

# Nottinghamshire Minerals Local Plan

## Representations - by respondent

Volume 9 of 11

Respondent number 7724 - 7824



## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 13 March 2016 12:46  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29158

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr Simon Channon,

Thank you for your representation which we received as follows:

Representation ID: 29158  
Document: Minerals Local Plan Submission Draft  
Section: MP2o - Coddington  
Support/Object: Object

I believe the plan to be unsound as 'The Strategic Traffic Assessment' included in the documents is not comprehensive and takes no account of peak time/seasonal traffic, or the impact of such an increase in HGV journeys if the quarry becomes operational. Neither are there any proper projections or considerations in the event of major accident/road works or other disruption, leaving local residents in fear of their own safety and that of vulnerable schoolchildren and the elderly.

The high density of traffic on the A17/A46/A1 junctions already causes severe traffic congestion at certain times of the day/week. Adding up to 200 HGV journeys a day on the A17 can only significantly worsen the situation.

### SUMMARY

Plan unsound as it does not take proper note of the current/future traffic disruption on A17 and nearby junctions.

### CHANGE TO PLAN

Remove Coddington from the Plan.

The document is unsound because it is not:  
i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 21:22  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29509

Mr Kevin Sims,

Thank you for your representation which we received as follows:

Representation ID: 29509  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2o Coddington  
Support/Object: Object

Because the quarry is next to my house and the way we will be effected it will change the whole reason my family moved to the country side, it will also make my house unsaleable, and De value it, my children play in the fields around my home, and we know they are safe, this will not be the case if there is a quarry next to my garden, also my business travels in and around Newark and already effected by the back up of traffic from the existing traffic not taking into account all the lorries from the quarry, I also at no point have ever even been considered by calling to have a chat about the proposal and the dramatic effect on us.

### SUMMARY

They will have a fight on there hands as I'm not prepared to give up the whole reason my family moved to a rural location and at no point was a query included in my wish list.

### CHANGE TO PLAN

Look for a more suitable site which would not have such an impact on a village and town and the local community and also the already at breaking point road infrastructure which could no possibly cope with the extra traffic.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 14 March 2016 12:17  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29161

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

ian woolridge,

Thank you for your representation which we received as follows:

Representation ID: 29161  
Document: Minerals Local Plan Submission Draft  
Section: DM9: Highways safety and vehicle movements/routeing  
Support/Object: Object

The number of HGV movements represents a significant increase in large vehicle movements every day along a road through the Village of Kirklington that has no capacity to cope with these large vehicles every day along the already narrow road and even narrower footpath. It represents a significant increased risk to local residents using the paths. The proposed number in the plan underestimates the number of movements as for each full lorry there is likely to be the inward journey of an empty lorry. Also, the back filling of the site with inert waste will also increase the lorry count (two journeys per load - in and out, which seem to have been ignored). The A617 is already a dangerous road, based on the number of reported accidents each year.

### SUMMARY

Significant number of HGV movements has been underestimated in the plan, adding even more traffic to an already dangerous road (A617).

### CHANGE TO PLAN

No extraction at all at flash farm

The document is unsound because it is not:  
i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 14 March 2016 12:24  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29162

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

ian woolridge,

Thank you for your representation which we received as follows:

Representation ID: 29162  
Document: Minerals Local Plan Submission Draft  
Section: DM8 Justification  
Support/Object: 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 movemnts for large / HGV at the Belle Aux park Yearsley depot.
- c)major acees between A1 and M1 since MARR opened.

### CHANGE TO PLAN

Remove F;lash Farm from Plan

The document is unsound because it is not:

- i. Positively prepared

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 14 March 2016 12:31  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29163

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

ian woolridge,

Thank you for your representation which we received as follows:

Representation ID: 29163  
Document: Minerals Local Plan Submission Draft  
Section: SP2 Justification  
Support/Object: 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.

### CHANGE TO PLAN

Withdraw Flash farm from plan as demand for sand and gravel can be obtained from existing or previously mothballed or un-used sites.

The document is unsound because it is not:  
i. Positively prepared

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 14 March 2016 12:38  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29164

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

ian woolridge,

Thank you for your representation which we received as follows:

Representation ID: 29164  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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.

### CHANGE TO PLAN

remove Flash Farm from plan, as demand can be met from previously identified and mothballed or unused existing sites in 2005 plan

The document is unsound because it is not:  
i. Positively prepared

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 16 March 2016 18:13  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29228

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr Martin Smith,

Thank you for your representation which we received as follows:

Representation ID: 29228  
Document: Minerals Local Plan Submission Draft  
Section: MP1 Justification  
Support/Object: Object

The MLP does not use the latest available LAA, dated April 2015. The MLP figure of 2.58 million tonnes per annum is 15% higher than the most recent 10 year average figure of 2.24 million tonnes and 66% higher than the most recent 3 year average figure of 1.55 million tonnes.

The 2015 LAA cites a future planned house-building target rate of 4596 per annum, despite the local councils having a history of never achieving their target. This rate is also well above the current completion rate of just over 2000 per annum and being a rate only ever achieved during the boom years of 2005-2007. This is also in a climate of uncertain short and long term economic forecasts and a period of no major infrastructure projects in Nottinghamshire, since completion of NET Phase 2 and the widening of the A453. Reliance of the MLP on potential demand for minerals from HS2 or construction-related investment from creation of the (as-yet unconfirmed) North Midlands Devolution Agreement should not be taken as sufficient evidence of future mineral extraction needs. Current economic growth forecasts would also suggest that the moving 10-year average demand will continue to decrease in the short-term, certainly until the boom years of 2004-2007 are removed from the equation.

The MPA has a responsibility, in accordance with the NPPF, to support economic growth by providing for a steady and adequate supply of aggregates. However, it also has a responsibility to avoid over-proliferation of minerals when it is recognised that mineral abstraction generally has a negative impact on the environment.

#### SUMMARY

The MLP does not use the latest available LAA, dated April 2015, and therefore over-estimates future mineral demand.

#### CHANGE TO PLAN

The MLP should include the most recent data on sales and production to generate more accurate predictions of future aggregate demand. Using the most recent 10 year sales data would reduce the estimated demand for the 19 year plan period to 42.56 million tonnes. However, there is an argument that this still over-estimates demand when looking at other evidence such as 3-year sales averages, lack of current infrastructure projects and uncertain economic growth. Taking an average of the current 10 year and 3 year sales data gives an annual figure of 1.90 million tonnes, equating to a total demand of 36.1 million tonnes. As the MPA has a responsibility for monitoring mineral abstraction and demand, there should be provision to react to changes in the 3 year sales data. Providing



that the 7 year land bank is maintained, this approach will ensure the MPA will meet its objectives in a responsible and balanced way.

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i. Positively prepared

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 16 March 2016 18:13  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29234

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr Martin Smith,

Thank you for your representation which we received as follows:

Representation ID: 29234  
Document: Minerals Local Plan Submission Draft  
Section: MP2 Justification  
Support/Object: Object

The MLP uses an annual allocation figure of 2.58 million tonnes, but this overestimates demand.

### CHANGE TO PLAN

Using the latest 10 year average of 2.24 million tonnes, the total demand reduces to 42.56 million tonnes. Using the latest 3 year average of 1.55 million tonnes gives a demand of 29.45 million tonnes. Splitting these two averages gives a more reasonable estimate of demand of 36.1 million tonnes over the 19 years of the plan period.

This demand can nearly be met by existing reserves and current permissions, leaving a shortfall of just 0.88 million tonnes. This casts different light on the requirement for new quarries.

The document is unsound because it is not:  
i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 17 March 2016 15:17  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29243

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr Martin Smith,

Thank you for your representation which we received as follows:

Representation ID: 29243  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

The location of the proposed site at Flash Farm has not been sufficiently appraised, particularly in terms of the impact on the local transport infrastructure.

The Strategic Transport Assessment (STA) Dec 2014 has used only high-level criteria to assess the impact on the road network, based on GEART guidelines of % increases in HGV and traffic flow. However, the actual impact of increased HGV movements will exacerbate already critical problems on the A617 to the east and west of the proposed site. The A617 is a single carriageway road that passes through several villages and 30mph zones. Due to its historic accident record, the road has a 50mph speed limit imposed between Newark to the east and the A614 roundabout to the west. The road also has one of the highest levels of HGV traffic for any single-carriageway A-road in Nottinghamshire.

The STA states that an estimated 72.5% of the HGV movements will be to the east. This has the following adverse impacts:

- The A617 east takes HGVs through the village of Kelham and over Kelham bridge, which is a listed stone bridge dating from 1858 and has a history of closures over many recent years due to accidents and essential maintenance: traffic has often had to be diverted onto unsuitable B roads and unclassified roads. The future of the bridge on such a strategic road as the A617 is often debated at present, yet more HGV traffic would further jeopardise its long-term suitability. The STA itself acknowledges that Kelham is a 'sensitive' location.
- The A617 between Kelham and Newark is also susceptible to flooding from the River Trent, resulting in the road being closed and further unsuitable diversions being set in place.
- The A617/A616/A46 roundabout (also known as the Cattle Market or Sugar Beet roundabout) suffers from chronic congestion on all its approach roads
- further increases in HGV movements will exacerbate this, particularly considering other planning applications including a new supermarket close to the roundabout.

The STA states that an estimated 27.5% of the HGV movements will be to the west. This has the following adverse impacts:

- HGVs travelling west to their markets will have to travel through the villages of Hockerton and Kirklington, with many blind road junctions/driveways and dangerous bends.
- There have been many road traffic accidents in the villages, from minor to fatal, the most recent being in May 2011 involving a HGV. The STA cites that the A617 contains 'some accident cluster sites' yet does not specify the location of these or the potential impact of increased HGV movements.

It is reasonable to assume that additional HGV movements will only increase the severity and probability of road traffic accidents occurring in the future.

- The additional HGV movements will increase noise, dust and air pollution in the villages, which despite the 30mph limits, suffer adversely from any increase in traffic on such an already busy road.

The inclusion of Flash Farm in the current MLP is therefore not justified as it does not form part of an effective, deliverable strategy which promotes sustainable development.

## SUMMARY

The MLP has not taken due account of the wider potential impacts of increased HGV movements on the local road infrastructure around the proposed site at Flash Farm. Such a site would have potentially critical adverse effects on the A617 to the east and west of the site, which cannot be easily mitigated and therefore inclusion of the site in the MLP may mis-represent its potential for future mineral abstraction needs.

## CHANGE TO PLAN

The assessment of the site at Flash Farm needs to be reconsidered. At the very least, the site needs to be removed from the strategic planning process of the current MLP until such time as issues on the A617 can be realistically addressed. The future of Kelham bridge and the A617 Kelham bypass need to be resolved before the site can even be considered for mineral abstraction.

The document is unsound because it is not:

- i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:25  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29165

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29165  
Document: Minerals Local Plan Submission Draft  
Section: DM2 Justification  
Support/Object: 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 becks/streams 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.

### CHANGE TO PLAN

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.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29166

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29166  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

The projected figures provided for the amount of gravel needed by the county are currently based on outdated usage and thus significantly overestimated. Developers are increasingly using recycled materials instead of virgin gravel (due to cost) and thus the demand has dropped significantly in the last 7 years both for this reason as well as the recession. There is strong evidence that it will never rise to previous levels of demand with new building styles and if this is the case it will not be necessary to approve any new extraction sites in the next few years if at all.

### CHANGE TO PLAN

Delay the adoption of the MLP until the updated LAA figures are available.  
Ensure that updated figures and forward estimates take account of the increased use of recycled and secondary materials as set out in the Notts Waste Plan and thus show accurate estimates for demand for virgin gravel based on current information. Review the accurate sales figures for existing sites and quantities remaining at these sites. Carefully consider if demand can be met from existing sites and use of recycled and secondary materials without opening any new sites in the area.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:25  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29169

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29169  
Document: Minerals Local Plan Submission Draft  
Section: MP5 Justification  
Support/Object: Object

I fully support the policy to increase the use of secondary or recycled materials but there is no evidence or data included in MLP to show this area has been fully explored and appropriate strategy applied. This recycling strategy should be fully exploited in Nottinghamshire and included in MLP before any new greenfield sites are approved for extraction. With proper use of recycled and secondary materials and accurate estimates for future demand for gravel it should not be necessary to start extraction at any new sites for a significant number of years conserving gravel for future generations.

### CHANGE TO PLAN

Full data on current use of recyclables and secondary materials to be provided. Strategy and plan developed to increase this use of secondary materials instead of primary extraction. Adjustment of the data used in the MLP to reflect this approach thus reducing the need for gravel going forward and ensuring the MLP is based on realistic and responsible forward demand. Cross reference MLP to Notts Waste plan with projected 70% use of recycled and secondary materials and reducing the demand for new materials in line with this, potentially meaning no new sites are needed before 2030.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:25  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29176

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29176  
Document: Minerals Local Plan Submission Draft  
Section: DM6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29184

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29184  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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.

### CHANGE TO PLAN

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.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29187

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29187  
Document: Minerals Local Plan Submission Draft  
Section: DM9: Highways safety and vehicle movements/routeing  
Support/Object: 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 Averham -Newark at times.

### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:25  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29195

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29195  
Document: Minerals Local Plan Submission Draft  
Section: DM1 Justification  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 12:25  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29256

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen Rushby,

Thank you for your representation which we received as follows:

Representation ID: 29256  
Document: Minerals Local Plan Submission Draft  
Section: DM8 Justification  
Support/Object: Object

many cumulative negative impacts:

1.detrimental to health with proximity to Averham, Kelham and Primary school 2.potential increase to flooding risk  
3.negative impact on local heritage and tourism 4.local eyesore and impact on conservation and local natural amenities over next 20 years 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 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

### CHANGE TO PLAN

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.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Lysette Spit [REDACTED] >  
**Sent:** 15 March 2016 11:14  
**To:** Development Planning  
**Subject:** Concerns Proposed Gravel Extraction at Coddington

Dear Sir/Madam,

With this email I like to share my concerns regarding the 'proposed gravel extraction at Coddington'. I do **NOT** support this. IN FACT **this is unacceptable!**

-Stapleford Woods and surround areas need to be maintained as they are. Cutting down more trees, taking away more nature and building more houses is not acceptable! *The state of the Woods is bad enough as it is, with **people dumping their trash in the Woods!** Why is nobody taking action on this?? Why are there no camera's being installed?? So we can get people caught dumping trash in the Woods! It's awful! I've also seen people dealing drugs here!! This is INSANE!*

-What about all the **animals** that live there and in surrounding environment? Where are they going to live?? If you proceed with your plan, **you will take away their habitat** and also there will be more cars and more animals will get killed! **This is unacceptable!**

**The council/government should take more action on mainting the Woods, rather then taking it away or spoling it by building right next to this amazing forest and habitat for animals!!!!!!!!!!**

-More trees, more beautiful nature

-More trees, more oxygen, so people maintain healthy

-Forest stays as it is, habitat of animals doesn't get ruined

-By not proceeding with your plan, there or less cars around, so less chance of animals getting killed

-No visual impact

-No noise complaints

**STOP SPOILING IMPORTANT AMENITIES!!!! Let's get Stapleford Woods recovered and clean up all the trash!**

Thank you for your time.

Kind Regards,

Lysette Spit

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:26  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29216

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29216  
Document: Minerals Local Plan Submission Draft  
Section: Chapter 1: What is the Minerals Local Plan  
Support/Object: 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

### CHANGE TO PLAN

The draft MLP should be reworked to ensure it is aligned with the adopted core waste strategy of 2014

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29217

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29217  
Document: Minerals Local Plan Submission Draft  
Section: Plan 1: Overview of the Plan Area  
Support/Object: Object

Health overview does not recognise the high incidence of respiratory disease in the Trent Valley

CHANGE TO PLAN

Above average incidences of particular diseases in parts of the county should be recognised

The document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:36  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29220

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29220  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO6: Protecting and enhancing natural assets  
Support/Object: 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

### CHANGE TO PLAN

Consideration of the importance of the current landscape to the area

The document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:35  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29219

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29219  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO5: Minimising impacts on communities  
Support/Object: 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

CHANGE TO PLAN

NCC to actively inform people in areas likely to be affected by significant planning decisions NCC to widen their communication routes

The document is unsound because it is not:  
iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:37  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29223

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29223  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO8: Protecting agricultural soils  
Support/Object: 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

### CHANGE TO PLAN

Strengthening the statement about safeguarding agricultural soils

The document is unsound because it is not:

- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

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## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:41  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29224

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29224  
Document: Minerals Local Plan Submission Draft  
Section: SP3: Biodiversity-Led Restoration  
Support/Object: 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

### CHANGE TO PLAN

Include a duty to restore the landscape and habitats where they have an historic or heritage value

The document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:44  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29225

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29225  
Document: Minerals Local Plan Submission Draft  
Section: SP5 Justification  
Support/Object: 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

### CHANGE TO PLAN

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 document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:46  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29226

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29226  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: Object

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.

### CHANGE TO PLAN

Extraction of minerals in historically important areas should only be considered as a last resort

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:58  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29227

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29227  
Document: Minerals Local Plan Submission Draft  
Section: DM1 Justification  
Support/Object: 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

### CHANGE TO PLAN

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 document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:03  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29229

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29229  
Document: Minerals Local Plan Submission Draft  
Section: DM2: Water resources and flood risk  
Support/Object: 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

### CHANGE TO PLAN

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

The document is unsound because it is not:  
ii. Justified  
iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:13  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29230

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29230  
Document: Minerals Local Plan Submission Draft  
Section: DM4 Justification  
Support/Object: 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

### CHANGE TO PLAN

Impact on the area surrounding the proposed sites needs to be considered in terms of protection and enhancement of existing biodiversity

The document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:14  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29231

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29231  
Document: Minerals Local Plan Submission Draft  
Section: DM5 Justification  
Support/Object: 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

### CHANGE TO PLAN

Assessment of sites should include impact on a wider area than just the site and its boundaries

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

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## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:16  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29232

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29232  
Document: Minerals Local Plan Submission Draft  
Section: DM6 Justification  
Support/Object: 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

### CHANGE TO PLAN

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

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

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## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:21  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29233

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29233  
Document: Minerals Local Plan Submission Draft  
Section: DM9 Justification  
Support/Object: 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

### CHANGE TO PLAN

The site at Flash Farm should not be included in the plan for gravel extraction

The document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:38  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29280

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29280  
Document: Minerals Local Plan Submission Draft  
Section: SP1: Sustainable Development  
Support/Object: 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

### CHANGE TO PLAN

Remove Flash Farm from the list of preferred sites

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:09  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29281

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29281  
Document: Minerals Local Plan Submission Draft  
Section: DM3: Agricultural land and soil quality  
Support/Object: 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

### CHANGE TO PLAN

Greenfield sites currently in agricultural use only to be considered for gravel extraction as last resort

The document is unsound because it is not:  
ii. Justified  
iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:32  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29282

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29282  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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.

### CHANGE TO PLAN

Remove Flash Farm from the plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29283

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29283  
Document: Minerals Local Plan Submission Draft  
Section: Nottinghamshire's mineral resource and industry  
Support/Object: 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.

### CHANGE TO PLAN

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.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:31  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29284

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29284  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO1: Improving the sustainability of minerals development  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:33  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29285

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29285  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO2: Providing an adequate supply of minerals  
Support/Object: 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

### CHANGE TO PLAN

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 document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:39  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29286

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29286  
Document: Minerals Local Plan Submission Draft  
Section: SP2 Justification  
Support/Object: 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

### CHANGE TO PLAN

Use latest data and rework supply plan

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:48  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29287

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29287  
Document: Minerals Local Plan Submission Draft  
Section: MP1: Aggregate Provision  
Support/Object: Object

The figures for aggregate provision have been proven to be out of date and therefore incorrect. By using the LAA 2015 data average annual production figure is reduced to 2.24m tonnes from 2.58m tonnes. Estimated demand to 2030 reduces from 49.02m tonnes to 38.08m tonnes and the predicted shortfall falls from 29.71m tonnes to 20.21m tonnes.

There is no numerical data stating the contribution of the recycling industry.

### CHANGE TO PLAN

Rework figures based on LAA 2015, and if available use 2016 figures Incorporate figures for recycled and secondary minerals provision

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:49  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29288

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29288  
Document: Minerals Local Plan Submission Draft  
Section: Table 1 Annual aggregate production  
Support/Object: Object

Table data is out of date and leads to projected future requirements that have been proven to be wrong

CHANGE TO PLAN

Use the table as produced in the LAA 2015 and if available in time for the planning inspectors hearing, the LAA 2016

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:23  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29289

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29289  
Document: Minerals Local Plan Submission Draft  
Section: Table 2 LAA Average Production Figure and Estimated Total Aggregate Demand  
Support/Object: Object

Use of out of date data gives a false and inflated estimate of future need

CHANGE TO PLAN

Use figures from LAA2015, or LAA 2016 if available, as the basis for predicted demand

The document is unsound because it is not:

- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:50  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29290

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29290  
Document: Minerals Local Plan Submission Draft  
Section: MP5: Secondary and recycled aggregates  
Support/Object: 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

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 13:51  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29292

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29292  
Document: Minerals Local Plan Submission Draft  
Section: MP5 Justification  
Support/Object: Object

The principle is supported . However, there is no numerical data or forecast. Since these alternative types of mineral supply play an important and as far as recycled minerals, a growing role in overall minerals supply, it is imperative that numerical data is supplied just as with primary minerals.  
Failure to incorporate this numerical data undermines the validity of the whole MLP

### CHANGE TO PLAN

The draft MLP needs to incorporate data that has recently been published in the NCC Waste Core Strategy 2014  
There should be a commitment to align the Waste Core Strategy and the MLP together.  
The primary minerals forecast demand needs to be recalculated using up to date data from both the current LAA and the Waste Core Strategy 2014 and the LAA 201

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:38  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29294

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29294  
Document: Minerals Local Plan Submission Draft  
Section: DM8: Cumulative impact  
Support/Object: Support

We support the policy

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 14:59  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29295

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

AKS Community Action Group (Mrs Linda White),

Thank you for your representation which we received as follows:

Representation ID: 29295  
Document: Minerals Local Plan Submission Draft  
Section: DM8 Justification  
Support/Object: 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

### CHANGE TO PLAN

Flash Farm should be removed from the MLP

The document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 16 March 2016 14:01  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29222

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

mr jason mayfield,

Thank you for your representation which we received as follows:

Representation ID: 29222  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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 is a bottleneck for traffic and the addition of further hgv traffic is ludicrous.

### CHANGE TO PLAN

Do not use flash farm as a gravel pit without a thorough overhaul of kelham bridge.

The document is unsound because it is not:  
i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 24 March 2016 14:00  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29361

Mr. Andrew Twidale,

Thank you for your representation which we received as follows:

Representation ID: 29361  
Document: Minerals Local Plan Submission Draft  
Section: SP2: Minerals Provision  
Support/Object: 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.

### CHANGE TO PLAN

The most up-to-date figures need to be used and the consultation should be restarted.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 24 March 2016 14:10  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29362

Mr. Andrew Twidale,

Thank you for your representation which we received as follows:

Representation ID: 29362  
Document: Minerals Local Plan Submission Draft  
Section: SP2: Minerals Provision  
Support/Object: 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.

**CHANGE TO PLAN**

Use latest figures and remove Flash Farm from the plan.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 24 March 2016 14:24  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29363

Mr. Andrew Twidale,

Thank you for your representation which we received as follows:

Representation ID: 29363  
Document: Minerals Local Plan Submission Draft  
Section: SP2 Justification  
Support/Object: 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.

### CHANGE TO PLAN

Used the most up-to-date figures. Remove Flash Farm from the policy.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 24 March 2016 14:32  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29365

Mr. Andrew Twidale,

Thank you for your representation which we received as follows:

Representation ID: 29365  
Document: Minerals Local Plan Submission Draft  
Section: SP3: Biodiversity-Led Restoration  
Support/Object: 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.

### CHANGE TO PLAN

Need is unjustified. Remove Flash Farm from the plan.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 24 March 2016 14:54  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29369

Mr. Andrew Twidale,

Thank you for your representation which we received as follows:

Representation ID: 29369  
Document: Minerals Local Plan Submission Draft  
Section: SP5 Justification  
Support/Object: Object

Road congestion and pollution have not been adequately considered in the plan. The A617 does not have capacity in its current design to take the extra traffic a quarry would create. Travelling towards Mansfield, the road goes through Hockerton and Kirklington villages both having houses close to the road. Noise levels are currently above the world health organisations suggested limits, so an increase would be unacceptable. The steep hill entering Kirklington has a sharp right hand bend at the bottom entering the village where many past accidents have been recorded. Extra traffic should be avoided.

The other direction, towards Newark is equally bad with Kelham Bridge being narrow and two lorries unable to pass. The A617 / A46 roundabout at the cattle market cannot cope with existing levels of traffic.

### SUMMARY

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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 10:49  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29248

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr David Walton,

Thank you for your representation which we received as follows:

Representation ID: 29248  
Document: Minerals Local Plan Submission Draft  
Section: MP1 Justification  
Support/Object: Object

The MLP looks at mineral development within the County over the next 14 years to 2030. . 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, which could be used first.

### CHANGE TO PLAN

Remove flash from from the document

The document is unsound because it is not:

- i. Positively prepared
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 10:51  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29249

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr David Walton,

Thank you for your representation which we received as follows:

Representation ID: 29249  
Document: Minerals Local Plan Submission Draft  
Section: Site Information  
Support/Object: 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,

### CHANGE TO PLAN

remove flash farm

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 10:51  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29250

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr David Walton,

Thank you for your representation which we received as follows:

Representation ID: 29250  
Document: Minerals Local Plan Submission Draft  
Section: MP2 Justification  
Support/Object: Object

NCC have stated that their figures for predicted demand show 5 years of recession and 5 years of growth. It is acknowledged that a 'buffer zone' would be a sensible precaution in the event of demand rising, however, it could be naïve to assume a 50:50 split. In fact, no information has been provided to show what the growth predictions are based on - in terms of length or amount. 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

### CHANGE TO PLAN

Developers across the industry are actively encouraged to increase the recycling of materials, which will naturally decrease the demand for new aggregate. Although this recycling does not appear to be effectively measured, recycling rates are highly likely to increase, especially in light of the introduction, and subsequent increase, of a Landfill Tax.

This will reduce demand for new minerals, and also reduce inert waste backfill supply

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 10:54  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29251

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr David Walton,

Thank you for your representation which we received as follows:

Representation ID: 29251  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

This section specifically mentions the huge cost of haulage which suggest the council are aware that there will be a huge increase in road haulage, This will dramatically effect the village of kirklington. Also no account has been taken of increase haulage at the Yeadsley facility or the planned increase in haulage requirements for strawsons farms

CHANGE TO PLAN

Remove flash farm

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 10:51  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29252

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr David Walton,

Thank you for your representation which we received as follows:

Representation ID: 29252  
Document: Minerals Local Plan Submission Draft  
Section: MP1 Justification  
Support/Object: Object

The recession has seen aggregate production fall significantly at local, and national, levels. Comparing the average annual sales for Nottinghamshire over each 10 year period, 2002-2011 is 2.58m tonnes p.a. whilst 2004-2013 is 2.24m tonnes p.a.

### CHANGE TO PLAN

Remove flash farm from the document

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 10:53  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29253

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr David Walton,

Thank you for your representation which we received as follows:

Representation ID: 29253  
Document: Minerals Local Plan Submission Draft  
Section: DM1 Justification  
Support/Object: Object

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). Local congestion points, such as Kelham Bridge and the Cattle Market roundabout at Newark, do not appear to have been considered - they are already overloaded yet do not receive even a mention in the assessment. Increases in traffic on the A617 will impact safety not only at junctions, but in terms of NHS ambulance access and response time, between Kings Mill and Newark Hospitals.

No consideration has been given to other local projects which will further affect traffic flow and volumes, such as the Yearsley/Brakes development at Bilsthorpe - this could add up to 164 HGVs through the villages plus additional staff transport. Again, a significant percentage increase to existing HGV traffic levels. It is appreciated that the transport assessment cannot cover every eventuality, however, consideration to existing new developments makes a real difference).

### SUMMARY

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

### CHANGE TO PLAN

Remove flash farm

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 18 March 2016 10:46  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29254

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr David Walton,

Thank you for your representation which we received as follows:

Representation ID: 29254  
Document: Minerals Local Plan Submission Draft  
Section: SP3 Justification  
Support/Object: 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

CHANGE TO PLAN

remove flash farm from the proposals

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Part A – Personal details

	Personal details	Agent details (where applicable)
Title		Dr
First name		Stuart
Last name		Aldridge
Address line 1		Public Health England
Address line 2		
Address line 3		
Postcode		
Email		
<i>For those replying on behalf of an organisation or group:</i>		
Organisation	Public Health England	
Job title	Environmental Public Health Scientist	

**If you are replying on behalf of an organisation or group, how was the response approved and how many people does it represent?**

The Centre for Radiation, Chemicals and Environmental Hazards, Public Health England.

### Do you wish to be notified of any of the following? (please tick as appropriate)

The submission of the Mineral Local Plan for independent examination	
The publication of the recommendations of the inspector	
The adoption of the Minerals Local Plan	

If agent details are provided contact will be made through them unless otherwise instructed.

**If your representation(s) is seeking a change, do you consider it necessary to participate at the oral part of the examination?** *Please note that if you do not participate at the oral examination your representations will be dealt with as written representations and carry the same weight as those presented orally.*

Yes, I wish to participate at the oral examination		No, I do not wish to participate at the oral examination	X
--	--	--	---

**If you would like to participate at the oral part of the examination, please outline why you consider this to be necessary.** *Please note that participation in the oral hearing sessions is at the discretion of the Inspector.*

--

Signature		Date	23 March 2016
Name	Stuart Aldridge		

*If you are submitting your representation electronically you do not need to provide a signature.*

## Part B – Your representation

Office use only  
Person No: 7747  
Rep No: 29624

Please read the guidance note before completing this section.

### 1. To which part of the document does this representation relate?

Policy		Site code		Map/Plan		Paragraph		Other	
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### 2. Do you consider the identified part of the document to be:

Legally compliant?	Yes		No	
Sound?	Yes		No	

If you do not consider the identified part of the document to be sound, please continue to question 3. In other cases please go to question 4.

If you think the identified part of the document is not legally compliant and is unsound and therefore want to answer 'no' to both parts of this question, please fill in two separate forms.

### 3. Do you consider the identified part of the document to be unsound because it is not:

(1) Positively prepared?		(2) Justified?		(3) Effective?		(4) Consistent with national policy?	
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You can select more than one test if you feel it is appropriate.

**4. Please give details of why you consider the identified part of the document is not legally compliant or is unsound, having regard to the test(s) identified in question 3 (if applicable).** Please expand box as necessary or attach additional sheets. If attaching sheets, please clearly mark these with the part of the document the representation relates to and your name.

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.

We do note that Paragraph 2.18 states

“Air quality is generally good across the County but several Air Quality Management Areas (AQMA) have been designated around Nottinghamshire because of known traffic and congestion problems.”

Environmental health teams would be able to add more detail to this.

Further to this

Paragraph 2.19 states

“Overall health indicators are slightly lower than both the regional and national average although life expectancy has recently grown closer to the national average. There are also wide variations in life expectancy with a twelve year gap in average life expectancy between the least and most deprived wards. In some areas low levels of income, and high levels of unemployment and stress, are seen as having a significant impact on health and wellbeing. The main urban areas of Mansfield and Ashfield are worst affected, whilst more rural, affluent areas within Rushcliffe and Gedling generally fare far better in line with national trends. Obesity, amongst both children and adults is also a concern.”

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.

PHE welcomes the opportunity to comment on individual planning applications, if requested.



**5. Please set out what change(s) you consider necessary to make the identified part of the document legally compliant or sound, having regard to the test(s) identified in question 3 (if applicable). Please state why this change will make it legally compliant or sound and suggest revised wording of policy or text. Please be as precise as possible. Please expand the box as necessary or attach additional sheets. If attaching sheets, please clearly mark these with the part of the document the representation relates to and your name.**

*Please note: You should provide as much information/justification in your representation as you feel necessary and appropriate because once you have submitted your representation there will not normally be a subsequent opportunity to submit anything else unless requested to do so by the planning inspector.*

**6. Have you raised this issue previously (during earlier stages of consultation)?**

<b>Yes</b>		<b>No</b>	
<b>If Yes, please give details</b>			

<b>Signature</b>		<b>Date</b>	
<b>Name</b>			

*If you are submitting your representation electronically you do not need to provide a signature*

## John Wilson

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 19 March 2016 09:29  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29277

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dr Philip Barron,

Thank you for your representation which we received as follows:

Representation ID: 29277  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

It appears to me that the transport implications of the use of the Flash Farm site are more significant than those stated in the impact assessment report. An increase of possibly more than 100 HGVs per day in the Kelham Bridge area of the A617 is likely to cause serious traffic difficulties, given the existing considerable problems in this area.

### CHANGE TO PLAN

If NCC consider that it is necessary to use this site, there needs to be re-consideration of the impact on Kelham Bridge and alternative routes for HGVs proposed/developed.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:27  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29293

Mr Stephen Marsh,

Thank you for your representation which we received as follows:

Representation ID: 29293  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2r Shelford  
Support/Object: 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.

#### CHANGE TO PLAN

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 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.

The document is unsound because it is not:

- ii. Justified

How you would like your representation to be considered at the independent

examination: Appearance at the Examination.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

### Grounds of Representation

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.

#### **The importance of a robust credible evidence base for the traffic assessment of alternative sites**

To the extent that development plan policies are material to an application for planning permission, the decision on an application following the adoption of a plan must be taken in accordance with that plan unless there are material considerations that indicate otherwise. There is therefore a presumption that once a site has been included in a Minerals Local Plan it will be granted planning permission and as paragraph 14 of the National Planning Policy Framework makes clear, granted planning permission without delay. It is therefore vital that all material considerations that might affect the acceptability of that site and its preference to other potential sites are considered on a robust basis with credible evidence before it is allocated in the Plan.

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. This undermines the efficacy of the decisions taken on which sites to include and which sites to exclude from the Plan and risks prejudicing the interests of those consultees who are concerned about the traffic impact of the sites. This representation focuses in particular, but not exclusively, on the assessment of the impact of HGVs emanating the Shelford West Allocation on the villages of Bulcote and Burton Joyce, but many of the issues raised will also relate to other sites.

#### **The Strategic Traffic Assessment**

##### *The consultants own caveats attached to the assessment*

The consultant charged with this assessment (URS) has at the outset of the assessment listed some (but by no means all) of the limitations of the assessment. At least two of those listed are of significant concern; namely that no warranty is made as to the professional advice included in the assessment and URS specifically does not guarantee or warrant any estimates or projections contained in the report. Even if the remainder of the assessment was soundly based (which it is not), an assessment with these limitations attached to it regarding the accuracy and reliability of its contents has no place in the decision making process of such an important document with such far-reaching and long-lasting implications for those affected by the proposed sites

##### *The basis of the assessment*

Notwithstanding the inappropriateness of the broad sweeping “strategic” nature of the traffic assessment and the consultants own qualifications attached to it, it is based on a document produced nearly a quarter of a century ago in 1993 called Guidelines for the Environmental Assessment of Road Traffic (GEART). It references many documents that are much older still. It was therefore developed under the policies, environmental concerns and thinking appertaining a quarter of a century ago which were significantly influenced by the then conservative government under the leadership of Margaret Thatcher. Whatever anyone’s view might be of those policies, they were unashamedly based on the primacy of car and lorry traffic. The concerns regarding the impact of traffic on the environment and on communities which are held today bear little relationship with those that appertained a quarter of a century ago and the consultant provides no reassurance or credible evidence to demonstrate that guidance produced so long ago is still valid today.

With respect to the impact of traffic on a local community it is perhaps worth considering what actually happened in Burton Joyce about 25 years ago. Back then, in common with many other villages, traffic passed through significantly

in excess of the speed limit. As a response to this the county council planned to increase the speed limit through the village from 30mph to 40mph. At that time (and bizarrely as this might now seem) the guidance 25 years ago advised increasing speed limits to match the speed of traffic rather than influencing the speed of traffic to match the speed limit. No-one would now contemplate using the guidance that appertained 25 years ago. Thanks to the vociferous objections of the villagers, the plan was dropped and in more recent times steps have been taken to seek to influence the speed that traffic passes through the village.

#### *The consequences of basing the traffic assessment on GEARTS*

By using GEARTS the consultant, and therefore the County Council, feel able to assert that a 30% increase in lorry traffic on a route is needed before any consideration need be given regarding the adverse effect of lorries emanating from the quarries and therefore on which sites might or might not be most suitable for including in the plan. By implication it also infers that a 30% increase in traffic is needed before a quarry developer need consider the need for mitigating measures. Whatever view might be taken of the efficacy of using a quarter of a century old guidance to justify taking this stance, it is patently irrational to say that it will not be discernible in a village if there is a 30% increase in traffic made up entirely of quarry lorries.

The specific impact of HGVs was even reflected in the thinking of 25 years ago, although from the consultant's selective and skewed quotes from the outdated guidance that is not apparent.

Starting at paragraph 3.15 GEART states that "to assist the assessor it is suggested that two broad rules of thumb could be used as a screening process to delimit the scale and extent of the assessment". The consultant has used the first of these (the 30% increase) not just to reduce the scale of work required but to "delimit the scale and extent of the assessment" to nothing; to add authenticity to this it gives the impression it was a rule in 1993 that should be used, not a suggested rule of thumb that could be used.

By selectively citing from GEARTS the consultant fails to explain the thinking behind and the caveats attached to the second rule of thumb (the 10% increase). This explanation is given in paragraph 3.20 of GEARTS and is entirely relevant (even in 1993) to the traffic impact from a quarry. This states that an assessor should include any other link or location where it is felt that specific environmental problems may occur. It goes on to state that it would not normally be appropriate to consider links where traffic flows have changed by less than 10% unless there are significant changes in the composition of traffic eg a large increase in the number of heavy goods vehicles. Put the other way round, even 25 years ago, where there was a large increase in HGVs on sensitive links, an assessment of traffic impact should still be made, regardless of any change in general traffic.

By using outdated guidance and citing from it very selectively, the Strategic Traffic Assessment provides no credible traffic evidence to support the choices made in the Plan. Despite its length, it is therefore essentially meaningless for the purpose for which it has been used.

#### *How traffic has changed over the past 25 years.*

Apart from the obvious risk to the soundness of the Plan by using such dated guidance and using it in such a selective way, there is the practical consideration as to how HGV traffic and the composition of it has changed over the intervening period.

It is manifest that the type and size of HGVs has changed dramatically over the past quarter of a century with them becoming ever larger and ever more intrusive in local communities. This can best be demonstrated by looking at Department for Transport statistics covering that period in Table RFS0106 – "Goods lifted by type and weight of vehicle". That table shows that between 1993 and 2014 there was:

- i) A 66% reduction in the goods lifted by smaller rigid HGVs (under 25 tonnes)
- (ii) An 81% reduction in the goods lifted by articulated HGVs (under 33 tonnes)

- (iii) A 47% increase in the goods lifted by larger rigid HGVs (over 25 tonnes)
- (iv) A 56% increase in the goods lifted by larger articulated HGVs (over 33 tonnes)

With the gradual introduction of quieter cars and the significant move towards larger and much more intrusive lorries since GEARTs was prepared, the impact of traffic, especially within local communities, is now much more influenced by the size and number of lorries than the number of cars; this is particularly so when the impact in this case comes from quarry lorries which are perhaps the most intrusive of all HGVs.

By disregarding and discounting this, using outdated guidance in GEARTS produced in an era when environmental concerns are not what they are today and selectively quoting from and selectively using that guidance as the basis of the traffic assessment, it was inevitable from the outset that the Strategic Traffic Impact Assessment and therefore the Submission Draft version of the Nottinghamshire Minerals Local Plan Draft Plan would be bereft of any meaningful consideration of the traffic impacts of sites on local communities to inform and support the choices made in the Plan.

### **The Shelford West Quarry**

In addition to all the above, such traffic assessment as there is of the Shelford West Quarry lacks any credible evidence. The consultant makes what it calls an “assumption” that 60% of the HGVs will turn to or come from the south. As highlighted above, the consultant does not “guarantee or warrant any estimates or projections contained in the report”. Notwithstanding this, it then unaccountably turns this particular assumption into a fact towards the end of the report when it states that 75 quarry lorries “will” turn to the south. The consultant sheds no light on and provides no evidence (let alone credible evidence) for this assumption, or fact.

The Shelford West site is expected to largely serve the Nottingham conurbation. Therefore it is not unreasonable to assume that the vast majority of the quarry lorries will take the most expeditious route to that conurbation. Even a cursory look at the conurbation would cast very significant doubt as to the robustness of the 60% assumption. Looking in a little more detail:

- (i) Given the high transportation costs it is unlikely that the Shelford West site would serve to any significant extent that part of the conurbation that lies towards the M1 motorway; to do so would in any case be highly undesirable with 32 tonne lorries having to pass through much of the conurbation to reach its destination.
- (ii) The most expeditious route to the south of the conurbation (West Bridgeford and Clifton) would clearly be to the south.
- (iii) The most expeditious route to the north and east of the conurbation would clearly be to the north through Burton Joyce.
- (iv) The most expeditious route to the remainder of the conurbation to the north- west would be more marginal. A quick look at Google Maps reveals it would be about the same distance travelling either way but for most of the day it would be around five minutes quicker travelling to the north through Burton Joyce; the route to the north is also likely to have the more certain and consistent journey times, particularly in peak periods (note the consultants own comments regarding congestion at peak times on the route to the south).

Without any other outside influences, the quarry lorries would be likely, if not certain, to take the quickest route offering the most reliable and consistent journey times; on this basis it is not unreasonable to expect that something nearer to 80% of the quarry lorries would turn north and pass through Burton Joyce, rather than the 40% assumed by the consultant.

### **The villages of Burton Joyce and Bulcote**

Burton Joyce and Bulcote straddle the A612 and are essentially contiguous settlements. Bulcote does not have a village centre as such and relies on Burton Joyce for its local services. The centre of Burton Joyce lies to the north-west of the A612; most of Bulcote and about 20% of Burton Joyce lie to the south-east. Because of the escarpment to the north and the river to the south, much of Burton Joyce has of necessity been developed alongside or close to the A612. There is about 1.5 miles of continuous development in the two villages adjacent to the A612 with some 250 properties directly fronting the road. Very unusually there are some 40 properties whose rear gardens directly abut the A612. For these 40 properties, their only or main outside recreational space lies just a few feet from where the quarry lorries will pass.

Because of the highly intrusive nature of the current traffic, there are numerous traffic islands in the middle of the road to help villagers cross the A612 as they go about normal village life. However the remaining road width is very limited and three metre wide HGVs (like quarry lorries) have to pass within inches of those traffic islands and the adjacent pavements. This is exceptionally intimidating and potentially very dangerous. These islands are frequently hit by traffic and two are currently out of commission having been hit by passing traffic in recent weeks. The increased risk to pedestrians, especially those who are frail or with young children, with the increases in 4 axle 32 tonne gross vehicle weight (or larger) quarry lorries is very real and very palpable. Without question the use of sustainable transport (walking and cycling) to get from one side of the village to the other is already seriously inhibited by the traffic and particularly the HGVs that pass through the village.

The restrictions imposed by the river and the escarpment make it impossible to relieve the village of through traffic by means of a bypass. The protection of the community from traffic that runs through it can therefore only be achieved through very carefully considered planning control based on robust and credible evidence. This is conspicuous only by its absence in the Submission Draft version of the Nottinghamshire Minerals Local Plan.

It will have been apparent from the outset to the County Council and its consultant that one of the major concerns emanating from any further quarrying alongside the River Trent close to Shelford, Bulcote or Burton Joyce would be the impact of quarry lorries emanating from the site on Burton Joyce and Bulcote and it of serious concern that the assessment of that impact has not been robust and does not have a credible evidence base. On the contrary, it is unfortunate that the impression created, however ill-founded that impression might be, is that the assessment and evidence such as it is, has been chosen and then skewed specifically to remove any meaningful consideration of that impact.

#### **Additional considerations**

##### *Other related development*

The Strategic Traffic Assessment looks at the potential cumulative impact of the mineral sites on any community and unsurprisingly given the assumption upon which the assessment is based again finds none. However what it does not look at is the cumulative impact of other developments which when taken together with the quarry traffic might lead to different conclusions to those drawn in the Plan. With respect to the Shelford West site, one such development is Seven Trent's Stoke Bardolph Energy Crop Anaerobic Digestion Plant.

This plant lies adjacent to Stoke Bardolph and close to Burton Joyce. In Seven Trent's own words it is one of the largest of its kind in the UK. To give some idea of its scale, in 2014-15 it generated 22 million kWh of electricity, equivalent to the use of around 5000 homes. It uses a combination of maize, wheat, rye and energy beet in the digesters. In its glossy brochure, Seven Trent states that "we grow our own crops on Severn Trent land adjacent to the concrete cow". This is a disingenuous statement which underplays the less sustainable and adverse aspects of this plant. Seven Trent may well grow some crops adjacent to the cow, but the vast majority is brought in from both outlying Seven Trent Land and from even further afield. This has to be brought in through Burton Joyce in exactly the same way that most of the quarry traffic will pass through Burton Joyce. It is transported in vast tractor and trailer loads. A by-product of the waste produced by the plant is used as a fertiliser; this is again tractor and trailered out through Burton Joyce. These tractors and trailers are significantly more noisy than virtually any other HGVs that pass through the village, they generate a noise frequency different to and more conspicuous than nearly



all other HGVs and their presence is felt for a much longer period of time as they pass through the village. The only other HGVs that generate a similar noise pattern are the occasional quarry lorries.

This plant has only fairly recently been brought into operation and it is no criticism of either the traffic consultant or Nottinghamshire County Council that they may both be oblivious to the impact it is having on Burton Joyce. However over the last two years there has been a seemingly inexorable and exponential increase in the number of tractor and trailers generated through the village by the plant. There is seemingly no time of year that these are not passing through in ever increasing numbers and it is difficult to see how and when the increase will stop. Even without the increase in HGVs that would be generated by the Shelford West Quarry, the situation for residents whose rear gardens lie within a few feet of the road is becoming intolerable due in no small part to the Stoke Bardolph Energy Crop Anaerobic Digestion Plant. The impact of these tractors and trailers which is very real and already very apparent makes the consultants assertion that you need a 30% (or even 10%) increase in traffic caused by the quarry lorries before anyone would notice appear absurd.

Whatever else happens, the combined impact of the Stoke Bardolph Energy Crop Anaerobic Digestion Plant and the Shelford West Quarry must be considered, and considered robustly with credible evidence, before any decision is taken to include the Shelford West site in the Minerals Local Plan.

#### *The consultation on alternative sites*

The lack of robust credible evidence regarding the traffic impact of a site can undermine the credibility of not only the plan itself, but also the consultation process which leads to the decisions taken to include or exclude a site in the Draft Submission version of the Plan. With respect to Shelford West, in its response to the consultation, Gedling Borough Council stated that “whilst it is possible that some HGVs could desire to utilise the A612, the connection to the A52 would provide a better link to Nottingham and destinations to the west and the M1/M42/A50 routes”. Thus the council raised no objection to the site being allocated and it did so on the basis that it was only possible that some traffic could use the A612 through Burton Joyce.

It is clear from Gedling’s response that the information provided to them (or that which they deduced themselves in the absence of robust credible evidence provided to them by the County Council) was about as far from robust and credible as it is possible to imagine.

#### *The need for the Shelford West site*

It is not the intention of this representation to look in any detail at the need for the Shelford West site over and above other sites that might have less impact. However, it is worth noting that no site in this part of Nottinghamshire was included in the preferred site options at an earlier stage of the Plan’s preparation because of highway access issue, so it is difficult to see there is an over-riding need for the Shelford West site.

### **Summary of Representation**

The Strategic Traffic Assessment is not based on robust credible evidence to support the choices made in the Submission Draft version of the Nottinghamshire Minerals Local Plan.

The traffic assessment is based on guidance which was produced a quarter of a century ago. The thinking and concerns of a quarter of a century ago regarding the impact of traffic on the environment and communities bear little relation to those held now and the make-up and impact of HGVs has changed dramatically since the guidance was produced. The consultant acknowledges the guidance is “somewhat dated” but provides no evidence to demonstrate its relevance today. Even if it were still relevant today, it has been used selectively to support the conclusion that no site has any discernible traffic impact on local communities, and it fails to recognise that the guidance when produced related to a general increase in traffic, not an increase in HGVs, let alone 4 axle 32 tonne quarry lorries which are amongst the most intrusive of all HGVs. The consequence of this is that the Draft Minerals

Local Plan is bereft of any meaningful assessment of the traffic impact of the sites on local communities and such that there is, is seriously misleading.

Such assessment as there is for the Shelford West site itself is based on an assumption, inexplicably turned into a fact for which the consultant provides no credible evidence; the assumption made does not stand up to scrutiny.

Decisions were taken and views given on the Shelford West site during the consultation on evidence that was as far from robust and credible as it is possible to imagine.

The consultant fails to assess the cumulative impact of major developments on Burton Joyce when assessing the acceptability of and preference for the Shelford West site above other potential sites.

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 20 March 2016 08:42  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29296

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dr Philip Rayner,

Thank you for your representation which we received as follows:

Representation ID: 29296  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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.

### CHANGE TO PLAN

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.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:07  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29303

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29303  
Document: Minerals Local Plan Submission Draft  
Section: SP2: Minerals Provision  
Support/Object: 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.

### CHANGE TO PLAN

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.

Other counties have been required to use their most up to date data eg Warks and Lincs

The document is unsound because it is not:

- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:09  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29309

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29309  
Document: Minerals Local Plan Submission Draft  
Section: SP6: The Built, Historic and Natural Environment  
Support/Object: 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

CHANGE TO PLAN

Delete the word "unacceptable"

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:12  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29310

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29310  
Document: Minerals Local Plan Submission Draft  
Section: MP1: Aggregate Provision  
Support/Object: Object

This refers to "identified levels" but these have been identified using out of dates figures for the period 2002-2011. More up to date figures are to be found in the LAA published in 2015 and these show a decline in demand

CHANGE TO PLAN

Use the latest figures to identify what levels are required

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:12  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29311

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29311  
Document: Minerals Local Plan Submission Draft  
Section: MP1 Justification  
Support/Object: Object

At 4.9 it states that NCC are to work with other MPAs to ensure their approach is consistent, however, other MPAs eg Lincs are using the more up to date data whereas NCC is relying on the older data. This is not producing consistency and is inflating the predicted demand since the later data shows a decline in demand

### CHANGE TO PLAN

Use the more up to date data that other local MPAs are relying on

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:16  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29312

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29312  
Document: Minerals Local Plan Submission Draft  
Section: Table 2 LAA Average Production Figure and Estimated Total Aggregate Demand  
Support/Object: Object

By using out of date data, the predictions for growth are incorrect. The old figures (2002-2011) have sales as 2.58m tonnes whereas the 2004-2013 figures show 2.24m tonnes. Demand is therefore in decline and could be met by using existing sites rather than opening up new ones

### CHANGE TO PLAN

Use the most up to date data and fully utilise resources at existing sites before creating new sites

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:17  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29313

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29313  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

The villages on the A617 are already blighted by the volume of HGVs on this road. Further HGV movements will exacerbate the current traffic issues, make living along the route for the community even more unbearable, affecting air quality, noise, dust, congestion and increasing vehicle emissions. Kelham Bridge is a bottleneck and further increases in HGVs on it is likely to cause damage and congestion. Furthermore Kelham Bridge is grade II listed and should be protected from potential damage due to increased use by HGVs.

### CHANGE TO PLAN

Remove Flash Farm from consideration for an extraction site

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:13  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29314

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29314  
Document: Minerals Local Plan Submission Draft  
Section: DM3 Justification  
Support/Object: 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

CHANGE TO PLAN

Remove Flash Farm from the plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:14  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29315

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29315  
Document: Minerals Local Plan Submission Draft  
Section: DM4 Justification  
Support/Object: 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

**CHANGE TO PLAN**

remove Flash Farm as a potential site

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

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**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29316

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29316  
Document: Minerals Local Plan Submission Draft  
Section: DM6 Justification  
Support/Object: 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.

**CHANGE TO PLAN**

Remove Flash Farm from the plan so that HGV movements over Kelham Bridge are not increased

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29317

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29317  
Document: Minerals Local Plan Submission Draft  
Section: DM8 Justification  
Support/Object: 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

**CHANGE TO PLAN**

Remove Flash Farm as a potential site

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:08  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29409

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29409  
Document: Minerals Local Plan Submission Draft  
Section: SP5 Justification  
Support/Object: 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

### CHANGE TO PLAN

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 document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:09  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29410

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29410  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

carry out/publish data from 2013 in order to assess whether the sites will be affected by emissions

The document is unsound because it is not:

- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:10  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29411

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29411  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

Carry out up to date survey on the destination of minerals to comply with the Sustainability Appraisal objectives.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:11  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29412

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29412  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

Do not create a new site at Flash Farm as this will increase traffic through the village of Kirklington

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:12  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29413

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29413  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

Do not create a site at Flash Farm

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 26 March 2016 15:18  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29415

Mrs amanda armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29415  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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.

### CHANGE TO PLAN

Withdraw Flash Farm from the plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 22:52  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29304

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29304  
Document: Minerals Local Plan Submission Draft  
Section: Plan 2: Nottinghamshire's mineral resource  
Support/Object: 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.

### CHANGE TO PLAN

The MLP should be revised using more relevant and up to date figures

The document is unsound because it is not:

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 22:55  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29305

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29305  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO1: Improving the sustainability of minerals development  
Support/Object: 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.

### CHANGE TO PLAN

Review forecast future requirements using most up to date figures

The document is unsound because it is not:

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 22:59  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29426

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29426  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO7: Protecting and enhancing historic assets  
Support/Object: Object

Historic England lists eleven listed structures in Kelham in close proximity to the A617. All of the buildings listed are within 200m of the A617 which is the proposed route for all HGVs carrying aggregates to the main arterial routes of the A1/A17. Among the aforementioned listed buildings are several Grade II residences within 50 metres of the road and the Grade I listed Kelham Hall and St Wilfred's Church. The road also 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 considerable additional threats to these historic structures.

#### SUMMARY

Detrimental effect to the significant historical built environment of the area

#### CHANGE TO PLAN

Removal of Flash Farm from the plan or provisional of alternate route for the transportation of aggregates & land fill

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:01  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29427

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29427  
Document: Minerals Local Plan Submission Draft  
Section: SP3: Biodiversity-Led Restoration  
Support/Object: 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.

**CHANGE TO PLAN**

Removal of Flash Farm from MLP

The document is unsound because it is not:  
i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:03  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29428

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29428  
Document: Minerals Local Plan Submission Draft  
Section: SP4: Climate Change  
Support/Object: 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.

### CHANGE TO PLAN

Alternate site should be identified due to flood risk

The document is unsound because it is not:

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29429

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29429  
Document: Minerals Local Plan Submission Draft  
Section: SP6: The Built, Historic and Natural Environment  
Support/Object: 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.

### CHANGE TO PLAN

Alternative site to be included in the plan where there is little or no risk to the build, historic and natural environment

The document is unsound because it is not:  
iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:16  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29430

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29430  
Document: Minerals Local Plan Submission Draft  
Section: DM2: Water resources and flood risk  
Support/Object: 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.

### CHANGE TO PLAN

Alternative site to be selected where there is no risk of flooding to adjacent residential areas

The document is unsound because it is not:  
iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:18  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29431

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29431  
Document: Minerals Local Plan Submission Draft  
Section: DM6: Historic environment  
Support/Object: 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 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 proposed change of current use of Flash Farm will make all these provisions difficult to implement.

### CHANGE TO PLAN

Selection of alternative site where there is no loss or detrimental effect on the historic environment

The document is unsound because it is not:  
iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:08  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29512

Andrew Fereday,

Thank you for your representation which we received as follows:

Representation ID: 29512  
Document: Minerals Local Plan Submission Draft  
Section: SP5: Sustainable Transport  
Support/Object: Object

The proposals as detailed are at odds with the aspects highlighted in SP5. There would appear to be no sustainable transport options proposed other than road haulage. In the case of minerals extraction in and around Newark the large majority of aggregates are for markets well outside of the county and therefore not in close proximity. Additionally whilst proposed locations are relatively close to the main highway network proposed distribution routes are via minor roads passing through residential areas and will only increase the traffic problems on an already over stretched road network. This is in addition to the detrimental affect the proposals will have in terms of pollution, noise, impact on the natural and local environment. The proposed route for traffic also takes heavy goods vehicles over the Grade I listed Kelham Bridge which would be at great risk given the additional number of vehicle movements.

#### SUMMARY

Proposals do not represent a sustainable solution when measured against the requirements of SP5

#### CHANGE TO PLAN

Identification of an alternative site to Flash Farm of a more sustainable nature in terms of transport

The document is unsound because it is not:  
iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:24  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29327

Miss Myra Ng,

Thank you for your representation which we received as follows:

Representation ID: 29327  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

CHANGE TO PLAN

Please reassure me I will not be flooded if the proposal goes ahead and measures will be taken to prevent this.

The document is unsound because it is not:

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:42  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29328

Miss Myra Ng,

Thank you for your representation which we received as follows:

Representation ID: 29328  
Document: Minerals Local Plan Submission Draft  
Section: DM1: Protecting local amenity  
Support/Object: 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

### CHANGE TO PLAN

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 document is unsound because it is not:

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:19  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29533

Miss Myra Ng,

Thank you for your representation which we received as follows:

Representation ID: 29533  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO5: Minimising impacts on communities  
Support/Object: 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.

#### CHANGE TO PLAN

Assume written notification would have been desirable to persons directly affected due to living in very close proximity to the proposed site.

The document is unsound because it is not:

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 14:54  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29557

Miss Frances Snell,

Thank you for your representation which we received as follows:

Representation ID: 29557  
Document: Minerals Local Plan Submission Draft  
Section: SP2: Minerals Provision  
Support/Object: 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

### CHANGE TO PLAN

Use the most up to date data available.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 15:04  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29562

Miss Frances Snell,

Thank you for your representation which we received as follows:

Representation ID: 29562  
Document: Minerals Local Plan Submission Draft  
Section: SP5 Justification  
Support/Object: 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

### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 15:14  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29569

Miss Frances Snell,

Thank you for your representation which we received as follows:

Representation ID: 29569  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

Justification is based on out-of-date data from LAA 2013. Up-to-date data (from LAA 2015) should be used. Justification does not build in numerical findings and targets as shown in NCC Waste Core Strategy, which with National Policy Objectives are dramatically increasing the amount of recycled aggregates. This is leading to a structural decline in sales of primary sand and gravel extraction. Using LAA 2015 figures requires less new greenfield sites. Acknowledging the data in the Waste Core Strategy and resultant structural shift in supply may make all greenfield sites unnecessary in lifespan of LMP.

### CHANGE TO PLAN

Remove Flash Farm from the draft MLP

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 15:25  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29577

Miss Frances Snell,

Thank you for your representation which we received as follows:

Representation ID: 29577  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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

### CHANGE TO PLAN

Remove Flash Farm from MLP, revisit existing sites and Barton in Fabis

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** [REDACTED]  
**Sent:** 28 March 2016 17:04  
**To:** Development Planning  
**Subject:** Local Mineral Plan - Sand & Gravel Extraction in Coddington

Dear Sirs

We wish to object to the council's plan for sand and gravel extraction in Coddington on the following grounds:

1. The road links around Newark are already overloaded and a quarry would just put more strain on the road network and gridlock Newark even more than it is now.
2. The resultant pollution of the atmosphere in the village thereby causing ill health to the residents.
3. Resultant noise created which would be detrimental to nearby villagers and their homes.
4. Danger to local schoolchildren with so much extra traffic on the roads around the village;
5. The damage which would be caused to nearby Stapleford Woods which is an amenity for the village and surrounding area.
6. The value of houses in Coddington would fall as a result of gravel extraction being allowed in Coddington.

Yours faithfully

Alan & Jenny Milne

[REDACTED]

---

**From:** Paul Bousfield <[REDACTED]>  
**Sent:** 21 March 2016 20:14  
**To:** Development Planning  
**Subject:** Proposed Flash farm gravel extraction

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

Please accept this e mail as my strong opposition to the proposed gravel extraction.

The grounds on which I strongly feel should be considered by the review are - 1.The dramatic impact of lorries near our school and crossing Kelham bridge. For example we already suffer from delays in Kelham as only one lorry can pass at a time.

2. The construction of the bridge is not suitable to increased levels as it was constructed in 1856 and is a grade 11 listed bridge.

3. Dust and other particulars will impact on our young children at school based only 600 yards away.

4. Serious risk of flooding due to the water being pumped out into what often is a network of dykes that reach capacity plus every year.

I would be pleased if you take the above into consideration.

Yours a concerned resident

Paul Bousfield  
3 Hopwas Close  
Averham  
NG23 5UA

Best Regards  
Paul Bousfield  
Chief Executive  
Armitage Pet Care  
Office: [REDACTED]  
Mobile: [REDACTED]

Interzoo 2016 Nuremberg Germany 26-29.05.2016  
Visit us in hall 9 stand 603a

This e-mail is confidential and intended solely for the use of the individual to whom it is addressed. Any views or opinions presented are solely those of the author and do not necessarily represent those of Armitage Pet Care. If you are not the intended recipient, be advised that you have received this e-mail in error and that any use, dissemination, printing, or copying of this e-mail is strictly prohibited.

If you have received this e-mail in error please notify the sender and then delete it from your computer.

Armitage Pet Care. Registered in England no. 658577  
[REDACTED]

## John Wilson

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 21 March 2016 21:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29322

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

mrs Lorraine Bousfield,

Thank you for your representation which we received as follows:

Representation ID: 29322  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: Object

I strongly object to a beautiful rural area being targeted for minerals based on money grabbing basis and figures and statistics used to support the application are not current and up to date.

The effect on traffic in the area will cause our roads to come to a standstill and isolate villages which feed onto the A617. Already traffic closes our roads when the A1 or A46 is shut. The experience of residents to traffic on the A617 is already to avoid travelling to Newark on a Friday and now Mondays are also backing up. I feel that there is a greater volume of HGV using the road and all traffic has to stop to allow each vehicle to pass singularly, with another 100 + trucks a day is laughable to think that this will not have any effect to our journeys and daily lives. Gravel should supply the locality and not be used to travel further miles to find a market, it is not sustainable to do so. Journey times for all vehicles will be adversely affected and standing traffic causes further pollution levels.

I have concerns that the dirt and dust created will have an adverse effect on our homes and health and particularly affect the children at Manners Sutton School.

The process of water during extraction, can we be guaranteed that the water table will not be affected and cause flooding to lower areas, at the bridge in particular.

In view of new 2014 forecasts of mineral usage and the amount of recyclable materials needed as , I question that this site is even needed.

I seriously doubt the at the end of the process that the company will restore the area/ create a nature reserve. There is experience that other companies have conveniently liquidated to avoid this spend.

There will be increased noise in a rural area which will impact on residents quality of life.

Does the gravel company have any requirement or obligation to interact or support the community which is it affecting? There has been no word from them wanting to be 'good neighbours' or take any lead on this front. How will they address complaints or issues raised by residents?

### SUMMARY

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.

#### CHANGE TO PLAN

Up to date figures to be used for mineral requirements, traffic congestion to be addressed in Newark area and Kelham Bridge in particular.

The document is unsound because it is not:

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## John Wilson

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 23 March 2016 10:49  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29332

Ms Amanda Rigby,

Thank you for your representation which we received as follows:

Representation ID: 29332  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: Object

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.

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.

### CHANGE TO PLAN

Please do not consider this area

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29450

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29450  
Document: Minerals Local Plan Submission Draft  
Section: DM1 Justification  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:33  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29451

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29451  
Document: Minerals Local Plan Submission Draft  
Section: DM2 Justification  
Support/Object: 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.

### CHANGE TO PLAN

The developer must produce a robust plan for the management of water at the the site before work at the site begins. This should include plans for high water levels in the Trent.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:45  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29453

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29453  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

Justification is based on out-of-date data from LAA 2013. Up-to-date data (from LAA 2015) should be used. Justification does not build in numerical findings and targets as shown in NCC Waste Core Strategy, which with National Policy Objectives are dramatically increasing the amount of recycled aggregates. This is leading to a structural decline in sales of primary sand and gravel extraction. Using LAA 2015 figures requires less new greenfield sites. Acknowledging the data in the Waste Core Strategy and resultant structural shift in supply may make all greenfield sites unnecessary in lifespan of LMP.

#### CHANGE TO PLAN

Acknowledge the structural change in balance between primary and recycled minerals. Use LAA 2015 data and numerical data from Waste Core Strategy to provide an estimate of future sand and gravel requirements during the life of the Plan. Remove Flash Farm and Shelford greensites from the Plan. These are due to start production in 2016. Keep other greenfield sites under review when relevant data becomes available.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:37  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29455

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29455  
Document: Minerals Local Plan Submission Draft  
Section: DM4 Justification  
Support/Object: 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.

**CHANGE TO PLAN**

Consider the value of the habitat as it is and not what it could be transformed into.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:35  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29456

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29456  
Document: Minerals Local Plan Submission Draft  
Section: DM5 Justification  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:39  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29457

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29457  
Document: Minerals Local Plan Submission Draft  
Section: DM6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

Remove Flash Farm from the Plan due to the negative impact on the historic assets of the area.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:43  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29459

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29459  
Document: Minerals Local Plan Submission Draft  
Section: DM9 Justification  
Support/Object: Object

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.

### CHANGE TO PLAN

A robust traffic management system is required for the A617 before any Flash Farm development is considered.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:48  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29460

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29460  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:13  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29461

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29461  
Document: Minerals Local Plan Submission Draft  
Section: SP3 Justification  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29462

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29462  
Document: Minerals Local Plan Submission Draft  
Section: SP4 Justification  
Support/Object: Object

Preferred site (Flash Farm) is in area of Flood Risk.

**CHANGE TO PLAN**

Remove Flash Farm from Plan unless prior measures are taken to reduce flood risk in area.

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:09  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29464

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29464  
Document: Minerals Local Plan Submission Draft  
Section: SP2 Justification  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 16:19  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29465

Dr Valerie Willcocks,

Thank you for your representation which we received as follows:

Representation ID: 29465  
Document: Minerals Local Plan Submission Draft  
Section: SP5 Justification  
Support/Object: 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

### CHANGE TO PLAN

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 document is unsound because it is not:

ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 23 March 2016 16:09  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29342

Hucknall Branch Labour Party (Kath Cooper),

Thank you for your representation which we received as follows:

Representation ID: 29342  
Document: Minerals Local Plan Submission Draft  
Section: MP12: Hydrocarbon Minerals  
Support/Object: Object

The following motion was passed by Hucknall Branch Labour Party on Wednesday 2nd March 2016:

"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

- oppose and campaign against this very damaging method of gas extraction, and, simultaneously,
- 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."

### CHANGE TO PLAN

The following motion was passed by Hucknall Branch Labour Party on Wednesday 2nd March 2016:

"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

- oppose and campaign against this very damaging method of gas extraction, and, simultaneously,
- 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."

The document is unsound because it is not:  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 27 March 2016 16:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29436

Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell),

Thank you for your representation which we received as follows:

Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell) [7780] represented by Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell) [7780]  
Representation ID: 29436  
Document: Minerals Local Plan Submission Draft  
Section: MP2o - Coddington  
Support/Object: Object

### NOISE POLLUTION:

Coddington already experiences noise from A1 traffic and due to it's topology Newark Showgrounds tannoy system is occasionally heard in the village and gives some insight into the susceptibility of the village to noise levels. There are a number of properties within a 250 mtr distance of the main site and the closer you are the more intense the noise is likely to be, from on site machinery, vehicle movements and the like.

British Standard 4142 (1997 and revised 2014) states that existing background noise above 10Db is an UNACCEPTABLE level, and complaints are highly likely and, even at 5dB above it would be considered of Marginal Significance and complaints are possible (SVR Consulting - Southdowns Consultants).

Noise pollution is a major source of complaint from quarry operations and investigations by Health and Safety concluded Sand and Gravel Plant was the second noisiest industry for workers to be involved in.

Consistent levels of machinery noise, materials handling, empty trucks being loaded and movement of mobile plant will make this environment unacceptably noisy. In addition Hanson has provided no detail of where the plant will be located on site, nor if any ancillary activities (e.g. cement production) are likely.

### VISUAL INTRUSION:

Plant will include towers, tall sloping conveyors and heaps of overburden etc. with the area cordoned by high fencing, soil banking and other planting in an attempt to mitigate effects.

Any attempts to screen will impact on visual appearance and detract from the natural setting of the village areas.

### NUISANCE:

Clearly HGV movements, plant movements and excessive noise levels will cause distress and disruption to a large part of the community and visitors to the area, especially those who enjoy the local amenities of Stapleford Woods and the surrounding natural habitats.

### SUMMARY

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.

### CHANGE TO PLAN

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.

The document is unsound because it is not:

- i. Positively prepared

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 12:08  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29448

Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell),

Thank you for your representation which we received as follows:

Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell) [7780] represented by Coddington Against Gravel Extraction (C.A.G.E.) (Mr Robert Campbell) [7780]  
Representation ID: 29448  
Document: Minerals Local Plan Submission Draft  
Section: MP2o - Coddington  
Support/Object: Object

**COMMERCIAL IMPACT:**

In a recent report "Nottinghamshire's Economic Assessment", the County Council categorised Newark as a "large secondary centre" with a diverse economic base and a strong service sector providing significant housing and employment through the infrastructure planned as part of the "Growth Point Plan".

The potential development of Sand and Gravel opportunities has already caused major concerns within communities that will be affected by much larger traffic volumes, noise, pollution and general disruption.

However, development of this kind not only threatens local environments but also the future of our economic base and its continuing health in the shorter to medium term.

**ROADS AND ROUTES:**

Our current Road Network is not fit for purpose - we have seen recent evidence of congestion increasing on all routes and with plans for the "Growth Point", Sainsbury's and the new District Council offices, in addition to the natural growth, it is not surprising that many businesses are concerned about their future ability to navigate their way around the problems.

There have been 2 traffic summits (a good indication as to the concern) chaired by local M.P. Robert Jenrick and looking at ways of improving the situation. However, even though the Highways Agencies and County Council have agreed that the roads in Newark and Sherwood are amongst the most dangerous and congested in the COUNTY the potential solutions are not expected to be implemented until 2020 - 25, and that only if the government can provide the much needed funding.

**Strategic Transport Assessment:**

The STA has failed to take any of the issues into account and has focused on the most immediate area to the site, rather than the overall effect on the Newark Area generally.

The STA addendum recently issued by NCC is flawed in that it suggests the speed limit on A17 is 70mph, when in fact it is only 60mph for cars/LCV's and 50 mph for HGV's. In addition speed limits beyond the Coddington Moor roundabout East of the site on A17 reduce to 40mph for all traffic, further reducing traffic flow all along the A17 from the Mastercare roundabout.

When considering the average traffic flow to/from the site to be an HGV at intervals of less than 4 mins, this traffic will cause additional congestion and even gridlock, especially in the case of accident or roadworks in nearby areas. The STA suggests a left hand turn only from site. This will only INCREASE the issues and add further to potential accidents arising from spillage at Coddington Moor roundabout, increasing potential accident risk from sand and gravel on the road surface...

In addition when the Newark Showground is active the management consider it so dangerous that they employ a professional traffic management company to control the movements of vehicles to and from the Showground. The "Growth Plan" will add around 7,000 homes to the area, further increasing the load on local routes which will feed into local roads.

**Business Interests:**



Newark has a very diverse business base with many self - employed and small businesses employing fewer than 8 people. However, exceptions include Curry's Know How (already committed to a large expansion programme), NSK Bearings, Vodafone, Timico, Airflow, British Sugar, Brownhills Motorhomes etc.

Although the smaller companies will find it easier to adapt, or move base of operations, bigger companies may well find that they are unable to ignore the commercial impacts on their businesses. Employees will find it increasingly difficult to travel to/from work making the businesses vulnerable to employee losses and making recruitment less attractive.

Distribution and deliveries of raw materials to site will be affected by increasing traffic congestion and delays making it less attractive to be located here and running the risk of these companies moving away with the consequent loss of revenue in business rates and a huge shortfall in funding for council services.

With recent developments such as the duelling of the A46, increased train services Nottingham to Lincoln, Newark and Sherwood's Economic Development Team are rightly justified, on the NSCC web site in pointing out that we are strategically well placed to locate businesses here. However, it seems that we risk all of that, not only by businesses choosing not to locate o here, but also with existing businesses questioning if they should adopt an EXIT STRATEGY. This is particularly true of existing distribution companies such as Rose (Newark) Ltd, Irish Groupage, Pykett Bros and others.

All these issues affect potential employment and economic security through lost spending power.

Tourism:

With many local attractions such as Southwell Minster, The Work House, Newark Air Museum, Newark Showground, Newark Castle, The Parish Church, Queens Sconce and the opening of the new National Civil War Centre and Museum (the latter projecting to attract an additional 57,000 tourists) we might expect Newark's future tourism to grow healthily.

Unfortunately, if Newark's visitors find it increasingly difficult to access the attractions due to traffic problems then this investment will be threatened and Newark as a place for tourists will become a "no go area".

## SUMMARY

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.

## CHANGE TO PLAN

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 document is unsound because it is not:

i. Positively prepared

How you would like your representation to be considered at the independent examination: Appearance at the Examination.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 10:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29525

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29525  
Document: Minerals Local Plan Submission Draft  
Section: Vision  
Support/Object: Object

I understand that there is a Minerals Supply Hierarchy that states:-

- 1 Reduce the quantity of minerals used as far as practicable
- 2 use the maximum amount Of secondary and recycled minerals as possible
- 3 finally use primary mineral to fill the gap The vision appears to concentrate on primary minerals and not fully explore the importance of recycled/secondary minerals.

Using the adage that if you cannot measure it you cannot manage it, the draft MLP only provides figure for the extractive industry and does not appear to understand quantitatively the growing importance of secondary and recycled minerals.

The vision is incomplete.

### CHANGE TO PLAN

The vision should encompass the minerals supply hierarchy to ensure it is well balanced

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 10:29  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29527

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29527  
Document: Minerals Local Plan Submission Draft  
Section: SP2: Minerals Provision  
Support/Object: Object

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.  
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. Similarly the effect of landfill taxes is not explored in the rapid increase expected in recycled minerals ( see NCC Waste Core Strategy 2014)

#### CHANGE TO PLAN

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 .

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 10:43  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29529

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29529  
Document: Minerals Local Plan Submission Draft  
Section: MP1: Aggregate Provision  
Support/Object: Object

Minerals provision comes not only from primary extraction but also from recycled and secondary minerals, there is no quantified figure of the contribution of secondary and recycled minerals expected for the plan period. Incorporating figures from the NCC Waste Core Strategy 2014 it will be seen that there is a potential massive oversupply of minerals.  
The figures used in this draft document are also out of date , and relate to the LAA 2013. The use of LAA (2015) drastically alter these figures and suggest the impact of increased use of secondary/ recycled minerals as per NCC Waste Core Strategy.

### CHANGE TO PLAN

The document should use latest LAA figures and should quantify and incorporate the contribution of secondary and recycled minerals as shown in NCC Waste Core Strategy.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 10:59  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29530

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29530  
Document: Minerals Local Plan Submission Draft  
Section: MP1 Justification  
Support/Object: Object

It would seem that if the east midlands working party is not taking into consideration the expanding contribution of secondary and recycled minerals in a quantified way, there is a flaw in the approach to minerals provision forecasting!

The figures on waste recycled minerals need to be built into the figures for minerals provision

CHANGE TO PLAN

Incorporate secondary and recycled minerals as per NCC Waste Core Strategy  
2014

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:05  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29531

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29531  
Document: Minerals Local Plan Submission Draft  
Section: Table 1 Annual aggregate production  
Support/Object: Object

The table is based upon the LAA 2013 and is therefore out of date.  
The table is therefore providing an incorrect basis to future primary minerals forecast of requirements.

### CHANGE TO PLAN

Use LAA 2015 figures and if available use LAA 2016 figures.  
Secondary and Recycled minerals included in this table would provide a more complete picture of the minerals supply figures and lead to more meaningful forecasts of requirements.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:21  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29534

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29534  
Document: Minerals Local Plan Submission Draft  
Section: Table 1 Annual aggregate production  
Support/Object: Object

The table is out of date using data from the LAA 2013. Furthermore the figure for 2011 does not correspond with the LAA 2013 document.

Using LAA 2015 figures will drastically reduce the estimate of demand to 2030, and significantly extend the life of reserves.

The document does not explain the continued low level of primary extraction despite the recovery of the construction industry. If the LMP paid cognisance to the drastic reduction of landfill and much higher recycling rates as per NCC Waste Core Strategy it would see a structural change to minerals supply, and base forecasts more realistically.

#### CHANGE TO PLAN

Use latest LAA figures.

Show recycled and secondary minerals as part of supply mix.

Incorporate structural change to supply of minerals to provide more realistic future forecast figures.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:24  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29535

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29535  
Document: Minerals Local Plan Submission Draft  
Section: Table 2 LAA Average Production Figure and Estimated Total Aggregate Demand  
Support/Object: Object

Table 2 is not based on latest available date as per LAA 2015 and gives a false picture of averaged production figures and forward estimated demand .

CHANGE TO PLAN

Use latest LAA figures

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:33  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29536

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29536  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision  
Support/Object: Object

This table is based upon out of date data and does not identify the contribution of recycled minerals.

### CHANGE TO PLAN

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.

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.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:35  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29537

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29537  
Document: Minerals Local Plan Submission Draft  
Section: Table 3 Contributions to the sand and gravel shortfall over the plan period  
Support/Object: Object

These contributions are based upon out of date data and also an incomplete analysis of sources of supply.

CHANGE TO PLAN

They need to be reworked as previously explained

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:56  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29541

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29541  
Document: Minerals Local Plan Submission Draft  
Section: MP5 Justification  
Support/Object: Object

This section is very weak.

There is no quantification which if incorporated using NCC Waste Core Strategy data would show that secondary and recycled minerals play a much more important contribution to minerals supply than primary sand and gravel extraction for example.

There is no statement about the impact of landfill taxes on the collapse in tonnages going to landfill (nationally down from 70mt in 2006 to 35mt in 2014).

Equally the statistics in the NCC Waste Core Strategy which provide quantities(1mt 2010) and forecast growth to 1.75mt per annum each year from 2015 to 2030 are not incorporated into this document.

### CHANGE TO PLAN

The section needs to explain the fundamental change to the secondary and recycled market as a result of government landfill taxes. This has led to a massive change in the supply mix which places recycled and secondary minerals at the forefront of supply with primary minerals filling the supply gap.

The section should be filled with quantified data, using that as published in the NCC Waste Core Strategy as a primary input.

In turn this quantified data and understanding of the structural supply should be used to provide new forecasts for future primary minerals supply.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 12:04  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29542

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29542  
Document: Minerals Local Plan Submission Draft  
Section: DM1: Protecting local amenity  
Support/Object: 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.

### CHANGE TO PLAN

Greenfield sites are unnecessary in the immediate/ middle term and this is the best way of protecting local amenity.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 12:13  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29543

mr john watchman,

Thank you for your representation which we received as follows:

Representation ID: 29543  
Document: Minerals Local Plan Submission Draft  
Section: DM6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

Flash Farm is not required to fulfil future requirements of sand and gravel in the LMP period. It should be removed.

The document is unsound because it is not:

- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Professor	
First name	Ian	
Last name	Johnson	
Address line 1	██████████	
Address line 2	██████████	
Address line 3	██████	
Postcode	██████████	
Email		
<i>For those replying on behalf of an organisation or group:</i>		
Organisation	Upton Parish Council	
Job title	Chair	

**If you are replying on behalf of an organisation or group, how was the response approved and how many people does it represent?**

Standing item on parish council agenda. Discussed at every monthly meeting in the last year.  
 The parish of Upton has approximately 300 electors in a population of around 400.

**Do you wish to be notified of any of the following? (please tick as appropriate)**

The submission of the Mineral Local Plan for independent examination	yes
The publication of the recommendations of the inspector	yes
The adoption of the Minerals Local Plan	yes

If agent details are provided contact will be made through them unless otherwise instructed.

**If your representation(s) is seeking a change, do you consider it necessary to participate at the oral part of the examination?** *Please note that if you do not participate at the oral examination your representations will be dealt with as written representations and carry the same weight as those presented orally.*

Yes, I wish to participate at the oral examination		No, I do not wish to participate at the oral examination	X
--	--	--	---

**If you would like to participate at the oral part of the examination, please outline why you consider this to be necessary.** *Please note that participation in the oral hearing sessions is at the discretion of the Inspector.*

Signature		Date	24/03/2016
Name	Ian R Johnson		

*If you are submitting your representation electronically you do not need to provide a signature.*

## Part B – Your representation

Office use only  
Person No: 7786 for 618  
Rep No: 29677

Please read the guidance note before completing this section.

### 1. To which part of the document does this representation relate?

Policy		Site code		Map/Plan		Paragraph		Other	justification
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### 2. Do you consider the identified part of the document to be:

Legally compliant?	Yes	X	No	
Sound?	Yes		No	X

If you do not consider the identified part of the document to be sound, please continue to question 3. In other cases please go to question 4.

If you think the identified part of the document is not legally compliant and is unsound and therefore want to answer 'no' to both parts of this question, please fill in two separate forms.

### 3. Do you consider the identified part of the document to be unsound because it is not:

(1) Positively prepared?		(2) Justified?	yes	(3) Effective?		(4) Consistent with national policy?	
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You can select more than one test if you feel it is appropriate.

**4. Please give details of why you consider the identified part of the document is not legally compliant or is unsound, having regard to the test(s) identified in question 3 (if applicable).** Please expand box as necessary or attach additional sheets. If attaching sheets, please clearly mark these with the part of the document the representation relates to and your name.

The legal basis of the plan is not challenged, but it is regarded as unsound, because it is not justified.

Sand and gravel requirements:

The National Planning Policy Framework requires councils to make decisions on mineral requirements based on a rolling average of 10 years' sales data and, crucially, other local information. The object is to calculate future demand. The National Practice Planning Guideline (PPG) suggests that councils should look at sales during the past three years in order to identify a general trend, to guide the consideration of whether it may be appropriate to increase (or, presumably, decrease) supply.

The current approach is based upon local aggregate assessments (LAA) using demand data from 2002-2011. This is despite the availability of an LAA published in April 2015 based on data from 2004-2013. It is clear from these data that, following the economic downturn from 2009 onwards, requirements based upon historic data grossly overestimate the likely future need. Even if the most recently available 10 year average is to be used, rather than following national guidance to look at sales for the last three years, need will be overestimated.

During the last 30 years there has been a steady decline in sand and gravel requirements. Current government policies and declarations do not suggest that a significant increase in economic activity is anticipated in the next 10 years. The provision of sand and gravel for development and the seven year land bank set out in this plan is too much.

Effect of recycling:

The costs of waste disposal for used aggregates are such that more and more are being recycled and re-used. In the last 10 years landfill tax has quadrupled. In consequence, standard waste going to landfill has decreased from 40 million tonnes in 2007, to 15 million tonnes in 2014. Whilst the quantitative effect of this on aggregate supply is currently difficult to evaluate, it will have an effect, and surely is to be encouraged. Clearly it will reduce requirements to some degree.

Problems with the Flash Farm site:

Upton Parish Council has doubts about the justification for continuing to include the Flash Farm site in the plan. Apart from not requiring the sand and gravel at Flash Farm (for the reasons stated above), other elements make this particular site unsuitable.

The geography of the site is such that there will be a high level of visibility and consequent visual impact. No provision has been made for screening the site, nor is any mention made of the position of the (inevitably noisy and dirty) processing plant. It is proposed that after extraction the site will be returned to its former state, filled with inert waste. This is an unlikely outcome. There is currently not enough inert waste material in the Nottinghamshire area to fill the hole that will be created. With aggregate recycling becoming more common and cost effective, the hole will remain. What plans are there for its use?

Highways issues at Flash Farm have not been dealt with effectively. The Strategic Transport Assessment of December 2014 is inadequate. It deals with the potential for increased accidents in roads adjacent to

the site. It considers the potential for traffic congestion in the immediate area around Newark, although rather superficially, taking these plans in isolation and not considering the additive effects of other developments, such as the increase in train traffic across Castle station level crossing, or the potential new supermarket near the A46 roundabout. It takes insufficient, if any, account of the problem at Kelham. The bridge at Kelham is narrow, and has a 90 degree bend at its eastern end. HGVs already cause frequent problems at the bridge, reducing it to alternate one way traffic at times. Congestion occurs at any time of day, not just rush hours. The substantial increase in HGV traffic expected if the Flash Farm development goes ahead will significantly extend travel time from Southwell and the west towards Newark. The villages to the west, such as Upton, depend upon Newark for services, not just shopping, but access to the national rail network, and, most importantly ambulance and other emergency provision. In recent history the bridge has been damaged and closed for a lengthy period. This caused chaos, almost closing Newark from the west. The likelihood of further damage and closure will be much increased by the proposals.

There appears to be no consideration of the potential for flooding. Estimations suggest that the water run-off from the site will be 17 times the capacity of the existing dykes. What plans are there for containing this?

Justification:

For the plan to be sound, it has to be justified. Justification of any policy requires there to be a need, and for the meeting of that need to be at an acceptable cost, monetary and human. Failure to adequately assess future sand and gravel needs, and failure to adequately address infrastructure needs and the impact on the local population renders this draft plan unsound.



**5. Please set out what change(s) you consider necessary to make the identified part of the document legally compliant or sound, having regard to the test(s) identified in question 3 (if applicable). Please state why this change will make it legally compliant or sound and suggest revised wording of policy or text. Please be as precise as possible. Please expand the box as necessary or attach additional sheets. If attaching sheets, please clearly mark these with the part of the document the representation relates to and your name.**

*Please note: You should provide as much information/justification in your representation as you feel necessary and appropriate because once you have submitted your representation there will not normally be a subsequent opportunity to submit anything else unless requested to do so by the planning inspector.*

What changes to the plan are required?

There will always be a need for some aggregates to be extracted, and aggregates are present at the Flash Farm site. However, the evidence suggests that they are not required now, nor are they likely to be required within the timescale of this plan.

The plan needs to be re-worked using the most up to date figures available, using common sense in identifying trends in aggregate usage. If this is done then it will be seen that the volume of aggregates required for the immediate future has been overestimated, and that the development of Flash Farm is not required.

A proper assessment of the likely effects of increased recycling of aggregates needs to be undertaken before future sites are identified for mineral extraction.

It is possible that at some time in the far future further sites will need to be identified for sand and gravel extraction. There needs to be some planning ahead. If Flash Farm is needed as a source of aggregates in the future, then planning needs to occur now.

The traffic infrastructure must be improved, probably be developing a Kelham bypass and a new bridge over the river. Improvement in the access to Newark and the A1 from the west is essential.

Plans for appropriate screening and siting of the processing plant should be developed, to allay local concerns.

The issue of returning the site to its previous state will have to be considered. If, as is likely, this is not possible, then an alternative acceptable use will have to be proposed.

**6. Have you raised this issue previously (during earlier stages of consultation)?**

<b>Yes</b>	yes	<b>No</b>	
<b>If Yes, please give details</b>	Letters sent to NCC at earlier stage outlining Upton PC's position.		

<b>Signature</b>		<b>Date</b>	24/03/2016
<b>Name</b>	Ian R Johnson		

*If you are submitting your representation electronically you do not need to provide a signature*

Upton Parish Council

[REDACTED]

[REDACTED]

Nottinghamshire County Council

Minerals Planning

17/02/2016

Dear Sirs,

I write again on behalf of Upton Parish Council regarding the proposal to extract gravel from land at Flash Farm Averham.

The Council has discussed this proposal in the light of decisions taken by NCC in January. We continue to believe that the effects on the local environment, and to the quality of life in the surrounding villages, including Upton, will be considerable, and none of them to our benefit. We were disappointed to hear that the council appear to be using historical figures to estimate the need for further gravel extraction and also out of date measures of traffic density. If up to date figures were to be used it is quite probable that there would be no need for the extraction at Averham.

We are also concerned about the process of the discussions of this potential development. As far as we are aware, no specific planning application has been submitted. In consequence, responses at this stage have to be rather limited. If the minerals plan is accepted and progresses, when and if an application is made it will appear that our objections have already been heard and dismissed. We have, as yet, had no opportunity to discuss specific effects upon our environment. For instance, is there to be a processing plant on site, and if so how will the noise nuisance be addressed? We, and others, must be given ample opportunity to comment upon these specifics, and not allow the whole project to slide through on the back of this draft minerals plan if it is accepted.

We realise that NCC have a responsibility to ensure sufficient gravel stocks for local needs. We recognise that NCC has the right to allow extraction of gravel from any site within its control where gravel is present.

However, with rights come responsibilities. NCC has a responsibility:

- 1) Not to blight people's lives when it is unnecessary, for instance if it can be demonstrated that there is no need to extract this gravel now.
- 2) To maintain flow of traffic to and from Newark from the West.

To discharge these responsibilities it is essential that NCC:

- 1) Ensures that the gravel is actually needed, by using up to date, relevant figures.
- 2) Establishes improvements to traffic infrastructure before starting developments, for instance building a Kelham bypass.

Yours sincerely,

Ian Johnson. Chairman, Upton Parish Council.

[REDACTED]

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 25 March 2016 10:54  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29405

Mr Richard Corner,

Thank you for your representation which we received as follows:

Representation ID: 29405  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: Object

#### Pollution

Noise:-there will be an excessive volume of noise from the gravel extraction workings at all times because of the prevailing wind direction, made worse by the felling of trees bordering the site by Notts C.C. This noise will be excessive especially when lorry engines are under extreme load when setting off fully loaded. There will also be air borne pollution from the gravel extraction, grading of the gravel and the movement of all vehicles on site both permanently and visiting. Fumes from diesel engines are currently of great concern to public health experts especially regarding children. Additionally there will be visual pollution, especially for the residents of The Close, Averham who are in close proximity to the site. The building of soil banks etc. will be an eyesore in its self.

#### Highways

Averham Flash is already an accident blackspot and the situation will be made worse by this proposal. Lorries will be accessing and exiting the site between 2 sets of traffic lights. This will cause a major problem and accidents will result because motorists will be impatient as they get delayed or lorries exiting the site inappropriately as the drivers are sure to be on bonus payments. Also there are 2 further major problems with Kirklington Hill and access to the A46 at Newark including accidents on Kelham bridge. Additionally when the bridge is closed because of flooding or accident, where will the traffic go - country lanes? I would also question the number of lorry movements, as unless very lorry leaves and returns with a full load the number of movements could easily treble.

I will also comment on the fact that there is a school very close to the site. Consideration be surely be given to the effective this gravel extraction will have on the education (noise) and health (air) of these children, not to mention the extra difficulty it will cause for parents when bringing or collecting their children.

#### Requirement

Is this gravel really needed as the latest forecasts suggest that there is sufficient capacity within the existing pits for years to come.

additionally is this proposal in the right location as future developments in the area are on the other side of the Trent and of Newark.

#### Flooding

The dyke that runs through this area is always one of the first on Environment Agency flood alert warnings. It must be a serious cause for concern what effects this unnecessary development would have on the whole area and the flood plains.

#### SUMMARY

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.

#### CHANGE TO PLAN

Reject the proposal in its entirety.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 24 March 2016 14:51  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29368

Mr Gary Athey,

Thank you for your representation which we received as follows:

Representation ID: 29368  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

**CHANGE TO PLAN**

The development should be removed from the minerals plan

The document is unsound because it is not:  
i. Positively prepared

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 24 March 2016 19:46  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29374

Phil Blinston,

Thank you for your representation which we received as follows:

Representation ID: 29374  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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.

### CHANGE TO PLAN

The removal of Flash Farm.  
The withdrawal of the proposals and redraft using up to date data.

The document is unsound because it is not:  
i. Positively prepared  
ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

[REDACTED]

---

**From:** Susan Bosworth <[REDACTED]>  
**Sent:** 25 March 2016 14:51  
**To:** Development Planning  
**Subject:** Proposed Gravel Extraction at Flash Farm, Averham

From: Susan Bosworth, [REDACTED]

Dear Sir/Madam

I wish to object to the proposed gravel extraction at Flash Farm, Averham.

My points of objections are:-

1) The additional traffic from the workings of lorries and wagons turning on and off the A617 is unacceptable. They will cause pollution, additional wear on the well used road surface and also will add to the already large volume of traffic using Kelham Bridge. The traffic often has to stop to allow large articulated lorries and other large vehicles to turn onto the bridge. This is in addition to the strain on the bridge itself, which has had to be closed within the past number of years for repairs, causing traffic chaos for accessing Newark from this side of the Trent. There are very limited crossing places.

2) The primary school and residents of Averham and Kelham will be at risk from both traffic pollution and the dust that will be generated by the gravel works. There is also the risk of increased traffic accidents due to the increase in the volume of traffic on the A617.

3) The gravel works will cause a blot on the landscape and disturb animal habitat.

I therefore most strongly object to this proposal.

Regards, Susan Bosworth.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 11:46  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29539

Mr John Wolfenden,

Thank you for your representation which we received as follows:

Representation ID: 29539  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: Object

I wish to object most strongly to the proposed inclusion of Flash Farm on the minerals local plan. The 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. The data used by officers is 2011 and the most up to date data 2015 show a continuing decline in projected needs.

This shows that the council has overestimated the need by a considerable 46% some 9.71 million tons. I don't believe that the officers have taken into consideration the impact of the landfill tax and the amount of construction and demolition waste that is annually being recycled with the consequence of reduced use of new aggregates. 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?

Over apportionment can lead to massive over availability of minerals and cause operators to make working quarries unviable. Already quarries are asking for extensions to their licenses, as they have not been able to sell to the shrinking markets.

The up to date evidence suggests that at least two quarries on the mineral plan are not required over the next 15 years.

Adopting correct procedure will also significantly benefit local communities under threat of increased traffic and flooding issues consequent to living in the vicinity of minerals extraction and waste processing.

Transport is also faced with similar arguments as the most up to date traffic data has not been used in the MPA. Again NCC have failed to do this as demonstrated by URS strategic traffic review for the proposed minerals sites, which takes very little account of well known traffic issues affecting the A617, A46, A17/ A1 and Newark town centre. The well documented pinch points of Kelham Bridge, Cattle Market Roundabout, A46/A1 by-pass are a increasing concern for local and longer distant travellers. On Friday vehicles were backed up to Averham Village from the Cattle Market island due to volume of traffic. We must adopt a strategic plan for the A617 as with each planning application more traffic is using an already congested route.

I urge NCC to remove the proposed inclusion of Flash Farm from the draft minerals plan.

#### SUMMARY

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

#### CHANGE TO PLAN

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

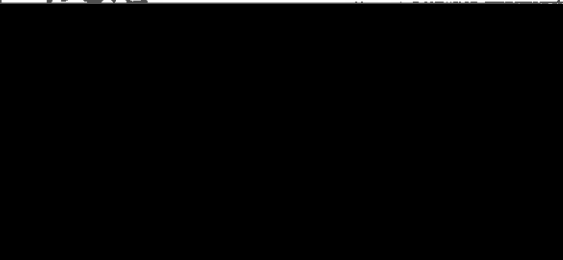
The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Part A – Personal details

	Personal details	Agent details (where applicable)
Title	MRS.	
First name	SANIYE	
Last name	YESIL	
Address line 1		
Address line 2		
Address line 3		
Postcode		
Email		
For those replying on behalf of an organisation or group:		
Organisation		
Job title		

If you are replying on behalf of an organisation or group, how was the response approved and how many people does it represent?

--

Do you wish to be notified of any of the following? (please tick as appropriate)

The submission of the Mineral Local Plan for independent examination	<input checked="" type="checkbox"/>
The publication of the recommendations of the inspector	<input checked="" type="checkbox"/>
The adoption of the Minerals Local Plan	<input checked="" type="checkbox"/>

If agent details are provided contact will be made through them unless otherwise instructed.

If your representation(s) is seeking a change, do you consider it necessary to participate at the oral part of the examination? Please note that if you do not participate at the oral examination your representations will be dealt with as written representations and carry the same weight as those presented orally.

Yes, I wish to participate at the oral examination	<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>
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If you would like to participate at the oral part of the examination, please outline why you consider this to be necessary. Please note that participation in the oral hearing sessions is at the discretion of the Inspector.

--

Signature		Date	24/03/2016
Name	SANIYE YESIL		

If you are submitting your representation electronically you do not need to provide a signature.

## Part B – Your representation

Office use only  
Person No: 7811  
Rep No: 29906

Please read the guidance note before completing this section.

1. To which part of the document does this representation relate?

Policy	MP2	Site code		Map/Plan		Paragraph	4.15	Other	
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2. Do you consider the identified part of the document to be:

Legally compliant?	Yes	x	No	
Sound?	Yes	x	No	

If you do not consider the identified part of the document to be sound, please continue to question 3. In other cases please go to question 4.

If you think the identified part of the document is not legally compliant and is unsound and therefore want to answer 'no' to both parts of this question, please fill in two separate forms.

3. Do you consider the identified part of the document to be unsound because it is not:

(1) Positively prepared?	No	(2) Justified?	No	(3) Effective?	No	(4) Consistent with national policy?	No
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You can select more than one test if you feel it is appropriate.

4. Please give details of why you consider the identified part of the document is not legally compliant or is unsound, having regard to the test(s) identified in question 3 (if applicable). Please expand box as necessary or attach additional sheets. If attaching sheets, please clearly mark these with the part of the document the representation relates to and your name.

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.

5. Please set out what change(s) you consider necessary to make the identified part of the document legally compliant or sound, having regard to the test(s) identified in question 3 (if applicable). Please state why this change will make it legally compliant or sound and suggest revised wording of policy or text. Please be as precise as possible. Please expand the box as necessary or attach additional sheets. If attaching sheets, please clearly mark these with the part of the document the representation relates to and your name.

Please note: You should provide as much information/justification in your representation as you feel necessary and appropriate because once you have submitted your representation there will not normally be a subsequent opportunity to submit anything else unless requested to do so by the planning inspector.

6. Have you raised this issue previously (during earlier stages of consultation)?

Yes		No	X
If Yes, please give details			

Signature		Date	24/03/2016
Name	SAMUEL YESU		

If you are submitting your representation electronically you do not need to provide a signature

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 21:26  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29510

Mrs Deborah Cassidy,

Thank you for your representation which we received as follows:

Representation ID: 29510  
Document: Minerals Local Plan Submission Draft  
Section: MP2 Justification  
Support/Object: Object

The figures used to estimate the projected requirement for sand and gravel provision are outdated. The figures shown on the Nottinghamshire and Nottingham Local Aggregates Assessment 2015 show the following:

	2011	2012	2013
10 year average production (million tonnes)	2.58	2.43	2.24
3 year average production (million tonnes)	1.51	1.61	1.55

It also states 'The latest 10 year average production figures have fallen for all aggregate minerals since the first LAA was compiled in 2011.'

It cannot be possible to accurately assess what future provision is required if the figures used are not the most up-to-date. This calls into question whether there is actually any need for the gravel extraction sites at all.

The DPD is not legally compliant or sound as it does not accurately assess the need for mineral in the County and cannot do so in an objective way if the current figures are not being used.

### SUMMARY

The most recent figures have not been used to calculate predicted requirements.

### CHANGE TO PLAN

Use the most up to date figures to accurately predict the required sand and gravel provision and then assess whether there is actually any need for the proposed sites.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 22:58  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29513

Mrs Deborah Cassidy,

Thank you for your representation which we received as follows:

Representation ID: 29513  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: Object

The A617 at Kelham cannot cope with an increase of 127 HGV's per day (as detailed in the Nottinghamshire Minerals Local Plan Strategic Transport Assessment Addendum February 2016). Kelham Bridge can only accommodate one HGV at a time requiring all other vehicle's to give way. This causes delays and congestion. Further delays, congestion and impact on the surrounding area when accidents, damage, and repairs to Kelham Bridge require traffic to be diverted to the A616 via narrow country lanes unsuited to HGV's or large volumes of traffic. The transport assessment acknowledges that 'The congestion (around Newark on Trent) is worsened when there is an accident or incident on either the A46 or the adjoining A1.'

Furthermore the proposed plan does not take into consideration the future developments of new District Council Headquarters at the Cattle Market in Newark, the proposed supermarket at Cattle Market Island, the planned duelling of the A46 in Newark, the proposed development of Kelham Hall into a hotel/spa, and the fact that Kelham Hall Country Park has recently started operating as a Caravan and Campsite which is becoming increasingly popular.

The transport assessment minimises the impact on the highways by referring to the planned A46 Relief Road and also to the proposed but as yet unfunded Kelham Bypass. Clearly any work to dual the A46 will also attract construction traffic and road closures, all within the time period of the plan.

The residual cumulative impact is clearly severe when consideration is given to the full scale of development in and around Newark on Trent.

This Plan is not based upon a robust and credible evidence base as all the evidence has not been included or assessed.

#### SUMMARY

The highway assessment used to influence this plan is not a credible representation of the current and future situation.

#### CHANGE TO PLAN

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 document is unsound because it is not:

ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:13  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29514

Mrs Deborah Cassidy,

Thank you for your representation which we received as follows:

Representation ID: 29514  
Document: Minerals Local Plan Submission Draft  
Section: DM9 Justification  
Support/Object: Object

The A617 at Kelham cannot cope with an increase of 127 HGV's per day (as detailed in the Nottinghamshire Minerals Local Plan Strategic Transport Assessment Addendum February 2016). Kelham Bridge can only accommodate one HGV at a time requiring all other vehicle's to give way. This causes delays and congestion. Further delays, congestion and impact on the surrounding area when accidents, damage, and repairs to Kelham Bridge require traffic to be diverted to the A616 via narrow country lanes unsuited to HGV's or large volumes of traffic. The transport assessment acknowledges that 'The congestion (around Newark on Trent) is worsened when there is an accident or incident on either the A46 or the adjoining A1.'

Furthermore the proposed plan does not take into consideration the future developments of new District Council Headquarters at the Cattle Market in Newark, the proposed supermarket at Cattle Market Island, the planned duelling of the A46 in Newark, the proposed development of Kelham Hall into a hotel/spa, and the fact that Kelham Hall Country Park has recently started operating as a Caravan and Campsite which is becoming increasingly popular.

The transport assessment minimises the impact on the highways by referring to the planned A46 Relief Road and also to the proposed but as yet unfunded Kelham Bypass. Clearly any work to dual the A46 will also attract construction traffic and road closures, all within the time period of the plan.

The residual cumulative impact is clearly severe when consideration is given to the full scale of development in and around Newark on Trent.

This Plan is not based upon a robust and credible evidence base as all the evidence has not been included or assessed.

#### SUMMARY

This Plan is not based upon a robust and credible evidence base as all the evidence has not been included or assessed.

#### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:33  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29516

Mrs Deborah Cassidy,

Thank you for your representation which we received as follows:

Representation ID: 29516  
Document: Minerals Local Plan Submission Draft  
Section: Plan 1: Overview of the Plan Area  
Support/Object: Object

There is a popular rural primary school and growing village within a short distance of the proposed site at Flash Farm. Serious consideration needs to be given to the potential effects on the children and staff at the school as well as all the residents of the nearby village. The increase in HGV's passing along the road immediately adjacent to the school is an obvious factor as is the effect of dust and pollution from the proposed site. It is not sufficient to brush over the possible effects as there are people living so close to the sight. A full review of the impact of this type of development on people's health needs to be conducted.

### SUMMARY

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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:37  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29608

Mrs Deborah Cassidy,

Thank you for your representation which we received as follows:

Representation ID: 29608  
Document: Minerals Local Plan Submission Draft  
Section: DM8: Cumulative impact  
Support/Object: Object

The cumulative impact of the proposed extraction site at Flash Farm is as follows:

The site will be an eyesore giving visitors to the region a negative impression and impacting on the residents of the surrounding areas.

The roads surrounding the proposed site - specifically the A617 and A46 will be unable to cope with the increased volume of traffic from this and other planned and proposed works that have not been taken into consideration by this plan. This will have negative consequences for the local economy as people will be deterred from travelling to and from the area for work and leisure as the increased travelling time and difficulty will have to be taken into consideration.

House prices in the village of Averham will be affected due to the increased dust and noise, and reduced air quality caused by the gravel extraction. The increased pollution resulting from the increase in HGV's on the A617 will also have a negative impact.

People's health cannot be gambled with. The primary school and village within a short distance from the proposed site should be enough to have the site removed from the list. The increase in dust and air pollution cannot fail to impact on people's respiratory health.

The risk of flooding associated with the proposals is again something that cannot be gambled with. It will be no use trying to rectify the problems when the damage has been done and there have been many recent examples of how poor planning and a tendency to ride roughshod over people's concerns over flooding have resulted in people losing their homes through flood damage or at the very least being refused home insurance due to their location and flood risk.

#### SUMMARY

The Cumulative impact of this proposal is so great that the Flash Farm site should be removed from the list.

#### CHANGE TO PLAN

Remove the site from the proposed list.

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:57  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29609

Mrs Deborah Cassidy,

Thank you for your representation which we received as follows:

Representation ID: 29609  
Document: Minerals Local Plan Submission Draft  
Section: SP6: The Built, Historic and Natural Environment  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 28 March 2016 23:31  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29515

Carolyn Bennett,

Thank you for your representation which we received as follows:

Representation ID: 29515  
Document: Minerals Local Plan Submission Draft  
Section: MP2o - Coddington  
Support/Object: 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.

### CHANGE TO PLAN

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 document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

Rep ID	Details
29538	<p data-bbox="177 181 1177 215"><b>(Object) SP6 Justification - Minerals Local Plan Submission Draft</b></p> <p data-bbox="177 241 683 275">Respondent: <b>Miss Aarti Varma [7823]</b></p> <p data-bbox="177 271 584 304">Received: <b>29/3/2016 via Web</b></p> <p data-bbox="177 322 1490 461">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</p> <p data-bbox="177 461 1490 517">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.</p> <div data-bbox="177 539 1490 775"> <p data-bbox="177 546 528 580"><b>Full Text:</b> (<a href="#">Show Full Text</a>)</p> <p data-bbox="177 575 1490 714">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</p> <p data-bbox="177 714 1490 770">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.</p> </div> <p data-bbox="177 797 413 831"><b>Changes to Plan:</b></p> <p data-bbox="177 831 309 864">See above</p> <p data-bbox="177 882 464 916">Document is not Sound</p> <p data-bbox="177 934 448 967"><b>Soundness Test(s):</b></p> <ul data-bbox="225 963 636 1043" style="list-style-type: none"> <li>i. Positively prepared</li> <li>ii. Justified</li> <li>iv. Consistent with national policy</li> </ul> <p data-bbox="177 1061 903 1095"><b>Representation at Examination:</b> Written representation</p>



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29552

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29552  
Document: Minerals Local Plan Submission Draft  
Section: Overview of the plan area  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29553

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29553  
Document: Minerals Local Plan Submission Draft  
Section: Plan 1: Overview of the Plan Area  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29554

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29554  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO2: Providing an adequate supply of minerals  
Support/Object: 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.  
In the case of Notts emerging MLP, using latest 2015 LAA gives a 10 year rolling average sales figure of 2.24million Tonnes/annum (2004-13) and permitted reserves figure of 17.81 million tonnes (as at Dec 2013) which results in a shortfall of some 20.27 million tonnes for the MLP period to 2030, which is some 9.44 fewer millions of tonnes or, a very significant 32% reduction when compared with current suggestions. The draft submission fails to take into consideration as a mineral resource the role of recycled and secondary waste.

### SUMMARY

The plan should be based on the current requirement figures of minerals and take into account the current recycling of minerals.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29555

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29555  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO5: Minimising impacts on communities  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29556

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29556  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO7: Protecting and enhancing historic assets  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29558

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29558  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO8: Protecting agricultural soils  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29559

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29559  
Document: Minerals Local Plan Submission Draft  
Section: SP2: Minerals Provision  
Support/Object: 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.

In the case of Notts emerging MLP, using latest 2015 LAA gives a 10 year rolling average sales figure of 2.24million Tonnes/annum (2004-13) and permitted reserves figure of 17.81 million tonnes (as at Dec 2013) which results in a shortfall of some 20.27 million tonnes for the MLP period to 2030, which is some 9.44 fewer millions of tonnes or, a very significant 32% reduction when compared with submission document figures.

### SUMMARY

Use current figures for the basis of the requirements within the plan.

### CHANGE TO PLAN

Use current figures for the basis of the requirements within the plan.  
remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29561

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29561  
Document: Minerals Local Plan Submission Draft  
Section: SP2 Justification  
Support/Object: 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.

In the case of Notts emerging MLP, using latest 2015 LAA gives a 10 year rolling average sales figure of 2.24million Tonnes/annum (2004-13) and permitted reserves figure of 17.81 million tonnes (as at Dec 2013) which results in a shortfall of some 20.27 million tonnes for the MLP period to 2030, which is some 9.44 fewer millions of tonnes or, a very significant 32% reduction when compared with submission document figures.

### SUMMARY

use current figures for the basis of requirements within the plan.

### CHANGE TO PLAN

use current figures for the basis of requirements within the plan. remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29563

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29563  
Document: Minerals Local Plan Submission Draft  
Section: SP3: Biodiversity-Led Restoration  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:15  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29564

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29564  
Document: Minerals Local Plan Submission Draft  
Section: SP3 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:18  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29566

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29566  
Document: Minerals Local Plan Submission Draft  
Section: SP4: Climate Change  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:25  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29568

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29568  
Document: Minerals Local Plan Submission Draft  
Section: SP4 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:23  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29571

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29571  
Document: Minerals Local Plan Submission Draft  
Section: SP5: Sustainable Transport  
Support/Object: 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. As the A617 passes through Kelham and narrows over the bridge this has been the location of a number of incidents involving HGV's and other vehicles resulting in the significant delays and inconvenience to residents. On regular occasion's traffic is tailing back from the Newark island into and beyond Kelham Village and once this road is blocked there is no direct route for emergency vehicles coming to the area from either direction. The addition of further HGV's to this road is not a sustainable solution and no proposal on the alternative transportation solutions has been put forward or investigated.

#### SUMMARY

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.

#### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:26  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29572

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29572  
Document: Minerals Local Plan Submission Draft  
Section: SP5 Justification  
Support/Object: 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. As the A617 passes through Kelham and narrows over the bridge this has been the location of a number of incidents involving HGV's and other vehicles resulting in the significant delays and inconvenience to residents. On regular occasion's traffic is tailing back from the Newark island into and beyond Kelham Village and once this road is blocked there is no direct route for emergency vehicles coming to the area from either direction. The addition of further HGV's to this road is not a sustainable solution and no proposal on the alternative transportation solutions has been put forward or investigated.

### SUMMARY

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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:26  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29573

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29573  
Document: Minerals Local Plan Submission Draft  
Section: SP6: The Built, Historic and Natural Environment  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:26  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29574

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29574  
Document: Minerals Local Plan Submission Draft  
Section: SP6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:26  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29576

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29576  
Document: Minerals Local Plan Submission Draft  
Section: MP1: Aggregate Provision  
Support/Object: 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.

In the case of Notts emerging MLP, using latest 2015 LAA gives a 10 year rolling average sales figure of 2.24million Tonnes/annum (2004-13) and permitted reserves figure of 17.81 million tonnes (as at Dec 2013) which results in a shortfall of some 20.27 million tonnes for the MLP period to 2030, which is some 9.44 fewer millions of tonnes or, a very significant 32% reduction when compared with submission document figures.

### SUMMARY

the figures used for the basis of the plan requirements are not the most up to date.

### CHANGE TO PLAN

use current requirement figures. remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:26  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29578

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29578  
Document: Minerals Local Plan Submission Draft  
Section: MP1 Justification  
Support/Object: 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.

In the case of Notts emerging MLP, using latest 2015 LAA gives a 10 year rolling average sales figure of 2.24million Tonnes/annum (2004-13) and permitted reserves figure of 17.81 million tonnes (as at Dec 2013) which results in a shortfall of some 20.27 million tonnes for the MLP period to 2030, which is some 9.44 fewer millions of tonnes or, a very significant 32% reduction when compared with submission document figures.

### SUMMARY

The plan does not use the current available figures relating to the requirements of minerals. It also does not take into account the recycling of existing minerals and there impact of the requirements.

### CHANGE TO PLAN

use current requirement figures. remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:27  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29580

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29580  
Document: Minerals Local Plan Submission Draft  
Section: Table 1 Annual aggregate production  
Support/Object: 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.

In the case of Notts emerging MLP, using latest 2015 LAA gives a 10 year rolling average sales figure of 2.24million Tonnes/annum (2004-13) and permitted reserves figure of 17.81 million tonnes (as at Dec 2013) which results in a shortfall of some 20.27 million tonnes for the MLP period to 2030, which is some 9.44 fewer millions of tonnes or, a very significant 32% reduction when compared with submission document figures.

### SUMMARY

When using latest 2015 LAA this gives a 10 year rolling average sales figure of 2.24million Tonnes/annum (2004-13) and permitted reserves figure of 17.81 million tonnes (as at Dec 2013) which results in a shortfall of some 20.27 million tonnes for the MLP period to 2030, which is some 9.44 fewer millions of tonnes or, a very significant 32% reduction when compared with submission document figures

### CHANGE TO PLAN

use current figures for the basis of the plan. remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:27  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29581

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29581  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision  
Support/Object: Object

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. 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 - a road that already suffers badly for traffic jams Heavy lorries over an awkward, old bridge not suitable for lorries Adverse impact on the local economy Adverse impact on the rural landscape Damage to human health Flooding and water management Historic environment at danger Cumulative impact of other developments in the area Loss of productive farmland Loss of local amenity and a failure to demonstrate a need to open this new greenfield site

#### SUMMARY

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.

#### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:31  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29583

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29583  
Document: Minerals Local Plan Submission Draft  
Section: MP2: Sand and gravel provision, MP2p Flash Farm  
Support/Object: Object

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. 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 - a road that already suffers badly for traffic jams Heavy lorries over an awkward, old bridge not suitable for lorries Adverse impact on the local economy Adverse impact on the rural landscape Damage to human health Flooding and water management Historic environment at danger Cumulative impact of other developments in the area Loss of productive farmland Loss of local amenity and a failure to demonstrate a need to open this new greenfield site

### SUMMARY

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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:27  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29584

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29584  
Document: Minerals Local Plan Submission Draft  
Section: MP2 Justification  
Support/Object: Object

NCC state that their predicted demand use a 5 year recession and 5 year growth model. It is naïve to assume a 50:50 split. No evidence is given to show what economic growth predictions support the demand through the plan period. The current proposals for demand would require an unrealistically high growth in sales to be achieved. The MLP uses an annual allocation figure of 2.58 million tonnes, and this overestimates demand.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:31  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29586

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29586  
Document: Minerals Local Plan Submission Draft  
Section: Table 3 Contributions to the sand and gravel shortfall over the plan period  
Support/Object: Object

No evidence is given to show what economic growth predictions support the demand through the plan period. The current proposals for demand would require an unrealistically high growth in sales to be achieved. As such, if current available figures are to be used then this demand can be met from existing locations without the requirement to use an additional green field location.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:27  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29587

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29587  
Document: Minerals Local Plan Submission Draft  
Section: MP5: Secondary and recycled aggregates  
Support/Object: Object

A major issue here is that the Nottinghamshire and Nottingham Replacement Waste Local Plan is not an integral part of the Minerals Local Plan, it is therefore impossible to make meaningful or indeed accurate forecasts of the quantity of secondary and recycled materials that may be available for re-instatement after minerals extraction. Also as current data shows, quantities available annually from the whole of Nottinghamshire of inert backfill material is minuscule in relation to the quantity required.  
Finally processing on greenfield sites of material for recycling is a noisy and pollution creating operation, causing further nuisance to local residents.

#### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:27  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29589

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29589  
Document: Minerals Local Plan Submission Draft  
Section: MP5 Justification  
Support/Object: Object

A major issue here is that the Nottinghamshire and Nottingham Replacement Waste Local Plan is not an integral part of the Minerals Local Plan, it is therefore impossible to make meaningful or indeed accurate forecasts of the quantity of secondary and recycled materials that may be available for re-instatement after minerals extraction. Also as current data shows, quantities available annually from the whole of Nottinghamshire of inert backfill material is minuscule in relation to the quantity required. Finally processing on greenfield sites of material for recycling is a noisy and pollution creating operation, causing further nuisance to local residents.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29590

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29590  
Document: Minerals Local Plan Submission Draft  
Section: DM1: Protecting local amenity  
Support/Object: 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 with a major contributor being the increase of Diesel particulate matter from increased road transport and dust generated by earth workings.

### SUMMARY

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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29591

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29591  
Document: Minerals Local Plan Submission Draft  
Section: DM1 Justification  
Support/Object: 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 with a major contributor being the increase of Diesel particulate matter from increased road transport and dust generated by earth workings.

### SUMMARY

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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29592

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29592  
Document: Minerals Local Plan Submission Draft  
Section: DM2: Water resources and flood risk  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:28  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29593

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29593  
Document: Minerals Local Plan Submission Draft  
Section: DM2 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:29  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29594

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29594  
Document: Minerals Local Plan Submission Draft  
Section: DM3: Agricultural land and soil quality  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:29  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29595

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29595  
Document: Minerals Local Plan Submission Draft  
Section: DM3 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:29  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29596

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29596  
Document: Minerals Local Plan Submission Draft  
Section: DM5: Landscape character  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:29  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29597

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29597  
Document: Minerals Local Plan Submission Draft  
Section: DM5 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:29  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29598

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29598  
Document: Minerals Local Plan Submission Draft  
Section: DM6: Historic environment  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29599

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29599  
Document: Minerals Local Plan Submission Draft  
Section: DM6 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29600

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29600  
Document: Minerals Local Plan Submission Draft  
Section: DM8: Cumulative impact  
Support/Object: 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.

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 - a road that already suffers badly for traffic jams Heavy lorries over Kelham bridge that is not suitable for lorries and if they meet on the bridge they are not able to pass without mounting the footpath presenting a further danger to pedestrians using the bridge.

Adverse impact on the local economy

Adverse impact on the rural landscape

Damage to human health as a result of the increases noise and air pollution.

Flooding and water management

Historic environment at danger

Cumulative impact of other developments in the area Loss of productive farmland Loss of local amenity and a failure to demonstrate a need to open this new greenfield site

### SUMMARY

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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.

## Eilidh McCallum

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29601

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29601  
Document: Minerals Local Plan Submission Draft  
Section: DM8 Justification  
Support/Object: 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.

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 - a road that already suffers badly for traffic jams Heavy lorries over Kelham bridge that is not suitable for lorries and if they meet on the bridge they are not able to pass without mounting the footpath presenting a further danger to pedestrians using the bridge.

Adverse impact on the local economy

Adverse impact on the rural landscape

Damage to human health as a result of the increases noise and air pollution.

Flooding and water management

Historic environment at danger

Cumulative impact of other developments in the area Loss of productive farmland Loss of local amenity and a failure to demonstrate a need to open this new greenfield site

### SUMMARY

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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

This email is acknowledgement of the receipt of your representation. It is NOT confirmation that the representation has yet been registered. You will not receive any further notification by email that your representation has been registered until the end of the participation period.



## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29602

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29602  
Document: Minerals Local Plan Submission Draft  
Section: DM9: Highways safety and vehicle movements/routeing  
Support/Object: 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 manor. 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. 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. 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. The Plan also makes no effort to investigate alternative transport solutions for this proposed site.

### SUMMARY

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 manor. 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29603

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29603  
Document: Minerals Local Plan Submission Draft  
Section: DM9 Justification  
Support/Object: 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 manor. 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. 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. 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. The Plan also makes no effort to investigate alternative transport solutions for this proposed site.

### SUMMARY

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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

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- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:31  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29604

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29604  
Document: Minerals Local Plan Submission Draft  
Section: DM12: Restoration, after-use and aftercare  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:31  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29605

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29605  
Document: Minerals Local Plan Submission Draft  
Section: DM12 Justification  
Support/Object: 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.

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

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- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 29 March 2016 16:24  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29606

Mr Ian Bradey,

Thank you for your representation which we received as follows:

Representation ID: 29606  
Document: Minerals Local Plan Submission Draft  
Section: MP2p - Flash Farm  
Support/Object: 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. 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. Potential impacts on heritage assets in Kelham and Averham in particular Kelham Hall and Bridge, and protection or suitable management of Averham footpath 6 also needs including.

### SUMMARY

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

### CHANGE TO PLAN

remove site MP2p (Flash Farm) from the draft minerals plan

The document is unsound because it is not:

- i. Positively prepared
- ii. Justified
- iii. Effective
- iv. Consistent with national policy

How you would like your representation to be considered at the independent examination: Written representation.

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