a further 14 years under this Plan of sand and gravel extraction at Langford South and Langford North (nearly 30 years cumulatively). Whilst the notion of considering cumulative impact is helpful, it means nothing without further definition and explanation. For example, how will this be taken into account at the planning stage? What is meant by no unacceptable cumulative impacts? What is expected of the industry?	The Plan needs to explain how this will be implemented and achieved.	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering future site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process. As such, due to changing local circumstances over the plan period, it would not be appropriate to provide an exhaustive list at this stage.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29641 - Shelford Parish Council [7840]	Object	<p>There has been a major failure to assess the cumulative impacts of an extension of the site into Shelford East.</p> <p>Both NCC policy and national Planning Regulations require that this is considered for projects that are "reasonably foreseeable" and "likely to progress". Since NCC's selection policy is to extend existing sites where possible, both of these need to be addressed.</p> <p>Shelford East is being treated and assessed as a separate site but its development is inextricably linked to Shelford West. The impact of this massive development (already being alluded to by the developer in emails to the Highways Authority) has nowhere been examined.</p> <p>See further notes under Cumulative Effects on page 7 of Attachment A.</p>	<p>A thorough examination of the cumulative impacts of the selection of Shelford West needs to be conducted and the two sites need to be treated holistically in order to properly assess the effects on the local and wider communities.</p>	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>The potential sand and gravel extraction site at Shelford West (submitted for consideration by the operator) is not considered to be deliverable during the plan period and as such is not included as a potential allocation within this Local Plan. Cumulative Impacts of a new site (if brought forward as a planning application) within the vicinity of the Shelford East site would be considered in line with Policy DM8 at the planning application stage.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29659 - Shelford Against Gravel Extraction (SAGE) (Mr J R Whysall) [2392]	Object	<p>There has been a major failure to assess the cumulative impacts of an extension of the site into Shelford East.</p> <p>Both NCC policy and national Planning Regulations require that this is considered for projects that are "reasonably foreseeable" and "likely to progress". Since NCC's selection policy is to extend existing sites where possible, both of these need to be addressed.</p> <p>Shelford East is being treated and assessed as a separate site but its development is inextricably linked to Shelford West. The impact of this massive development (already being alluded to by the developer in emails to the Highways Authority) has nowhere been examined.</p> <p>See further notes under Cumulative Effects on page 7 of Attachment A.</p>	A thorough examination of the cumulative impacts of the selection of Shelford West needs to be conducted and the two sites need to be treated holistically in order to properly assess the effects on the local and wider communities.	<p>Objection not accepted</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>The potential sand and gravel extraction site at Shelford West (submitted for consideration by the operator) is not considered to be deliverable during the plan period and as such is not included as a potential allocation within this Local Plan. Cumulative Impacts of a new site (if brought forward as a planning application) within the vicinity of the Shelford East site would be considered in line with Policy DM8 at the planning application stage.</p>	
29600 - Mr Ian Bradey [7824]	Object	The proposed flash farm site at Averham will result in a significant increase in traffic volumes in and around Newark, with the majority being Heavy Goods Vehicles, this would further exacerbate the problems with traffic congestion in the Newark area. This factor has not been properly taken into account within the Plan.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29294 - AKS Community Action Group (Mrs Linda White) [7742]	Support	We support the policy		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29817 - Nottingham Friends of the Earth (Mr Nigel Lee) [1261]	Support	Further to comments made on the Preferred Approach and amendments made, we would like to support the following policies: Policy SP4 - Climate Change Policy DM1: Protecting Local Amenity Policy DM2: Water Resources and Flood Risk Policy DM4: Protection and Enhancement of Biodiversity and Geodiversity Policy DM8: Cumulative Impact		Support noted	

### DM8 Justification

29162 - Ian Woolridge [7726]	Object	The A617 has had a number of increases in vehicle usage over the last few years, none of which have been assessed cumulatively. A) increased emergency vehicle movements between Kings Mill and Newark Hospitals b) 100 plus extra movements for large / HGV at the Belle Aux park Yearsley depot. c) major access between A1 and M1 since MARR opened.	Remove Flash Farm from Plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29470 - Tony Warwick [3331]	Object	<p>The A617 is busy and dangerous. Hence the reduced speed limit, sadly often flouted.</p> <p>Already there are large numbers of HGVs passing through Kirklington. Noise pollution and air pollution - including diesel particulates which are particularly dangerous to children.</p> <p>It is the ambulance route for Kings Mill. The more traffic, the slower the response times for emergency call outs.</p> <p>There are lots of accidents that interrupt traffic flow. There have been other changes which have added to the density of traffic on the A617 and there are more to come.</p>	Remove flash Farm site from plan.	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29385 - Kirklington Parish Council (Helen Cowlan) [879]	Object	Although the proposals do make comment on the weight restrictions around Southwell, they do not acknowledge the recent redevelopment and expansion of the Yearsley/Brakes business at Belle Eau Park which will lead to an increase in HGV traffic. Neither do they acknowledge existing congestion points at Kelham and around Newark itself. Lack of clarity with regard to the latter/infill stages exacerbates concerns about the types of vehicles which will be on the roads. There is no mention of increasing emergency service usage between Newark and Kings Mill Hospitals.	*realistic/"bigger picture" thinking required	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	
29446 - Michael Staff [3695]	Object	The cumulative effect of Flash farm development on the land use of this supposedly rural area will be significant and undermines the council supported drive to develop the tourist potential of the area ( Kelham Hall, Civil War Museum and trails etc)	Flash Farm should be removed from the Draft LMP	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29199 - Mrs Linda White [7642]	Object	NCC seems not to be able to integrate aspects of its planning to be able to come up with a robust plan. Although individual developments in themselves in the A617 and Newark catchment may not be significant, their combined effect on traffic, noise , pollution and congestion are great and this plan chooses to work in a bubble that ignores the wider situation	NCC to demonstrate that their planning recognises the cumulative impact of developments within an area	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p>	
29325 - Philip Henson [3575]	Object	<p>object on grounds of:</p> <p>1. soundness</p> <p>-negative impacts on residents with regard to noise, dust and nuisance.</p> <p>-Increased traffic burden for an extended period of time (20 years).</p> <p>-Road infrastructure A17/A1/A46 under stress from current volumes as identified by Newark Council.</p> <p>2. object on grounds of:Legality-claims risk</p> <p>-Under ECHR people particularly badly effected by planning decisions may claim for damages.</p> <p>-Coddington primary school with 400+ cohort and many residents with young and elderly dependents within 1/2 mile of site.</p>	Coddington removed from the DPD.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29522 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The proposed flash farm site at Averham will result in a significant increase in traffic volumes in and around Newark, with the majority being Heavy Goods Vehicles, this would further exacerbate the problems with traffic congestion in the Newark area. The use of the sites will also create noise and air pollution in the surrounding villages as well as in the town of Newark and this factor has also not been properly considered within the Plan. Increased traffic through local villages Heavy traffic on the route to Newark Heavy lorries over Kelham bridge that is not suitable for lorries.	Flash Farm, site MP2p should be removed from the local minerals plan.	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29256 - Helen Rushby [7730]	Object	<p>many cumulative negative impacts:</p> <ol style="list-style-type: none"> <li>1.detrimental to health with proximity to Averham, Kelham and Primary school</li> <li>2.potential increase to flooding risk</li> <li>3.negative impact on local heritage and tourism</li> <li>4.local eyesore and impact on conservation and local natural amenities over next 20 years</li> <li>5.increased HGV traffic on an already overloaded road system particularly A617 and A46 causing traffic bottlenecks at Kelham Bridge and Cattle Market roundabout and unacceptable journey times at peak times in summer of approx an hour for 3 miles</li> <li>6.Would place Averham between the power station at Staythorpe and the gravel pit at Flash Farm, each being approx 500 mtres from the village boundary</li> </ol>	<p>the figures for the demand for gravel are overstated and operation of this new gravel pit is not proven as required in 2016. This site should be taken out of the MLP at this stage and only considered when demand can be evidenced based on accurate figures and proactive recycling/waste strategy. Also the eastern bypass for A46 to A1 should be completed and full operational and the Kelham bypass built and in full use before this site is considered in the future to ensure minimum impact on traffic and health. The council traffic assessment should be carried out again during peak summer holiday period as winter traffic is always lower having lived in the village for 6 years, during which time delayed journeys into Newark have got worse.</p>	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29601 - Mr Ian Bradey [7824]	Object	The proposed flash farm site at Averham will result in a significant increase in traffic volumes in and around Newark, with the majority being Heavy Goods Vehicles, this would further exacerbate the problems with traffic congestion in the Newark area. This factor has not been properly taken into account within the Plan.	remove site MP2p (Flash Farm) from the draft minerals plan	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process. As such, due to changing local circumstances over the plan period, it would not be appropriate to provide an exhaustive list at this stage.</p> <p>A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29317 - Mrs amanda armstrong [7755]	Object	There are a number of recent developments in the A617 area which are having a cumulative detrimental effect on the villages in the A617 corridor eg the environment weight restriction on the A612 through Upton to Southwell which has moved that traffic onto the A617, the increase in activity at the depots at Belle Eau Park between Kirklington and Bilsthorpe, the opening of the power station at Staythorpe, the opening of a second school in Kirklington and increased hospital traffic between Newark Hospital and Kings Mill	Remove Flash Farm as a potential site	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Potential Cumulative Impacts have been considered within the Sustainability Appraisal when considering potential site allocations.</p> <p>The justification text for Policy DM8 specifically discusses that the cumulative impact of any future proposals will be considered prior to any decisions being made as to whether the proposal is acceptable. The cumulative impact for future development proposals will be dependent on individual local circumstances at the time of the planning application which will be apparent during that stage of the process.</p> <p>A Strategic Transport Assessment has been undertaken to consider the potential impacts that the traffic movements will have on the highway network. A detailed transport assessment will be required as part of the planning application stage which will consider cumulative impacts.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
29295 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Despite the policy the LMP would add yet another industrial site within the broader Averham and Kelham conservation areas. If this goes ahead the area will be sandwiched between a gas-fired power station and a gravel pit, transforming this from a rural to an industrial environment. Feb 2016 NCC traffic survey shows traffic levels at all time high as result of A617 now being a link between A1 and M1. An enlarged distribution plant at Bilsthorpe will add further HGVs and the cumulative effect will be even more serious with the traffic that would come from Flash Farm	Flash Farm should be removed from the MLP	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM9: Highways safety and vehicle movements/routeing</i>					
29778 - Roger Fell [2474]	Object	<p>Object on highway safety grounds as follows:</p> <ul style="list-style-type: none"> <li>* The draft proposal access fails to comply with the adopted NCC Policy (1st April 2009) Section IN5: Our Access to Road Network Policy as the road speed at the proposed location is national 60mph.</li> <li>* The road is already demonstrating capacity and is a Main Strategic Highway over Gunthorpe Bridge and has a high HGV movements.</li> <li>* There is limited vision (sightline) from north on a long left hand curve.</li> <li>* At limit of a section of A6097 controlled by average speed cameras (40mph).</li> <li>* Proposed traffic light junction is on an embanked slope of highway which is known to be unstable.</li> <li>* No sufficient analysis of alternative access.</li> <li>* The presence of an Environmental Weight Limit does not preclude the use of minor road access to premises by commercial vehicles exceeding 7.5 tons.</li> <li>* False weighting has been given in the Sustainability Analysis to allocate Shelford West by an assumption that the junction is to be directly onto A6097.</li> </ul>	Move site access to "C" road (Bridgford Road between Kirkhill (EB) and Newton village by using an existing private access track	The County Council's response to site specific concerns are addressed against mineral provision policies. For Shelford see policy MP2, MP2r.	
29623 - Southwell Town Council (Ms C Standish) [784]	Object	<p>The Council notes that the C612 [previously the A612] which runs through Southwell is subject to a 7.5tonne HGV limit.</p> <p>In the event of the Draft Plan being adopted, it will expect the limits to be rigidly enforced. Any traffic between the A617 at Averham, and the processing plant at Fiskerton must be required to use the existing HGV routes via Newark and the A46.</p>	The Plan should be amended to ensure appropriate transport plans	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29804 - Barnby in the Willows Parish Council (Mrs Yvette Wellard) [3548]	Object	<p>The Parish Council strongly object to the proposal for gravel extraction on the A17 Coddington site (MP2o) as the additional traffic that would be generated by the site would affect the whole of the Newark area. The current road network is inadequate for current levels of traffic, which, considering the growth points planned to the south of the town, and the general increase in traffic, will be even greater by 2023.</p> <p>Congestion in the town centre is a major problem and will be further aggravated by the increase in the number of trains coming through the town, the new District Council offices and the proposed sale of land for retail on the B6326 - all impacting on the A46/A617 roundabout.</p> <p>There are no guarantees that funding will be available to undertake the proposed highway improvement works.</p> <p>Experience here has proved that improvements are never enough to cope with the traffic levels for a significant period of time, so gravel extraction over a 25 year period would still be a problem.</p>	<p>We do not believe that the traffic assessments carried out for this application accurately reflect the problems that Newark experiences on a daily basis. There has to be a firm commitment to major improvements to the road network, and more over-all strategic planning of developments in and around the Newark area. However, a site that is so close to the town, the County Showground, and all the overstretched traffic intersections around Newark, would always create major transport problems, and alternative sites should be considered. A far more comprehensive traffic assessment, and long term planning for the whole area are essential before allowing even more slow-moving heavy lorries on to the single carriageways of the A17 and A46.</p>	<p>The County Council's response to site specific concerns are addressed against mineral provision policies. For Coddington see Policy MP2, MP2o.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29711 - Newark and Sherwood District Council (Matthew Tubb) [2950]	Object	<p>The District Council objects to the plan in terms of the need for sand and gravel and requests to delete Coddington and Flash Farm (see previous representations). However, were the proposed allocations to remain part of the plan then the District Council considers that safeguards relating to highways impact must be included within the plan. On this basis the Authority considers Policy DM9 to be unsound as it does not represent the most appropriate strategy, when considered against the reasonable alternatives, for addressing highways issues.</p> <p>The addendum to the Strategic Transport Assessment concludes that, in respect of Coddington and Flash Farm sites, the addition of traffic around Newark will add to existing traffic levels and peak period congestion. However this is not considered a material and significant impact.</p> <p>The District Council takes a fundamentally different view in that a 4% increase in HGV traffic given the current congestion problems in and around Newark will have a disproportionate effect. The conclusions of the Strategic Transport Assessment and Addendum do not fully address the transport context of the Newark area.</p> <p>Given the significant issues around the capacity of the A617 and the suitability of Kelham Bridge the District Council challenges the idea that the bridge would be able to accommodate additional HGV traffic from the quarry. The narrow nature of the bridge means that large scale HGV's are unable to pass one another which given the volume of traffic results in bottle necks and also gives rise to significant safety concerns. These concerns over safety are borne out by a number of serious accidents which have occurred in recent years, the most significant of which resulted in the bridge being closed for six weeks last year.</p>	<p>Policy DM9: Highway Improvements Safety and Vehicle Movements/Routeing Proposals for minerals development will be supported where it can be demonstrated that:</p> <p>Criteria a) to d) to remain the same addition of new criteria e) and f) e) in the case of MP2o Coddington and MP2p Flash Farm that planned highway improvements to the A46 Newark Northern Relief Road and A46/A1/A17 junctions have been implemented. f) in the case of MP2p Flash Farm that planned highway improvements to the A617 Kelham Bridge have been implemented.</p>	<p>The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm and Coddington see policies MP2, MP2p and</p>	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29161 - Ian Woolridge [7726]	Object	Significant number of HGV movements has been underestimated in the plan, adding even more traffic to an already dangerous road (A617).	No extraction at all at flash farm	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	
29244 - Mr Ray Edwards [3531]	Object	I do not believe that the strategic traffic assessment with regard to the proposed site at Coddington is sound. I see no reflection of the existing, very real and at times severe, traffic problems which will clearly be accentuated by any of the proposed quarry development. The A17 in particular is a busy and dangerous route and to my personal knowledge there have been two fatalities at the A17/Drove lane junction.	There is one simple solution - that is - not to accept the Coddington site for gravel extraction.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Coddington see policy MP2, MP2o.	
29523 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The road has had its speed limit reduced previously to 50 MPH as a result of previous road safety initiatives and with vehicle related incidents still increasing this must be addressed. The proposed site of Flash farm will introduce slow moving and contaminated vehicles onto this route creating further congestion and additional surface debris hazards as well as slow emerging vehicle hazards. The Minerals plan for the Flash farm site does not address the current state of the roads, highways, traffic flows and densities nor does it present a workable traffic solution for the A617 through Kelham and Averham.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	
29143 - Mr Daniel Davies [7699]	Object	The highways surrounding the proposed site are narrow in places and are close to capacity. Additional HGV traffic being forced to use Kelham Bridge is unsafe.	Site to be reconsidered upon completion of Kelham bypass.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29766 - Craig Black [3612]	Object	The A617 is a road which is seriously stressed everyday and when there is an accident, breakdown, coming together of lorries in Kelham or on Kelham Bridge (frequent occurrence), or at Peak holiday times, it grinds to a standstill. These lengthy delays are intolerable to the people living along the A617 and cause considerable disruption to trade in Newark. It is understood that these traffic problems are out with the remit of the current consultation. Incoming and outgoing quarry site traffic will have to use the A617 and add to this already overloaded road.	Remove Flash Farm from the plan or provide an alternative site access away from the A617	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see Policy MP2, MP2p.	

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## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29770 - Coddington Parish Council (Linda Cox) [7846]	Object	<p>TRAFFIC</p> <p>This representation is made in respect of the Sand and Gravel allocation at Coddington (Reference Code MP2o) using the guidance set out in "Examining Local Plans Procedural Practice". Coddington Parish Council (CPC) contends that the Minerals Local Plan (MLP) is not sound with regard to Policy DM9 Highways Safety and Vehicle Movement (paras a, b, and c). The inadequacies of the supporting Strategic Transport Assessment (STA) 2014, which examined the proposed MLP sites, were identified at the County Council's January 2016 meeting. Following a further review, a Strategic Traffic Assessment Addendum was produced in February 2016. (Disappointingly for CPC, there are two correctable errors in the Addendum at para 4.8.4 (line 4). The A17 was opened in 1989, as a single carriageway trunk road subject to the national speed limit of 60 mph, and not 70 mph, as stated.) More generally, we do not consider that the Addendum has improved the soundness of the MLP, and conjoined with the STA still does not support the MLP's proposals. It is interesting to note that full Council approval of the submission draft on 14 January 2016 pre-empted any additional findings contained in the Addendum published in February 2016.</p> <p>a. DM9 - para a. There is no future traffic prediction for the A46, A1 and A17 at Newark to cover the period of the gravel extraction (2023-2043). Funding is now in place for a feasibility study and planning to start on dualling of the single carriageway section of the A46. However, there is no provision for long-term financing, nor any commitment to implementation. Moreover:</p> <p>(1) Should a decision be taken to widen the A46 single carriageway it would cause major disruption during the period when there is proposed joint extraction at Flash Farm and Coddington (2023-29).</p> <p>(2) The developing Newark Southern Link</p>	Coddington Parish Council proposes that the Minerals Local Plan be amended so that extraction at the allocated site at Coddington (MP2o), and the further greenfield site within the Newark area, should not be considered until all of the existing traffic issues have been fully resolved. Until that stage, the Minerals Local Plan DM9 is neither justified nor effective.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Coddington see policy MP2, MP2o.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
		<p>Road, south of Newark, is part of the Growth Point but regarded (Addendum, para 6.7) as a desirable alternative route for A46/A1 bound traffic; there is no statistical basis or survey results supporting this assumption. This new route is a single carriageway access and distributor road for the traffic generated by the new development, adding vehicle movements onto existing urban roads; although six roundabouts between the A46 and A1 are planned, there is no quantification of this increased Growth Point traffic. Furthermore, Coddington itself already has increased traffic from the Fernwood development using Balderton and Drove Lane to access the single carriage way A17, and the A46. The reliance placed in the Addendum upon major highway improvements by Highways England, is replete with expectations but with no firm commitments. The policy in DM9.a is therefore unsound.</p> <p>b. DM9 - para b. The Addendum acknowledges the existence of congestion problems at the junctions around Newark, but their severity is not quantified. Additionally, the MLP and the Addendum do not take into account how these congestion issues will be further aggravated at Newark by, but not exclusively:</p> <p>(1) On the B6326 - Trent Bridge, north to A46 Roundabout (King Edward VII Avenue):</p> <p>(a) The proposed Sainsbury's store on land between Kelham Road and the A46.</p> <p>(b) The increase in trains passing through Castle Station, with 24 more daily crossing closures.</p> <p>(c) New District Council offices adjacent to Castle Station.</p> <p>(2) Events at Newark Showground.</p> <p>(3) Accidents on the A1 and A46, (the major hospital is 45 minutes away, via Kelham / A617). The 2014 STA/Addendum's understated accident figures are focused too closely on the</p>			

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
		<p>environs of the Coddington site entrance and immediate export route westwards. The Addendum has failed to link the serious A46 Relief Road congestion issues with the inextricably linked difficulties in Newark. The policy in DM9.b is therefore unsound</p> <p>c. DM9 - para c. The Addendum (para 6.4) notes that the Newark Relief Road roundabouts are insufficient to cope with congestion from the already increased traffic. Any further increase, however modest but with slow, heavy vehicles, will worsen the problem. The Addendum's observation and recommendations appear to CPC, to be a desk-top exercise; mere figures do not accurately reflect the congestion and subsequent blocking of the town and its road systems. Solid empirical evidence, also, is required to measure and understand the nature of the traffic problem; Friday observations would be especially illuminating. Additionally:</p> <p>(1) The Addendum (para 6.7) also indicates that the Kelham Bypass Scheme would be a major improvement to alleviate the problems experienced at Newark, but, like the A46 Relief Road project, it does not currently feature in a programme for construction; it is merely being "protected [sic] for possible construction during the lifetime of the third local transport plan ie by 2026". Again, any construction would cause major disruption and congestion during the extraction period.</p> <p>(2) Highways England is also considering smaller scale safety/capacity initiatives to address the existing road safety issues. However there is no detail on these mere palliative measures; their potential efficacy at acknowledged A1/A46/A17 choke points cannot be judged, therefore, even if delivered by 2020.</p> <p>CPC submits that the traffic management of the Newark area has not been studied sufficiently in the Addendum to introduce effective and holistic measures to minimize the impact of traffic on Newark.</p>			

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
		Policy DM9.c is therefore unsound.			
29187 - Helen Rushby [7730]	Object	Specific representation for Flash Farm site. The junctions of the A617/A46 and A46/A1 currently are subject to significant delays when traffic is heavy. Although data shows a decrease in traffic along the A617 it also shows an increase on A46 causing a bottleneck at the cattle market roundabout. Also Kelham bridge is too narrow for the current level of HGV traffic and an increase along this route should not be considered. Traffic flows increase in the summer due to tourist traffic and are higher in peak times causing journey times of an hour Atherham -Newark at times.	The site at Flash Farm should not be included in the plan for gravel extraction until the eastern bypass taking traffic from A46 south of Newark to A1 is fully operational and until the Kelham bypass is built and in use ensuring HGV traffic does not have to use Kelham bridge. The recent traffic assessment carried out by the council should be re-run at the peak summer time of the year over a longer period to provide more comprehensive data, and to include minor bumps and scrapes which still cause traffic build up or stoppage.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	
29602 - Mr Ian Bradey [7824]	Object	The A617 currently handles on average 18000 vehicles a day and carries an increasing number of HGV's along this route as it is the main link from Mansfield to Newark and the A1. With the expansion of a number of haulage companies within the area this will further increase in a unregulated manner. The road has had its speed limit reduced previously to 50 Mph as a result of previous road safety initiatives and with vehicle related incidents still increasing this must be addressed.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	
29302 - Mrs Sally JOHN [7710]	Object	A quarry at Flash Farm would lead to even more HGV traffic in both directions. A617 is narrow. Kelham Bridge is a safety hazard, not fit for even the present demands made on it. It is very narrow and a right angled bend on the Newark side makes it difficult to see oncoming traffic. Exiting /entering the Quarry site via A617 will cause more traffic difficulties for the villages needing to access the narrow A617. More HGV traffic over Kelham Bridge gives even greater potential for accidents. Even minor accidents cause big tailbacks and are of great concern to Emergency vehicles.	A new crossing over the Trent or a replacement bridge for Kelham Bridge must be considered before any gravel extraction is considered. A bypass for Kelham should be put in place. A new complete and thorough examination be made on the present road structure in the areas which would be impacted even as far as the A1, A46 and Newark. where already severe congestion occurs at certain times.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29138 - Mr Tim Parkinson [7694]	Object	<p>The objection relates specifically to the potential siting of a sand and gravel extraction site at Coddington.</p> <p>Policy DM9 states that proposals for minerals development will be supported where it can be demonstrated that:</p> <p>The highway network can satisfactorily and safely accommodate the vehicle movements, including peaks in vehicle movements, likely to be generated;</p> <p>The objection is that in respect of the road network in the Coddington area, the cannot be achieved because the capacity of the A17 and A46 is insufficient to take significant additional traffic and the junction of the A17, A46 and A1 is regularly beyond capacity.</p>	Either the proposed site at Coddington be located elsewhere or significant de-bottlenecking upgrades of the A17, A46 and A17/A46/A1 junction be made.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Coddington see MP2, MP2o.	
29386 - Kirklington Parish Council (Helen Cowlan) [879]	Object	<p>The A617 cannot easily accommodate the additional HGV traffic which will be generated from the site, especially in light of the cumulative effect from the Yearsley/Brakes development at belle Eau Park. Traffic surveys do not sufficiently place attention/weighting to the increase in HGV traffic specifically - only to overall traffic. There are a number of sections of the road which will create hotspots/slow movement e.g. hills and Kelham Bridge. The road quality will exacerbate noise issues especially for empty lorries heading to the site. Lack of depth with regard to "infill" traffic too.</p>	*Remove Flash Farm from the MLP as it is not required.	The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29838 - Newark PAGE (Enquiries .) [2485]	Object	<p>Whilst we welcome this policy in principle, we consider that it should also have a more strategic dimension, either by amending this policy or Policy SP5 to require alternative sites with shorter or more environmentally acceptable routes to market to be preferred. Routeing agreements should limit movements to the servicing of markets where minerals cannot reasonably be received by waterway or by rail to incentivise investment in sustainable modes.</p> <p>Special arrangements should be agreed to reduce or avoid movements during periods in which diversionary routes are in place on strategic highways to limit the already extensive impact to settlements affected by such diversions.</p>	Amend this policy or Policy SP5 to require alternative sites with shorter or more environmentally acceptable routes to market to be preferred.	Not accepted. The site allocation process has considered a range of issues including the geographical location of sites in relation to the main markets to identify those that are in principle suitable for future minerals extraction. Depending on the location of quarries it is not always possible to gain access to suitable waterways or rail to transport minerals however the minerals plan supports the movement of minerals by more sustainable means wherever possible.	
30034 - Highways England (Trevor Murray) [7614]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>HE welcomes the inclusion of Policy DM9. The policy states that all new development proposals need to consider the needs of all road users, with the needs of pedestrians, cyclists and vulnerable road users being placed at the forefront of any considerations. It is also states that proposals for minerals development will be supported where it can be demonstrated that "the highway network can satisfactorily and safely accommodate the vehicle movements, including peaks in vehicle movements, likely to be generated". This is welcomed by HE as a means of ensuring that the strategic road network is safeguarded and assumes that this will be established through the undertaking of a transport assessment.</p>		Support noted	



# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30062 - Derbyshire County Council (Mr Rob Murfin) [1041]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>to minimise the impact of traffic on local communities. A number of the proposed sites are close to the Derbyshire/ Nottinghamshire county boundary; therefore DCC requests that your Council consults DCC as Highway Authority on any planning applications relating to the proposed sites that potentially involve routing heavy goods vehicles on Derbyshire's roads. DCC would also wish to be party, where appropriate, to any such routing agreements.</p>		<p>Comment noted. Derbyshire County Council as an adjacent authority will be consulted on all planning applications which have the potential to impact on Derbyshire's road network.</p>	
<i>DM9 Justification</i>					
29459 - Dr Valerie Willcocks [7774]	Object	<p>The Flash Farm Development would result in additional heavy lorries on the A617. The holiday traffic from the Midlands to the East Coast already causes traffic build up and delays. Accidents cause re-routing of traffic - the A617 accident statistics do not reflect the delays and rerouting of traffic, as they do not include accidents where there is no injury. Ambulance journeys to Kings Mill hospital have increased up to 29% a month during the past 3 years; EMAS statistics record one way only. Flooding at Kelham also causes traffic diversions.</p>	<p>A robust traffic management system is required for the A617 before any Flash Farm development is considered.</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	
29524 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	<p>The road has had its speed limit reduced previously to 50 MPH as a result of previous road safety initiatives and with vehicle related incidents still increasing this must be addressed. The proposed site of Flash farm will introduce slow moving and contaminated vehicles onto this route creating further congestion and additional surface debris hazards as well as slow emerging vehicle hazards. The Minerals plan for the Flash farm site does not address the current state of the roads, highways, traffic flows and densities nor does it present a workable traffic solution for the A617 through Kelham and Averham.</p>	<p>Flash Farm, site MP2p should be removed from the local minerals plan.</p>	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29233 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Specific representation for Flash Farm site. The junctions of the A617/A46 and A46/A1 currently are subject to significant delays when traffic is heavy. Increasing traffic on A46 causes bottlenecks at the cattle market roundabout. Kelham bridge is too narrow for the current level of HGV traffic and an increase along this route should not be considered. Traffic flows increase in the summer due to tourist traffic and during the sugar beet campaign . Peak traffic causes journey times of up to an hour between Averham and Newark	The site at Flash Farm should not be included in the plan for gravel extraction	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29514 - Mrs Deborah Cassidy [7818]	Object	This Plan is not based upon a robust and credible evidence base as all the evidence has not been included or	Complete a further Strategic Transport Assessment to establish a true picture of the likely increase in traffic and congestion in and around Newark on Trent. Specifics to include the planned A46 Relief Road as it is due to be built within the timescale of this plan; the planned building of offices to house Newark and Sherwood District Council; the planned conversion of Kelham Hall to a Hotel and Spa and the increase in traffic as a result of the caravan site. Also to complete a report that truly reflects the reality of 127 HGV's passing one at a time over Kelham Bridge and the true impact on surrounding areas when that bridge is closed.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29447 - Michael Staff [3695]	Object	The A617 is an unimproved A road subject to a 50 mph speed limit from Newark to Mansfield. pinch Kelham Bridge which is so narrow two HGV's cannot pass at the same time is a growing problem as traffic levels have surged( see NCC traffic survey Feb 2016). The road cannot cope with existing traffic and blocks back regularly. Flash Farm adds what can be seen as an acceptable increase in traffic.However taken cumulatively with other locally generated growth and A1/M1 link traffic it is no longer fit for purpose or able to cope.	Remove Flash Farm from the draft LMP>	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29603 - Mr Ian Bradey [7824]	Object	The proposed site of Flash farm will introduce slow moving and contaminated vehicles onto this route creating further congestion and additional surface debris hazards as well as slow emerging vehicle hazards. As there is currently little in the way of screening since Notts County Council recently remove the mature woodland bordering the A617, vehicle engine noise, audible reversing notifications and other plant equipment noise will travel easily and cause impact to residents of Averham and Kelham.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29206 - Tim Harrison [3311]	Object	This section of the Plan makes no reference to the current situation regarding highway safety on the A617 between Newark and Lockwell Hill. It is impossible to assess impact if a baseline is not established. Increased heavy lorry traffic will exacerbate current hazards Road congestion and pollution were ignored in the draft plan, particularly with reference to Flash Farm. Environmental consideration would suggest that mineral extraction takes place where good transport links are available.	Remove Averham Flash Farm from the Plan on the grounds that the road network is unsafe and inadequate	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29201 - Mrs Linda White [7642]	Object	A617 is already an overloaded road particularly during the summer, sugar beet campaign, events at the show ground and following accident that lead to diverted traffic. Although an A road it has a reduced speed limit as an accident prevention measure and in parts is actually a single carriageway for larger vehicles, especially in Kelham and on the bridge. Accident figures underestimate events as many do not cause injury, but still disrupt traffic. Traffic sampling as done for the plan gives a snapshot that does not represent the issues	Newark regional traffic management measures to be put in place before any more development in the area. The imposition of a robust traffic management system for the A617	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM10: Airfield safeguarding</i>					
29722 - Mr Adrian Hatton [2828]	Object	Policy DM10 has not identified all airfields with safeguarding. NCC have a duty to include such and therefore plan is not legally compliant.	NCC must identify all airfields with airfield safeguarding packages in place (normally lodged with local district council planning offices). Those airfields must be included within MLP at DM10.	<p>Objection partially accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Policy D10 safeguards Civil and Military airfields (licenced through the Civil Aviation Authority) in line with national guidance. However, there is a line of text at the bottom of the policy which 'safeguards other new areas'.</p> <p>In order to acknowledge other 'local' airfields the County Council will add some further wording to the justification text to ensure that the unlicensed 'local' airfields are also considered during the planning application stage.</p>	<p>1) Amend paragraph 5.108 to include the word 'licenced' as follows:</p> <p>"There are eight licenced safeguarded airfield areas..."</p> <p>2) Add new paragraph for justification text:</p> <p>"5.109 Other, non-licenced, aerodromes may be safeguarded by privately agreed consultation with the Local Planning Authority. This is called 'unofficial' safeguarding and is not obligatory under Statutory Direction however, the County Council acknowledges the Government's advice in that "aerodrome owners should take steps to safeguard their operations" and as such Policy DM10 will also apply to these 'unofficial' safeguarded areas as recorded by Local Planning Authorities."</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30101 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust agree that the working and restoration of minerals sites should not compromise airfield safeguarding, and we recognise that bird strike is a potential issue, but we are concerned that the safeguarding zones in the Plan policy are awarded equal risk status, regardless of the level and type of use. Given the substantial areas of the County covered by safeguarding zones (including many of the main mineral extraction areas), this could have a potentially significant effect on both the working and restoration of mineral sites and so a more measured and evidence-based approach is required. For example, several of the aerodromes listed (Gamston, Hucknall, Netherthorpe, Nottingham City) are used wholly by small planes, flying at relatively low speeds, in the daytime only. The risk of being hit by birds (who will see the planes) is minimal in this situation and is not comparable to the risks of large planes taking off and landing at high speeds, as might be the case for East Midlands Airport and Robin Hood Airport.</p> <p>For the latter two airports, the whole safeguarding zone may not need to be treated equally, as the risk of bird strike at edge of the zone (when planes are usually above 2000') is significantly less than within the closest 7 or 8km of the airport. In order for an applicant to be able to provide the MPA with a meaningful assessment of the likely hazards that may result from a scheme, they will need to be in possession of the above information and to have access to the necessary risk-model and ornithological expertise. In the absence of such an evidence-based approach, a blanket safeguarding policy could compromise both the working of a number of sites and also the aim of creating substantive priority biodiversity habitats.</p>	<p>The policy should be re-worded to reflect the differential levels of risk within different types of safeguarding zone, based on up to date and accurate information provided by the aerodrome operators.</p> <p>Additional text should be included to ensure that an evidence-based approach is used when determining risk that may result from the different types of habitat restoration and it is important to note that large open water habitats are not a priority for biodiversity-led restoration.</p>	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed. The policy requires applicants to demonstrate that their extraction, restoration and after-use proposals would not have any adverse impacts on aviation safety and consideration of this matter would take account of the use of any particular airport of aerodrome.</p> <p>The policies contained within the Local Plan should be read as a whole and as such specific details of any proposal will be required to submit detailed site specific assessments.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29544 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	<p>Not all active safeguarded airfields are included in DM10 list and at least one non-operational (closed) airfield is still listed as safeguarded.</p> <p>Rectory Farm airfield at Averham has Safeguarding document in place at Newark and Sherwood District Council (planning dept) and falls well within 8mile radius of Flash Farm preferred site - no account of this has been taken for this in the Plan and therefore the Plan is neither sound, nor positively prepared in this respect.</p> <p>It is likely that other airfields have similar safeguarding policy lodged with local authorities.</p> <p>All safeguarded airfields should be listed at DM10.</p>	Flash Farm, site MP2p should be removed from the plan	<p>Objection partially accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Policy D10 safeguards Civil and Military airfields (licenced through the Civil Aviation Authority) in line with national guidance. However, there is a line of text at the bottom of the policy which 'safeguards other new areas'.</p> <p>In order to acknowledge other 'local' airfields the County Council will add some further wording to the justification text to ensure that the unlicensed 'local' airfields are also considered during the planning application stage.</p>	<p>1) Amend paragraph 5.108 to include the word 'licenced' as follows:</p> <p>"There are eight licenced safeguarded airfield areas..."</p> <p>2) Add new paragraph for justification text:</p> <p>"5.109 Other, non-licenced, aerodromes may be safeguarded by privately agreed consultation with the Local Planning Authority. This is called 'unofficial' safeguarding and is not obligatory under Statutory Direction however, the County Council acknowledges the Government's advice in that "aerodrome owners should take steps to safeguard their operations" and as such Policy DM10 will also apply to these 'unofficial' safeguarded areas as recorded by Local Planning Authorities."</p>
29748 - Elizabeth Stokes [7844]	Object	<p>Airfield Safeguarding. Not sound. Not positively prepared - Rectory Farm has airfield safeguarding in place with Newark &amp; Sherwood District Council and is not on this list</p>	Rectory Farm is not on the list of airfield's which have safeguarding in place - contact Newark & Sherwood District Council.	<p>Objection partially accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Policy D10 safeguards Civil and Military airfields (licenced through the Civil Aviation Authority) in line with national guidance. However, there is a line of text at the bottom of the policy which 'safeguards other new areas'.</p> <p>In order to acknowledge other 'local' airfields the County Council will add some further wording to the justification text to ensure that the unlicensed 'local' airfields are also considered during the planning application stage.</p>	<p>1) Amend paragraph 5.108 to include the word 'licenced' as follows:</p> <p>"There are eight licenced safeguarded airfield areas..."</p> <p>2) Add new paragraph for justification text:</p> <p>"5.109 Other, non-licenced, aerodromes may be safeguarded by privately agreed consultation with the Local Planning Authority. This is called 'unofficial' safeguarding and is not obligatory under Statutory Direction however, the County Council acknowledges the Government's advice in that "aerodrome owners should take steps to safeguard their operations" and as such Policy DM10 will also apply to these 'unofficial' safeguarded areas as recorded by Local Planning Authorities."</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29437 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	<p>Policy DM10 and its application in the Local Plan is not consistent with NPPF Paragraph 143. Policy DM10 only considers airport safeguarding when assessing the risks of bird strikes from sites reclaimed to open water, and not the bird strike risks to the safety of low flying military aircraft on training flights.</p> <p>The creation of a large area of open water will significantly increase the risk of bird strikes to low flying military aircraft above Coddington, and this risk should have been identified during the site selection process, and the site removed from the Minerals Local Plan.</p>	<p>Policy DM10 only considers airport safeguarding when assessing the risks of bird strikes from sites reclaimed to open water, and not the bird strike risks to the safety of low flying military aircraft on training flights.</p> <p>The proposed Coddington site experiences approximately 10 times the hours of low level fixed-wing military training flights compared to the majority of Nottinghamshire, and if worked the site would certainly leave large areas of open water resulting in increased risk of bird strikes.</p> <p>The Coddington site (MP2o) should be removed from the Minerals Local Plan due to the risk to aviation safety from the proposed restoration scheme and the likely wet method of extraction.</p>	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>The NPPF states that "In preparing Local Plans, local planning authorities should...put in place policies to ensure worked land is reclaimed at the earliest opportunity, taking account of aviation safety...."</p> <p>The safeguarding areas defined in the Minerals Local Plan identify those areas where an applicant of any future planning application will need to demonstrate that the proposed extraction and restoration will not result in adverse impacts on aviation safety.</p> <p>RAF Syerston is identified within the Minerals Local Plan on the airfield safeguarding area plan and is also contained within the policy (DM10). The 13km safeguarding area from this aerodrome covers the Coddington site and as such any potential adverse impacts on aviation safety resulting from extraction, restoration and after-use of the site will need to be considered at the planning application stage.</p>	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29735 - Mr Adrian Hatton [2828]	Object	Not all safeguarded airfields are included in list. Rectory Farm airfield at Averham has Safeguarding document in place at Newark and Sherwood District Council - no account of this has been made for this in the plan - the airfield operator at Rectory Farm (and any others not included on list) must be contacted and all aviation safety related mitigation measures incorporated before considering including Flash Farm as a preferred site.	Rectory Farm airfield at Averham has Safeguarding document in place at Newark and Sherwood District Council - no account of this has been made for in the plan - the airfield operator at Rectory Farm (and any others not included on list) must be contacted and all aviation safety related mitigation measures incorporated before considering including Flash Farm or any other preferred sites.	Objection partially accepted.  The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.  Policy D10 safeguards Civil and Military airfields (licenced through the Civil Aviation Authority) in line with national guidance. However, there is a line of text at the bottom of the policy which 'safeguards other new areas'.  In order to acknowledge other 'local' airfields the County Council will add some further wording to the justification text to ensure that the unlicensed 'local' airfields are also considered during the planning application stage.	1) Amend paragraph 5.108 to include the word 'licenced' as follows:  "There are eight licenced safeguarded airfield areas..."  2) Add new paragraph for justification text:  "5.109 Other, non-licenced, aerodromes may be safeguarded by privately agreed consultation with the Local Planning Authority. This is called 'unofficial' safeguarding and is not obligatory under Statutory Direction however, the County Council acknowledges the Government's advice in that "aerodrome owners should take steps to safeguard their operations" and as such Policy DM10 will also apply to these 'unofficial' safeguarded areas as recorded by Local Planning Authorities."



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM10 Justification</i>					
29736 - Mr Adrian Hatton [2828]	Object	Para 5.108 - Factually incorrect.	Para 5.108 - revise to include all safeguarded airfields.	<p>Objection partially accepted.</p> <p>The Development Management Policies are intended to provide criteria against w</p> <p>Policy D10 safeguards Civil and Military airfields (licenced through the Civil Aviation Authority) in line with national guidance. However, there is a line of text at the bottom of the policy which 'safeguards other new areas'.</p> <p>In order to acknowledge other 'local' airfields the County Council will add some further wording to the justification text to ensure that the unlicensed 'local' airfields are also considered during the planning application stage.</p> <p>Hucknall Aerodrome will also be removed from the list contained within Policy DM10 as this has recently closed.</p>	<p>1) Amend paragraph 5.108 to include the word 'licenced' as follows:</p> <p>"There are eight licenced safeguarded airfield areas..."</p> <p>2) Add new paragraph for justification text:</p> <p>"5.109 Other, non-licenced, aerodromes may be safeguarded by privately agreed consultation with the Local Planning Authority. This is called 'unofficial' safeguarding and is not obligatory under Statutory Direction however, the County Council acknowledges the Government's advice in that "aerodrome owners should take steps to safeguard their operations" and as such Policy DM10 will also apply to these 'unofficial' safeguarded areas as recorded by Local Planning Authorities."</p> <p>3) Remove Hucknall Aerodrome from the list contained within Policy DM10 and remove from Plan 5.</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29545 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	<p>Not all active safeguarded airfields are included in DM10 list and at least one non-operational (closed) airfield is still listed as safeguarded.</p> <p>Rectory Farm airfield at Averham has Safeguarding document in place at Newark and Sherwood District Council (planning dept) and falls well within 8mile radius of Flash Farm preferred site - no account of this has been taken for this in the Plan and therefore the Plan is neither sound, nor positively prepared in this respect.</p> <p>It is likely that other airfields have similar safeguarding policy lodged with local authorities.</p> <p>All safeguarded airfields should be listed at DM10.</p>	Flash Farm, site MP2p is removed from the plan.	<p>Objection partially accepted.</p> <p>Policy D10 safeguards Civil and Military airfields (licenced through the Civil Aviation Authority) in line with national guidance. However, there is a line of text at the bottom of the policy which 'safeguards other new areas'.</p> <p>In order to acknowledge other 'local' airfields the County Council will add some further wording to the justification text to ensure that the unlicensed 'local' airfields are also considered during the planning application stage.</p> <p>Hucknall Aerodrome will also be removed from the list contained within Policy DM10 as this has recently closed.</p>	<p>1) Amend paragraph 5.108 to include the word 'licenced' as follows:</p> <p>"There are eight licenced safeguarded airfield areas..."</p> <p>2) Add new paragraph for justification text:</p> <p>"5.109 Other, non-licenced, aerodromes may be safeguarded by privately agreed consultation with the Local Planning Authority. This is called 'unofficial' safeguarding and is not obligatory under Statutory Direction however, the County Council acknowledges the Government's advice in that "aerodrome owners should take steps to safeguard their operations" and as such Policy DM10 will also apply to these 'unofficial' safeguarded areas as recorded by Local Planning Authorities."</p> <p>3) Remove Hucknall Aerodrome from the list contained within Policy DM10 and remove from Plan 5.</p>
29416 - Mr. Christopher Parrett [3469]	Object	The road network cannot sustain any new developments that add to the already very congested traffic, not just near Coddington (A17) but the whole of Newark area, the notorious A17/A46/A1 roundabouts and roads are among the 3 worst in the country, This making Newark a 'no go' town, ruining businesses and the lives of local people and the plan has not looked fully at these implications. Added to this we now have 24 extra trains using the Castle Station and causing more road blockages	Coddington must be taken out of this plan until the road networks have been greatly improved because it is the only major crossing for the River Trent and the main route to the North for traffic using the A1 (North and South) and A46 (West to East) this route seen a very large increase since it was duelled, all making Newark the 'Bottle Neck' of the east midlands	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>DM12: Restoration, after-use and aftercare</i>					
29604 - Mr Ian Bradey [7824]	Object	<p>The submission policy states "Mineral extraction proposals which rely on the importation of waste for restoration must:</p> <p>a. Include satisfactory evidence that the waste will be available over an appropriate timescale in the types and quantities assumed;"</p> <p>The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the submission MLP is unrealistic, unsustainable and flawed.</p>	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29466 - Mrs Jackie Armstrong [2881]	Object	<p>Notts MLP DM12: Restoration, after-use and aftercare 5.127 (relocating soils from Best and Most Versatile Agricultural Land (BMVL) which are surplus to requirement for a specific chosen restoration method), does not comply with the requirements of NPPF Paragraph 143 to safeguard the long term potential of BMVL and conserve soil resources. The argument is flawed because factors in soil quality are site and location specific, so relocated BMVL sourced soils may not perform as well in their new environment. Transporting the soils in HGVs also has environmental and traffic impacts.</p>	<p>Acknowledge in all relevant places that best and most versatile land is site specific and any disturbance of soils from best and most versatile land (BMVL) can affect their quality. This must be considered when evaluating the impacts of working any allocations with significant proportions of BMVL, and in determining the most desirable and optimal restoration schemes for such sites.</p> <p>Remove from the MLP sites with high proportions of best and most versatile land, including Coddington MP2o, which cannot reasonably expect to be restored to a similar high proportion of agriculture. Site selection should give priority to include sites in the MLP where it is practicable to restore BMVL in situ.</p>	<p>Not accepted. As part of a detailed planning application, a range of assessment work would be required and this would include details on how soil resources would be protected and maintained during the stripping, storage and final placement. The outcomes of this work would then inform the final working and restoration of the quarry. Any planning application would be assessed against the policies in the plan including Policy DM12 Restoration, after use and aftercare along with Policy DM3: Agricultural land and soil quality. In most cases soils would be used on site as part of the restoration but in certain circumstances it maybe more appropriate to use them elsewhere. If this was the case, detailed information would be included in the planning application.</p>	

<i>Respondent</i>	<i>Nature</i>	<i>Summary</i>	<i>Suggested Change to Plan</i>	<i>Council's Response</i>	<i>Council's Change to Plan</i>
29767 - Craig Black [3612]	Object	<p>This green belt site is quality agricultural land which currently supports grazing and various crops. This will be lost for a lifetime if not forever if quarrying takes place.</p> <p>The inert waste required to fill the "hole" left after the sand and gravel has been removed will be more than the County can produce. This sheds doubt on the likelihood of the site ever being restored to its former state. The alternative is lorries travelling hundreds of road miles to provide suitable infill.</p>	Re-consider the siting of the proposed quarry.	<p>Objection not accepted.</p> <p>The Development Management Policies are intended to provide criteria against which future planning applications for mineral development proposals will be assessed.</p> <p>Agricultural Land Quality, Soil Quality and restoration proposals (where appropriate) have been considered within the Sustainability Appraisal when considering site allocations.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30102 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust welcome this policy and we are in general support. We do not consider, however, that the policy wording fully reflects the importance of biodiversity-led restoration as it is represented either in the supporting text or elsewhere in the Plan. We welcome the changed text in 2a, as previously requested by us, but still feel that the Policy wording is insufficiently strong. This could be readily resolved by adding further text. There is also a statement in the Policy section 8 that after-use proposals should provide wider community benefits. It is, of course, the case that the local community should benefit from a diverse and wildlife-rich landscape that they can access for informal recreation, and thus also contributes to their enhanced health and wellbeing. Such landscapes may also contribute to sustainable tourism. NWT do not, however, support the reference to employment uses in this policy as this implies a general presumption that may be interpreted in favour of built employment development, which would be contrary to a biodiversity-led approach. There will be certain sites which for historical reasons (such as Thoresby Colliery pit-head) this may be appropriate, but most new mineral developments are on greenfield sites in predominantly rural locations, where such an approach would be contrary to other policies. The removal of this reference from Policy DM11 bullet point 8 would resolve this issue.</p> <p>NWT strongly welcome the reference to the need for different length aftercare periods to ensure that habitats have been properly established and secured.</p>	<p>Amend policy as follows: After-use: 5. In accordance with the biodiversity-led approach, there is an assumption that the proposals for after use will include substantive habitat creation, applicants will therefore be required to demonstrate how the proposals contribute to the delivery of Local Biodiversity Action Plan targets and have regard to the biodiversity-led restoration approach and the opportunities identified in the National Character Area profile.</p> <p>Remove reference to employment uses from Policy DM11 bullet point 8.</p>	<p>Not accepted. The Plan should be read as a whole. Paragraph 5.119 specifically states that Policy DM12 should be read alongside Policy SP3 Biodiversity-Led Restoration and paragraph 8 highlights that community benefits may include enhancement of biodiversity and geodiversity interests. It is not therefore considered necessary to repeat further references here.</p> <p>It would not be appropriate for the plan to promote biodiversity to the exclusion of other potential after-uses and the County Council would not wish to preclude the potential for linking restoration proposals to employment opportunities which may be acceptable in some cases. The development of employment uses would not necessarily preclude associated biodiversity benefits as part of the overall restoration scheme. The plan seeks to strike an appropriate balance whilst ensuring biodiversity benefits are optimised as far as possible.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29454 - Mrs Jackie Armstrong [2881]	Object	The availability of suitable inert fill has become a critical factor in the sustainability of gravel extraction on sites with high water tables and low overburdens - severely limiting the proportion of land-surface in any restoration. MLP Development Management policies should clearly state this and spell out the consequences. Consultation site information should provide transparency, prominently displaying a rough quantitative measure of the likely balance between water and restored land-surface, based on onsite fill, overburden, and depth of extraction. Understanding the conflict between enforced water restoration and other desirable methods, and cumulative impact would inform expectations when developing the MLP.	<ol style="list-style-type: none"> <li>1. The consequences of the lack of a suitable inert fill on many sites should be openly acknowledged and the consequences clearly reflected in MLP Development Management policies.</li> <li>2. NCC should require developers in their Site Information Request Form to supply data and a calculation that roughly quantifies the likely ratio between water and land-surface on restoration, at the earliest consultation stages.</li> <li>3. In MLP consultations NCC should provide transparency in this aspect by prominently displaying the rough quantitative ratio between water and land surface on restoration in the site information or site development brief and in other appropriate site selection papers. The developers' 'Site Information Request' data for all sites should be included in the public papers.</li> <li>4. Remove Coddington MP2o site allocation from the MLP, as it is unsuitable for this endangered Notts Sandlands landscape.</li> </ol>	<p>Not accepted. As part of the evidence gathering process, a call for sites was undertaken with the minerals industry to identify those sites that they wished to be considered for allocation in the emerging Minerals Local Plan. A minimum level of information was required to ensure that the sites were deliverable, realistic and achievable. At the site allocation stage detailed site information is not available as the allocations are those that are in principle suitable for future minerals development.</p> <p>The restoration of worked out quarries will vary on a site by site basis taking into account a wide range of issues such as the depth of the mineral, the amount of overburden available, water table levels and the ownership of the land. Given the location of sand and gravel quarries many are restored to wetland based schemes and are one of the few activities that through restoration can result in the creation of significant areas of important habitats to meet Local Biodiversity Action Plan targets.</p> <p>As part of any planning application a wide range of detailed assessment work would be undertaken and the results from this work would inform the working of the quarry and the final restoration scheme.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29626 - Natural England (Consultation Services) [1750]	Object	<p>Whilst Natural England generally welcomes this policy we would like to see greater reference to the "Bigger and Better" document and the related concept plan, prepared by the RSPB and endorsed by Natural England and other environmental organisations, which promote landscape scale nature conservation restoration in the Trent &amp; Tame River Valleys.</p> <p>We acknowledge that this document is mentioned in the explanatory text of Policy SP3: Biodiversity Led Restoration, however it would also be useful if further details could be included within DM12 to add to the references to the National Character Areas (paragraph 5.122), the local Biodiversity Action Plan (paragraph 5.123) and the Nottinghamshire Landscape Character Assessment (5.125). It would also be helpful if the recently prepared concept plan for the Trent Valley between Newark to South Clifton was also referenced as this is particularly relevant to the following minerals sites: Langford Lowlands, Cromwell, Besthorpe and Gorton.</p>	<p>We suggest that the following paragraph should be added to policy DM12:</p> <p>"The "Bigger &amp; Better" document, prepared by the RSPB in partnership with other environmental organisations, promotes a strategic, landscape scale approach to biodiversity led minerals restoration which will help to establish a coherent and resilient network of wetlands across the whole of the Trent and Tame River Valleys. In addition a more detailed concept plan has been developed for the section of the Trent Valley between Newark and South Clifton which is intended to complement the existing positive approach towards future mineral site restoration in this area."</p>	<p>Objection accepted.</p> <p>The County Council agree that reference to the two documents should be made within the justification text for Policy DM12 and agree with Natural England's suggested wording.</p>	<p>Add further paragraph to justification text after 5.123 as follows:</p> <p>"5.124 The "Bigger &amp; Better" document, prepared by the RSPB in partnership with other environmental organisations, promotes a strategic, landscape scale approach to biodiversity led minerals restoration which will help to establish a coherent and resilient network of wetlands across the whole of the Trent and Tame River Valleys. In addition a more detailed concept plan has been developed for the section of the Trent Valley between Newark and South Clifton which is intended to complement the existing positive approach towards future mineral site restoration in this area."</p>
29698 - Tarmac Ltd [580]	Object	<p>Whilst Tarmac are broadly supportive of Council's approach to the restoration, after-use and aftercare of minerals sites, as set out in in Policy DM12, it does not appear to be fully reflective of or in accordance with Strategic Policy SP3 (Biodiversity-led Restoration). In addition, Tarmac wish to raise concerns regarding the wording of some parts of the policy - see attachment for details</p>		<p>Not accepted.</p> <p>It is not considered necessary to amend the text in criteria 1 of the policy from 'environment' to 'locality' as the policy states that where opportunities arise, after- use proposals should provide benefits to the local and wider community which could include environmental as well as social and economic benefits.</p> <p>It is considered that criterion 2 and criterion 3 are inline with policy SP3 as quarry restorations can in certain circumstances be returned to other uses such as leisure or agriculture whilst still maximising biodiversity gain. This can be achieved through detailed design work at an early stage of the process.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29402 - John Allan [3617]	Object	The submission policy states "Mineral extraction proposals which rely on the importation of waste for restoration must: a. Include satisfactory evidence that the waste will be available over an appropriate timescale in the types and quantities assumed;" The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the submission MLP is unrealistic, unsustainable and flawed.	remove the Flash Farm site from the draft MLP.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29238 - Harworth Estates Ltd [1941]	Object	Whilst we do not object to Policy DM12, we believe that policies for the restoration/ afteruse of minerals sites should not be overly prescriptive or rigid. The restoration of sites should be considered on a case-by-case basis.	Policy DM12 refers to the 'requirement for proposals to demonstrate how the after-use of the site will contribute to the delivery of local biodiversity action plan targets'. Biodiversity-led restoration may not always be the most suitable approach to the afteruse of a minerals site (particularly former colliery sites which may lend themselves to redevelopment as employment sites over biodiversity end-uses). It would be beneficial if the Council could add some supporting text to Policy DM12 in recognition of this.	Objection not accepted.  Policy DM12 does not preclude other after uses of the site in terms of restoration proposals. Policy DM12 (5) is clear in that 'WHERE PROPOSALS FOR AFTER USE INCLUDES HABITAT CREATION, applicants will be required ...' as such the policy allows for other after-use proposals where these would be appropriate depending on the site and its surroundings. Moreover, DM12 (8) allows for employment after-use (amongst others).	
29506 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The submission policy states 'Mineral extraction proposals which rely on the importation of waste for restoration must: 'a. Include satisfactory evidence that the waste will be available over an appropriate timescale in the types and quantities assumed' The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the submission MLP is unrealistic, unsustainable and flawed.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
30011 - The Coal Authority (Rachael Bust) [2853]	Support	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  Support - The Coal Authority welcomes the Minerals Plan approach towards the issue of restoration.		Support noted	
29852 - National Trust (Kim Miller) [2987]	Support	The approach to restoration and aftercare is supported, particularly the commitment to seeking long term enhancement of the environment.		Support noted	

### DM12 Justification

29387 - Kirklington Parish Council (Helen Cowlan) [879]	Object	There is a lack of clarity with regard to recycling rates. Also with regard to where the landfill will come from and how (and associated impacts - particularly traffic). Insufficiently quantifiable information means that comments cannot accurately be made with regard to the later stages of the site's lifespan. It is felt that the ability to effectively fill the hole left by the extraction has been grossly overestimated, and that the site will be 'incomplete' for many years longer than stated.	*Provide more specific data with regard to existing and anticipated recycling rates *Clearly outline expectations for infill provision - what, how much, from where, envisaged end date *Clearly state what the site will look like at the end of it's life and any anticipated ongoing effects, environmental or otherwise.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29208 - Tim Harrison [3311]	Object	The Plan does not include satisfactory evidence that the waste will be available over an appropriate timescale in the types and quantities assumed, provide the optimum restoration solution or and provide evidence that it is not practical to re-use or recycle the waste. Increased recycling and landfill taxes have reduced the inert waste available in the County. To achieve the proposed tonnages the site, on its own, would have to import more than is available County-wide.	Remove Averham Flash Farm from the Plan on the grounds that site restoration with inert waste is not feasible in the timescales allowed.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29417 - Mr. Christopher Parrett [3469]	Object	If this plan is included, when completed I feel strongly that it should be restored to it's original state as agricultural use. The character of Coddington village is of crops, animals and green fields and this should be maintained.	Specify that it is to be restored to it original state.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29468 - Tony Warwick [3331]	Object	The plan does not contain satisfactory evidence that the waste will be available in the types and quantities assumed, over an appropriate timescale or provide the optimum restoration solution or provide evidence that it is not practical to re-use or recycle the waste. increased recycling (which should be encouraged) together with the increasing landfill taxes have reduced the inert waste available in the County. To achieve the proposed tonnages, the site would have to import more than is available County wide.	Remove Flash farm from plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29605 - Mr Ian Bradey [7824]	Object	The submission policy states "Mineral extraction proposals which rely on the importation of waste for restoration must: a. Include satisfactory evidence that the waste will be available over an appropriate timescale in the types and quantities assumed;" The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the submission MLP is unrealistic, unsustainable and flawed.	remove site MP2p (Flash Farm) from the draft minerals plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29507 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	The submission draft MLP policy states 'Mineral extraction proposals which rely on the importation of waste for restoration must: a. Include satisfactory evidence that the waste will be available over an appropriate timescale in the types and quantities assumed' The developer's proposal included backfilling the site with inert waste streams, however evidence shows that the county's entire inert waste production would be insufficient for this site alone, therefore the submission MLP is unrealistic, unsustainable and flawed.	Flash Farm, site MP2p should be removed from the local minerals plan.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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DM13: Mineral safeguarding and consultation areas

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29782 - Mineral Products Association (Malcolm Ratcliff) [1517]	Object	<p>Mineral safeguarding should be reflected in a strategic policy along with a more detailed policy in this part of the plan. The suggested DM13 should be used as it upgrades a number of considerations from the supporting text to a policy. We also object to the omission of safeguarding in the urban areas. The buffers adopted by the mpa to extend the MSAs beyond the resource boundary also need to be applied to the urban edge at the very least. The MSA boundaries therefore need to be amended to include urban areas.</p> <p>We also find that the Background Paper is too dismissive of prior extraction which will lead to developers continuing to not take the issue seriously despite the existence of a very strong national policy to include policies for prior extraction in</p>	<p>This will necessitate changes to Policy DM13 as follows (see attachment for details of deletions and insertions). Policy DM13: Mineral Safeguarding and Consultation Areas</p> <p>Safeguarding Areas</p> <p>1. Planning permission will not be granted for any form of development that would sterilise mineral resources within the Mineral Safeguarding Areas or prevent future minerals extraction on neighbouring land unless:</p> <ul style="list-style-type: none"> <li>* The applicant can demonstrate that the mineral concerned is no longer of any value or potential value; or</li> <li>* The mineral can be acceptably extracted prior to the non-mineral development taking place, or</li> <li>* The incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or</li> <li>* There is an overriding need for the development; or</li> <li>* The development is of a minor nature as defined by the exemption criteria below which would not inhibit extraction of the mineral resource; or</li> <li>* The development is, or forms part of, an allocation in the Development Plan.</li> </ul> <p>2. Exemption Criteria</p> <ul style="list-style-type: none"> <li>* applications for householder development;</li> <li>* applications for alterations and extensions to existing buildings and for change of use of existing development, unless intensifying activity on site;</li> <li>* applications that are in accordance with the development plan where the plan took account of the prevention of unnecessary mineral sterilisation and determined that prior extraction should not be considered when development applications in a MSA came forward;</li> <li>* applications for advertisement consent;</li> <li>* applications for reserved matters including subsequent applications after</li> </ul>	<p>Comments Noted. Objection partially accepted.</p> <p>The County Council do not agree that this topic should form a strategic policy.</p> <p>Minerals may be finite but they are not always scarce and this has important implications for defining practical safeguarding areas. The County Council has produced a Background Paper on this issue which sets out the reasons for the safeguarding approach for each mineral. Apart from coal, opportunities for mineral extraction on any scale in urban areas will be rare and, bearing in mind the information contained within the background paper, the safeguarded areas should disregard urban areas in Nottinghamshire.</p> <p>It is accepted that further wording would provide clarity to the reader in terms of the information required as to why prior extraction is not appropriate and also provide exemption criteria. However, the County Council consider that this would be more appropriate to be contained within the supporting text and propose to amend the Plan to include this information.</p>	<p>Add further paragraphs to supporting text after paragraph 5.142 to provide clarity in terms of the information required as to why prior extraction is not appropriate and also provide exemption criteria, as follows:</p> <p>"It is accepted that that there may be circumstances where prior extraction may not be appropriate. In these cases the County Council would expect the developer to demonstrate that:</p> <ul style="list-style-type: none"> <li>* The mineral concerned is no longer of any value or potential value; or</li> <li>* There is an overriding need for the non-mineral development which outweighs the need for the mineral; or</li> <li>* The proposed non-development site is located on the urban fringe and mineral extraction would be inappropriate in this location; or</li> <li>* The non-mineral development is of a minor nature as defined by the exemption criteria in paragraph 5.140 above."</li> </ul> <p>Add further paragraph as follows:</p> <p>"Where prior extraction can be undertaken, an assessment should be undertaken to include an explanation of how this will be carried out as part of the overall development scheme"</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
			<p>outline consent has been granted;</p> <p>* prior notifications (telecoms, forestry, agriculture, demolition);</p> <p>* Certificates of Lawfulness of Existing Use or Development (CLEUD) and Certificates of Lawfulness of Proposed Use or Development (CLOPUD);</p> <p>* applications for works to trees;</p> <p>* applications for temporary planning permission</p> <p>* development types already specified in a DPD as exempt from the need for consideration on safeguarding grounds</p> <p>Consultation Areas</p> <p>4. District and Borough Councils within Nottinghamshire will consult the County Council as Minerals Planning Authority on proposals for non-minerals development within the designated Mineral Consultation Area, as shown on the Policies Map.</p> <p>5. The Minerals Planning Authority will resist inappropriate development within the Mineral Consultation Areas.</p> <p>In addition we would also ask that the following is placed in the supporting text, Within a Mineral Safeguarding Area, non-mineral development except for those types of development set out in policy DM13, should not be permitted until the prospective developer has produced evidence prior to determination of the planning application to demonstrate through a site-specific desk-based Mineral Assessment the existing surface and solid geological and mineral resource including an estimate of the economic value (for example quality and quantity) of the mineral, its potential for use in the forthcoming development and an assessment of whether it is feasible and viable to extract the mineral resource ahead of development to prevent unnecessary sterilisation. Where prior extraction can be undertaken, the assessment should also include an explanation of how this will be carried out as part of the overall development scheme.</p>		

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29699 - Tarmac Ltd [580]	Support	Tarmac support the Council's proposed approach to minerals safeguarding, including the identification of safeguarding/ consultation areas in respect of sand and gravel, limestone and industrial dolomite. This is in accordance with National Planning Policy.		Support noted	
30012 - The Coal Authority (Rachael Bust) [2853]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Support - We agree that the whole surface coal resource should be safeguarded from sterilisation. Given that Nottinghamshire remains a two-tier area, the use of Mineral Consultation Areas will be an effective tool for District/Borough Councils to utilise.</p> <p>We support the exempt development set out in the justification text. In particular the recognition that allocated sites for non-mineral surface development should only be excluded where the allocation process has taken into account mineral sterilisation, including consideration of the potential for prior extraction. The policy is considered to broadly accord with the NPPF.</p> <p>We support the identification of the PEDL licensed areas for CBM and other hydrocarbons, and the principle of safeguarding hydrocarbons. We note these resources are not illustrated on Plan 6, and support this approach.</p>		Support noted	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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DM13 Justification

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29783 - Mineral Products Association (Malcolm Ratcliff) [1517]	Object	<p>Paragraph 5.145</p> <p>This paragraph is UNSOUND by reason of</p> <ul style="list-style-type: none"> <li>*not being effective</li> <li>*not being consistent with national policy and guidance</li> </ul> <p>Although the paragraph notes that Nottinghamshire does not have any strategic mineral infrastructure facilities, it does not mention 'existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.' as required by NPPF paragraph 143 bullet point 4 and is thus unsound because it is not in accordance with national policy. Any such sites and facilities identified as result of this policy change should be added to the Policies Map.</p>	<p>This will necessitate a new policy as follows</p> <p><b>NEW POLICY DM19 MINERAL INFRASTRUCTURE SAFEGUARDING</b></p> <p>Existing, planned and potential infrastructure supporting the aggregates industry will be safeguarded from inappropriate development. These sites are shown on the Policies Map. This includes sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material. Proposals for non-mineral related development on the site or within 100 metres that may lead to the loss of or damage to safeguarded infrastructure or locations will not be permitted unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>* An alternative site within an acceptable distance can be provided, which is at least as appropriate for the use as the safeguarded site; and</li> <li>* It can be demonstrated that the infrastructure no longer meets the current or anticipated future needs of the minerals, building and construction industry or the waste management industry.</li> </ul>	<p>Objection partially accepted.</p> <p>The County Council acknowledges the content of the National Planning Policy Framework in terms of safeguarding infrastructure, however, in light of the guidance contained within the National Planning Policy Guidance (Paragraph 006: Ref ID 27-006-20140306) which states that "...responsibility for safeguarding facilities and sites for the storage, handling and transport of minerals in local plans will rest largely with the district planning authority" the County Council do not consider it to be appropriate to safeguard these sites.</p> <p>In addition, due to the large number of these sites within the County and the majority of these being located on existing industrial estates, which are identified within District/Borough Local Plans, there is no indication that any individual plant is important in its own right. Such plants are also physically relocatable and as such are considered non-strategic and will not be safeguarded by the County Council.</p> <p>It is acknowledged however, that further text should be added within this section to explain the County Council's approach in more detail.</p>	<p>Amend title of Section to:</p> <p>DM13: Mineral Safeguarding, Consultation Areas and Important Mineral Infrastructure</p> <p>Delete paragraph 5.145 and replace as follows:</p> <p>5.145 The NPPF states that Minerals Planning Authorities, when preparing their plans should include policies to safeguard:</p> <ul style="list-style-type: none"> <li>* Existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials, and</li> <li>* Existing, planned and potential sites for concrete batching, the manufacture of coated materials and other concrete products, and the handling, processing and distribution of recycled and secondary aggregate material.</li> </ul> <p>Wharfs</p> <p>5.146 Nottinghamshire does not contain any rail heads or rail links to quarries, however, two wharfs are located within the County:</p> <ul style="list-style-type: none"> <li>* Besthorpe - this wharf is directly linked to Besthorpe quarry and is used to transfer sand and gravel by barge to South Yorkshire.</li> <li>* Colwick - this is a general -purpose wharf that has previously been used as a river dredging transfer facility. It has also been identified as a location to land and distribute a proportion of the sand and gravel output from the proposed Shelford quarry allocation.</li> </ul> <p>5.147 It is not considered appropriate to safeguard the</p>



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
					<p>Besthorpe wharf as it is located in a remote greenfield location and is poorly connected to the road network should sand and gravel cease to be worked in this area in the future. However as Colwick wharf has been identified for use as part of the shelford quarry proposal, is located close to the built up area and is on an existing industrial estate it is considered necessary to identify it as part of the consultation areas.</p> <p>Secondary Processing Facilities 5.148 Concrete batching plants, coated road stone and other minerals infrastructure provide materials to maintain both existing infrastructure and new developments. In Nottinghamshire these facilities associated with concrete, mortar and asphalt plants which utilise sources of aggregates to make 'value added' products. The facilities are relatively small in nature and whilst some are located on existing mineral workings, others are stand-alone facilities on industrial estates in urban areas.</p> <p>5.149 Due to the large number of these sites within the County and the majority of these being located on existing industrial estates, which are identified within District/Borough Local Plans, there is no indication that any individual plant is important in its own right. In addition, such plants are also physically re-locatable and as such are considered non-strategic and will not be safeguarded by the County Council.</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29307 - Gedling Borough Council (Mr Graeme Foster) [2120]	Object	The words "which took account of minerals sterilisation" should be deleted from paragraph 5.140. The wording is insufficiently explained in terms of what information is required and potentially adds a layer of uncertainty on allocated sites in adopted Local Plans where the principle of development is for all intents and purposes is established.	Delete the words - "which took account of minerals sterilisation" - in paragraph 5.140.	<p>Objection not accepted.</p> <p>The National Planning Policy Framework requires Mineral Planning Authorities and Local Planning Authorities to define and have regard to Minerals Safeguarding Areas.</p> <p>If non-mineral development proposals (including existing or new allocations) have not considered Minerals Safeguarding Areas as part of their decision making criteria then decisions being made on any future planning applications submitted for those areas will need to to consider the Safeguarding Area in their approach to determining whether the planning application is appropriate.</p>	

### DM14: Incidental mineral extraction

30013 - The Coal Authority (Rachael Bust) [2853]	Support	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>We support the policy approach. Prior extraction of surface coal resources can easily take place within urban areas without undue harm to residential amenity. Since it takes the form of activity similar to normal ground works and is undertaken by standard construction type machinery it occurs within a matter of weeks or a few months rather than any significant time. In some cases prior extraction would occur where no mining legacy is present, but in these cases the income potential from the extraction of the coal can be a useful addition to the economic viability of sites in these tough economic times. The support the plan gives to the potential for prior extraction of mineral resources is therefore welcomed.</p>		Support noted	
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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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### Chapter 6: Implementation and Monitoring

#### Chapter 6: Implementation and Monitoring

29434 - Holme Parish (Patricia Richards) [1835]	Object	Consultation and monitoring processes are taking place and are advocated in this Plan mainly with local agencies but without community involvement	Local communities should be fully engaged in monitoring the Plan and explicitly covered in all monitoring processes. Evidence of such engagement should be covered in annual reviews.	<p>Objection not accepted. The purpose of monitoring is to ensure that the Plan is delivering what it set out to achieve. To this end, the County Council has set out a comprehensive monitoring and implementation framework in Appendix 5 of the Plan. This details the performance indicators, targets, triggers and mitigation measures that will be used in the monitoring process. This is a technical exercise, using published data and outcomes from planning applications and on this basis the input of communities is not appropriate. However, communities will have the opportunity to comment on planning applications and thus feed in to the process in this way.</p> <p>Communities have had an opportunity to comment on the content of the monitoring framework through the various stages of consultation on the Plan and the outcomes of the monitoring will be reported each year in a published report. These annual reports will also detail any consultations that have taken place and that are expected in future.</p> <p>Should monitoring identify the need to review any element of the Plan or the Plan as a whole, this would involve public consultation, again giving communities the opportunity to be involved.</p>	
29388 - Kirklington Parish Council (Helen Cowlan) [879]	Support	It is vital that a regular review of the Plan takes place to ensure that existing sites are prioritised and are being utilised effectively. This should then negate the need for new sites being used unnecessarily. The LAA figures should be up to date and included within the plan to accurately identify demand and forecast future need. If emphasis is to be placed on the last three years, as well as overall trends, this should assist with more accurate prediction of future demand.		Comments noted. The monitoring and implementation sections of the Plan detail how the Plan will be reviewed. The LAA will continue to be updated annually to take account of the most recent data.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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### Appendix 2: Delivery Schedules

#### Sand and gravel delivery schedule

29389 - Kirklington Parish Council (Helen Cowlan) [879]	Object	The figures used to identify demand are not up to date therefore the schedule cannot be either. using the most up to date LAA figures will mean that Flash Farm can be removed from the schedule altogether.	*Produce a new schedule based upon more up to date figures - this should demonstrate the need to remove Flash Farm from the MLP altogether	Objection not accepted. The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.  The County Council maintains that it has used the most appropriate figures in determining the level of demand and so do not consider that any change to the delivery schedule on this basis is needed.	
29974 - Rotherham Sand and Gravel Ltd [496]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  We ask that the schedule is amended such that the Scrooby South (MP2d) is delivered prior to the delivery of Scrooby North (MP2c). We have recently been advised by the landowner that access to the Scrooby South site is available until the terms of a current agreement for only a limited period. The working of Scrooby South could be accommodated within the proposed delivery timescales, only if it is worked in advance of Scrooby North.		Comments accepted, relevant changes to be made to the sand and gravel delivery schedule and justification text to MP2 to reflect these changes.	Amend sand and gravel delivery schedule to bring MP2d to be worked prior to MP2c. Amend justification text to MP2, at paragraphs 4.32-4.33 to reflect this change.

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
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### Appendix 3: Site Allocation Development Briefs

#### Appendix 3: Site Allocation Development Briefs

29820 - Anglian Water Services Limited (Stewart Patience) [7379]	Object	<p>We would request the Council also consider the implications of mineral extraction for Anglian Water's assets.</p> <p>Generally, in relation to water and wastewater assets within the boundary of the sites, Anglian Water would require the standard protected easement widths for these assets and for any requests for alteration or removal to be conducted in accordance with the Water Industry Act 1991. Within the easement strips there should be no building over or restriction of access (required for routine maintenance and emergency repair).</p> <p>Standard easement width requirements are supplied.</p> <p>In addition, where there are water supply pipes located within or close to the site special protection measures may be required if the land use is likely to cause contamination.</p>	<p>Reference to the required easements for water supply assets is included in Appendix 3 for the relevant allocation sites.</p>	<p>Objection not accepted.</p> <p>It will be for the relevant operator to identify any water and wastewater assets within the development site and for them to comply with the relevant Act which would be reflected in the planning application process.</p>	
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# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Appendix 3: Site Allocation Development Briefs

Appendix 3: Site Allocation Development Briefs

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29856 - R.S.P.B. (Central Region) (Mr Colin Wilkinson) [1006]	Support	<p>The MLP already addresses many of the principles that are set out in the two Bigger and Better Documents. In particular we support the proposal in the relevant Site Allocation Development Briefs in Appendix 3, to implement a master-planning process for the cluster of sites between Newark and South Clifton. The Concept Plan provides a natural starting point for this master-planning process. As such, we would like to see the Concept Plan explicitly referred to in the MLP.</p> <p>Whilst we support the reference to a master-planning approach in Appendix 3, we believe that this approach should also be reiterated within the main body of the MLP, ideally in the new supporting text for Policy SP2 - Biodiversity-led restoration). This would also be an appropriate place to explicitly reference the first Bigger and Better document as this document encapsulates many of the aspirations set out in this text.</p> <p>By incorporating the suggested amendments, we believe that the Nottinghamshire MLP will truly be an outstanding, national exemplar for the biodiversity-led restoration of mineral sites. The RSPB responds to Mineral Local Plans all around the UK and we often cross-refer to the latest visible example of best practice in each major policy area. The Nottinghamshire MLP could be just such an example for other mineral planning authorities to follow.</p>	<p>In Appendix 3: Site Allocation Development Briefs: All sites within the Newark to South Clifton Cluster (i.e. Langford Lowfields, Besthorpe, Cromwell):</p> <p>Amend the text relating to master-planning to explicitly reference the Newark to South Clifton Concept Plan (i.e. 'The approach to restoration ... should ideally be co-ordinated through a Masterplanning process, or similar, as exemplified by the Newark to South Clifton Concept Plan ...')</p> <p>MP2h (Langford Lowfields West) / MP2 I (Cromwell South)</p> <p>Add the sentence relating to master-planning that is included in the Site Allocation Development Briefs for other sites within this cluster (i.e. 'The approach to restoration ... should ideally be coordinated through a Master-planning process...').</p>	<p>Support and Comments noted.</p> <p>The County Council do not feel that it would be appropriate to add any further text (over and above that already contained within the relevant development briefs) in relation to the potential for a masterplanning process as further text has already been added (in light of the previous comments submitted by the RSPB) in terms needing to identify the need to complement the existing and proposed restoration schemes in this area when developing restoration proposals for the site.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2e - Besthorpe East</i>					
30106 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust object to MP2e - Besthorpe South, as whilst we strongly support the proposal for biodiversity-led restoration, given the proximity of the site to the species-rich wet grassland SSSI at Besthorpe Meadow, floodplain grazing marsh/ MG4 wet grassland would be a more suitable dominant restoration habitat than reedbed (where it is technically achievable). We note that the text has been amended since the last iteration but we still do not consider that it reflects strongly enough that floodplain grazing marsh is one of the highest priority habitats in this Trent Vale Living Landscape area, particularly as so much restoration has already been allocated for reedbed. Floodplain grazing marsh should be a high priority wherever the final landform levels can be used to accommodate it.</p> <p>In addition, in the "Water and Flooding" section, a line has now been added that states " No excavation within 45m of the toe of any flood defence or the River Trent itself", which is clearly contrary to the stated aim of investigating opportunities for floodplain reconnection, new channel creation (braiding) etc. This line should be moderated.</p>	<p>Add reference to the fact that floodplain grazing marsh should be a high priority wherever the final landform levels can be used to accommodate it.</p> <p>Amend "Water and Flooding section" to: " No excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river and/or to create a more hydromorphologically diverse channel"</p>	<p>Not accepted. The site development brief sets out the key issues any planning application would need to address. The potential for floodplain grazing marsh is referenced in the development brief, however maximising this type of habitat may not be technically achievable. Detailed assessment work undertaken as part of a planning application relating to issues such as the extent of the extraction area and the availability of overburden would inform the final restoration scheme.</p> <p>It is not considered necessary to mention floodplain reconnection given the location of the extension.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2f - Besthorpe South</i>					
30107 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>The Trust object to MP2f - Besthorpe East, as whilst we strongly support the proposal for biodiversity-led restoration, given the proximity of the site to the species-rich wet grassland SSSI at Besthorpe Meadow, floodplain grazing marsh/ MG4 wet grassland would be a more suitable dominant restoration habitat than reedbed (where it is technically achievable). We note that the text has been amended since the last iteration but we still do not consider that it reflects strongly enough that floodplain grazing marsh is one of the highest priority habitats in this Trent Vale Living Landscape area, particularly as so much restoration has already been allocated for reedbed. Floodplain grazing marsh should be a high priority wherever the final landform levels can be used to accommodate it.</p> <p>In addition, in the "Water and Flooding" section, a line has now been added that states " No excavation within 45m of the toe of any flood defence or the River Trent itself", which is clearly contrary to the stated aim of investigating opportunities for floodplain reconnection, new channel creation (braiding) etc. This line should be moderated.</p>	<p>Add reference to the fact that floodplain grazing marsh should be a high priority wherever the final landform levels can be used to accommodate.</p> <p>Amend "Water and Flooding section" to: " No excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river and/or to create a more hydromorphologically diverse channel"</p>	<p>Partially accepted. The site development brief sets out the key issues any planning application would need to address. The potential for floodplain grazing marsh is referenced in the development brief, however maximising this type of habitat may not be technically achievable. Detailed assessment work undertaken as part of a planning application relating to issues such as the extent of the extraction area and the availability of overburden would inform the final restoration scheme.</p> <p>The text in the development brief relating to floodplain reconnection will be amended to state:</p> <p>Given the proximity of the site to the River Trent, an additional consideration is the opportunity for floodplain reconnection in this area, which would bring ecological and sustainable flood management benefits, potentially through realignment of the floodbank, and which could include river re-braiding. Dialogue should be undertaken with the Environment Agency at an early stage to explore these ideas.</p> <p>Point one set out under the water and flooding section will be amended to state: 'no excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river.'</p>	<p>Amend text under the quarry restoration heading in the development brief to state:</p> <p>'Given the proximity of the site to the River Trent, an additional consideration is the opportunity for floodplain reconnection in this area, which would bring ecological and sustainable flood management benefits, potentially through realignment of the floodbank, and which could include river re-braiding. Dialogue should be undertaken with the Environment Agency at an early stage to explore these ideas'.</p> <p>Point one under the water and flooding section will be amended to state: 'no excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river.'</p>



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2g - Langford South</i>					
30108 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>In the "Water and Flooding" section, a line has now been added that states " No excavation within 45m of the toe of any flood defence or the River Trent itself", which is clearly contrary to the stated aim of investigating opportunities for floodplain reconnection, new channel creation (braiding) etc. This line should be moderated.</p>	<p>Amend "Water and Flooding section" to: " No excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river and/or to create a more hydromorphologically diverse channel".</p>	<p>Not accepted. The site development brief sets out the key issues a detailed planning application would need to address. The potential for flood plain connection has been identified as part of the Shelford west allocation, however any specific scheme would need to be investigated thoroughly through the planning application process in co-operation with the Environment Agency regarding the amendment/removal of existing flood banks.</p>	
<i>MP2h - Langford West</i>					
30109 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>In the "Water and Flooding" section, a line has now been added that states " No excavation within 45m of the toe of any flood defence or the River Trent itself", which is clearly contrary to the stated aim of investigating opportunities for floodplain reconnection, new channel creation (braiding) etc. This line should be moderated.</p>	<p>Amend "Water and Flooding section" to: " No excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river and/or to create a more hydromorphologically diverse channel".</p>	<p>Accepted. The text in the development brief relating to floodplain re-connection will be amended to state: Given the proximity of the site to the River Trent, an additional consideration is the opportunity for floodplain reconnection in this area, which would bring ecological and sustainable flood management benefits, potentially through realignment of the floodbank, and which could include river re-braiding. Dialogue should be undertaken with the Environment Agency at an early stage to explore these ideas.</p> <p>Point one set out under the water and flooding section will be amended to state: 'no excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river.</p>	<p>Amend text under the Quarry restoration heading to state:  Given the proximity of the site to the River Trent, an additional consideration is the opportunity for floodplain reconnection in this area, which would bring ecological and sustainable flood management benefits, potentially through realignment of the floodbank, and which could include river re-braiding. Dialogue should be undertaken with the Environment Agency at an early stage to explore these ideas.</p> <p>Amend point one under the water and flooding section to read: no excavation within 45m of the toe of any flood defence or the River Trent itself, except where part of an agreed restoration plan to reconnect the floodplain to the river.</p>

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2j - East Leake North</i>					
30103 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>Incremental development of extensions of East Leake Quarry over the last 10 years have lead to a higher proportion of agricultural restoration than there should be. Hence it is particularly important that the primary restoration type for these extensions should be to biodiversity.</p>	Add primary restoration type for these extensions to biodiversity.	<p>Not accepted. The site development brief already states that restoration should primarily be biodiversity led, however the higher quality agricultural soils should be taken into account. As part of a planning application, detailed information would be included regarding the extent of the excavation area and a proposed restoration of the quarry. This would set out the type and extent of habitats being put forward.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2m - Barnby Moor</i>					
29706 - Hanson Aggregates North (Mr Ben Ayres) [1021]	Support	<p>Quarry Restoration section states 'Restoration of the site should be primarily biodiversity-led, however the high quality agricultural soils should be taken into account in the final restoration proposal reflecting policy DM3; Agricultural land and soil quality. Target restoration will depend on landform, hydrology and substrate characteristics.'</p> <p>Whilst the site provides an opportunity for biodiversity-led restoration, we are pleased with the reference to agriculture as the site has to be economically self-sustainable following restoration and as such there needs to be a balance between biodiversity (reedbeds), agriculture, low key amenity and uses such as the continuation of rotational willow coppicing.</p> <p>Water and Flooding section states: '-No plant or equipment or storage of aggregate or overburden should be in the Main Drain area and no excavation within 30m of the top of the bank forming the Main Drain -Ensure 9 metre easement from watercourse that runs through the site from south to north is suitable to withstand ingress from water into the quarry.'</p> <p>The total mineral reserve of 1.1mt within the proposed allocation assumes that the route of the Main Drain is altered as a result of extraction of mineral. The drain will form an integral part of the final restoration scheme for the site. Hanson will consult with the IDB and other statutory bodies on this site specific development and restoration proposal prior to any planning application and EIA is submitted for the site.</p>		<p>Comments not accepted. Proposals regarding the main drain are noted; it is not considered that a change to the Site Allocation Development Brief is needed as a result of this as the points regarding the drain remain, regardless of its position within the site.</p>	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2o - Coddington</i>					
29118 - Mr Simon Wilson [7659]	Object	I object to this plan on the grounds that it will increase noise, traffic and ruin the environment for my family and other local residents. The increased traffic will bring added pollution, noise and vibration to the area whilst also being an added safety issue for both pedestrians and local vehicles, kind regards Simon Wilson	Do not quarry in this area!	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29330 - Philip Henson [3575]	Object	object on grounds of: 1. soundness -negative impacts on residents with regard to noise, dust and nuisance. -Increased traffic burden for an extended period of time (20 years). -Road infrastructure A17/A1/A46 under stress from current volumes as identified by Newark Council. 2. object on grounds of: Legality-claims risk -Under ECHR people particularly badly effected by planning decisions may claim for damages. -Coddington primary school with 400+ cohort and many residents with young and elderly dependents within 1/2 mile of site.	Coddington to be removed from DPD until a thorough risk assessment has being undertaken to establish if and how the residents will be affected, and how negative impacts can be reduced to an acceptable level.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29449 - Miss Sarah Blount [3460]	Object	My objection is based on the increase in traffic and the effect on the surrounding environment in the Newark area and the resulting impact this will have on village life in Coddington.	I object wholeheartedly to the building of a quarry so close to a village and the surrounding countryside.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29126 - Miss Inga Usaite [7677]	Object	this plan should be rejected, as Coddington is such a beautiful and peaceful place to live. and I feel that sand and gravel extraction will totally ruin it. bringing the extra heavy traffic, noise, dirt on the roads, which will cause accidents. also will cause damage to nature (birds, small animals). and more importantly I am concerned about my health as I already suffer from asthma. so all in all a very bad idea.	please find an alternative sight	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	

# Nottinghamshire Minerals Local Plan Submission Draft

## Summary of representations received and Council's response, September 2016

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29133 - Ms Sharon Bevan [3452]	Object	<ul style="list-style-type: none"> <li>- Adverse impact to natural and expansive woodland extensively used by the public; prevailing wind will increase noise and dust pollution. Impact on wildlife.</li> <li>- Adverse and enduring impact on Stapleford Lane house prices and ability to sell.</li> <li>- Adverse impact to air quality/ noise for these properties due to prevailing wind from quarry. Location/tranquillity are key selling assets for these properties.</li> <li>- Risk of flood to 12+ properties in Stapleford Lane.</li> <li>- Risk of tree falls and hence safety impact due to ground disturbance.</li> <li>- Impact on local, already busy, road networks.</li> <li>- Seriously undermines character of area.</li> </ul>	Omit Coddington Drove Lane location from the Minerals Plan.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29135 - Deborah Johnson [7690]	Object	That the plan for site MP2o fails in consistency with National Policy in relation to sections 20, 21, 23 and 28 of the Technical Guidance to the National Planning Policy Framework document issued by the Department for Communities and Local Government.	That the site is not suitable and an alternative site further away from homes, schools and communities should be chosen.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29121 - Jeanette Smith [7661]	Object	<p>I moved to Barnby in 2014 due to it being in a beautiful conservation area, so that My husband and I may enjoy the peace and tranquility in our run up to our retirement years..</p> <p>What is the point in having conservation areas if the land is being destroyed around or in it..</p>	<p>Do it somewhere else.</p> <p>No idea about legal compliance or whether it is sound or not, but had to choose one to submit my objection</p>	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29408 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	<p>ENVIRONMENTAL ISSUES</p> <p>Impact on the built environment * The site is within an area noted by English Heritage to have a high potential for non-designated archaeology.</p> <p>Impact on the landscape * Almost the entire landscape area classified by NCC as 'Notts East Sandlands' is 'minerals safeguarded' and under threat of destruction from sand and gravel extraction.</p> <p>Impact on the natural environment * The site is populated by birds that are categorised as 'Rare and declining, farmland and woodland birds', several on the red list.</p> <p>Impact on air quality * The increase in traffic due to the proposed development, particularly HGVs, will have a negative impact on the air quality around Coddington.</p>	In the light of the environmental issues described in the covering note to the petition, Coddington Action Group requests that the proposal to include Coddington MP2o site in the Nottinghamshire Minerals Plan be removed.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29712 - Newark and Sherwood District Council (Matthew Tubb) [2950]	Object	Through its representations on Policy MP2 the District Council has already made representations over the soundness of the proposed Coddington allocation, identifying the need for it to be deleted in order for the plan to be made sound. Nonetheless were the proposed allocation to remain part of the plan then the District Council considers that safeguards relating to highways impact must be included within the plan, as detailed in the representation on DM9. Accordingly the site development brief in Appendix 3 would need to be updated to reflect these proposed modifications.	<p>Appendix 3 - MP2o Coddington</p> <p>Additional bullet point in access and transport</p> <p>□ No extraction of minerals until the planned highway improvements to the A46 Newark Northern Relief Road and A46/A1/A17 junctions have been implemented.</p>	<p>Objection not accepted.</p> <p>A Strategic Transport Assessment has been undertaken to assess the appropriateness of all site allocations within the Local Plan based on existing information. At the time of a planning application, the operator will be required to undertake and submit a site specific transport assessment which must accord with the current standards and other relevant guidance at the time of submission as such it would not be appropriate to include the suggested text.</p>	
29329 - Mr Terence Whitburn [3340]	Object	<p>Noise, Dust from site and increased road traffic.</p> <p>Water table pollution, distance to local housing. the return of land to agriculture . devalue environment and property. depth of gravel in the North of site deep enough to be profitable ?</p>	Do not allow this development.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29156 - Miss J Smith [3662]	Object	<p>*Major impact on the local area, Stapleford Woods being on the very edge of the suggested site - wildlife/woods will be threatened.</p> <p>*Risk to health, due to dust and noise pollution, along with more traffic.</p> <p>*More traffic = more traffic congestion and higher risk of more accidents.</p> <p>*Too close to residential areas &amp; school.</p>	Remove Coddington site off the mineral plan all together.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29158 - Mr Simon Channon [7724]	Object	Plan unsound as it does not take proper note of the current/future traffic disruption on A17 and nearby junctions.	Remove Coddington from the Plan.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29147 - Mr Jonathan Garner [3291]	Object	The crux of this objection is that the proposed site is wholly unsuitable for the location, this being far too close to the village of Coddington. It will affect all residents greatly, not least because the current road infrastructure will not cope (which will not only affect Coddington - Newark will also be affected by yet more traffic congestion) but in terms of noise, poor air quality as a result of dust, and destruction of the immediate surrounding rural environment.	Remove the Coddington site from the mineral plan.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29119 - Stephen Barlow [7660]	Object	<p>Currently the road system in this area cannot cope with traffic.</p> <p>Grid locked and dangerous now (2016)</p> <p>The above comment is accepted by all agencies.</p> <p>Minor roads around the area will not cope with the rat run implications if this project is opened.</p>	Not allow the application to go ahead until further transport / road systems are put in place	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29407 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	<p>Petition to Nottinghamshire County Council resubmitted on 23/3/2016 - Covering note on traffic problems:</p> <p>Traffic congestion - One of Coddington's strong objections to the proposed Local Mineral Plan MP2o is the inadequate infrastructure of the road network in and around Newark-on-Trent. It will cause long delays, resulting in people avoiding the town, which could have an adverse impact on trade and businesses.</p> <p>Accidents - County Road Safety manager, Mrs Pam Shaw's report states that almost 20% of accidents occur in the Newark and Sherwood area and most of the fatalities are on 'A' roads. The A1/A46/A17 junction is ranked in the top 10% nationally for casualties.</p>	<p>In the light of the traffic problems described in the covering note to the petition, Coddington Action Group requests that the proposal to include Coddington MP2o site in the Nottinghamshire Minerals Plan be removed.</p>	<p>This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o. The Petition was submitted again during the period for representations and has been registered against MP2, MP2o.</p>	
29540 - Mr Robert Campbell [3140]	Object	<p>Local people would want to see proper restoration to agricultural use and not the development of a wildlife sanctuary.</p> <p>Planned restoration will be heavily influenced by the justification that losses in high grade agricultural land will be compensated by gains in bio diversity etc.</p> <p>However, why should the local community suffer several generations of upheaval merely to see it's valuable resource of high grade agricultural land be turned into yet another wildlife sanctuary.</p> <p>This whole area is based on agriculture qualifying as "the best and most versatile land".</p>	<p>There must be a site specific "Land Classification Survey"</p> <p>Once this is produced and a detailed study published regarding soils, subsoils and overburden we would want to see what plans can be introduced to ensure the land can be recovered for agricultural use.</p>	<p>Objection not accepted.</p> <p>The Local Plan should be read as a whole and as such any planning application submitted for mineral extraction will need to be assessed against all the policies contained within the Plan. Policies DM3 (Agricultural Land and Soil Quality) and DM12 (Restoration, After-use and After-care) provide the appropriate criteria for proposals to be assessed against in this regard.</p>	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29515 - Carolyn Bennett [7820]	Object	Traffic congestion in Coddington is already hampered by issues on the A17 / A46 / A1 and the economic impacts on Newark and beyond from the quarry have not been evaluated nor has the effect on the local wildlife/environment. Increased traffic congestion would make already dangerous roads more hazardous for children, the elderly and the many dog walkers in Coddington who would not feel safe. The health risks from increased dust, light and noise pollution has not been fully assessed for the local population particularly the elderly residents of the village.	The proposed quarry is in the wrong place and should be withdrawn from the plan until there are definitive proposals for dealing with traffic congestion in the Newark area. A proper assessment of controls needed to protect good quality agricultural land, trees, wildlife and residents of properties closest to the quarry. A health review of the impact on the high proportion of the elderly that reside within the village.	The site development briefs set out the key issues that will need to be considered as part of a detailed planning application. The County Council's response to site specific concerns are addressed against mineral provision policies. For Coddington see policy MP2 and MP2o	
29440 - Mr Mark Ross [3459]	Object	My objection is based on the impact of increased lorry traffic that the proposed quarry would cause, both on the immediate area and the knock on affect to Newark town centre and major roads A1/A46/A17	The propose quarry on the Coddington site is totally unsuitable for the above reasons	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29448 - Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell) [7780]	Object	The developments pose particular issues which affect the economic sustainability of businesses and attractions all over the Newark Area. This is due to traffic congestion from accidents and roadworks - increases in traffic numbers over time - difficulties of access to areas caused by accidents etc - diversions of cars and goods vehicles through village roads and back roads (E.G. BALDERTON LANE) to avoid congestion.	The authority should be taking greater measures to consider the impact of TRAFFIC and DISRUPTION on the economic activities across the entire area, including the town of Newark itself. The STA is flawed and a much more in depth study needs to be undertaken. It has not been properly prepared and is not fit for purpose.	The site development briefs set out the key issues that will need to be considered as part of a detailed planning application. The County Council's response to site specific concerns are addressed against mineral provision policies. For Coddington see policy MP2 and MP2o	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29117 - Richard Boot [7657]	Object	<p>I feel this plan should be rejectored, the increase in large transport vehicles to the already congested road newark will lead to increased delays to all traffic and more significantly clearly the potential of serious injury due to pressure on the already strained road newark.</p> <p>There will be an significant increase in air and noise pollution which will impact all residence of Coddington village and newark as a whole. This will lead to an negative impact on the health, especially the very young and elderly which are the communities most vulnerable</p>	Change the location of the possible site away for the village of Coddington	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29435 - Mr John Barker [3532]	Object	<p>I believe the plan is unsound as "The Strategic Traffic Assessment" included in the documents is now comprehensive and takes no account of peak/seasonal traffic, or impact of such on increase of HGV journeys when the quarry becomes operational. Neither are there any projections or considerations in the event of accidents/road works leaving local residents in fear of their safety.</p>	Reject the proposed MP site for Coddington!	The site development briefs set out the key issues that will need to be considered as part of a detailed planning application. The County Council's response to site specific concerns are addressed against mineral provision policies. For Coddington see policy MP2 and MP2o	
29406 - Coddington Against Gravel Extraction (Mr David Armstrong) [7719]	Object	<p>Petition to Nottinghamshire County Council resubmitted on 23/3/2016 - Covering note on deliverability:</p> <p><b>DELIVERABILITY OF CODDINGTON QUARRY SITE</b></p> <p>There are significant challenges to the deliverability of the proposed Coddington Quarry site, both from the ownership structure of the parcels of land making up the site and from several strategically important infrastructures crossing the site.</p> <p>The petition, although available to NCC since 2014, has not been acknowledged nor have any of the issues been referenced in any NCC summaries of responses or the MLP evidence base.</p>	In the light of the deliverability arguments in the covering note to the petition, Coddington Action Group requests that the proposal to include Coddington MP2o site in the Nottinghamshire Minerals Plan be removed.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o. The Petition was submitted again during the period for representations and has been registered against MP2, MP2o.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29532 - Mrs Jackie Armstrong [2881]	Object	<p>The scoring of sites against SA Objective 3 is flawed. Based primarily on export mode and site proximity to the main highway network, it fails to reflect 'reducing transport distances for minerals' - yet vehicle-kilometres correlate strongly with many negative impacts of HGVs.</p> <p>Site Coddington MP2o scores negatively against many of SA Objective 3's decision making criteria, including transport distances, increasing congestion and requiring new infrastructure. Yet Coddington has been scored +1 during the operational period, 0 long term.</p> <p>The current scoring underplays negative impacts of operators of large allocations transporting gravel to distant processing/concrete plants or markets.</p>	<p>Sustainability appraisal of all sites against Objective 3: Sustainable transport need to be revised to take account of the available market information from developers to capture environmental impacts of transport to and from the forecast market locations. The site information for Coddington has recently become available, and has been used to demonstrate the changes required.</p>	<p>The site development briefs set out the key issues that will need to be considered as part of a detailed planning application. It is not considered appropriate to discuss the sustainability appraisal methodology in the site development brief. The County Council's response to site specific issues are discussed in the minerals provision policies. For Coddington see MP2, MP2o.</p>	
29343 - David C Hedge [3097]	Object	<p>The proposed extraction of sand and gravel from land adjacent to A17 single carriage way is not feasible. This route is already a very congested road during the summer with holiday traffic and heavy goods vehicles heading to Lincolnshire. The damage that will be done to the Stapleford woods area, be it road and trees and wildlife is unacceptable. The traffic accidents on the three major roads in the area should be taken into account as the gridlock will be horrendous.</p>	<p>There is a need to look at the whole scheme again.</p>	<p>This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.</p>	
29607 - Mr Leon LeBlanc [7830]	Object	<p>Too much traffic Too dangerous for children who may veer onto the site</p>	<p>Drop the plan for the quarry</p>	<p>This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.</p>	

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Appendix 3: Site Allocation Development Briefs

MP2o - Coddington

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29306 - Mr Paul Tunaley [3014]	Object	I strongly object on the grounds of the additional heavy traffic burden on the already chaotic road system around Newark, the negative environmental impact on the local amenities (Stapleford Woods, Newark Air Museum, The Newark Showground), the potential adverse effects on local air quality and the consequential effects on the health and welfare of the local population, and the huge loss of agricultural land.	The Coddington option should be removed from the Plan	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
29436 - Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell) [7780]	Object	CAGE believes that the levels of noise, pollution, nuisance and visual impacts are unacceptable to local residents and are likely to affect the quality of life of all villagers for a very long time.	There are properties within 250 mtrs of the site and the impact on these will be severe. The whole area needs re assessing as to it's suitability.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Coddington, see Policy MP2, MP2o.	
<b>MP2p - Flash Farm</b>					
29415 - Mrs amanda armstrong [7755]	Object	The plan for site at Flash Farm fails in consistency with National Policy in relation to sections 20, 21, 22, 23, 26 and 28 of the Technical Guidance to the National Planning Policy Framework document issued by the Department for Communities and Local Government.	Withdraw Flash Farm from the plan	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29164 - ian woolridge [7726]	Object	if up to date sales data for sand and gravel extration is used ie 2015-2014 some 4.9m tonnes less demand cumulatively is required in the plan overall compared with data shown in plan 2002-2011.	remove Flash Farm from plan, as demand can be met from previously identified and mothballed or unused existing sites in 2005 plan	<p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p> <p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p>	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29296 - Dr Philip Rayner [7752]	Object	As a resident of the village of Kirklington I am extremely concerned about the potential increase in traffic resulting from this development. The village is already blighted by heavy lorries and it would appear this development would significantly increase their number. I am concerned that the recent significant increase in size of a transport depot in the neighbouring village of Bilsthorpe means that any recent traffic surveys are already out of date.	Until the full impact of an inevitable increase in heavy lorries passing through Kirklington has been re-considered I feel any development of Flash Farm should be postponed.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29125 - mr daniel whitt [7675]	Object	i am very concerned about the scale, location, adverse impact on infrastructure and environment of this proposed extraction. The A617 and Kelham Bridge in particular are not fit to safely facilitate such a significant increase in heavy traffic over the duration of this proposed mineral extraction. Kelham Bridge is already subject to fairly regular incidents when lorries inevitable collide with this extremely narrow crossing over the Trent, and the impact on Newark and the wider communities when this occurs is significant.	Reduce the scope and duration of this proposal by >50%	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29123 - Mr Stephen Short [7667]	Object	The 617 is already congested and the number of HGVs using the road presents many problems.ie. on the sharp bend at Kelham where the road width is restricted and in particular at the road bridge over the river at Kelham. This bridge is already unsuitable for the present heavy level of traffic and it would be folly to add extra vehicles leaving and returning to the site at Flash Farm.	The proposal for this gravel extraction site is not sound due to the unsuitable road access which requires heavy vehicles to put unsustainable pressure on an already over used road.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29148 - John Peterson [7673]	Object	On grounds of assessment made on out of date information, unproven need, detriment to lives, environment, health and safety in affected villages on A617, even more heavy traffic on Newark roundabout, Kirklington Hill and Kelham Bridge I feel that Flash Farm should not be considered appropriate or viable and planning considerations would make proposal of this site unacceptable	Build a new dual carriageway between the A1 and Flash Farm avoiding the A617 route through our villages. It won't happen as it's not viable.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

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Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29134 - Chris Hall [3582]	Object	There are serious concerns about the potential impact on the immediate surrounding environment. The main areas of concern are increased HGV traffic on the already, well publicized, overloaded road network in particularly the A617, Kelham bridge, A46/A1 junctions, together with the inevitable noise/air pollution and initial disruption to wildlife whilst extraction is carried out. We would strongly request that these local community issues are considered to outweigh any financial benefit to NCC, the land owners and site operators and that this site is rejected.	Site to be rejected outright in favor of a more suitable site offering considerably less impact on neighboring communities, environment and infrastructure.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29577 - Miss Frances Snell [7759]	Object	lack of proven need for sand & gravel, use of out of date data. Exacerbate existing traffic problems, queues on A617, inability of lorries to cross on Kelham Bridge. Locals not trading in Newark because of traffic queues. Effect of dust on residents with allergies and young children at local primary school. Untested removal of water from site, local flooding	Remove Flash Farm from MLP, revisit existing sites and Barton in Fabis	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29184 - Helen Rushby [7730]	Object	The local area is already subject to flooding of fields and roads at times of high rainfall due to surface flooding and the assessment needs to include the wider area not just the site of the extraction. Potential risk of road closures and flooding of houses in adjacent villages of Averham and Kelham. Also the site will be an eyesore for the years of its operation being close to the road and visible having a negative impact on the landscape and heritage, including Kelham woods and possible archaeology at the location of the site.	Site to be taken out of the plan until the following reports are completed. Full assessment of local streams and river to carry additional water used in the extraction process away from the site. Full assessment of impact on the local area across the full range of criteria over the proposed life of the quarry. Full archaeological assessment of the site itself. All of these to be completed and reviewed before this site is included in the Plan.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29332 - Ms Amanda Rigby [7770]	Object	<p>Too many beautiful pieces of countryside are being ruined due to such industry and I would hate to see our wonderful village become the next.</p> <p>My biggest concern is around Kelham Bridge, which would see significant increase in traffic: this is ALREADY a significant issue and travelling along it twice a day, it is already subject to delays. I fear that an increase in traffic numbers, particularly heavy vehicles will make this much worse, along with increasing the number of accidents that already occurs in the area.</p>	Please do not consider this area	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29392 - Kirklington Parish Council (Helen Cowlan) [879]	Object	<p>*Out of date data used</p> <p>*Overestimation of demand</p> <p>*Underestimation of infill/site 'completion'</p> <p>*Underestimation of % increase of HGV traffic compared to existing and its importance/impacts</p>	*Remove Flash Farm from the MLP	<p>The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.</p> <p>The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.</p>	
29222 - mr jason mayfield [7743]	Object	i strongly object to the proposal for mineral extraction at the above site. The a617 is presently overwhelmed with hgv traffic. kelham bridge has footpaths which are .8 m wide and is dangerous to use as a pedestrian and cyclist. it a a bottleneck for traffic and the addition of further hgv traffic is ludicrous.	Do not use flash farm as a gravel pit without a thorough overhaul of kelham bridge.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

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29713 - Newark and Sherwood District Council (Matthew Tubb) [2950]	Object	Through its representations on Policy MP2 the District Council has already made representations over the soundness of the proposed Flash Farm allocation, identifying the need for it to be deleted in order for the plan to be made sound. Nonetheless were the proposed allocation to remain part of the plan then the District Council considers that safeguards relating to highways impact must be included within the plan, as detailed in the representation on DM9. Accordingly the site development brief in Appendix 3 would need to be updated to reflect these proposed modifications.	Appendix 3 - MP2p Flash Farm Additional bullet point in access and transport <input type="checkbox"/> No extraction of minerals until the planned highway improvements to the A46 Newark Northern Relief Road, A46/A1/A17 junctions and A617 Kelham Bridge have been implemented.	Not accepted. It is not considered necessary to include the suggested text as the strategic transport assessment has not identified any transport issues with the proposed Coddington site. The County Council's response to site specific issues can be found in the minerals provision policies. For Coddington see Policy MP2, MP2o.	
29539 - Mr John Wolfenden [7806]	Object	Council officers have not taken the most recent and up to date data available on the use and the amount of gravel needed over the next 15 years Council has overestimated the need by a considerable 46% some 9.71 million tons. The figures for growth that the Notts MPA forecast in annual sand and gravel extraction in Nottinghamshire is a staggering 70%. What evidence has the MPA have to support this prediction? NCC have failed to use up to date transport data in the draft MDP for the A617, A46/A1	To use the most up to date data for mineral and recycled demolition waste. To use the strategic traffic review update March 2016 instead of out of date pre 2014 data Remove Flash Farm from the draft mineral plan	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.  The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	
29322 - Mrs Lorraine Bousfield [7763]	Object	Traffic on Kelham Bridge and A1 and A46 should be addressed even without a gravel pit. Use 2013 traffic data not 2009. Strategic review needed for the area. Traffic standstills will create higher pollution levels. Dirt and dust particulates detrimental to health. Potential effects on the water table creating flooding in the area. Out of date data is being used to support the plan. Ensure the current data information is used. Get an annual amount from the company ring fenced to restore the site after extraction Oblige George to support community causes and have a method of addressing complaints/issues raised by residents.	Up to date figures to be used for mineral requirements, traffic congestion to be addressed in Newark area and Kelham Bridge in particular.	The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.  The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	



Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29127 - Mr DANIEL SEYMOUR [7679]	Object	I object to the proposed gravel extraction at Drove Lane, Coddington for similar reasons set out by Robert Jenrick, MP in his letter to residents in the surrounding areas. Further, the extraction of half a million tonnes annually will have further impact on the air quality already suffered by those with respiratory conditions in these areas as general practitioners of medicine in Newark surgeries regularly remind us. I believe that truly independent Public Health analysis would support the medical view.	For the gravel to be extracted well away from Newark and the surrounding areas. I also believe that the plan should include robust Public Health analysis detailing the calculated impact upon taxpayers with, or who may be vulnerable to respiratory conditions within a 20 mile radius of the proposed site. I believe that the proposal is not consistent with regional or national health programmes addressing population based health need in respect of respiratory disease. On this basis I do not believe that the proposal takes into account the health of local residents.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29405 - Mr Richard Corner [7789]	Object	There are noise, air and visual pollution reasons combined with traffic concern reasons to reject the application. These are supported by concerns over the well being of children. Also is this gravel truly required and is it geographically correctly sited? There is great concern over the effects of this development on the flooding issue of the greater area surrounding it.	Reject the proposal in its entirety.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29282 - AKS Community Action Group (Mrs Linda White) [7742]	Object	Lack of proven need for this site, as per our representation under SP2, MP1 and MP5, the development of which would further impact on the health and safety of those living on or using the already overstressed A617 and the Newark bypass link. Detriment to the landscape, historic and heritage assets would be caused and would be irreversible. This site is in a flood zone and working, including management of waste water, could increase the flood risk to housing. This heritage area should not become an industrial zone.	Remove Flash Farm from the plan	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29171 - Miss Lysette Spit [7731]	Object		STOP SPOILING IMPORTANT AMENITIES!!!! Let's get Stapleford Woods recovered and clean up all the trash!	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29140 - Mr James Adey [7693]	Object	Road safety. Dust and pollution. Wildlife and scenery.	The proposed plan is not suitable for the existing infrastructure and would have a negative effect on the already struggling surrounding road network. Therefore, unless large investment is to be made into the surrounding roads including Kelham Bridge, an alternative site should be considered.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29570 - Mr Michael Taylor [7828]	Object	will add significantly to an already highly congested A617 and effectively cut off towns and villages North of the Trent from Newark and its facilities. Further detrimental effect on the local economy to the extent that it harms the unique built and historical features of the area.	the plan should be rejected: the local infrastructure cannot be easily adapted to accommodate the increased traffic without enormous disruption and the benefits to the local economy will be outweighed by the damage to the tourist potential of the area.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29606 - Mr Ian Bradey [7824]	Object	All proposals for restoration schemes should be in line with the County Council's approach to Biodiversity-Led Restoration contained within Policy SP3 and also with full consultation of local interested parties	remove site MP2p (Flash Farm) from the draft minerals plan	The site development briefs set out the key issues that will need to be considered as part of a detailed planning application. The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	
29547 - Jonathan Lightbody [3071]	Object	It's unsound because the plan uses old data, doesn't consider recent traffic levels or traffic noise which exceeds WHO safe limits. It doesn't consider the proposed plan of a supermarket at Newark roundabout, it doesn't consider current levels of traffic volume; it's so amateurish it is extremely unsound and almost childlike in naivety .	Consider current traffic volumes consider recent noise surveys Consider up to date building requirements Consider up to date aggregate requirements Resubmit when consequential analysis has been carried out if it is still considered sound.	The site development briefs set out the key issues that will need to be considered as part of a detailed planning application. The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.	
29374 - Phil Blinston [7792]	Object	I object most strongly for the inclusion of the Flash Farm site in the proposals. Whilst minerals extraction is necessary for the kind of infrastructure developments needed in the future, nevertheless the development of this site ignores the well documented transport difficulties around the A617 / A46 / A17 / A1 and the frequent gridlock around Kelham Bridge. To add to this is sheer madness. The use of out of date mineral demand forecasts also renders the proposals completely flawed and for these reasons should be withdrawn.	The removal of Flash Farm. The withdrawal of the proposals and redraft using up to date data.	The County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.  The County Council's response to concerns regarding the figures and process used to identify the level of demand for aggregates made in the Plan are addressed against Minerals Provision Policy MP1.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29469 - Tony Warwick [3331]	Object	Flash Farm should not be considered. This site is actively farmed and should not be lost to food or bio-fuel production. It forms part of the characteristic landscape of the area. out of date data has been used which is therefore inaccurate and misleading. The A617 is already heavily used by HGVs. It runs through 3 rural villages which would be even more negatively impacted. Road traffic noise in Kirklington and Hockerton has already been measured by Newark & Sherwood District officers and found to be in excess of the CRTN and WHO standards.	Remove Flash farm from plan.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29124 - Mr John Gell [7672]	Object	My concerns relates to traffic on the A617 and the impact on the already very busy Kelham Bridge. The bridge already struggles with HGV traffic and this will put further strain on this route.	To extract the volumes indicated there needs to be improvements made to A617 and traffic around Newark or limit the number of lorries that can leave the site on a daily basis.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29308 - Mrs Linda White [7642]	Object	Details do not represent the real situation in the area. A617 currently overloaded. Vehicle noise and emissions above healthy levels. Route over bridge and through Kelham problematic for HGVs. Frequent delays on this important ambulance route. Potential for damage to historic bridge and buildings in conservation area. Loss of amenity through transport issues and damage to landscape around historically important area (Civil war site of great importance nationally). Flooding and dewatering issues ignored.	Remove Flash Farm from plan as location is unsuitable and the resources there are not vital for local development needs	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
29139 - Dr Peter Lyth [7696]	Object	As a resident of Hockerton, which is already severely blighted by heavy traffic passing through it on the A617, I am appalled at the prospect of even more heavy trucks thundering through our village. A gravel extraction operation at Flash Farm will put extra pressure on the A617 and make the already difficult process of negotiating Kelham bridge even more dangerous and complicated; indeed I would not be surprised if this ancient structure finally collapses under the weight of a new column of 40-ton gravel trucks passing over it.	The project be sited elsewhere and if that is not possible, the contracting parties should agree to build a complete new access road, including a new bridge over the Trent at Averham	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	
29508 - Averham, Kelham & Staythorpe Parish Council (Mr J Burbidge) [781]	Object	All proposals for restoration schemes should be in line with the County Council's approach to Biodiversity-Led Restoration contained within Policy SP3 and also with full consultation of local interested parties. A return to full agricultural use also needs consideration. Indirect impacts on Kelham Woods LWS must be considered, in particular to maintaining the current level of the local water table, High archaeological potential which needs to be managed through appropriate survey methods, these methods need to be beyond the control of any potential developer and fully available for public scrutiny.	Flash Farm, site MP2p should be removed from the local minerals plan.	Not accepted. The development brief for Flash Farm sets out the types of habitat that would be suitable as part of the restoration, the need to consider indirect impacts on Kelham woods LWS and the high archaeological potential. As part of any detailed planning application, a wide range of assessment work would have to be undertaken. The outcomes of this work would then inform the final design and restoration of the quarry.	
29120 - Stephen Barlow [7660]	Object	I have no objection to aggregate removal however the issue here is the location and its impact on vehicular movement around this area, it is well documented and commonly discussed that the A617 / A46 / A17 / A1 road system around the Newark area is currently unable to cope with its current vehicle numbers, add to the mix the sugar beet campaign each year and the proposal to place greater pressure on the roads with aggregate HGV's and it is a disaster waiting to happen.	Refuse the application until the above road system is developed.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Flash Farm, see Policy MP2, MP2p.	

Respondent	Nature	Summary	Suggested Change to Plan	Council's Response	Council's Change to Plan
<i>MP2r - Shelford</i>					
29546 - Jonathan Lightbody [3071]	Object	<p>It's unsound because the plan uses old data, doesn't consider recent traffic levels or traffic noise which exceeds WHO safe limits.</p> <p>It doesn't consider the proposed plan of a supermarket at Newark roundabout, it doesn't consider current levels of traffic volume; it's so amateurish it is extremely unsound and almost childlike in naivety .</p>	<p>Consider current traffic volumes consider recent noise surveys</p> <p>Consider up to date building requirements</p> <p>Consider up to date aggregate requirements</p> <p>Resubmit when consequential analysis has been carried out if it is still considered sound.</p>	<p>The site development briefs set out the key issues that will need to be considered as part of a detailed planning application. The County Council's response to site specific concerns are addressed against mineral provision policies. For Flash Farm see policy MP2, MP2p.</p>	
29762 - Brett Aggregates Limited [69]	Object	<p>It is proposed that initial processing of the material to be barged from the site will be screened at the excavation area. This needs to be reflected in the development brief. A further point is that the development brief requires that machinery required for extraction at Shelford will be brought in by river. In order to take material by barge from the site it is proposed that moorings will be created in the river and aggregate will be deposited in the tied up barges by conveyor see attached draft drawing. No engineered wharf will be created at the site. This will minimise environmental disruption associated by the barging operations. In order to bring excavation plant to the site an engineered wharf would be needed. In order to create this type of wharf large scale plant would have to be brought in and this could only be achieved by road. Consequently there would be no environmental benefit in bringing excavation plant by river. It is, therefore, proposed that excavation plant will be brought in by road. The development brief for Shelford should be amended as suggested in order that the Plan is effective and justified.</p>	<p>The development brief for Shelford should, therefore, be amended as follows in order that the Plan is effective and justified.</p> <p>" Access and transport</p> <p>- 180,000 tonnes per annum transported from the site by barge along the River Trent to Colwick industrial estate for processing</p> <p>- .....</p> <p>- Machinery required on the extraction site to be brought in by river.</p> <p>- ..... "</p>	<p>Accepted. The development brief will be amended in line with the comments submitted.</p>	<p>Under the access and transport section of the Shelford development brief amend the first bullet point to say:</p> <p>'180,000 tonnes per annum transported from the site by barge along the River Trent to Colwick industrail estate'.</p> <p>Delete the third bullet point that states: 'Machinery required on the extraction site to be brought in by river'</p>

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## Summary of representations received and Council's response, September 2016

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29321 - Mr Paul Bousfield [7762]	Object	The dramatic impact of lorries near our school and crossing Kelham bridge. Kelham bridge is a grade 11 bridge constructed in 1856 and is not capable of taking increased volume of heavy lorries. Dust and other particulars will impact on our young children at school based on 600 yards away. Serious risk of flooding due to water being pumped out into dykes that reach capacity+ every year.	No gravel pit at Flash farm Averham	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
29458 - Gunthorpe Parish Council (Mr Gordon Oldham) [1670]	Object	1 The increase in traffic on the A6097 will lead to an unacceptable difficulties for residents leaving the Village. 2 The plan to move gravel by barge has no worked elsewhere and will probably not be carried out in Shelford. 3 The proposal will no doubt lead to an increased flood risk for Gunthorpe. 4 The proposal would undoubtedly lead to a greater health risk.	Shelford West should be dropped from the Minerals Plan.	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
29372 - Councillor Kevin Doyle [7086]	Object	Barges may not be commercially sustainable leading to an increase in huge juggernaut traffic which will adversely affect the A612 through Burton Joyce due to the lure of the Gedling Access Road. Other factors which will affect the Burton Joyce are noise, pollution and air quality. This is due to its proximity to future quarrying operations.	Ensure the barge transportation is upheld for the duration of quarrying. No quarry transport be permitted to use the A612	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	
29111 - John Chatterton [5448]	Object	I strongly object to this submission as it does not appear to have properly addressed transport issues or the rights of homeowners	transport all minerals by barge or remove the plan from Shelford altogether	This objection does not relate to the Site Allocation Development Brief. However, the County Council's response to site specific concerns are addressed against the Mineral Provision Policies. For Shelford, see Policy MP2, MP2r.	

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29218 - Environment Agency (Mr Andrew Pitts) [2714]	Support	We emphasise the importance of this site in relation to flood risk, to both the village of Shelford and the village of Gunthorpe. It must be ensured there is clear evidence that flood risk is not increased for either community. The site is protected by minor flood defences and we request as part of development of this site, the developer explores in partnership with RMAs and local communities, opportunities to improve flood risk for both communities. Where opportunities are identified, we expect that the developer will lead on the delivery of these improvements, as part of restoration of the site.		Support noted	
<i>MP3c - Scrooby Top North</i>					
30104 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  Restoration to priority habitats should have primacy.	Add restoration primacy to priority habitats.	Partially accepted. The site development brief states that restoration should include agricultural and biodiversity elements and lists suitable priority habitats, however the development brief will be reworded to state: 'Restoration should be biodiversity led, and may include habitat creation and agricultural elements'.	Amend the text under the quarry restoration heading of the Scrooby Top North development brief to read: 'Restoration should be biodiversity-led, and may include habitat creation and agricultural elements'.
<i>MP6a - Kirton West</i>					
29404 - KIRTON PARISH COUNCIL (MRS KAREN WILDGUST) [7714]	Object	CROSS WONG LANE IS A PROMINENT LANDSCAPE FEATURE. NO MENTION OF IT HAS BEEN MADE IN THE ALLOCATION DOCUMENT. IT IS IN A GOOD CONDITION AND, IN LINE WITH LANDSCAPE POLICY, SHOULD BE CONSERVED THE FIELDS WITH THE OLD MLA STATUS SHOULD BE PRESERVED. THE ADOPTED PLAN ACTUALLY STATES"PROVIDING THIS FIELD IS PRESERVED". NO ALTERNATIVE EXTRACTION SITES HAVE BEEN IDENTIFIED.	STATE CLEARLY THE PROPOSAL FOR CROSS WONG LANE. PRESERVATION OF FIELDS WITH OLD MLA STATUS SHOW EVIDENCE OF ALTERNATIVE AREAS FOR EXTRACTION OF CLAY	Objection not accepted.  The Local Plan should be read as a whole and as such any planning application submitted for mineral extraction will need to be assessed against all the policies contained within the Plan. Policy DM5 (Landscape Character) provides the appropriate criteria for proposals to be assessed against in this regard.	

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30105 - Nottinghamshire Wildlife Trust (Janice Bradley) [1495]	Object	<p>NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE</p> <p>NWT disagree that the extension should follow the approved concept for the existing quarry, which is a missed opportunity to create substantive areas of priority woodland and species-rich grassland habitats. The restoration of the extension should be determined in accordance with this Local Plan and with the biodiversity-led approach. This area is particularly important for contributing to mixed ash/oak woodland and species-rich neutral grassland targets for the County.</p>	Amend restoration section to ensure contribution to mixed ash/oak woodland and species-rich neutral grassland.	Not accepted. The existing restoration scheme for the permitted site includes the creation of species rich grassland and woodland. The development brief also includes both of these habitats as targets for creation. As part of any planning application a detailed restoration scheme would be included which would set out the types and extent of different habitat.	



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### Appendix 4: Policies Map

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29975 - Rotherham Sand and Gravel Ltd [496]	Object	NOT SUBMITTED ON CORRECT FORM - DETAILS INCOMPLETE  We notice from Inset Plan 3 that there is a sliver of unallocated land and unpermitted land between the north of consolidating planning permission (1/42/98/7 and ROMP 1/14/00537/CDM) and the proposed Scooby North allocation. I believe this to be a drafting anomaly which should be rectified at the earliest opportunity to ensure that in due course, once the Minerals Local Plan is adopted, the complete and logical staged working of minerals can be undertaken in this location.		Objection accepted - minor amendment to be made to Policies Map.	Policies Map - Inset 3. Amend boundary of SGf - Scooby to reflect its full extent (bring it directly adjacent to allocation MP2c Scooby North)
29853 - National Trust (Kim Miller) [2987]	Object	The small scale and low resolution of the Policies map makes it difficult to read. Unfortunately this means that individual layers such as SSSIs are obscured by overlaid information.	Can the Council provide an interactive online version of this map to improve its readability?	Objection not accepted. The County Council has produced the map in the best format available given the technology available to the Planning Policy Team. Interactive mapping is not currently an available option.	
29705 - Hanson Aggregates North (Mr Ben Ayres) [1021]	Support	Hanson Quarry Products Europe Limited supports the following elements of the Minerals Local Plan: - Policy MP2, parts 1.b and 2.2 - Site allocations MP2m and MP2o - Policies Map Insets 5 and 13	n/a	Support noted	