



Nottinghamshire Minerals Local Plan

Representations - by respondent

Volume 4 of 11

Respondent numbers 2752 - 2881



Part A – Personal details

	Personal details	Agent details (where applicable)
Title	(Mick George Ltd) Mr	
First name	John	
Last name	Gough	
Address line 1	██████████	
Address line 2	██████████	
Address line 3	██████████	
Postcode	██████████	
Email	██████████	
<i>For those replying on behalf of an organisation or group:</i>		
Organisation		
Job title	Planning Manager	

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	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	X	No, I do not wish to participate at the oral examination	
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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	29/03/2016
Name	John Gough		

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

Part B – Your representation

Office use only Person No: 2752 Rep No: 29875

Please read the guidance note before completing this section.

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

Policy	SP2 1b	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	X
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?	X	(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.

See Section 3 of the Supporting Statement

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.

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Criteria 1b should be deleted.

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

Yes	X	No
If Yes, please give details	Minerals Local Plan Preferred Approach Consultation – representation dated 18/12/2013	

Signature		Date	29/03/2016
Name	John Gough		

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

Part B – Your representation

Office use only Person No: 2752 Rep No: 29858

Please read the guidance note before completing this section.

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

Policy	MP1	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	X
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.

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

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See Section 3 of the Supporting Statement

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Yes	X	No
If Yes, please give details	Minerals Local Plan Preferred Approach Consultation – representation dated 18/12/2013	

Signature		Date	29/03/2016
Name	John Gough		

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

Part B – Your representation

Office use only
 Person No: 2752
 Rep No: 29859

Please read the guidance note before completing this section.

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

Policy	MP2	Site code	MP2p	Map/Plan		Paragraph		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?		(2) Justified?		(3) Effective?		(4) Consistent with national policy?	
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See Section 2 of the Supporting Statement

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.

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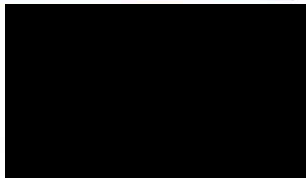
We do consider that the plan provision for sand and gravel should be maintained at an appropriate level and that the present level may not make adequate provision for the level of demand within the County. Taking account of new development within Nottinghamshire (and to a lesser degree South Yorkshire and Derbyshire), the proposed level of mineral provision within the Plan should not be reduced and possibly increased to allow for future growth which is currently lacking.

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

Yes	X	No
If Yes, please give details	Minerals Local Plan Preferred Approach Consultation – representation dated 18/12/2013	

Signature		Date	29/03/2016
Name	John Gough		

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



Mr S. Osbourne-James
Planning Policy Team
Nottinghamshire County Council
County Hall
West Bridgford
Nottingham
NG2 7QP

29th March 2016

Dear Sirs,

Nottinghamshire Minerals Local Plan Consultation 15th February – 29th March 2016 (Ref MLP SubDraftConsult)

In relation to the Submission Draft of the Nottinghamshire Minerals Local Plan, please find attached the representation by Mick George Ltd (MGL) with particular attention to the Flash Farm site near Averham.

The representation refers to future mineral demand and supply within the County, MGL note that with the updated economic aims of the County, particularly the introduction of the North Mids Devolution Agreement, the level of mineral provision should be reconsidered and increased as it is considered Nottinghamshire County Council have under-estimated likely future demand for sand and gravel over the Plan period.

Moreover, MGL also highlight that a preference for extensions should not be used to exclude entry to new operators in the County and that consideration should be given to which sites provide the greatest deliverability with least environmental impacts.

The MGL submission reiterates that it is considered that on balance, with appropriate mitigation the proposal to extract sand and gravel on land at Flash Farm can be carried out in an acceptable manner without causing demonstrable harm. The resultant restoration scheme particularly reflects County Council objectives and governmental advice in that it will ensure all high quality agricultural land is reinstated to it's current ALC status but importantly will also result in an improved restoration profile integrating the restored quarry into the wider landscape and promoting landscape, nature conservation and biodiversity initiatives in line with local and national policy objectives.

A comprehensive Environmental Impact Assessment has been prepared for the Flash Farm site (by MGL). Whilst the draft application is in an advanced state, submission has been delayed awaiting the outcome of the County's consultation exercise. The environmental appraisals that have been undertaken confirm that the quarry can be worked with minimal adverse impacts. The scheme at

Mick George Ltd Registered no. 2417831 (England)

Mick George Managing Director Jon Stump Finance Director Geoff Craven Logistics Director

Neil Johnson Technical and Waste Director Pete Newman MSOE MIRTE (Eng-Tech) Engineering Director Michael George Contracts Director





Flash Farm will provide a high standard of mitigation by delivering net gain in environmental capital and strategic bio-diversity networks as envisaged within the NPPF and development plan policies.

The quarry scheme at Flash Farm is immediately available to develop in anticipation of economic growth within the County, whilst there remains doubt about the deliverability of other large sites identified within the Plan which the allocation of Flash Farm could readily replace.

We trust that the attached representation on the consultation document can be given due consideration.

Yours sincerely,

PP **John Gough**
Planning Manager

Enc.

Representation Forms x3

Supporting Statement

Appendix 1 Archaeological Evaluation and Built Heritage Assessment

Nottinghamshire Minerals Local Plan Submission
Version March 2016

Representations by Mick George Ltd (MGL)

29th March 2016

MICK GEORGE ®

1. Introduction

- 1.1. This representation is made on behalf of Mick George Ltd (MGL) which is one of the leading suppliers to the construction industry in East Anglia and the East Midlands, specialising in providing bulk excavation & earthmoving services, aggregate supply and waste management services, with quarries, landfill sites and waste transfer stations spread across Northamptonshire, Cambridgeshire, Lincolnshire, Bedfordshire and Hertfordshire. The Company's commercial fleet size is in excess of 200 HGV vehicles and specialises in bulk excavation & earthmoving services, supplying a range of aggregates and providing a variety of waste management services. In 2015 the Company produced 1,400,000 tonnes aggregate (sand & gravel plus limestone) 375,000 tonnes recycled aggregate and handled 1,750,000 tonnes of waste (70% being inert). The 20 sites operated by the Company include a range of aggregate supply, waste transfer stations, landfill and recycling facilities. At present the Company employs over 600 staff.
- 1.2. Mick George Ltd is one of the largest independent mineral and waste operators in East Anglia and the East Midlands and the Company has identified a strategic opportunity for expansion of its business in Nottinghamshire and has proposed the Flash Farm site as a new entrant to the marketplace. Whilst the recession has hit the construction sector and therefore the minerals extraction sector hard, the company has been able to expand its operations when competitors have been mothballing existing operations. The company's favoured position rests on its ability to offer customers a unique product service which combines the supply of mineral and back haul of inert waste. This comprehensive service is extremely well received by customers and the company is looking to set up new operations in attractive areas with potential for future growth, such as Nottinghamshire.
- 1.3. The sands and gravels of Nottinghamshire are a major resource for the economy in the East Midlands and increasingly so for South Yorkshire, which is suffering from long term shortages of local materials. This preference for Nottinghamshire mineral not only reflects the quality of the Trent gravels but its proximity to market and the prospects for future construction activity and economic growth.

2. Support for the Plan – Site allocation MP2p Flash Farm, Averham

- 2.1. The company is therefore promoting a new site at Flash Farm, Averham near Newark and we support the allocation of this site (MP2p) in the Local Plan. This site located on the A617 at Averham west of Newark would produce about 200,000 tonnes of high quality aggregate a year for markets to the north of Nottingham, Ashfield, Mansfield and possibly Derbyshire beyond. Some material is also likely to be sold in the immediate Newark area.
- 2.2. A planning application including a comprehensive Environmental Impact Assessment has been prepared for the Flash Farm quarry (with a boundary identical to that of the site identified within the Consultation Document). The application is in an advanced state to formally submit to the County Council. However, that submission is currently being held in abeyance awaiting the progression of the consultation process but demonstrates a clear commitment to “deliver” the site by Mick George Ltd.
- 2.3. The environmental appraisals undertaken as part of the Environmental Impact Assessment as part of the Environmental Impact have raised no issues that would warrant refusal of the development proposals and confirm that the site is eminently suitable as a Local Plan allocation.
- 2.4. The site is located partially within the western floodplain of the north-eastward flowing River Trent and consists of gravels and sandy gravels concealed in part by shallow deposits of alluvium. The mineral deposit is characterised by low fines content and high percentage of gravel. The gravel fraction is predominantly fine with occasional cobbles whilst the sand is medium grained and these consist primarily of quartz and quartzite with subordinate amounts of flint, chert and sandstone.
- 2.5. The site lies in the Trent Valley in the Trent Washlands Landscape Character Area and the proposed extraction area is largely flat lying at about 14m AOD and located in open countryside characterised by large fields, low hedges with sporadic hedgerow trees, and occasional blocks of woodland on higher ground to the north. It is also fairly isolated, with the property of Flash Farm itself, located 160 metres to the north. All other properties are at the villages of Averham and Kelham which are 540m and 660m to the south east and north east respectively.
- 2.6. The Flash Farm site comprises a number of agricultural fields, sub-divided primarily by fencing, under arable and pasture use. The site is crossed by a 400 Kva overhead power line with three substantial stanchions within the land in question. The wider landscape is dominated by adverse detractors consisting of the Staythorpe Power Station (to the south) and power lines leading from it as well as the dominant flue stack from the sugar beet factory to the north-east.
- 2.7. As the mineral extraction area is not sub-divided by any hedgerows, the scheme of working therefore importantly does not require the removal of any sections of vegetation (i.e. hedgerow or trees) whatsoever. An advantage which few, if any, of the other potential sites in the emerging minerals plan could match.
- 2.8. The quarry has been designed to reinstate the land in a sensitive fashion seeking to apply best environmental practice and give practical effect to strategic government initiatives on protection of soil resources and habitat creation using importation of suitable inert material as a catalyst for the beneficial restoration of the land to be reinstated to its existing “best and most versatile” agricultural land status.

- 2.9. Moreover, the opportunity has afforded conditions to create bio-diversity action plan priority habitats such as species rich grassland and lowland wet grassland as well as some 2.3km of new hedgerows (which currently do not exist).
- 2.10. The proposed scheme of working has been devised to reflect current landscape improvement and nature conservation policies. Net biodiversity gain would be achieved through the creation of a cohesive network of new habitats, contributing to the Government's commitment to halt the overall decline in biodiversity. The application site itself is currently of limited ecological value with a majority of the site consisting of intensively managed fields with very limited hedgerows of variable quality within the site itself.
- 2.11. Accordingly, the scheme provides a high standard of mitigation by delivering net gain in environmental capital and strategic bio-diversity networks. Such benefits to bio-diversity are envisaged within the National Planning Policy Framework and Planning Practice Guidance as well emerging plan policies within the draft replacement Minerals Local Plan which contains a "bio-diversity led" philosophy for the restoration of quarry workings (i.e. emerging Policy SP3).
- 2.12. Given the site's location the proposed scheme of working can readily provide effective protection against unreasonable noise and dust emissions with the site design carefully aimed to balance protection of the local environment with the requirement to extract and process mineral.
- 2.13. The site access will be directly onto the A617 upgrading an existing gated access. The A617 is part of the Strategic Highway Network and policy objectives (locally and nationally) support the use of such roads to transport goods and materials (including minerals).
- 2.14. The Flash Farm site is the only sand and gravel allocation identified within the Consultation Plan in the Newark area lying to the west of Kelham Bridge which is ideally located to serve markets such as north of Nottingham city, Mansfield and other growth areas. Without Flash Farm being present other quarries would have to transport material across Kelham Bridge to serve those same markets. Congestion around Kelham Bridge has been highlighted by some local residents (of Kelham villages and Averham) as being of concern although the A 617 is identified as part of the County's Core Road Network. Accordingly, Flash Farm would have a neutral effect as movements west over the bridge would be balanced by movements in the other direction.

3. Objections to the Plan

- 3.1. However, the company has the following objections to the Mineral Local Plan Submission Version.

Policy SP2 1b

- 3.2. The Policy is unsound because it is contrary to national policy and guidance and is not justified by the evidence.
- 3.3. The policy gives priority to extensions of existing operations where economically, socially and environmentally acceptable. We disagree with the stated reasons for this. It is implied that such extensions are inherently more environmentally sustainable than new sites, but this is not necessarily so. We notice that the plan indicates that the benefits of extending quarries relying on existing infrastructure must be balanced against cumulative impact and longer term disturbance to communities. The supporting text (para 3.10) then goes on to say that all new proposals, whether allocated or otherwise, will need to be assessed in terms of their impact on local communities and the environment and what contribution they would make to achieving local and national biodiversity targets. The supporting text therefore reflects national guidance which requires that each proposed site must be considered on its merits (PPG 27-010). We therefore believe that the proposed policy is contrary to this guidance and is unsound. There should be no policy preference for extensions; the supposed advantages of extensions will be become apparent in a consideration of proposals on their merits. It may be that a certain proposal for a new site is a more superior alternative to an extension and this should be given serious consideration and not be dismissed on a priori grounds as a matter of policy.
- 3.4. One other aspect of treating extensions and new sites in the same way is that it allows new entrants to emerge in the marketplace. It is important to have regard to the findings of the Competition Commission's (CC) investigation of the aggregates, cement and ready mix concrete industry which were published in May 2013. This report states in paragraph 25 that *"There were significant barriers to entry into local aggregates markets through the supply of primary aggregates due (in the case of land-won primary aggregates) to the time required to identify and acquire a suitable site and to obtain planning permission..."* and *"...we found that there were fewer barriers to the expansion of existing aggregates operations, and to entry through the supply of recycled and secondary aggregates."*
- 3.5. Thus the County Council noticed the barriers for new entrants. This is caused in part by the established practice of mineral planning authorities preferring extensions over new sites and new entrants having to wait until an operator goes out of business or fails to find a replacement site when the current one is exhausted. Treating proposals on their merits avoids this preference for incumbents and lets new entrants such as MGL to advance the merits of their sites without unnecessary constraints.
- 3.6. We acknowledge that the County Council cannot make decisions purely on the grounds of favouring one operator over another. However, we challenge the assumption of the policy and the Site Assessment Methodology (para 1.22) that extensions are necessarily the better environmental option. MGL believes that allocations should be made on the basis of the most sustainable sites while maintaining productive capacity. Therefore, if two sites, one an extension and another a new site, score the same in sustainability terms then we would expect either that the plan should be flexible enough to allow for a new entrant to establish a site, or that the new entrant is given the benefit of the doubt, especially if the incumbent operator already has a generous allocation.

- 3.7. We therefore object to the policy and to the presumption without qualification that extensions to existing sites should have priority.

Proposed Changes to Policy SP2 1b

- 3.8. We suggest that the criterion 1b in the policy should be deleted.

Policy MP1

- 3.9. This policy is unsound because it does not follow national guidance on assessing the future demand for aggregates in the Plan area, and is therefore not justified by the evidence.
- 3.10. Policy MP1 makes provision for 49.02 Mt of sand and gravel from 2012-2030, a figure which has been derived from the Local Aggregates Assessment (LAA). However, the LAA uses only a 10 year average as a proxy for demand and fails to include two other material considerations. Firstly, it ignores the growth inherent in local plans and economic plans for Nottinghamshire in the North Midlands Devolution Deal contrary to the guidance of PPG paragraph 27-062. Secondly,, it discounts consideration of expected shortfalls in South Yorkshire through the resources in the Idle valley becoming exhausted and the growth ambitions of the Sheffield City Region.

Nottinghamshire Growth

D2N2

- 3.11. The Derby & Derbyshire & Nottingham & Nottinghamshire Local Enterprise Partnership (D2N2) produced a Strategic Plan for government in 2014. The Strategic Plan has an aspiration for *“supporting not only iconic D2N2 businesses...but also our small and medium sized business and start-ups to grow faster, access finance, innovate and export. Through a targeted accelerated development programme we will provide the economic infrastructure to speed up delivery of key development and affordable homes for people to live in”*. Infrastructure is of course, the area of the economy where the products of the proposed quarry can make the most contribution.
- 3.12. The Strategic Economic Plan aims to provide, *“Economic infrastructure that meets the needs of the 21st century economy, including a world-class transport system, building on existing excellence, that allows us to capitalise on our position at the heart of the UK’s road and rail network, with links to international markets via East Midlands Airport, other airports including Manchester, Robin Hood and Birmingham and, in future, HS2, alongside excellent local connectivity, a range of employment locations to suit our diverse business base, digital infrastructure that reaches all parts of our geography, and a housing offer that reinforces the vibrancy of our cities, towns and villages and attracts and retains the high quality workforce that our businesses need.”*
- 3.13. The key sectors identified in the area include transport equipment manufacturing, life sciences, food and drink manufacturing, construction, the visitor economy, low carbon economy, logistics and creative industries.
- 3.14. The Strategic Plan says, *“Our target is to increase the potential growth in the number of private sector employee jobs from 30,000 (if current trends were to continue) to 55,000 in the ten year period to 2023, and accelerate the delivery 77,000 new homes. This investment will play a critical role in tackling barriers to the effective operation of our economy and enable the rapid delivery of suitable employment and housing sites that meet local planning objectives. Our evidence indicates that, without a step-change in*

infrastructure investment across the D2N2 area, we will face serious constraints in unlocking these ambitions.”

3.15. In terms of the Strategic Packages for a number of sub areas within the LEP area, the infrastructure implications are as follows,

- **Growing Greater Nottingham:**
 - Nottingham City Centre – focused on infrastructure to unlock strategic extensions of the city centre, strategic east-west growth corridor: Invest to support mixed use regeneration of the Waterside area in the east of the city and provide infrastructure to unlock the full potential of the Enterprise Zone on the western side. All of these investments will be complemented by the Southern Growth Corridor (existing LTB scheme), transforming connectivity on the primary east-west axis through the city. Further investments will be made to unlock potential,
 - Strategic growth priorities across the wider Greater Nottingham area, including unlocking key employment sites...strong synergies with the city's Southern Growth Corridor.
 - In addition, undertaking a detailed feasibility study to assess the role of a new fourth Trent Crossing, to be delivered post-2021, to improve orbital movements and provide longer term capacity for growth on the eastern side of the conurbation.

- **Sustained growth and new housing in Mansfield / Ashfield and North Nottinghamshire:**
 - Focused on unlocking strategic employment, regeneration and housing sites to transform growth prospects in Mansfield, Ashfield and northern Nottinghamshire.
 - Mansfield / Ashfield – focused on unlocking strategic employment sites along the A617 Mansfield / Ashfield Regeneration Route (MARR), together with new housing at key sites. This includes sustainable travel measures focused on key corridors to create headroom for growth, pinch point improvements at key junctions and site access improvements.
 - Worksop and Harworth / Bircotes: a programme of sustainable travel measures and targeted junction improvements to unlock capacity for mixed housing and employment in Worksop as part of an A57 growth focus (including existing committed A57/A60 LTB scheme) and large-scale employment development on the northern edge of the area in Harworth / Bircotes..

- **Accelerating housing and employment growth in Newark:** A programme of sustainable travel measures to create headroom for growth at key sites in Newark East, Newark South and Balderton (to the south east), supported by targeted pinch point improvements on the road network in and around the town. There will also be phased construction of the Newark Southern Link Road, which will provide access to the Newark South growth area and which is critical to Newark's future growth. (NB all of these initiatives are allocated in the adopted Local Plan)

- **East Midlands Connectivity:**
 - Focused on unlocking the potential of the M1 J23a / J24 / A50 area as the leading logistics hub in the UK, and ensuring the benefits of HS2 are captured for the D2N2 economy.
 - D2N2 LEP will lead a taskforce to develop a strategy to fully capture the benefits of HS2, bringing together HS2 Limited, LLEP and local transport authorities. This will include the development of a Masterplan for the proposed HS2 station, to enable early work on infrastructure and a regional connectivity package to ensure improved connectivity across the D2N2 area and fully capture the benefits of HS2 for the East Midlands economy.

- Working with East Midlands Airport and LLEP to develop East Midlands Airport to its full potential, including supporting the development of freight expansion to new global destinations and increased numbers of passenger destinations, including primary European cities, transatlantic and Middle East markets. Also improving sustainable travel options to the airport, for both passengers and to provide access to new job opportunities.
 - Working to maximise the benefits to the D2N2 area of emerging proposals for Strategic Rail Freight Interchanges in the area. A proposal has, for example been submitted to the Planning Inspectorate for a major scheme adjacent to M1 Junction 24, and other alternative potential proposals have been identified along the A50 corridor.
- 3.16. Robust assessments have been undertaken of the projects included within the strategic infrastructure packages. The overall assessment of the impacts during the six year lifetime of the Local Growth Fund (2015/16 to 2020/21) is a total value of £1.4 Billion potentially unlocking over 12,000 houses and 20,000 jobs with a GVA of £800 Million. Over the longer term, the Plan forecasts that these interventions will be critical in unlocking much larger numbers of new jobs and homes in the area.
- 3.17. For housing, the Strategy says, *“An adequate supply of housing is crucial in realising our growth ambitions. D2N2’s housing mix is a key element of the LEP’s ‘offer’, helping to make it an attractive and aspirational place to live and work, complementing the high quality natural environment and helping to attract skilled labour and inward investment. Housing supply is key to promoting affordability. To realise D2N2’s ambitions for growth, there must be an adequate supply of housing which provides the right mix of homes for growth. In addition to housing’s role in supporting growth in the wider economy, there is considerable economic benefit to be gained from investment in housing development. Every £1 invested in house building generates £2.84 of economic activity based on increased profits and wages for contractors (direct impacts), for the supply chain e.g. manufacturers (indirect impacts) and from spending in the wider economy (multipliers), and it is therefore important that local construction companies are able to access procurement and development opportunities.”*

The Newark Growth Point

- 3.18. The Newark and Sherwood District Core Strategy was adopted in March 2011. Newark and Sherwood has been identified as a “Growth Point” along with Lincoln to the east and Nottingham to the west. The adopted Core Strategy states that *“the District’s excellent communication links, potential for regeneration and need for substantial affordable housing and infrastructure improvements, were all factors that contributed to the identification of the District as a New Growth Point”*.
- 3.19. The Core Strategy confirms that Newark’s role as a growth point will be strengthened through housing and employment growth in sustainable urban extensions, the regeneration of existing neighbourhoods, new economic and infrastructure investment, and addressing the shortage of affordable housing. This will entail the construction of 14,800 dwellings between 2006 and 2026 (740 dwellings per year). The employment land requirement is in the range of 210-220 hectares (about 10 ha per year).
- 3.20. Housing and employment needs are to be delivered in three Strategic Sites at
- Land South of Newark;
 - Land East of Newark; and
 - Land around Fernwood.

3.21. The local economy will be strengthened and broadened by promoting major new economic development as part of the Strategic Sites planned for Newark Urban Area, linked to infrastructure improvements including the provision of the Newark Southern Link Road to the south of the town. The new Relief Road will also open up 278 hectares of land, adjacent to the southern edge of Newark's built-up area, for housing and employment use. This area has planning permission for up to 3,150 houses, including low-cost housing, two retail and commercial centres, a 60-bed care home, two primary schools, community buildings, a medical centre, 50 hectares of mixed use commercial development and landscaped green community spaces. Phase one of the Newark Southern Relief Road is under construction, with contractor Buckingham Group Contracting Ltd on-site, and phase two will begin in 2016. Of the dwellings due to be constructed on this site, the majority (2,200) are expected to be complete by 2026 (Policy NAP 2A). This would involve construction of 220 dwellings per year. Current plans are also to provide 165,000 m² of new employment floorspace.

3.22. In addition, there are a number of supporting infrastructure projects including strategic highway schemes at the following locations:

- A46 Link Capacity, Newark-on-Trent Bypass;
- A46/A617 Cattle Market Roundabout;
- A46 at Farndon; 72 Newark and Sherwood Core Strategy 6 Area Policies
- A1/B6326 London Road Roundabout, Balderton;
- A1/A17/A46 Roundabout; and
- A1/A46 Brownhills Roundabout

3.23. In addition, in the wider area an examination of Local Plan commitments reveals that a total of 23,200 dwellings are planned together with the development of 220 ha of employment land (Table1).

Table 1: New Development Commitments in East Notts.		
Site Location	No. of New Homes	New Employment Space (ha)
Newark	7,760	87
Calverton	1,055	
Bingham	1,000	15
North of Tollerton	4,000	20
South of Clifton	3,000	20
Edwalton	1,500	4
Cotgrave	470	5
Newtown	550	
Worksop	1,993	48
Retford	1,574	21
Tuxford	301	
	23,203	220

The North Midlands Devolution Deal

3.24. The North Midlands Devolution Deal which was submitted to government at the end of 2015 and is confidently expected to be approved by May of this year would deliver:

- 55,000 new private sector jobs
- 77,000 extra homes
- A £200 Million Investment Fund over 30 years to provide infrastructure such as roads and bridges

- A joint assets board to identify extra land and brownfield sites
- Adult skills provision to better meet the needs of businesses
- A joint transport fund to spend on key transport improvements
- Better co-ordinated public transport, with Oyster card style smart ticketing
- More responsive and co-ordinated business support for growth
- 110,000 new apprenticeships
- More people entering employment through better targeted local programmes
- Journey times to London of less than 90 minutes by train

3.25. Other plans include strengthening and streamlining compulsory purchase order provisions to make it easier for local authorities and partnerships to acquire land for building houses and setting up a pilot to test out revised planning application fees. The region has seen delays to development, with around 47,000 permissions not implemented. Under the Deal the Combined Authority would hope to speed up development by gaining extra planning powers. The Combined Authority would also seek to be involved in any “permission in principle” pilot that comes into law as part of the Housing and Planning Bill.

3.26. In essence, this is a repackaging of the Strategic Economic Plan and seeks alternative means to implement and speed up delivery of these plans. Nevertheless, it does show resolve in dealing with existing barriers to growth.

Nottinghamshire LAA 2015

3.27. The Notts LAA 2015 does not make it clear if the figures for housing completions in section 5 incorporate the Devolution Deal expectations for Notts/Derbys and Sheffield, but a comparison of Figures 2 and 7 in the LAA indicate that the trajectories for sand and gravel and for housing completions (as a proxy for demand for sand and gravel) are similar. The D2N2 SEP aims to construct 77,000 houses over 10 years at a rate of 7,700 per year, and whilst there is no split in the SEP by area Table 6 of the Notts LAA lists housing requirements by district totalling 4,596 pa compared to past average completion rates of 3,370, which represents an uplift annually of over 36% in the level of housing completions. This is at variance with the Derbyshire LAA 2014 which says (pages 27/28) *“For Nottinghamshire, proposed housing growth for the Plan period is 86,500, an annual rate of 4325, somewhat higher than that achieved annually for the 10 year period to 2010 (3600). For the Greater Nottingham Housing Market Area, which includes Erewash Borough in Derbyshire, the housing provision figure to 2026 is 52,050 (2001 annually).”* It is interesting to note that in the year closest to the LAA’s estimate of the average completion rate (2006) the extraction rate for sand and gravel in Notts was over 3.0 Mt.

3.28. Although the LAA is correct that housing is only part of the overall demand for aggregates, it is also true that traditionally most sand and gravel has been used in concrete and that concrete is a major part of development works for housing, road structures and commercial development. Consequently, it is misleading to only tie sand and gravel production to the housing sector because it is also used in drainage works, road construction, and for the associated retail, employment and education uses that are developed alongside large urban housing extensions and renewal schemes.

South Yorkshire

3.29. The adopted Doncaster Core Strategy states in paragraph 7.23,

“For sand and gravel, the evidence indicates that it will be difficult to maintain a supply of sand and gravel to meet the apportionment up to the end of the plan period, nor to maintain a 7 year landbank beyond mid-2016. A 7 year landbank

equates to 5.6 million tonnes (based on the current sub-regional apportionment of 0.81 million tonnes annually). Monitoring information indicates that Doncaster's landbank at the end of 2008 was 10.04 million tonnes (made up of historic and current permissions now containing predominantly soft sand), providing a reserve up to mid-2021 at an annual extraction rate of 0.81 million tonnes. The representations received to-date from mineral operators would yield just over 2 million tonnes (and of this 1.76 million tonnes has been put forward as potential sites for the plan period). Therefore, even if all the site representations for the plan period were allocated and fully extracted during the plan period, this would only provide the equivalent of just over an additional 2 years' requirement (i.e. up to 2023), leaving a shortfall of approximately 5 years to the end of the plan period."

3.30. Paragraph 7.24 goes on to state,

"The council's intention is to meet as far as is practicable the sub-regional apportionment. Evidence at present suggests that this is unlikely and hence Table 6 indicates what appears to be a reasonable indicative figure at present."

3.31. Table 6 identifies 1 Mt of sand and gravel which is called a realistic additional supply out of a calculated need to 2028 of 6.16 Mt leaving a shortfall of 5.16 Mt. The Core Strategy does not state where this extra material should come from.

3.32. The 2015 LAA for Doncaster & Rotherham (based on 2013 data) indicates that the 10 year average of sand and gravel sales is 0.35 Mtpa but that this has collapsed since 2010 with an estimated three year average of only 0.14 Mtpa coming from two active sites. Most of the current sales are soft sand and very little concreting sand and gravel is produced, which also reflects the content of the landbank. The 2015 LAA concludes that *"This LAA also shows that Doncaster and Rotherham has limited sand and gravel resource availability and the material available is 99% soft sand"*.

3.33. The Doncaster & Rotherham LAA does not attempt to produce any form of forecast for demand as required by NPPF and PPG. Despite both authorities having recently adopted Core strategies, there is no demand calculation of planned developments in the LAA, nor any mention of the Strategic Economic Plan (SEP) and the more recent Devolution Deal for the Sheffield City Region (SCR).

3.34. Nottinghamshire County Council's response to the mineral supply crisis in south Yorkshire is to recognise that the provision of Sand and Gravel is the biggest issue for Nottinghamshire and over the plan period resource depletion in the Idle Valley is likely to be the biggest factor potentially influencing exports to South Yorkshire. The Nottinghamshire LAA concentrates on the likelihood of exports from its side of the Idle valley continuing in the long term and concludes that this is likely to fall. The LAA does not mention the lack of resources already occurring on the South Yorkshire side of the county boundary, does not acknowledge the growth ambitions in the south Yorkshire area and makes no calculation of the likely call on Nottinghamshire's resources from South Yorkshire.

3.35. Nottinghamshire County Council believes that it is already making up the shortfall from South Yorkshire. However, the only site in the plan that specifically does that is Sturton le Steeple which is an existing commitment to replace Finningley quarry when it finally closes in 2018. Although Finningley represents a large part of Doncaster's capacity, it does not account for all of the lost capacity, nor does it include the growth in the Sheffield City Region mentioned earlier.

- 3.36. Based on an old estimate of demand of around 840,000 tpa for South Yorkshire and after 2017 a likely production level of about 140,000 tpa of soft sand, it is evident that there is a shortfall of around 700,000 tpa without adding in expected growth in the region. The replacement of Finningley quarry in Nottinghamshire will supply some of that gap, but MGL estimates a continuing shortfall in south Yorkshire of at least 200,000 tpa.

Discussion

- 3.37. The LAA opts to use an earlier 10 year average between 2002 and 2011 as the provision figure for the county because this incorporates times of growth and recession rather than a later average which is more heavily influenced by the recession. There is general agreement that the economy is slowly coming out of recession and it follows that using the most recent 10 year average as the provision figure would be misleading and would lead to under-provision.
- 3.38. MGL's objection is that the 2002-2011 average is arbitrary and not related to future prospects as laid out in the SEPs and the Devolution Deals that seek to accelerate the delivery of much needed housing, infrastructure and economic development. PPG sets out how LAAs should be prepared.
- 3.39. Paragraph 27-064 says that LAAs must consider other relevant local information in addition to the 10 year rolling supply, which may include levels of planned construction and housebuilding in their area and throughout the country. Paragraph 027-062 says that an analysis of aggregate supply options should be informed by planning information, the aggregate industry and other bodies such as local enterprise partnerships. In addition, the assessment of the balance between supply and demand should be accompanied by an assessment of the economic and environmental opportunities and constraints that might influence the situation. It should conclude if there is a shortage or a surplus of supply and, if the former, how this is being addressed. Although these things mentioned in the Notts LAA they are not given any prominence nor is any attempt made to quantify their potential effect.
- 3.40. The Notts MLP thus adopts the NPPF recommended ten year average output of 2.58 mtpa for 2002 -2011 as the provision figure for the Mineral Local Plan making no allowance for extra demand which may draw on the county's resources. The last time housing completions were at the average projected level for Nottinghamshire in the plan period was in 2006 when sand and gravel output was above 3.0 Mtpa. Given the resource issues with South Yorkshire which faces a shortfall of concreting sand and gravel after 2018, and the accelerated growth aspirations of the Devolution Deals for Sheffield City Region and Nottinghamshire/Derbyshire, it is clear that the compromise provision level selected by the County Council will not be sufficient. There is a case for an increase in Nottinghamshire's local provision for its growth ambitions, and 500,000 tpa for Nottinghamshire's growth and between 250,000 tpa and 500,000 tpa to meet the shortfall for south Yorkshire.

Proposed Changes to Policy MP1

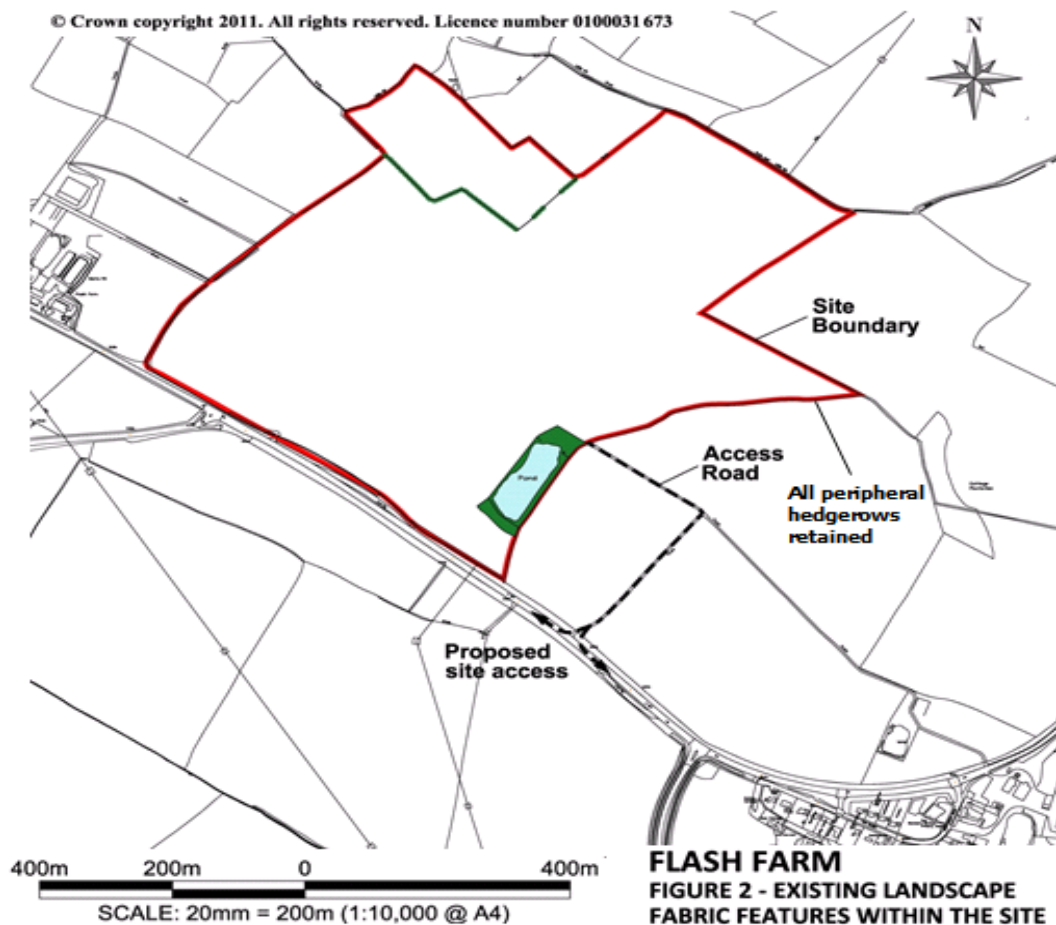
- 3.41. It is suggested that the local provision level is increased from 2.58 Mtpa to between 3.3 Mtpa to 3.5 Mtpa to accommodate growth plans and resources shortages in accordance with PPG guidance.

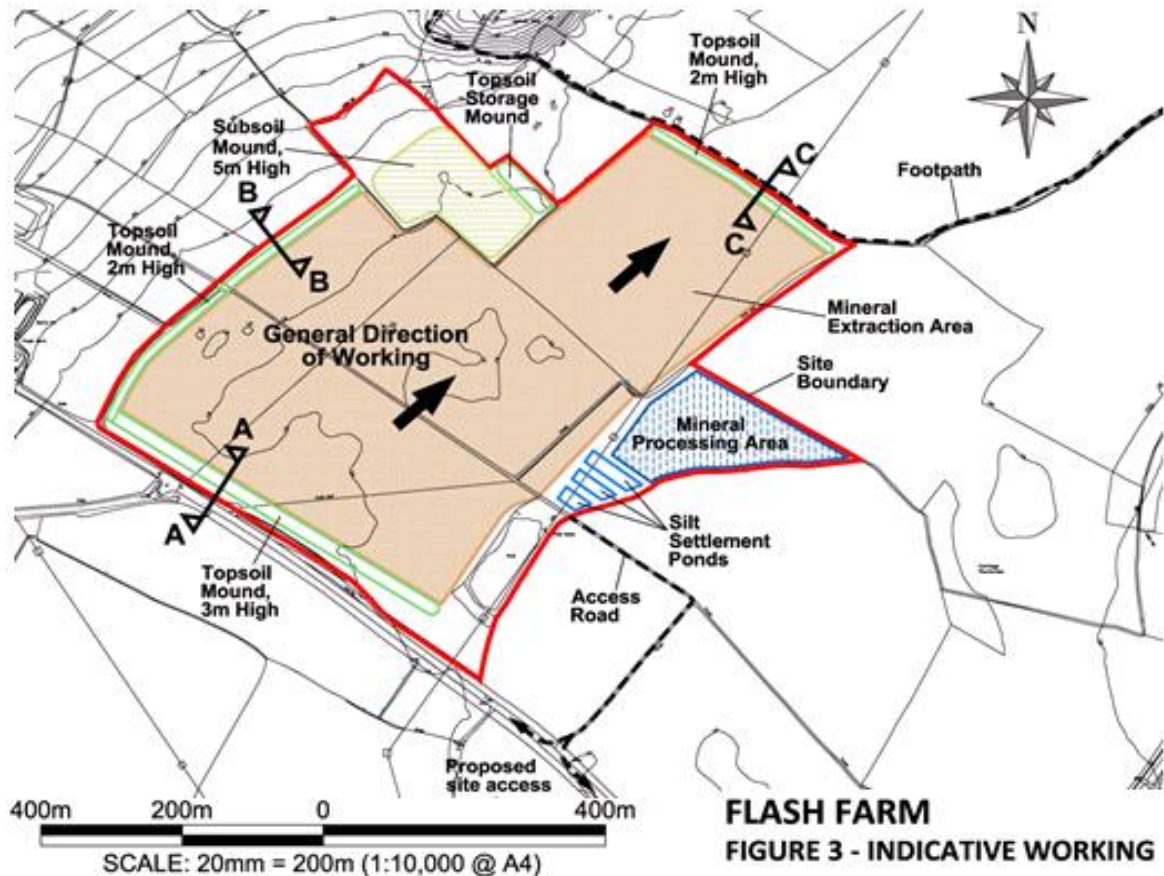
29860 4. Sustainability Appraisal

- 4.1. MGL believes the Sustainability Appraisal is unsound in respect of the site selection methodology and in particular the scores for each site as set out in that document because it is not justified by the evidence. MGL challenges the scores applicable to the Flash Farm allocation believing that the County Council has either ignored evidence submitted on behalf of the site or has been inconsistent in the application of the sustainability scores across sites.
- 4.2. In order to put the objection into context, the company wishes to rehearse Flash Farm's suitability as an allocation.

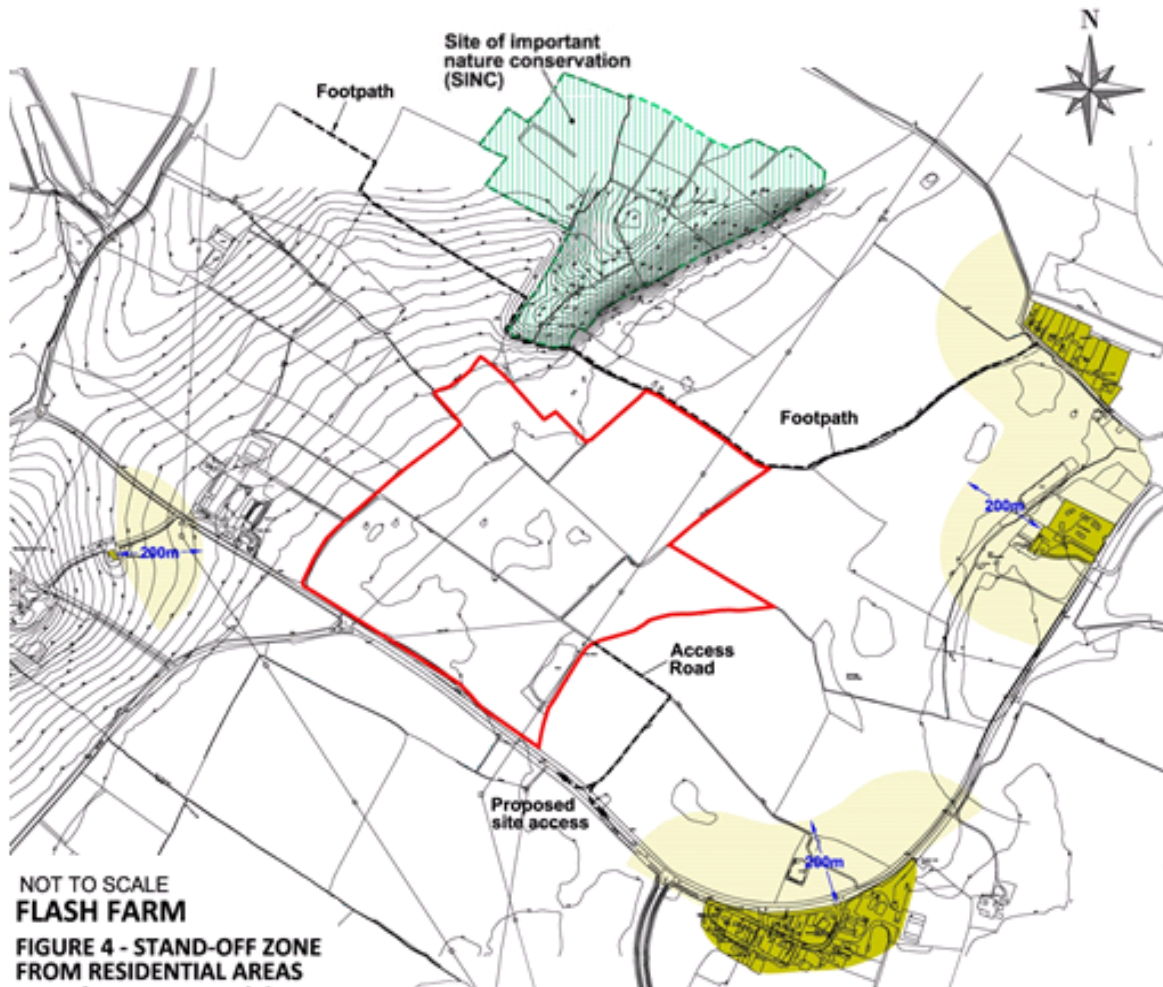
Working Scheme

- 4.3. Given the site's setting the proposed quarry development at Flash Farm can be operated with minimal environmental impact. The landscape within the site is flat and featureless with numerous adverse landscape detractors within and surrounding the site including a 400 Kva overhead power line crossing the site and Staythorpe Power Station to the south. Importantly the working scheme will not require the removal of any hedgerows whatsoever and by importing suitable clean uncontaminated materials, the site can be reinstated close to original ground levels giving the opportunity to substantially improve the natural capital balance of the site making a major local contribution to the bio-diversity resource on the site. Fig 2 below indicates the site boundary and location of existing hedgerow and trees all of which will be retained.





- 4.4. Only part of the site is located within the functional floodplain. Importantly, by careful design of the restoration contours, the opportunity exists to extend that flood plain thereby offering long term sustainable benefits in respect of flood risk as envisaged within national policy.
- 4.5. The quarry will be progressively worked and restored disturbing the minimum area of land practical to do so at any one time. Typical of MGL sites it is proposed to use a low profile mineral processing plant with a maximum height of 5.5m and this will be located in the eastern sector of the site 400 m from the public highway and over 600m from the nearest residential dwelling. A strategically located landscaped screening mound will significantly reduce any potential adverse long distance views of this mineral processing area. Figure 3 indicates an indicative working with soil screening mounds shown and location of the low profile mineral processing plant in relation to the proximity of residential dwellings.
- 4.6. It is generally recognised within current and historic governmental advice documents that operational quarries can have an adverse impact on dwellings within 200m (although with mitigation such distances can be reduced). Figure 4 over the page shows this 200m “stand-off” distance from the residential dwellings in Kelham and Averham villages to demonstrate the relatively remote nature of the operations from occupied dwellings.



Access

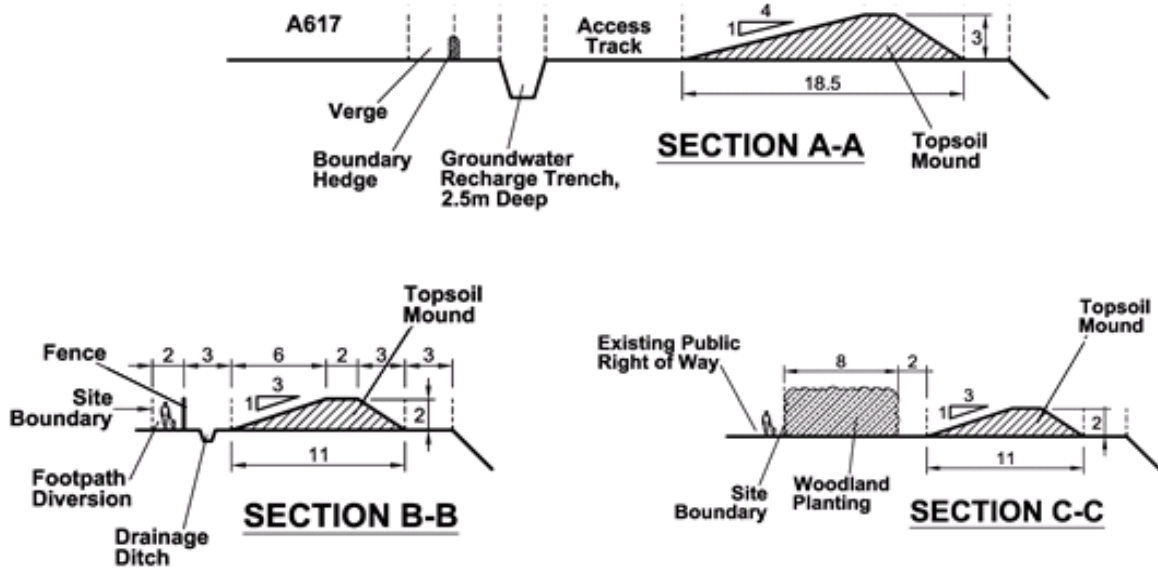
4.7. The existing farm access point onto the A617 will require only minor modification to accommodate quarry traffic. The existing mature roadside hedgerow is set several metres back from the highway carriageway and clear visibility can be achieved in both directions. The Transport Appraisal undertaken as part of the draft Environmental Impact Assessment confirms the acceptability of this junction to gain safe access and egress to and from the site. It is anticipated that the mineral will be exported at a typical rate of 4,000 tonnes per week and a high proportion of imported material will be “back-loaded” which would reduce overall traffic movements. Higher daily levels of traffic have been considered as a worst case scenario and no highway safety or capacity issues were identified whatsoever.

Quarry design

4.8. The quarrying operations can be readily be screened by the strategic design and positioning of peripheral soil screening mounds that can be sympathetically designed to blend into the wider landscape. A 3m high topsoil screening mound will be off-set at least 15m from the south-western site boundary parallel with the A617 and designed with a shallow (i.e. 1:4) outer facing slope to restrict views from passing traffic (and those parked in the lay-by) 2m high topsoil screening mounds will be positioned along the north-western and north-eastern boundaries of the site to limit views from Public Rights of Way (PRoW) both existing and temporary diversion routes. Advance tree planting would

additionally be incorporated along the north-eastern boundary of the site to further minimise potential adverse impact.

- 4.9. The cross-sections below indicate the above profiles of the various mounds. (The location of the sections are shown on Figure 3)



- 4.10. The low-profile mineral processing plant will be located within a remote sector of the quarry development and would additionally be screened by the establishment of a 5m high sub-soil mound that could be tree planted on the upper slopes to further minimise long distant views from the south (i.e. from the A617 and outer limits of Averham village). The screened mineral processing area will be in excess of 650m from any residential dwelling.
- 4.11. Other soil resources (top-soil and sub-soil) will be stored within separate mounds in the northern most sector of the development. These will be separated from the mineral extraction area by a retained mature hedgerow with access provided from the east where significant gaps exist within that hedge line. These mounds will, in part, restrict longer distant views from the PRow that exists to the north.

Objectives and Restoration Concept

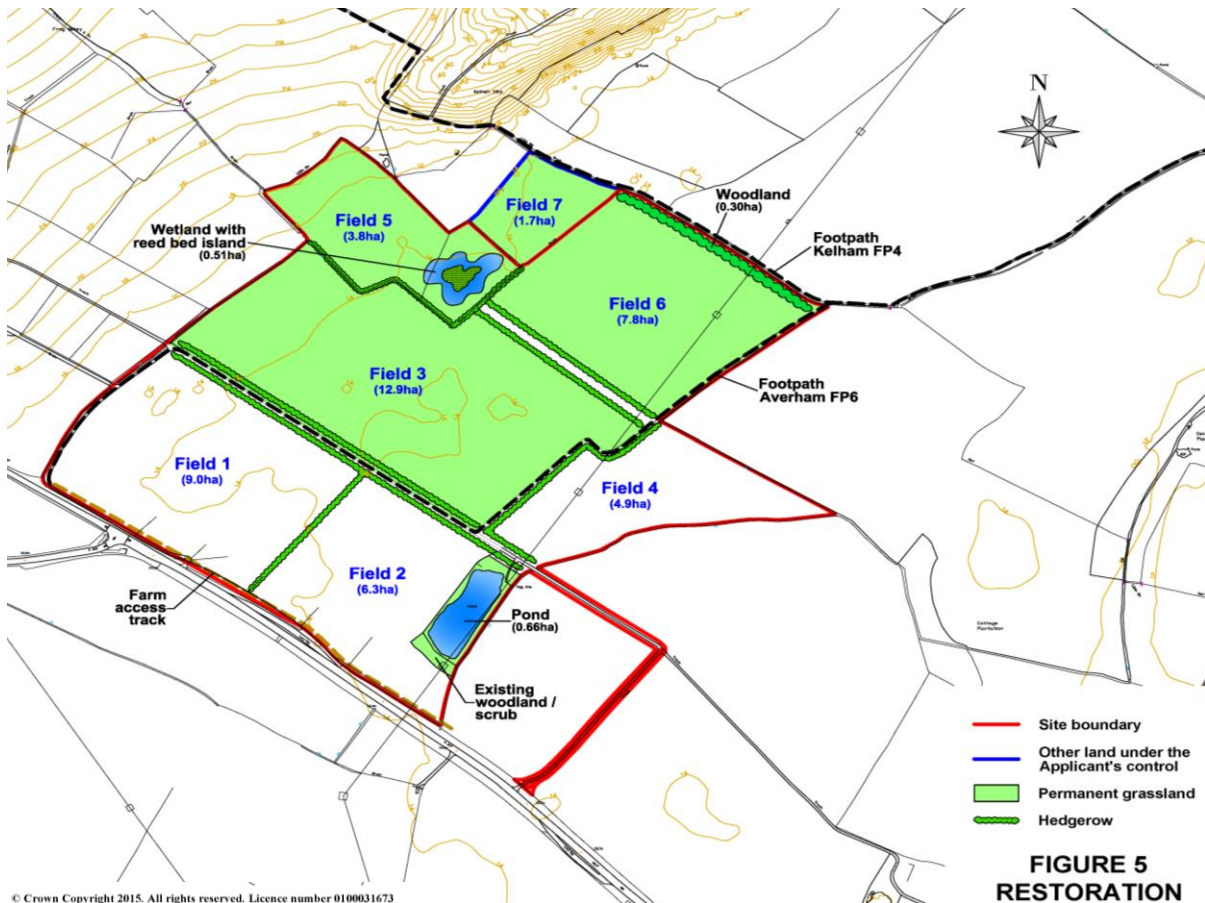
- 4.12. The proposed restoration scheme will secure a suitable and characteristic afteruse for the site in terms of improved landscape character and as a bio diversity resource contributing to the County's Biodiversity Action Plan. The proposed restoration strategy for the site involving the importation of suitable inert material will ensure there is no permanent loss of "best and most versatile" soil resources (i.e. ALC Grades 2 and 3a) with the ability to re-establish all prime quality agricultural land, along with a range of alternative habitats, which will complement the existing degraded landscape setting and provide the opportunity for contributions to green infrastructure improvements. (The protection of high quality soil resources is supported by local policy and national guidance).
- 4.13. The restoration concept has been influenced by the Newark and Sherwood Landscape Character Assessment for the Trent Washlands and in particular for the Policy Zone TW PZ 11 - Cromwell, North and South Muskham, Kelham, Averham, and Rolleston Village Farmlands (TW9D). This is a very large landscape tract in which the site is located at its western end. It is described as "...a predominantly flat, large scale, arable landscape with

large semi-irregular fields; often with low trimmed gappy hedgerows...Hedgerows are mostly Hawthorn with some mixed species hedgerows, particularly along roadsides and near to / within villages. Hedgerows are often missing, or very gappy within large arable fields. The historic field pattern has largely been lost as a result of intensive arable farming and fragmentation has occurred as a result of provision of transport routes. Woodland cover is insignificant – tree cover is largely roadside planting and hedgerow trees –including Ash, Oak and some Willow.”

- 4.14. The LCA description goes on to observe that “... the National Grid station at Staythorpe/Averham with its associated pylons are all prominent features in this area. Views are often open across the flat landscape and more enclosed along narrow roads with hedgerows and within villages.”
- 4.15. The assessed character condition and sensitivity is described as both Moderate with a policy objective of Conserve and Create. This policy approach is heavily influenced by the ‘historic’ character of the landscape tract and its ‘sense of place’. However, the site itself is not typical of these attributes; most landscape features having been removed long ago.
- 4.16. The final restoration of the site would be the subject of a long term, comprehensive landscape management proposal designed to realise and integrate landscape, recreational and nature conservation objectives and benefits of future restoration works with the surrounding landscape context. In terms of Landscape Actions the objectives are to
- Conserve and restore the traditional pattern of hedged fields – seek opportunities to restore the historic field pattern.
 - Conserve the historic woodland and parkland landscape around Kelham Hall.
 - Seek opportunities to restore arable land to permanent pasture/wet alluvial grassland close to the River Trent.
 - Promote measures for strengthening the existing level of tree cover.
 - Strengthen the continuity and ecological diversity of stream corridors.
- 4.17. The Bio-Diversity Action Plan for Nottinghamshire is intended to guide local authorities in translating advice into action for habitats and species alike. The Bio-Diversity Action Plan sets out targets for the conservation and enhancement of the County’s bio-diversity. The County’s development plan determines the strategic role of development control in the delivery of bio-diversity action and as such is guided in part by the Bio-diversity Action Plan for the County. As well as playing a role in the protection of the important statutory sites, such as SSSI’s and County Wildlife Sites, development plans also play an important role in the protection and enhancement of the wider countryside. This opinion is reinforced by the National Planning Policy Framework.
- 4.18. In the case of the proposals at Flash Farm, the relevant BAP Action Plans include
- lowland neutral grassland,
 - lowland wet grassland,
 - hedgerows, and
 - wetland
- 4.19. The proposal is to reinstate a high proportion of the land to a combination of lowland neutral grassland and lowland wet grassland with species rich hedgerows (and associated ditches) along with a wetland area consisting of reed fen in the north-west extremity which will be fed by the springs emanating from higher ground to the west. The working scheme will be designed to provide a sufficient buffer zone to the Kelham Woods SINC during the

mineral extraction phase whilst the restoration detail will be sympathetic to the site of local importance for nature conservation.

- 4.20. The Nottinghamshire BAP confirms that Lowland Neutral Grassland occur in isolated sites across otherwise intensively farmed landscapes in the County and it is estimated that 1380ha exist at present. Lowland Wet Grasslands is a more scarce resource and is estimated to extend to only some 160ha in total across the County.
- 4.21. Both types of grassland are managed by a combination of livestock grazing and hay cutting although the wet grassland is characterised by seasonally water filled hollows and may contain areas of emergent swamp communities being generally neutral but not botanically species rich.
- 4.22. The Nottinghamshire BAP recognises that within the River Trent (and River Idle) floodplain valleys both types of grassland could be looked at together as there is often an overlap between the two habitat types. Such grasslands whether independent or in combination with each other will provide valuable feeding and breeding habitat for a number of scarce or declining farmland birds such as skylark. The Wet Grassland will in particular provide valuable support to breeding waders (such as snipe, lapwing and curlew) as well as meadow pipit and yellow wagtail.
- 4.23. In respect of scale, the BAP advises that in respect of breeding waders "the minimum target should be to have lowland wet grassland in blocks of 10ha". The proposal at Flash Farm would be to create a combination of the two types of grassland with the wet grassland being fed by the springs flowing from the north-west of the site that would flow through a fen swamp feature
- 4.24. Within this predominantly arable landscape, diversity of the restored landscape will be achieved by re-establishing hedgerows of varied species of native origin, consistent with the BAP although being mindful of the potential impact of the proposal to establish the lowland neutral and wet grassland in particular and the general concern about predation.
- 4.25. New hedgerows will be planted using locally sourced native plants, to complement the retained hedgerow structure around the periphery of the site. This will add to the overall landscape structure of the area but in the long term also add to the overall ecological diversity within the site. It should be noted that the proposed scheme of working importantly does not remove any sections of existing hedgerows.
- 4.26. Thus the restoration proposals will be able to meet both the sustainability objectives of conserving "best and most versatile" land and make a serious contribution to biodiversity and ecological services objectives.



Soil resources

4.27. The NPPF advises that higher quality soil resources should be protected. Accordingly, the soil will be carefully handled using methods as set out in the MAFF Good Practice Guide issued in April 2000. All topsoil and subsoil mounds will be seeded with grass to minimise loss by erosion and infestation by weeds. The grass sward will be subject to an annual maintenance regime and any excess weed growth will be controlled by a combination of herbicides and mechanical means as required.

4.28. Aftercare provisions for the reinstated agricultural land including the proposed grassland will be appraised at annual meetings which will be held with the MPA to review the ongoing aftercare provisions of the site on a regular basis. The gradients of the restored permanent grassland agricultural land will be designed to provide appropriate surface drainage and a landform, which is conducive to good agricultural husbandry including the long term maintenance of the proposed lowland grassland.

Detailed Environmental Impacts – Ecology

4.29. A detailed ecological appraisal has been undertaken on the land in question by suitably qualified ecologists. The assessment consisted of a walk-over survey along with a desk based appraisal of relevant published data. The appraisal confirmed there were no statutory designated sites of international, national or local nature conservation located within 5km, 2km or 1km respectively of the site. Kelham Hills is a non-statutory local wildlife site and that is located to the north of the proposed site boundary although mineral extraction will be in excess of 150m of the nearest part of that site. The principal landuse

and habitat is that of arable and improved grassland with a small area of broadleaf woodland surrounding an irrigation reservoir (both of which will be retained and incorporated within the restoration scheme).

- 4.30. The site is bounded by hedgerows which have been assessed using the Hedgerow Evaluation and Grading System (HEGS). The hedgerows were identified as being classed between "moderate" and "high" value and all will be retained (and enhanced where appropriate). The restoration will create an improved bio-diversity resource, significantly adding to the natural capital balance within the site. BAP priority habitats will be established as a direct result of the development using the mineral extraction as a catalyst for beneficial change.

Detailed Environmental Impacts – Transport

- 4.31. In the vicinity of the site, the A617 is a high standard rural single carriageway road being generally around 7.3m wide with edge lining and overtaking permitted. Along the site frontage the road is lit and subject to a 50mph speed limit and in general the road is of good vertical and horizontal alignment. To the east of the site, the A617 routes through the settlement of Kelham, where the speed is restricted to 30mph. To the east of the village the road crosses the River Trent where width is more restricted (circa 5.5m) and there is a sharp bend on the eastern side of the river. At this point the road has been widened to accommodate turning by large vehicles.
- 4.32. The transport statement assessed the suitability of the adjacent highway network to accommodate the level and type of traffic expected to be generated by the proposed mineral workings. The analysis concluded that the existing highway infrastructure is adequate to cater for existing traffic flows and that no further off-site improvement works are necessary as a result of the development. The report identified an appropriate access strategy for the proposed development. The transport appraisal therefore concludes that the proposed development will have no material impact on the safety or operation of the adjacent highway network and therefore concluded that there are no highways or transport grounds for objecting to the proposed development.

Detailed Environmental Impacts – Archaeology & Heritage

- 4.33. A desk based archaeology assessment has been undertaken and this confirmed that a wide range of sources were consulted for this study, including the County Historic Environment Record (HER), cropmarks identified by the National Mapping Programme, historic maps, published articles and books and manuscript documents. There are several entries in the HER within the site boundary, the most notable of which are a series of large undated cropmark complexes. These cropmarks could indicate the presence of late Prehistoric and/or Romano-British farmsteads exploiting the rich farmland along the floodplain of the River Trent.
- 4.34. Subsequently a geo-physical survey was undertaken followed by a detailed trail trenching exercise agreed with the County curatorial authority. A copy of that report along with the setting assessment can be found at Annexure 1.
- 4.35. On the basis of current evidence, the proposed allocation area can be assumed to have a moderately high potential for the recovery of archaeological remains. Initial examination of the cropmark complexes does not suggest that they represent sites which could be deemed to be of national importance and therefore worthy of preservation in-situ. It is probable that any adverse effects upon the archaeological resource could be adequately mitigated through an approved programme of archaeological works prepared in consultation with the archaeological advisers to Nottinghamshire County Council.

- 4.36. The potential presence of archaeology within the proposed allocation area should not therefore be viewed as a constraint to allocation in the forthcoming Nottinghamshire Minerals Local Plan. Indeed, progressing the quarry development at Flash Farm, will allow for a greater understanding of the archaeology of this section of the northern flank of the Trent Valley.

Detailed Environmental Impacts – Landscape

- 4.37. The wider landscape character is set out within Natural England’s National Character Areas and that Nottinghamshire County Council has carried out a more detailed landscape appraisal of the County, and have defined a series of policy zones. Neither the site nor surrounding area is recognised by any national or local designations such as National Park or AONB and has minimal recreational value, apart from the footpaths.
- 4.38. The site is relatively flat and as such views into the site are limited. A high voltage power line crosses the site and a large agricultural irrigation pond is situated beneath the line, enclosed by mature and outgrown hedgerows. The southern and western boundary of the site is formed by the A617 and to the west this is lined by a semi mature tree belt, which restricts views from the road across the site. Land rises to the north of the site and this rising land comprises pasture and woodland, with woodlands at Kelham Hills and Frog Abbey.
- 4.39. A public footpath known as the Trent Valley Way descends Kelham Hills to the north of the site and passes by the eastern site boundary. A further footpath crosses the site to meet the A617 south of Flash Farm. This path appears little used with the style to the A617 being quite overgrown at the time of the appraisal. To the south of the site and the A617 the village of Averham sits relatively low in the landscape. Staythorpe power station lies further south and is a visually more dominant structure, with high voltage lines extending from it. To the east of the site the village of Kelham contains some vernacular buildings, including Kelham Hall and park.
- 4.40. Overall the local area comprises a varied landscape character, with some valuable landscape features including Kelham Hall parkland, and the woodland on the rising ground on the edge of the Trent Valley. The area also contains several landscape detractors, including Staythorpe Power Station and the power lines. The LVIA confirms that “local landscape has the capacity for positive change.”
- 4.41. Most of the site is located within the “Cromwell, North and South Muskham, Kelham, Averham, Staythorpe and Rolleston Village Farmlands” policy zone TW11 area. The County Council work includes a broad description and details of the condition and sensitivity for these areas. The mineral extraction scheme would alter part of this area on a temporary basis and there would be a low/medium magnitude of change across the landscape areas, leading to a positive minor/moderate effect on the landscape character overall following restoration.
- 4.42. In terms of visual effects a small number of properties on the northern edge of Averham village have potential views north towards the site. The workings would however be relatively distant filtered by intervening vegetation. The overall visual effects would be no greater than minor and most of the rest of the village would have no view at all. Kelham lies to the east and some properties on Broadgate Lane have views west towards the site. Again the distance and low profile of the mineral operations means that any changes to the view would be low magnitude. The overall visual effects would be minor. From most of Kelham, including Kelham Hall, no effects at all are expected. The development would be visible from limited parts of the A617. At the closest point where the road forms the western site boundary, the existing tree belt provides a high degree of screening.

- 4.43. The LVIA concludes that overall the site has the capacity for some landscape change and a sensitively designed scheme ensuring minimal disturbance to the landscape fabric within the site could be accommodated without any significant landscape or visual effects. The LVIA recognises the relatively minor impact during working but concludes “there would also be some longer term landscape enhancement as a result of improvements to the landscape fabric through the restoration.”

Detailed Environmental Impacts – Hydrology (Flood Risk)

- 4.44. The Environment Agency’s (EA’s) indicative flood risk mapping shows the estimated maximum area of fluvial flooding in a 100-year flood and in a 1,000-year flood. These constitute approximately 30% and 38% of the site area, respectively, leaving approximately 62% of the site beyond the influence of any form of flooding.
- 4.45. The existing ground surface is nearly level at approximately 14 metres Above Ordnance Datum (m AOD) within the central, southern and eastern parts of the site, starting to rise gently from the middle of the site towards the northern edge, where the maximum elevation is approximately 19 m AOD. Kelham Hills Wood lies immediately north of the site, on the edge of this higher ground. The River Trent passes the eastern side of Averham and Kelham, flowing in a northeast direction passing within 1 km on the southeast of the prospective quarry site at its closest approach.
- 4.46. There are wells and springs scattered through the higher ground west of the River Trent valley, taking water from the Mercia Mudstone (Keuper Marl). The closest such is a well approximately 450 m northeast of the site. Published borehole records show that the watertable in the floodplain around the site is generally less than 2 m, and occasionally as little as 0.5 m below ground surface. The site lies on the Trent Valley Formation from which it is proposed to extract sand and gravel. This is underlain by the Mercia Mudstone Group, which forms the higher ground to the northwest of the site, on which Kelham Hills Wood is established.
- 4.47. The Sustainability Appraisal for Flash Farm site undertaken by the County Council also refers to potential effects of the proposed development upon the nearby broadleaved woodland (Kelham Hills Site of Importance for Nature Conservation).
- 4.48. Dewatering of the quarry will lower the watertable (currently <2 mbgl) in the alluvium and in the Trent Valley Formation sands and gravels. Dewatering of workings will draw groundwater from the river gravels to the northeast, southeast and southwest, in preference to the mudstone on the northwest. It is therefore expected that most shallow groundwater entering the workings will be from river gravels and alluvium and that no significant inflow of groundwater will come from the lower permeability Mercia Mudstone (and the Kelham Hills SINC).
- 4.49. The site will be restored to the similar land use and ground elevations as in the pre-development situation. This will make the restored site indistinguishable from the pre-development site in terms of flood risk. Therefore the restored site will not increase flood risk for any receptors (external or internal).
- 4.50. It will also be possible to restore parts of the site to slightly lower than original ground levels, tying in with lower adjacent ground to the south. Floodwaters would thus be able to spread across a wider area. The site restoration could thus potentially contribute a greater dedicated floodplain for flood events with return periods between 100 and 1,000 years. Some less severe flood events might receive a contribution greater than 33 ha. This would be a valuable, permanent increase in passive flood storage within the Trent Valley, reducing flood risk for external receptors such as Newark-on-Trent and adjacent

settlements. This flood storage function would be compatible with the intended agricultural/grassland function of the restored site.

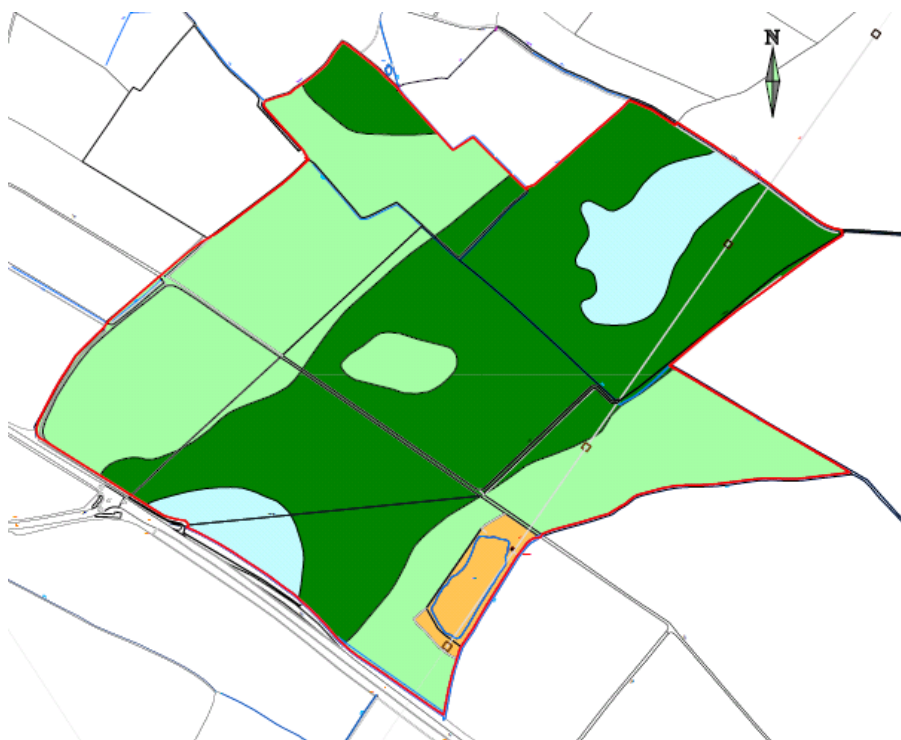
- 4.51. Flood risk and hydrogeological issues relating to quarrying at the Flash Farm site are not insurmountable and it is considered that they could be mitigated adequately during and after operations. Therefore, it is considered that these issues should not preclude the site from the Minerals Local Plan. Furthermore, the restored site is ideally placed to make a positive long-term contribution to flood alleviation in the Trent Valley near Newark, by allocation as low-level land for the accommodation of flood water.

Detailed Environmental Impacts – Soils

- 4.52. A study has been conducted to assess the agricultural land quality of the site comprising seven fields. In the central parts of the site the soils have permeable sandy loam or sandy clay loam layers over gravel at various depths. The agricultural land quality of these soils is defined by the amount of soil moisture available to sustain crop growth over the summer, and this is limited by the depth to very stony or gravelly layers. Where gravel is within 65 cm depth in this rather dry agricultural climate, the land is limited to sub-grade 3a by droughtiness. In deeper soils the limitation is less, and the land is of grade 2 quality. Along the site edges, the soils have clay topsoils and subsoils, and are slowly permeable, so that winter wetness is the principal limitation and the land is of sub-grade 3b quality.

- 4.53. The distribution of the land grades in agricultural use are as follows:

Grade/sub-grade	% of agricultural land on site
Grade 2	9
Sub-grade 3a	47
Sub-grade 3b	41
Other	3
Total area	100



4.54. The appraisal undertaken confirms that with adoption of the MAFF Good Practise Guide for Handling Soils soil resources will not be harmed. By carefully conserving and replacing the loamy topsoils and subsoils on the site alleviating the excessive site drainage that causes droughtiness in the BMV soils it will be possible to ensure that the land can readily be restored to areas of best and most versatile quality similar to those that existed before working.

Areas of Multiple Environmental Sensitivity (AMES)

4.55. Areas of Multiple Environmental Sensitivity (AMES) have been identified in the Trent valley by Nottinghamshire County Council in a report dated July 2013. The exercise was designed to aid the process of site selection and allocation for the MLP. This looked at three datasets for landscape, ecology and the historic environment at the level of the Landscape Description Unit (LDU) which provided a finer grain to the assessment of development potential. Maps were produced and various sites proposed for mineral working were analysed. The results were depicted as four levels of sensitivity as follows,

- Dark Red – highest sensitivity – significant for three datasets
- Red - significant for two datasets
- Pink - significant for one dataset
- Pale Pink – lowest sensitivity – no significance for datasets

4.56. The AMES study for the Trent valley states that

“The pink and pale pink areas shouldn’t be interpreted simply as a ‘yes’ for mineral planning purposes as there are clearly environmental issues associated with these areas such as national designations, local interests, and constraints identified in this assessment . Equally the dark red and red areas should not be interpreted as ‘no’ although it is clear that these areas are environmentally valuable across multiple disciplines, are most likely to be environmentally constrained, and development in this area is most likely to result in multiple environmental impacts, even if the designated sites and features are avoided.” (page 9)

4.57. Even so, the study is a pointer to the most and least constrained areas. The report identifies a number of sites which are Dark Red or Red for which the focus should be “Protection” including Girton West, Besthorpe East, Besthorpe South, Cromwell South, Langford North and Langford South. (Flash Farm is not within this zone).

4.58. A selective analysis has been carried out on the allocated sites which have been subject to AMES appraisal as part of the Sustainability Appraisal as set out below. This demonstrates a pronounced mismatch between the SA score and whether the site is in areas of highest sensitivity.

Site	AMES Result	SA score Operations	SA score Long Term
Besthorpe East	Dark Red	-5	0
Besthorpe South	Dark Red	-6	0
Langford West	Dark Red/Pink	-8	0
Langford North	Dark Red	-7	+3
Langford South	Dark Red	-5	+2
Cromwell South	Dark Red/ Pale Pink	-12	+1
Flash Farm	Pale Pink	-10	+1
Coddington	Pink	-6	-3

Critique of SA Selection process

- 4.59. From the S.A. the Flash Farm site overall score is -9 (-10 and +1). It is apparent that there are some methodological questions about the scoring exercise. Because the scoring technique is numerical, the practice of scoring certain criteria with a question mark due to lack of information or where the compiler cannot say whether an effect is good or bad, gives a misleading impression of the sustainability of any particular site. It effectively means that no information tends to be a benefit when looking at comparisons between sites, which is unhelpful in the process of site selection.
- 4.60. **Criterion 1 – Mineral Demand** – the sites are scored according to their contribution to demand meaning that larger sites score better than smaller ones. However, this is not balanced in other parts of the SA by the observation that the larger the site the greater will be the degree of environmental disturbance. Moreover, Barnby Moor with only one third of the quantity of mineral of Flash Farm scores the same, and East Leake North with only a quarter of the quantity of mineral of Flash Farm also scores the same. Cromwell South has no estimate of quantity of mineral at all and thus has no score. This not only gives a regrettable misleading impression of its sustainability, but also calls into question whether other sites are deliverable and should thus be allocated until more information is available. The table below shows this relationship. MGL believes that the score for the Flash Farm site should be “+3” in line with other large sites.

Site	Mineral Yield (tonnes)	SA Score
East Leake North	750,000	2
Barnby Moor	1,100,000	2
Cromwell South	Unknown	?
Flash Farm	3,080,000	2

- 4.61. **Criterion 2 – Biodiversity** – the scores do not seem to reflect the AMES results set out below in that the three sites at Langford, two at Besthorpe and one at Cromwell, all of which are at least partly in the Dark Red zone, score with one exception the same in the operational phase as Flash Farm which is in the Pink zone.

Site	AMES Result	SA score Biodiversity Operations	SA score Biodiversity Long Term
Besthorpe East	Dark Red	-2	+2
Besthorpe South	Dark Red	-1	+2
Langford West	Dark Red/Pink	-1	+3
Langford North	Dark Red	-1	+3
Langford South	Dark Red	-1	+3
Cromwell South	Dark Red/ Pale Pink	-1	+1
Flash Farm	Pale Pink	-1	+2
Coddington	Pink	-2	0

- 4.62. In respect of long term proposals although the score for Flash Farm recognises the biodiversity potential of restoration, this does not seem to be fundamentally different in nature from the proposals for restoration at Langford which would merit a higher score for that site. The lower scores for Cromwell and Coddington either reflect the lack of information supplied by the proposer or the nature of the restoration proposed which is not

biodiversity led. MGL believe tha the Flash Farm score is right but doubts whether that is true of the other sites located in areas of highest sensitivity.

4.63. Moreover, when compared with Criterion 8 – protection of BMV land – if sites contain BMV land, as most do, scores cancel each other out leading to the impression that there is no sustainability gains from mineral working because BMV land is turned into wetland biodiversity. The opposition of biodiversity over BMV land is a purely policy preference and not a necessary consequence of mineral working. This is surely counter intuitive and is misleading. It also does not give sufficient credit to schemes like Flash Farm which are able to both preserve best and most versatile land and offer biodiversity gain.

4.64. **Criterion 3 – sustainable transport** – two sites score positively because of proposals to transport mineral by barge (Besthorpe East & Shelford). Besthorpe South material is uncertain to be barged and thus has no score. However, all of the rest propose road transport but are not accorded the same scores. This is because an assumption is made about the desirability of extensions and their acceptability regardless of their specific performance, whilst a new site is automatically downgraded because it is a new access, regardless of whether an access can be gained acceptably with minimal engineering work as required at Flash Farm. The scores thus give a wrong impression that there is more difference between the sites than there is in reality.

4.65. In particular, the score for Flash Farm is the second lowest at -1 because the “*extra HGV movements generated could increase congestion over Kelham Bridge and through Southwell*”. However, the A617 serving Mansfield and Newark, and the A612 serving north Nottingham are part of the county Core Road Network (CRN) and any gravel quarry serving these markets will have to use Kelham Bridge. There is an HGV weight limit through Southwell and as such any references to this route should be removed. Wherever they are located and yet they are not penalised with low transport scores. In addition, some sites allocated with higher scores are not located on the Core Road Network, which is also inconsistent. The table below shows this relationship. MGL believes the score for the Flash Farm site should be +1 consistent with other sites.

Site	SA Comment	Traffic Connection	SA Score
Langford North	As this is an extension the existing access would be utilised, which is well related to the main highway network with direct access to the A1133.	A1133 CRN direct	+1
Coddington	The site is well-related to the main highway network with direct access off the A17	A17 CRN direct	+1
Cromwell South	As this is an extension the existing access could be utilised, which is well related to the main highway network with direct access to the A1.	A1 (T) CRN direct	+1
Botany Bay	The site is well-related to the main highway network with direct access to the A638.	A638 not CRN	+1
Barnby Moor	The site is well-related to the main highway network with direct access to the A638.	A638 not CRN	+1
Flash Farm	The site is well-related to the main highway network being located on the A617, however the extra HGV movements generated could increase congestion over Kelham Bridge and through Southwell.	A617 CRN direct	- 1

- 4.66. It appears that Flash Farm is being treated as a special case even when a Traffic Assessment shows that there will be no traffic or environmental problems in developing an access to the A617 and using it as a traffic route. The Flash Farm TIA concludes *“In proportional terms, the development flows represent less than a 0.6% change in overall flows during the peak hours (on the A617) and less than 0.6% over a typical day. The proportional change in terms of HGV flows on the A617 will be in the order of 12.9% to the east and 4.3% to the west over a typical day. The changes in flows are well within the daily variation in flows which vary by as much as 2,000 vehicles per day. On this basis, if the proposed site traffic was twice as high, the impact would still not be material. In terms of impact through the village of Kelham and Kelham Bridge in particular, the impact will thus be minimal.”*
- 4.67. **Criterion 5 – landscape** – all sites are given negative scores in operation even where the process is necessary to achieve landscape improvement. Again, the scores are influenced by the LCA for the Trent Washlands in those cases affected by it and judgments are made about specific sites and locations often within large landscape tracts which must by their nature contain a lot of variability. Therefore, the scoring process seems overly influenced by landscape tract policy assumptions rather than an appraisal of the actual effects of working at a specific location. This is understandable where there is little or no information about a site, but in the case of Flash Farm a detailed LVIA has been carried out to demonstrate that the landscape of the site is not of high quality. An amended score would therefore seem to be justified of -1 for the operational stage and 0 for the long term.
- 4.68. **Criterion 6 – flooding** – sites are categorised according to which EA flood zone they are in. Since Flash Farm is partially within Flood Zone 3 then it was accorded a score of -3. However, a detailed site FRA carried out to support the proposals observes that *“the volume of surface water generated during the 1 in 100-year rainfall event (future climate) has been estimated and can be accommodated readily within the quarry void during operations and post-restoration. The site is not at risk of fluvial flooding from the River Trent, but remains at risk from Pingley Dyke. During a flood event, waters will not be discharged from the quarry void until flood waters have receded and there is no longer a risk to the external receptors. Post-restoration the site will be restored as per the pre-extraction phase, potentially with slightly lower ground levels. Watercourses diverted for operations will be re-diverted as per the pre-extraction phase. The centre of the site may be restored to wet grassland increasing the attenuation of flood flows. The site will restrict run-off to ‘greenfield’ rates, thereby ensuing no increase in flood risk to external receptors post-restoration. It is not considered that there is any flood risk from water mains/sewers (as the rural area around the site is unlikely to have a dense water main/sewer network). It is concluded that the site location and proposed surface water management, during both the operational and the restored phases, will ensure that flood risk to internal and external receptors will not be significant.”* On the basis of this information MGL believes the site score for flooding should be zero as the effect of the proposals will be neutral.
- 4.69. **Criterion 8 – agricultural land quality** – all sites score negatively on the SA for agricultural land quality. All scores are -2 except for Cromwell and Barnby Moor which score -3, and significantly East Leake which is unscored because a survey has yet to be undertaken. This benefits the site since it appears likely that if BMV land was found it would lead to the same score as other sites. The scores are based on the quality of agricultural land affected by working and by the assumption that this would lead to a negative impact. Where some restoration is proposed to agriculture the statement is made that *“it is unclear whether this would be high quality.”* However, in the case of Flash Farm a detailed soils assessment has been carried out that shows that *“the land has both loamy soils over gravel, and heavy soils developed in alluvial clay. Droughtiness is the principal limitation to agriculture land quality on the lighter land which is of sub-grade 3a and grade*

2. *Seasonal wetness limits the quality heavy land to sub-grade 3b.*” The site is proposed to be backfilled to near original ground levels and those parts of the site which are restored to agriculture will be replaced to original grades and even upgraded by improvements to address the droughtiness identified. Other parts of the site will be restored to wet grassland using the heavier soils. Thus no reduction in soils quality will be experienced in the long term and operational effects will be temporary. Accordingly the SAscore should be amended.

- 4.70. **Criterion 9 – efficient use of resources** – also gives preference for extensions over new sites or favours large sites over smaller ones. Whilst it is a general observation that mineral that can be worked acceptably should not be left in the ground, the SA appears to have been presented on the basis of an assumption that that is always the case, when as PPG observes, that is not always the case, and sites need to be treated on their merits at a suitable level of detail. Of the sites allocated only East Leake (as a new site), Flash Farm and Barnby Moor (all of which are new sites) have scores of zero; all others are positive including the other new sites of Shelford, Coddington and Botany Bay. The first two of these are given higher scores because of their size but Botany Bay which is only 80% the size of Flash Farm in terms of yield merits a higher score because *“A large site such as this can be considered to be more efficient use of land during the operational phase than a number of smaller sites....”* However, if Botany Bay is a large site, then so must Flash Farm be.
- 4.71. On the other hand, if Botany Bay is considered more efficient because it is larger in area than Flash Farm (114 ha as opposed to 47 ha) then the yield per hectare of the two sites are as follows; Flash Farm 65,500 t/ha; Botany Bay 21,900 t/ha. With three times the yield per unit area than Botany Bay, Flash Farm must be considered the more efficient site in terms of land and resources and merits a +1.
- 4.72. **Criteria 11, 12 & 14 – air quality, water issues & human health and quality of life** – these criteria concern amenity issues with sites uniformly attracting negative scores in the operational phase. Again, judgements appear to have been made without an acceptance of mitigation. For example, the simple statement is made that sites will produce dust (Criterion 11). But beyond distances of 200m from sensitive receptors the effects are trivial. Why then have sites scored negatively if there are no sensitive receptors within this distance? And in any case, alluvial sand and gravel is predominantly wet when worked and leads to de minimis effects due to dust. This has been recognised for many years by the DEFRA Process Guidance Note 3/08(12) - Statutory guidance for quarry processes. Paragraph 3.2 of the guidance states, *“Sand and gravel - the extraction of sand and gravel is not a prescribed process. Crushing, grinding, screening and grading of wet material is not normally likely to result in the release into air of particulate matter except in a quantity which is trivial.”*
- 4.73. Criterion 12 deals with water quality and the relationship of the sites to Groundwater Protection Zones. This does not affect most sites except those in the Idle valley. A negative score where sites do not impact on groundwater source protection zones seems excessive.

- 4.74. For local amenity effects (Criterion 14) most sites are scored -2 except for Shelford (-3) and East Leake North (-1). The judgement is based on proximity to settlements, which is modified in the case of the two sites above because of either their small size or close proximity to settlements. However, in the case of Flash Farm the site is positioned the following distances from settlements;

Settlement	Distance to Flash Farm
Mickleborough House (owned by Flash Farm)	450m west of mineral extraction area 1,100m west of mineral processing area
Averham	500m south-east of mineral extraction area 650m south of mineral processing area
Kelham	650m east of mineral extraction area 700m east north-east of mineral processing area

- 4.75. It is clear from this table that even without mitigation such as screen bunds (which would be used in any event) the site is so far from the nearest settlements as not to cause any likely problem due to noise, dust and traffic (which uses an A road). The only potentially significant receptor of disturbance might be the PRoWs crossing the site.
- 4.76. **Criterion 13 - Support wider economic development** – this duplicates Criterion 1 – mineral demand and largely stops the scores from being too negative overall.
- 4.77. In conclusion, MGL believes the SA process to be flawed by making wide assumptions about effects and not giving sufficient attention to the likely effects of mineral working at each site, by an unreasonable assumption that large sites are better than smaller ones, by a similar assumption that extensions are better than new workings, by favouring a lack of information about effects, and by inadvertently cancelling sustainability gains in biodiversity against loss of BMV land, when that is encouraged by policy.

Reappraisal of Flash Farm Sustainability Scoring

- 4.78. The Sustainability Appraisal that was undertaken as part of the Minerals Plan Review assessed each of the prospective sites put forward by mineral operators and landowners then "scored" each site in light of data available at the time.
- 4.79. In the first instance only limited information was put forward by the landowners for the Flash Farm site. At the last consultation MGL submitted much more detail on additional environmental information and suggested amendments to the original score in light of that data. This has led to a slight 'improvement' of two points which MGL feels is inadequate and misleading. The company has therefore carried out its own reassessment again.
- 4.80. Each prospective site was assessed against 14 Objectives with the effect considered during the operational period and then in the long term.
- 4.81. In respect of each sustainability appraisal we comment as follows

1. Ensure adequate provision is made to meet local and national mineral demand

- 4.82. Although the revised scheme will generate a smaller tonnage, the estimated figure of 3.08 million tonnes nevertheless will make a large contribution to aggregate supply and therefore the score should be amended to **+3**.

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

- 4.83. There is now a clearly defined stand-off from the Kelham Hills SINC to the north-west of the site and the ecological appraisal confirms as the woodland is on higher ground and based on different underlying geology with different hydraulic characteristics there no envisaged adverse impacts. Notwithstanding the increased stand-off distance, the woodland is not on the receiving alignment of the prevailing wind (which is from the south-west) and therefore indirect effects of noise and dust would be negligible. In any event the material when excavated is in a damp state and therefore dust is rarely a serious adverse issue.
- 4.84. In respect of the restoration, it is proposed that lowland neutral and wet grassland will be established across the site with additional lengths of species rich hedgerows. The grasslands and hedgerows are high priority habitats identified within the Nottinghamshire Bio-diversity Action Plan. Accordingly, it is suggested that the effect during the operational phase will be neutral (0) whilst the long-term effect is positive and it is suggested this should score at least +2 for the potential contribution to BAP priority habitats

3. Promote sustainable patterns of movements and the use of more sustainable modes of transport

- 4.85. The appraisal undertaken by Nottinghamshire County Council confirms the site is well-related to the main highway network but then raises an issue about Kelham Bridge and to a lesser degree, Southwell. The A617 is extensively used by HGV's and although Kelham Bridge is not ideal its impact has been overstated. It is therefore suggested that the environmental score should be +1 in line with other similar sites.

4. Protect the quality of the historic environment above and below ground

- 4.86. Agree with -1 score

5. Protect and enhance the quality and character of our townscape and landscape

- 4.87. The landscape appraisal undertaken confirms the blandness of the site with numerous landscape detractors present (e.g. pylons on the site and Staythorpe power Station a prominent feature). The site itself consists of fields sub-divided by post and wire fences. The scheme can be worked without removing a single section of hedgerow and therefore there are no landscape fabric features on site to be harmed. The concept restoration scheme will introduce varied species hedgerows along with conservation wet grassland. During working therefore it is suggested that a more reflective score would be no more than -1 whereas the restoration should score positively (+1)

6. Minimise impact and risk of flooding

- 4.88. The Flood Risk Assessment concludes there will be no adverse impacts during the working phase and highlighting that only a proportion of the site is identified as being within the flood plain. The restoration will be designed to incorporate lowland wet grassland and will extend the floodplain thereby offering greater long term sustainable benefits. It is therefore suggested that during the working phase the impact should be 0 whereas the long term gain should +1

7. Minimise any possible impacts on and increase adaptability to climate change

- 4.89. No comment and agree with the score ?

8. Protection of high quality agricultural land and soil

- 4.90. The ALC assessment confirms that less than 60% of the site constitutes Grade 2 and 3a land (i.e. best and most versatile). The site will be worked sequentially, progressively restoring the land close to pre-development ground levels so only a proportion of the site will be out of productive agricultural use at any one time. Soils will be stripped, stored and replaced using accepted practices to ensure the same or better ALC can readily be achieved post-restoration. The score during the working phase should therefore be no greater than **-1** and **+1** post restoration.

9. Promote more efficient use of land and resources

- 4.91. Agree with original sustainable assessment score of ?

10. Promote energy efficiency and maximise renewable energy opportunities from new or existing development

- 4.92. Agree with original sustainable assessment score of ?.

11. Protect and improve local air quality

- 4.93. Recognised research work undertaken by central government indicates that matters such as dust can readily be controlled particularly when appropriate stand-offs are introduced. The critical zone in respect of dust is 100m and at Flash farm the settlements of Averham and Kelham are 500 to 650m respectively from the nearest site operations. The score should be **0**.

12. Protect and improve water quality and promote efficient use of water

- 4.94. Agree with original sustainable assessment score of **-1**

13. Support wider economic development and promote local job opportunities

- 4.95. Although the revised scheme will generate a smaller tonnage, the estimated figure of 3.08 million tonnes nevertheless will make a large contribution to economic development and employment for the duration of operations and therefore the score should be amended to **+3**.

14. Protect and improve human health and quality of life

- 4.96. The boundary of the site at Flash Farm has been significantly reduced and moved further away from the settlement of Averham. Recognised research work undertaken by central government indicates that matters such as noise and dust can readily be controlled particularly when appropriate stand-offs are introduced. The critical zone in respect of dust is 100m and at Flash farm the settlements of Averham and Kelham are 500 to 650m respectively from the nearest site operations. At such distances noise can readily be controlled but in any event, screening mounds will be incorporated (primarily to minimise any potential visual impacts).
- 4.97. Accordingly the "score" should be no greater than **-1** for this aspect of the protection of human health and quality of life.

Proposed Changes to Sustainability Appraisal

4.98. MGL proposes that the SA scores for Flash Farm should be changed as follows;

Sustainability Appraisal for Flash Farm	Scores (MGL)	
	Operational period	Long- term
1. Ensure adequate provision is made to meet local and national mineral demand	+3	0
2. Protect and enhance biodiversity at all levels and safeguard features of geological interest	0	+2
3. Promote sustainable patterns of movements and the use of more sustainable modes of transport	+1	0
4. Protect the quality of the historic environment above and below ground	-1	*
5. Protect and enhance the quality and character of our townscape and landscape	-1	+1
6. Minimise impact and risk of flooding	0	+1
7. Minimise any possible impacts on and increase adaptability to climate change	?	*
8. Protection of high quality agricultural land and soil	-1	+1
9. Promote more efficient use of land and resources	+1	?
10. Promote energy efficiency and maximise renewable energy opportunities from new or existing development	?	?
11. Protect and improve local air quality	0	0
12. Protect and improve water quality and promote efficient use of water	-1	0
13. Support wider economic development and promote local job opportunities	+3	0
14. Protect and improve human health and quality of life	-1	0
Total	+3	+5
Combined Total	+8	

Annexure 1

Archaeological Trial Trenching and Settings Assessment



PHOENIX CONSULTING
Archaeology Limited

**ARCHAEOLOGICAL EVALUATION
TRIAL TRENCHING**

**LAND AT FLASH FARM
AVERHAM
NOTTINGHAMSHIRE**

PC409c

on behalf of:

Mick George Ltd

by:

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and
A Richmond BA PhD MCI(A) FSA

with contributions by:

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J Summers & J Wood

24th April 2015



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Plate 7 Ditches [1013], [1007] & [1019] in trench 10.
Plate 8 Ditches [1109] & [1111] in trench 11, looking south-westwards.
Plate 9 Enclosure Ditch [1205], looking north-westwards.
Plate 10 Ditch [1504], looking south-westwards.
Plate 11 Ditches [2304] & [2305], looking north-eastwards.
Plate 12 Ditches [2606] & [2608], looking south-eastwards.
Plate 13 Pit [3108], looking south-westwards.
Plate 14 Curvi-linear ditch [3618], looking south-westwards.
Plate 15 Ditches [4414] & [4419], looking south-westwards.
Plate 16 Ditches [4607], looking south-eastwards.
Plate 17 Ditches [4714], [4716] & pit [4715], looking south-westwards.

Non-Technical Summary

During February & March 2015 Phoenix Consulting Archaeology Ltd carried out an archaeological trial trench evaluation across land at Flash Farm, Averham, Nottinghamshire (NGR SK 7577 5546). The work was carried out on behalf of Mick George Ltd. and forms part of an archaeological evaluation of the Site, comprising a desk-based assessment, an archaeo-geophysical survey and a trial trenching investigation, all conducted in order to support a forthcoming application for mineral extraction. The Site is a prospective sand and gravel quarry identified within the emerging Nottinghamshire Minerals Local Plan.

To date, a desk-based assessment has been prepared and an archaeo-geophysical survey completed. The present document outlines the results of a recent trial trench evaluation. 47 trenches were targeted on geophysical anomalies indicating the presence of below-ground archaeology, together with cropmarks of suggested archaeological origin and archaeologically 'blank' areas to act as a control.

Archaeology was found across various parts of the Site. The main concentrations related to cropmark complexes in the south and on the eastern edge, along with further evidence of activity in the NE and NW corners. The main periods of activity identified were of late pre-Roman Iron Age and Roman date, although there was some evidence of earlier isolated Bronze Age activity. Many of the features identified lacked correlating artefactual evidence and remain undated, although some features could be dated by association. Parts of the site were archaeologically blank, where no past activities were identified.

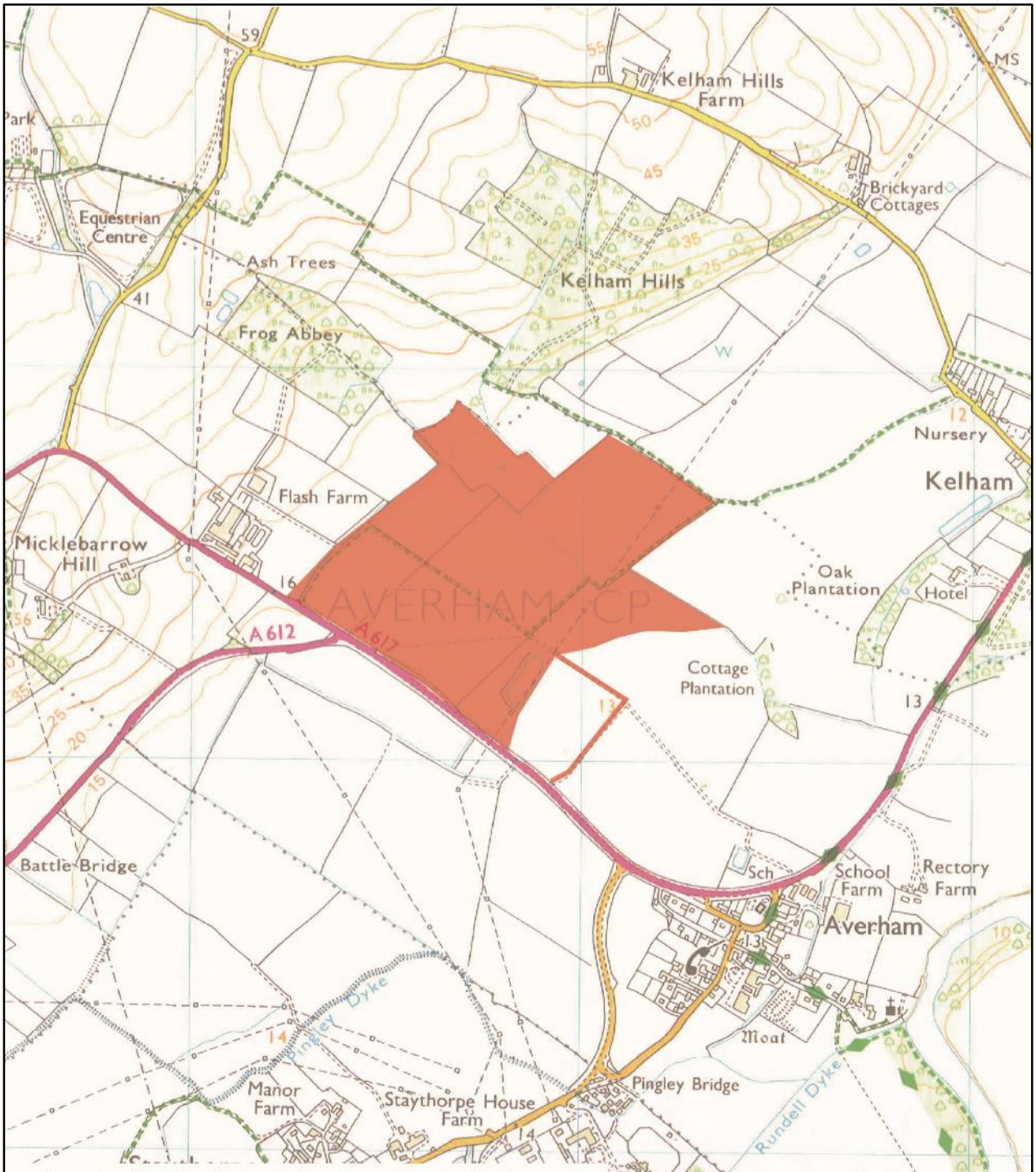


Figure 1

Land at Flash Farm, Averham, Nottinghamshire : Site Location

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1.0 INTRODUCTION

1.1 The commission

- 1.1.1 Mick George Ltd are promoting a site known as Land at Flash Farm in the Parish of Averham for mineral development. It is a prospective sand and gravel quarry identified within the emerging Nottinghamshire Minerals Local Plan. The area under consideration for extraction and soil/landscape bunding covers approximately 47 hectares, being centred at NGR SK 7577 5546 (see Figure 1).
- 1.1.2 In order to better understand the impact proposed development may have on surviving archaeological deposits, the Company are carrying out a series of archaeological investigations. All such works are been conducted in full consultation with the Curatorial Archaeological Office (CAO). To date a desk-based assessment (Richmond & Thomas 2013) and an archaeo-geophysical survey (Bartlett & Richmond 2014) have been completed. These both indicated that parts of the Site have a moderate to high potential for the recovery of archaeological remains.
- 1.1.3 Following completion of the non-intrusive surveys, it was agreed with the CAO that a programme of trial trenching be carried out in order to assess the extent, date and survival of archaeological features across the Site. The results from the trenching will allow the archaeological adviser to the mineral planning authority to make their recommendations on any forthcoming application.
- 1.1.4 The remit of the trial trenching was discussed in detail with the CAO prior to the commencement of on-site works. Trial trenches were excavated across geophysical anomalies that suggested the presence of below-ground archaeology, across 'archaeological' cropmarks plotted from aerial photographs and across apparently 'blank' areas to act as a control.
- 1.1.5 This document outlines the results of the trial trenching exercise which was carried out between the 16th February & 20th March 2015. Forty-seven (47) trenches totalling 4,700m² were excavated across the Site (see figure 2). Most trenches measured 50m long by 2m wide, although some were split into two where they crossed field boundaries.

2.0 PHYSICAL BACKGROUND

2.1 Site Location (figure 1)

- 2.1.1 The proposed development area lies in fields directly to the east of Flash Farm, approximately 0.5km to the NW of the village of Averham and

approximately 1km to the west of the village of Kelham (see Figure 1). The Site presently covers several agricultural fields with their boundaries marked by semi-mature hedgerows and tracks (plate 1). An irrigation pond is located close to the SE boundary.

- 2.1.2 The land generally lies on the 13m AOD contour, within the wide valley floodplain of the River Trent, which is located 1.2km to the east. The elevated western edge of the valley is located just to the west of the Site, with the ground noticeably rising to form the local landforms of Micklebarrow Hill and Kelham Hills. The A617 forms the SW boundary with agricultural fields around the remaining edges.

2.2 Geology

- 2.2.1 The solid geology comprises the *Mercia Mudstone Group* overlain by sands and gravels of the *Holme Pierrepont Sand and Gravel Member* and alluvial deposits of clay, silt sand and gravel (www.bgs.ac.uk). These alluvial deposits are derived from the periodic flooding of the River Trent. Soils which have developed on this geology are of the *Arrow Association* (543), being deep permeable loams over glaciofluvial drift. These border a thin band of red clay soils to the immediate west, being of the *Compton Association* (813e). As the land rises, soils of the *Worcester Association* (431) are encountered, being non-calcareous red clays over mudstone.



Plate 1

The site at the commencement of trenching, looking west across Trench 45

3.0 AIMS AND OBJECTIVES OF THE ARCHAEOLOGICAL EVALUATION

3.1 Aims and objectives

- 3.1.1 The general aim of the trench evaluation was to obtain useful information concerning the presence, character, date and level of preservation of surviving archaeological remains across the Site. The results of the exercise will allow for the archaeological advisor to the planning authority to determine the impact of any proposed development on the archaeological resource. The results will also allow the curatorial authority to make their detailed recommendations on an appropriate mitigation strategy should development proceed.

3.2 Trench evaluation methodology

- 3.2.1 All archaeological operations were carried out in accordance with current FAME guidelines¹ and Health and Safety legislation. A detailed *Risk Assessment* was circulated to all staff prior to work commencing.
- 3.2.2 All trenches were surveyed and located using GPS systems and levelling equipment. Overburden was removed from each trench in a clean and methodical manner and stored alongside. This was carried out under the supervision of a suitably qualified archaeologist using a tracked excavator fitted with a 2.0m wide toothless ditching bucket. Where deep deposits were encountered, machine excavation was undertaken in stints to check for the presence of archaeology at various horizons.
- 3.2.3 Machine excavations took place to a level of either natural deposits or when potential archaeological horizons were encountered. All subsequent excavations were undertaken by hand. Sampling was designed to characterise and date features.
- 3.2.4 A detailed context record was maintained on individual pro-forma record cards. Each archaeological layer, fill, cut, etc., was individually numbered and described in terms of soil detail, stratigraphic position, dimensions, artefact content, samples and interpretation.
- 3.2.5 Trench plans and sections were drawn at scale 1:50 and 1:20 as necessary and located on a site plan. Excavated sections were drawn at scale 1:10. A full photographic record was made using slide, monochrome 35mm film and digital format.

¹ Federation of Archaeological Managers and Employers, formerly known as SCAUM (Standing Conference of Archaeological Unit Managers)

- 3.2.6 All finds relating to the archaeological record of the site were collected with reference to context and location.

3.3 The archive

- 3.3.1 The written, drawn and photographic records form the site archive, which is currently stored at *Phoenix Consulting's* Bedford office. All artefacts recovered (which comprises pottery sherds, two pieces of flint and fragments of animal bone) have been cleaned, marked and conserved, in accordance with best practice.
- 3.3.2 The archive has been organised using the standards set out in MAP 2 Appendix 3 (Management of Archaeological Projects – published by English Heritage – 1991).
- 3.3.3 The ultimate recipient museum for finds and the archive will be the recognised depository for the archaeological material for Nottinghamshire and their Conditions of Acceptance will be adhered to.

4.0 ARCHAEOLOGICAL & HISTORICAL BACKGROUND

4.1 Background to the site and surrounds

- 4.1.1 A full archaeological and historical background to the Site and its surrounds is contained within the desk-based assessment (Richmond & Thomas 2013). What follows here is a summary of the main points.
- 4.1.2 There are several entries in the HER within the Site boundary, the most notable of which are a series of large undated cropmark complexes. It has been suggested that these cropmarks indicate the presence of Iron Age and/or Romano-British farmsteads exploiting the rich farmland along the floodplain of the River Trent. The discovery of a Neolithic axehead and the identification of potential ring ditches within the Site may hint at an earlier Neolithic/Bronze Age presence.
- 4.1.3 Bronze Age (*c. 2,200 - 800 BC*) and Iron Age (*c. 800BC – AD 43*) activities are well represented in the vicinity of the Site with settlement being focused on the river terrace and its major tributaries. This era saw a transition from a landscape of open to enclosed settlements with the former characterised by pit/posthole scatters and the occasional roundhouse. The rise in the number of enclosed settlements appears to be linked to the growth of linear ditched boundaries and pit alignments which may have divided blocks of land farmed by individual communities. This culminated with the development of extensive co-axial field systems comprising rectilinear fields linked to trackways and pit alignments (Knight & Spence, 2013, 24-26).



Figure 2. Location of trial trenches, superimposed upon geophysical survey results

- 4.1.4 The Roman period (AD 43 - 410) also saw significant developments in the pattern of rural settlement and the organisation of the rural landscape. Sites all along the river valleys of the region saw the evolution of a hierarchy of small rural settlements; mainly enclosed farmsteads, along with larger nucleated villages, villas and towns. Co-axial field systems continued to develop and typically comprised groups of rectilinear fields integrated with ditched trackways and rectilinear ditched enclosures used for habitation, stock and intensive horticulture (Knight and Spence, 2013, 26). It was considered likely that some of the extensive cropmarks within the Site date to this period.

Geophysical Survey:

- 4.1.5 A detailed magnetometry survey was carried out across the Site in 2014 (Bartlett & Richmond 2014). This recorded a series of anomalies which broadly correlated to the cropmark complexes previously identified. Broad areas of suggested alluvial deposits were also identified across parts of the Site, particularly to the east, close to a bordering stream. Some limited disturbances relating to 19th century field boundaries were detected, together with extensive systems of modern land drains.



Plate 2

Trenches 2 & 38, showing the deeper alluvial deposits (Tr.2) and sand & gravel natural geology (Tr.38) present on the Site

5.0 RESULTS

5.1 Summary (Figure 2)

- 5.1.1 Archaeological features were identified within 28 trenches². The features identified comprised of ditches, pits and possible post-holes. The remaining trenches contained nothing of archaeological significance. A number of potential features were sample excavated, but they turned out to be either geological in nature, former furrows, modern field boundaries or the remains of relatively modern land drains.
- 5.1.2 Where no alluvial clays were present, the natural geology was generally encountered between 0.3m and 0.5m below the topsoil horizon. The sub-surface geology was a brown sand and gravel (plate 2). The topsoil had a sandy matrix and was between 0.2m and 0.3m depth. The subsoil deposit was between 0.05m and 0.2m in depth and was a pale brown sand. All identified archaeological features cut the natural geology and were sealed by either the subsoil/topsoil horizon or by alluvial layers.
- 5.1.3 The alluvial clays were grey and orange in colour and varied in depth between 0.5m and in excess of 2m (plate 2). They were typically encountered in the far eastern, north-western and western edges of the site (see figure 20).
- 5.1.4 The artefacts recovered during the trenching exercise included a small assemblage of pottery dated to the Bronze Age, pre-Roman Iron Age (PRIA) and Romano-British periods, two undiagnostic flints along with a small selection of fragmented animal bone. A series of environmental samples were taken from features across the Site.

5.2 Trenches 1-3, 19-22, 24-5, 28, 30, 33-5, 37-39, 43 & 45

- 5.2.1 The above trenches did not contain any features or finds of archaeological significance. Trench 45 was positioned over a suggested cropmark enclosure, but no features were identified (see further discussion below). Some trenches were located across geophysical anomalies which turned out to be geological in nature. The remainder were positioned in blank areas to act as a control or where past cultivation lines were picked up on the geophysical survey. A selection of trenches encountered furrows, or post-Medieval field boundaries, as depicted on the 19th century Ordnance Survey maps.

² Trenches containing probable archaeological features were Nos. 4-18, 23, 26-27, 29, 31-2, 36, 40-42, 44 & 46-7.

5.3 Trench 4 (figure 3)

- 5.3.1 Trench 4 was located in the western-most field. Prior to the trenching, there were no suggestions of archaeology here, either from the geophysical survey or the cropmark plot. Excavation, however, identified three ditches at the southern end of the trench: [404], [406] & [409] (plate 3).
- 5.3.2 Ditch [404] had a NW-SE alignment with a shallow U-shaped profile and was filled with two deposits of silt sand. Excavation of the feature recovered no finds. Nearby was ditch [409] which had steep sides and a flat base and appeared to be the corner of an enclosure or boundary ditch. It contained two fills of sandy silt, the lower with a slight organic content. It was truncated by a later ditch [406] which contained grey silty sands. None of the ditch fills in this trench contained any artefacts.



Plate 3
Ditches [406] & [409], looking south

- 5.3.3 *Interpretation:*
The ditches in this trench were identified in an area devoid of cropmark anomalies or archaeo-geophysical readings. Whilst undated, they are considered to represent outlying field boundaries or enclosure ditches associated with the archaeological activity identified to the immediate east.

5.4 **Trench 5** (figures 3 & 4)

5.4.1 Trench 5 was positioned where a single linear was indicated on the cropmark plot. The geophysical survey, however, did not pick up any readings of suggestive archaeology. Opening of the trench identified a single ditch [504] which appeared to relate to the cropmark feature, together with a possible pit [507], both at the eastern end of the trench (plate 4). The pit contained pottery sherds of Early Bronze Age date.

5.4.2 Pit [507] was ovoid in plan with concave sides and a flat base, measuring 1.2m in width and 0.5m deep. It was filled with two sandy deposits (505) & (506), both of which contained pottery dated to the Early Bronze Age. Analysis suggests the pottery emanates from a single 'food vessel' (see Edwards below; plate 5). Two undiagnostic flint artefacts were also recovered from the pit. The feature was truncated on its western edge by a 0.5m deep N-S aligned ditch [503], which did not contain any finds.

Interpretation:

5.4.3 The pit represents evidence of isolated Bronze Age activity in this part of the Site. The ditch, which corresponds with a N-S linear cropmark, post-dates the pit and may relate to the pre-Roman Iron Age activity identified to the immediate south.



Plate 4

Ditch [504] and pit [507]
within Trench 5, looking northwards

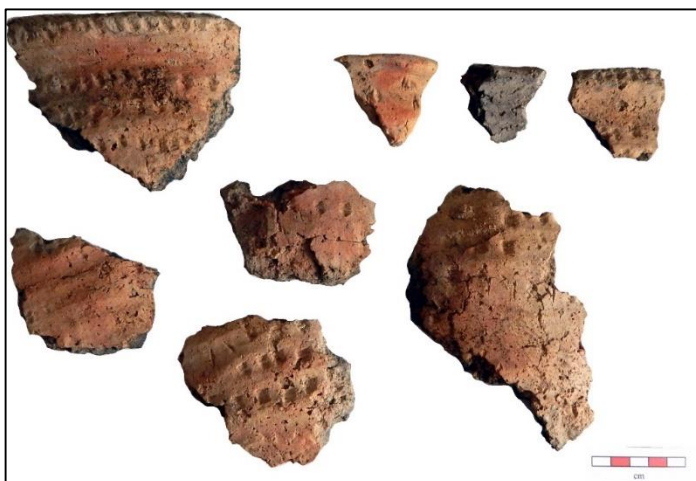


Plate 5

Early Bronze Age pottery sherds
from a probable food vessel in pit (505)

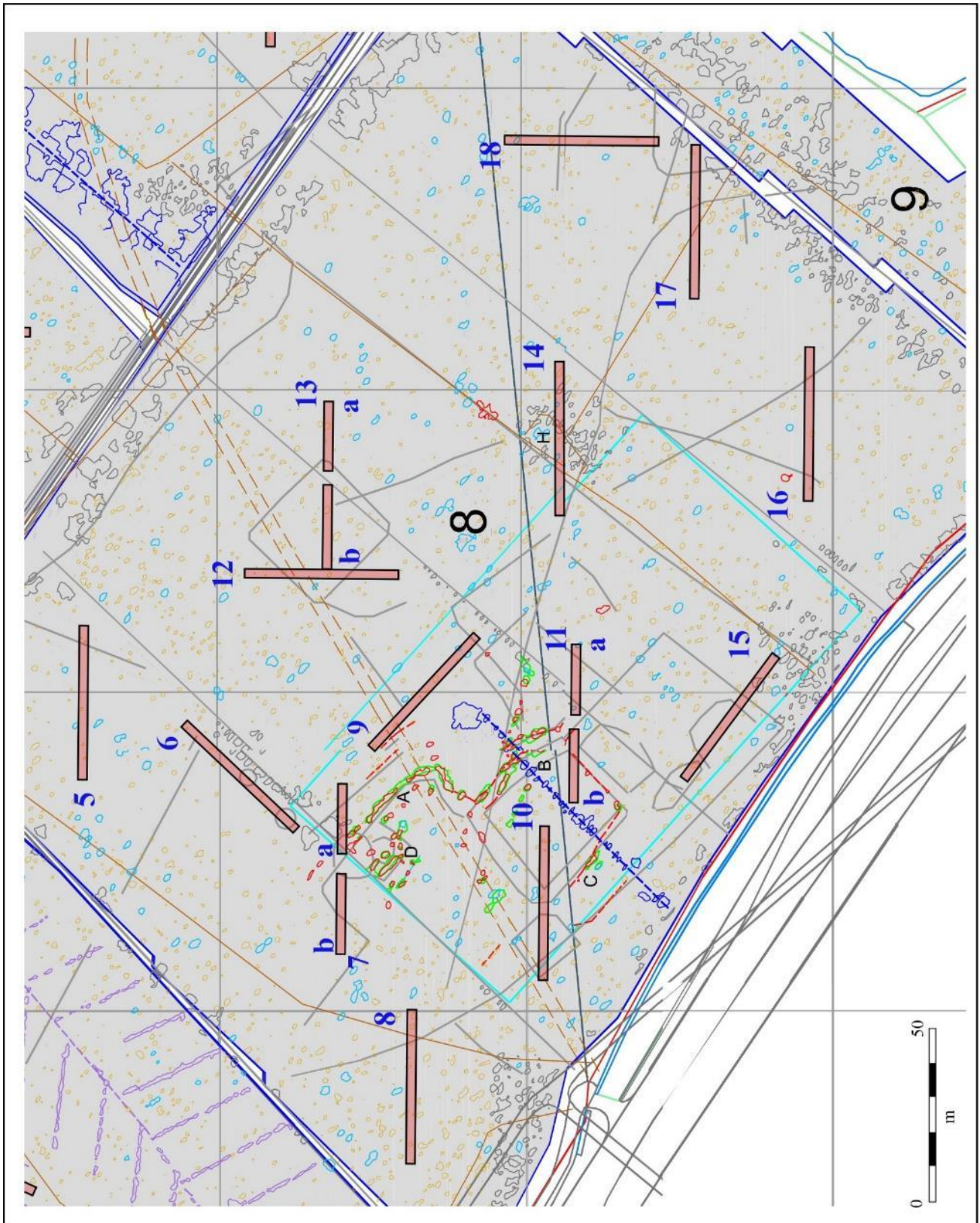


Figure 3 Trench location in the southern cropmark complex area

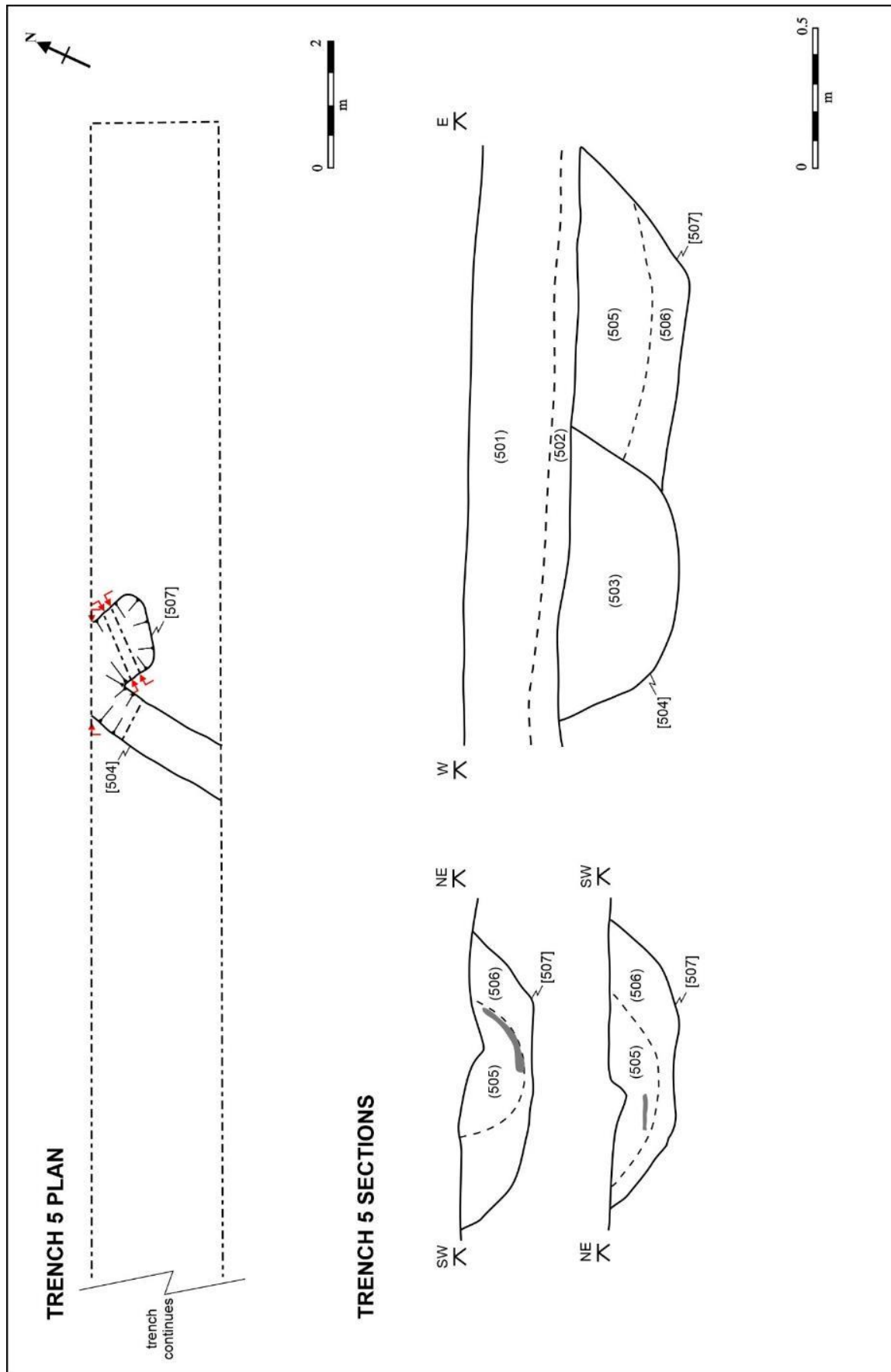


Figure 4 Trench 5 Plan and Sections

5.5 **Trench 6** (figure 3)

5.5.1 Trench 6 was positioned in an area where the cropmark plot suggested the presence of two small ring-ditches and a field boundary. The geophysical survey did not identify anything at this location. Opening of the trench identified three ditches, one of which was curvi-linear, and a possible pit.

5.5.2 The curvi-linear ditch [604] was located in the central part of the trench, broadly corresponding to one of the ring-ditches identified on the cropmark plot. It had a shallow U-shaped profile, filled with two deposits of sand silt, with no artifacts. Bordering the curvi-linear ditch to the north was a pit (unexcavated) and two further ditches. Ditch [607] had a N-S alignment with steep sides and a flat base. Its two sterile silty sand fills were again devoid of any artefacts. The final ditch was not excavated, but was seen to relate to the identified cropmark field boundary.

Interpretation:

5.5.3 The undated features in this trench are likely to represent the northern extent of the identified activity to the immediate south.

5.6 **Trench 7** (figures 3 & 5)

5.6.1 This trench was located to investigate a large ring-ditch and several linear anomalies (some of which appeared to relate to enclosure ditches) evident both in the geophysical survey and on the cropmark plot. The trench was separated into two parts (a & b) to accommodate a fence line and water pipe. Trench 7a contained two inter-cutting ditches [711] and [714], together with two linear features which were not investigated. Trench 7b contained a curvi-linear ditch [709] with associated pit [703], a post-hole [706], and a ditch and two pits which were not excavated. The curvi-linear ditch corresponded with the location of the cropmark ring-ditch.

5.6.2 Ditch [711] had a NE-SW alignment, with a shallow U-shaped profile, and was filled with a single deposit of brown silt sand. It was truncated on its western edge by a more defined, NW-SE aligned, ditch [714], which was of similar dimensions, but slightly deeper, containing two deposits of silty sand (712) & (713). Neither ditch contained any artefacts.

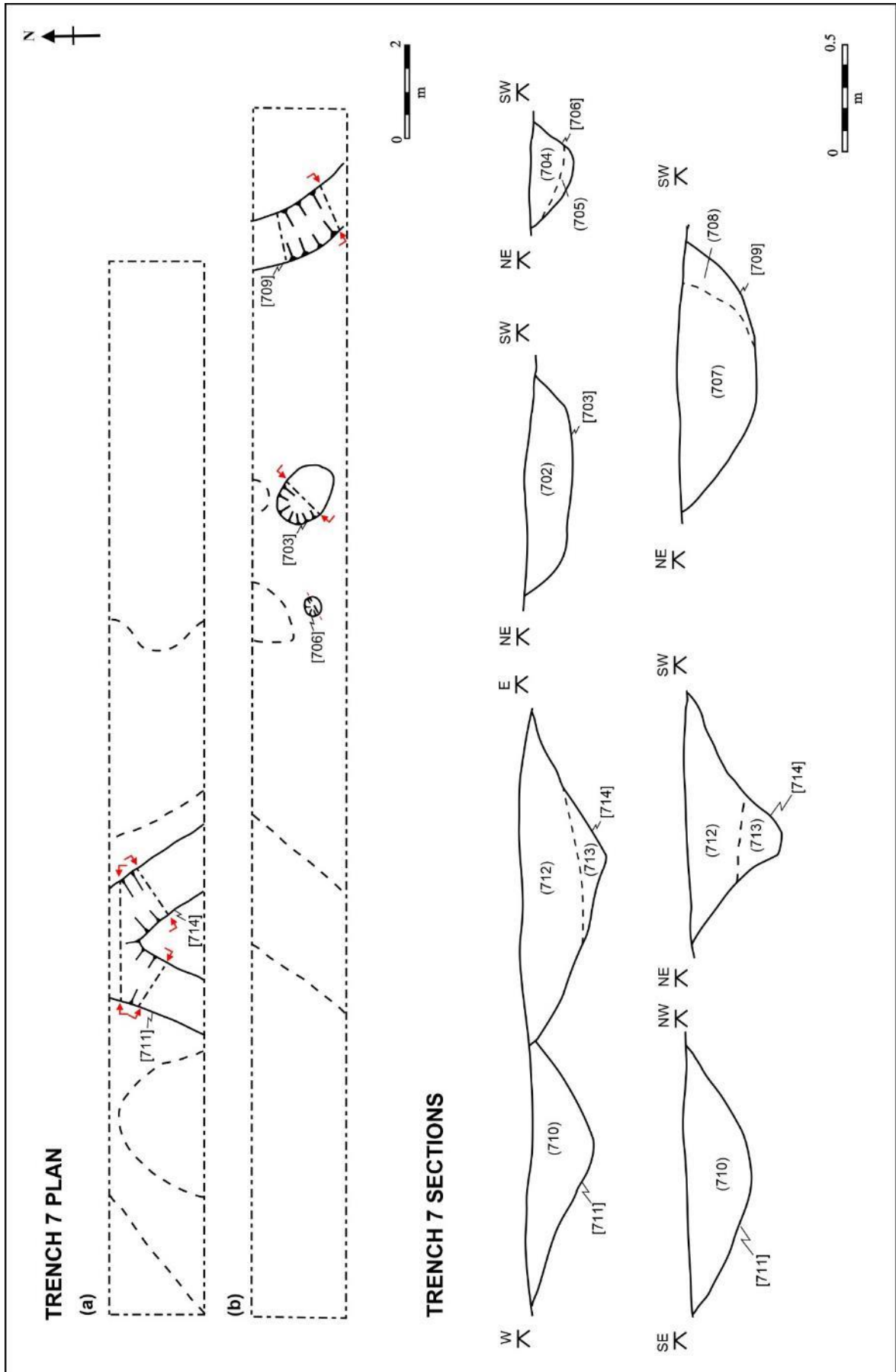


Figure 5 Trench 7 Plan and Sections

- 5.6.3 Curving ditch [709] corresponded to the cropmark ring-ditch. It had concave sides leading to a flat base and was filled with a single deposit of grey sand silt. A single carbonised oat grain was identified in an environmental sample taken from this ditch (see Summers below). The nearby pit [703] was ovoid with a bowl-shaped profile. It was filled with two deposits of the usual sand silt. Nearby post-hole [706] was sub circular in shape with a bowl-shaped profile. None of these features contained any artefacts.

Interpretation:

- 5.6.4 The excavated ditches identified in Trench 7a broadly correspond to a geophysical feature and linear cropmark, which are seen to intersect with a large circular feature. The curving ditch recorded in Trench 7b appears to represent the western side of this circular cropmark. Further features identified in the trench relate to other geophysical and cropmark features recorded across this part of the site. The lack of artefacts make it difficult to characterise the features, but they would appear to be associated with the pre-Roman Iron Age activity recorded to the immediate south.

5.7 Trench 8 (figure 3)

- 5.7.1 This trench was located to investigate a linear cropmark. Opening of the trench identified a single ditch [805] in the eastern end of the trench (plate 6). It had a broadly NW-SW alignment with a U-shaped profile, 1.4m wide and 0.4m deep. It was filled with three deposits of sandy silt, which did not contain any artefacts.



Plate 6
Ditch [805] looking north-westwards.

Interpretation:

- 5.7.2 The undated ditch may correspond with the recorded cropmark, but it may also be the remains of a former field boundary as depicted on the 1st edition Ordnance Survey map.

5.8 Trench 9 (figures 3 & 6)

- 5.8.1 This trench was positioned between the cropmark evidence of two large square enclosures, in an area where several linear features had been recorded. Opening of the trench identified seven rather similar ditch features, of which four were archaeologically investigated. All had an approximate NE-SW alignment, being broadly parallel to each other. Two ditches [9004/6] & [9008] were seen to correspond to the recorded cropmarks.

- 5.8.2 Ditch [9006] appeared to be the terminus of an earlier ditch which had been truncated by a later ditch [9004] with the same alignment. Ditch [9004] had a shallow U-shaped profile and was filled with a single deposit of grey silt sand. Bordering ditch [9008] had a slightly deeper profile and filled with a similar deposit. Neither feature contained any artefacts.

- 5.8.3 In the central part of the trench were two intercutting ditches [9010] & [9012], the earliest of which had a narrow V-shaped profile. Both features were filled with similar silty sand deposits, which did not contain any artefacts.

Interpretation:

- 5.8.4 Although the ditches investigated in this trench contained no artefacts and their exact function remains unknown, they do appear to relate (in part) to a series of intercutting and overlapping enclosure features and field boundaries recorded as cropmarks. They appear to form part of the northern extent of former agricultural enclosures of pre-Roman Iron Age date.

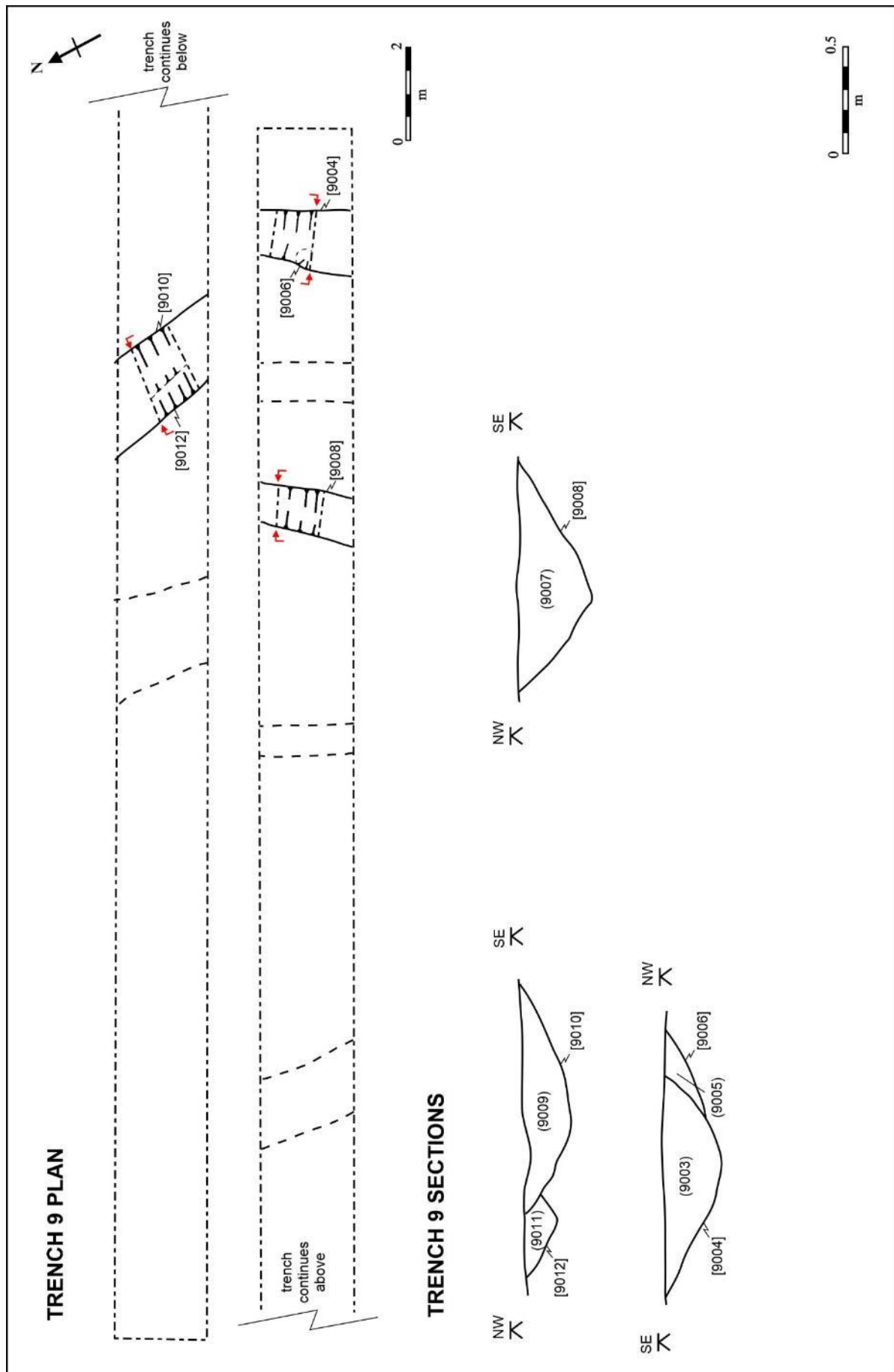


Figure 6 Trench 9 Plan and Sections

5.9 **Trench 10** (figures 3 & 7)

5.9.1 This trench was located to investigate several cropmark features, which appeared to relate to a series of overlapping square enclosures and boundary ditches. Opening of the trench identified several ditches, the most notable being two sets of complex intercutting ditches [1003/6/8] and [1010/13/17/19], the latter of which appeared to be the re-defined western corner of the formerly identified square enclosure represented by the cropmark plot.

5.9.2 The earliest of the first group of ditches was [1008]. It had a shallow U-shaped profile, just 0.2m deep, and was filled with a brown silt sand. The feature was truncated by later ditch [1006] which had a similar profile, but was deeper. This was filled with two markedly sterile deposits of silt sand. The latest ditch in this sequence, [1003], was curvi-linear in plan, with a shallow V-shaped profile, only 0.17m deep. This was filled with a grey-brown silt sand (1002) from which were recovered three sherds of pre-Roman Iron Age pottery.

5.9.3 The earliest of the second group of intercutting ditches was [1017]. This had a U-shaped profile, with three fills of silty sand. A number of fragments of daub or fired clay were recovered from middle fill (1015). This ditch was truncated on its western edge by shallow ditch [1019] and on its eastern edge by ditch [1013] (plate 7). The two fills of ditch [1013] both contained abraded and small fragments of pottery characteristic of the pre-Roman Iron Age (c. 500 BC to AD 50) (see Leary below). Environmental sampling of one of these fills, (1011), recovered a few carbonised wheat grains (see Summers below). Ditch [1010] was the latest in this particular sequence; it did not contain any artefacts.

Interpretation:

5.9.4 The various features in this trench (both excavated and unexcavated) clearly relate to the previously identified cropmark features across this part of the Site. Whilst the majority of ditch sections failed to recover dateable artefacts, enough pottery sherds were found to show that the activity dated to the pre-Roman Iron Age period.

5.9.5 It is suggested that the evidence relates to the establishment, and then re-definition of a series of agricultural enclosures, no doubt with low-level settlement in the vicinity. The re-definition of the enclosure ditches would seem to indicate the continuous use of the features over several generations.

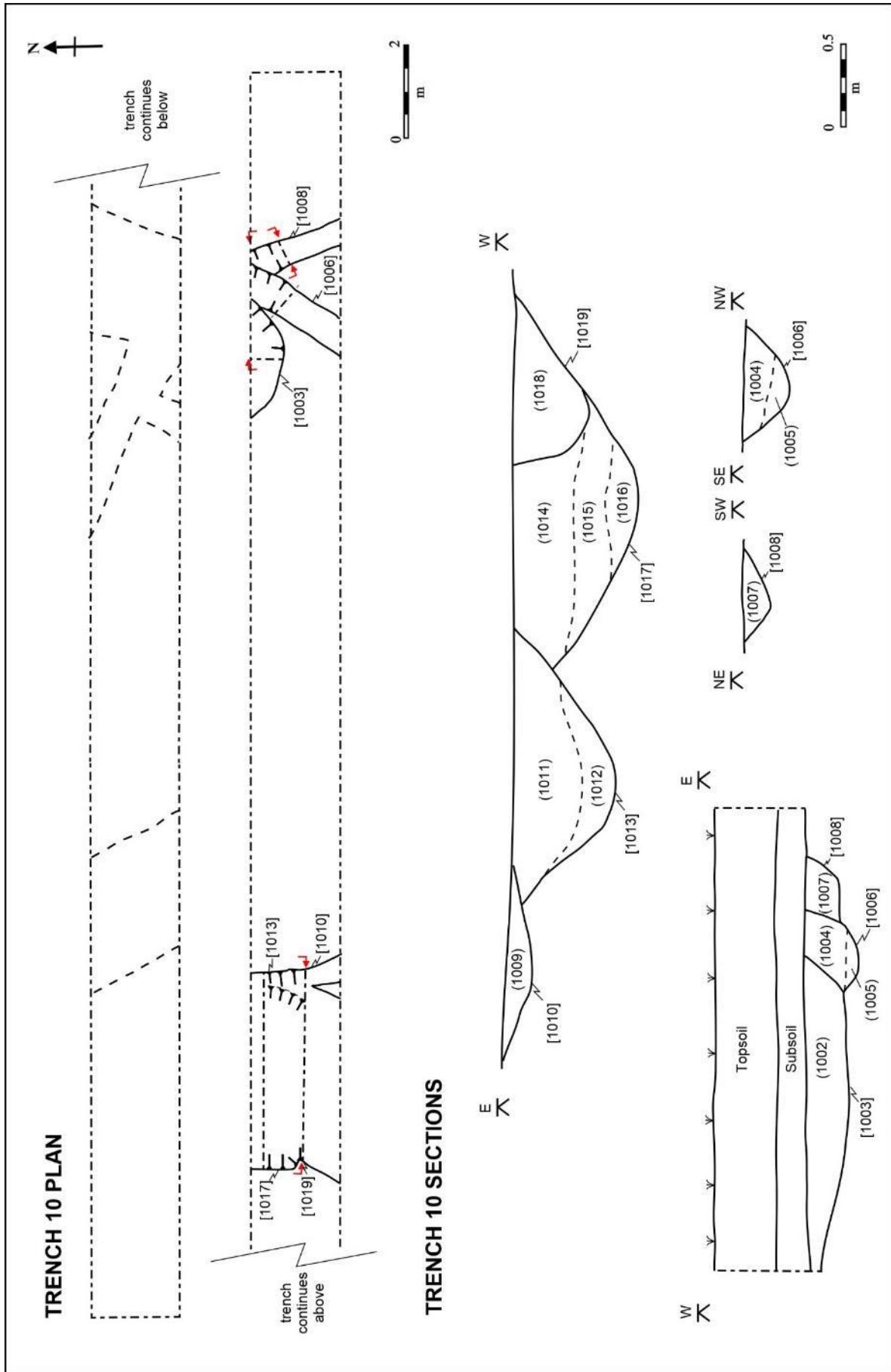


Figure 7 Trench 10 Plan and Sections



Plate 7
Ditches [1013], [1007] & [1019] in trench 10

5.10 Trench 11 (figures 3 & 8)

- 5.10.1 This trench was located to investigate enclosure ditches and boundary features, evident both in the geophysical survey and the cropmark plot. The trench was separated into two parts (a & b) to accommodate a fence line and buried water pipe. Opening of the trench identified eight ditches of which five were investigated.
- 5.10.2 Ditch [1117] appeared to relate to the corner of a former enclosure on a NE-SW alignment. The ditch, however, was very shallow, and clearly plough truncated. Its fills contained no finds. Close-by was ditch [1115], which was far more substantial. Excavation of it identified two silty sand fills, neither which contained finds.
- 5.10.3 Further east were a series of ditches, some of which were intercutting. Ditch [1106] was aligned NE-SW with concave sides and a flat base, filled with a single deposit of grey/brown silt sand. It was truncated by ditch [1104], which had a similar profile. Neither feature contained any finds.



Plate 8

Ditches [1109] & [1111] in trench 11, looking south-westwards

- 5.10.4 Intercutting ditches [1109] and [1111] were at the eastern end of the trench (plate 8). Ditch [1109] appeared to be a re-cut of [1111] and had a U-shaped profile up to 0.5m deep. Excavation showed it to contain two deposits of silt sand, of which the lower fill (1107) contained three sherds of pottery from a handmade jar dated to the late pre-Roman Iron Age (c. 100 BC to AD 50) (see Leary below). The feature appears to correspond well with a cropmark enclosure.

Interpretation:

- 5.10.5 The various ditches identified in this trench relate to a series of cropmark enclosures plotted across this part of the site. The few finds recovered from the excavations suggest that the enclosures were in use during the late pre-Roman Iron Age. It is suggested that the evidence relates to the establishment, and then re-definition of a series of agricultural enclosures, no doubt with low-level settlement in the vicinity.

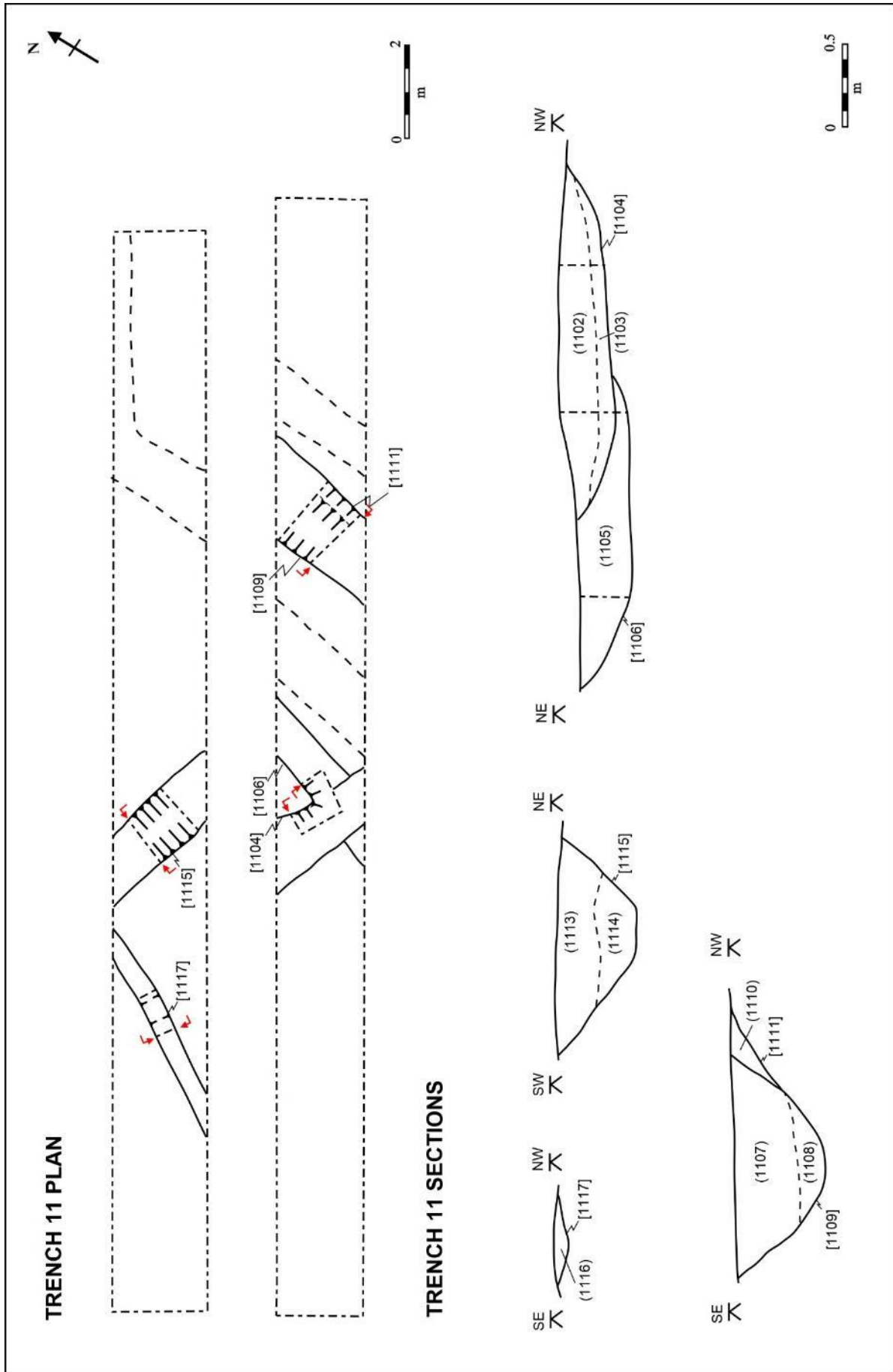


Figure 8 Trench 11 Plan and Sections

5.11 Trenches 12 & 13 (figures 3 & 9)

- 5.11.1 These two trenches were located to investigate a square enclosure plotted from the cropmark evidence, but which was not responsive to the geophysical survey. Trench 13 was divided into two parts (a & b) to avoid a fence line. Ditches were identified in both trenches which confirmed the presence of the enclosure together with further undefined linear features.



Plate 9
Enclosure Ditch [1205], looking north-west

- 5.11.2 The cropmark enclosure was identified and excavated in both Trench 12 [1205] and Trench 13a [1306/9]. Ditch section [1205] was aligned NW-SW, with a U-shaped profile. It was filled with three deposits of silt sand but no finds. A further section of the enclosure return was identified at the northern extent of the trench, but was not investigated. The eastern side of the enclosure was represented by two intercutting ditches [1306/9] in Trench 13a. Excavation here identified a recut, c.1m deep ditch again with no finds. An environmental sample from intermediate fill contained carbonised grains from wheat and barley.

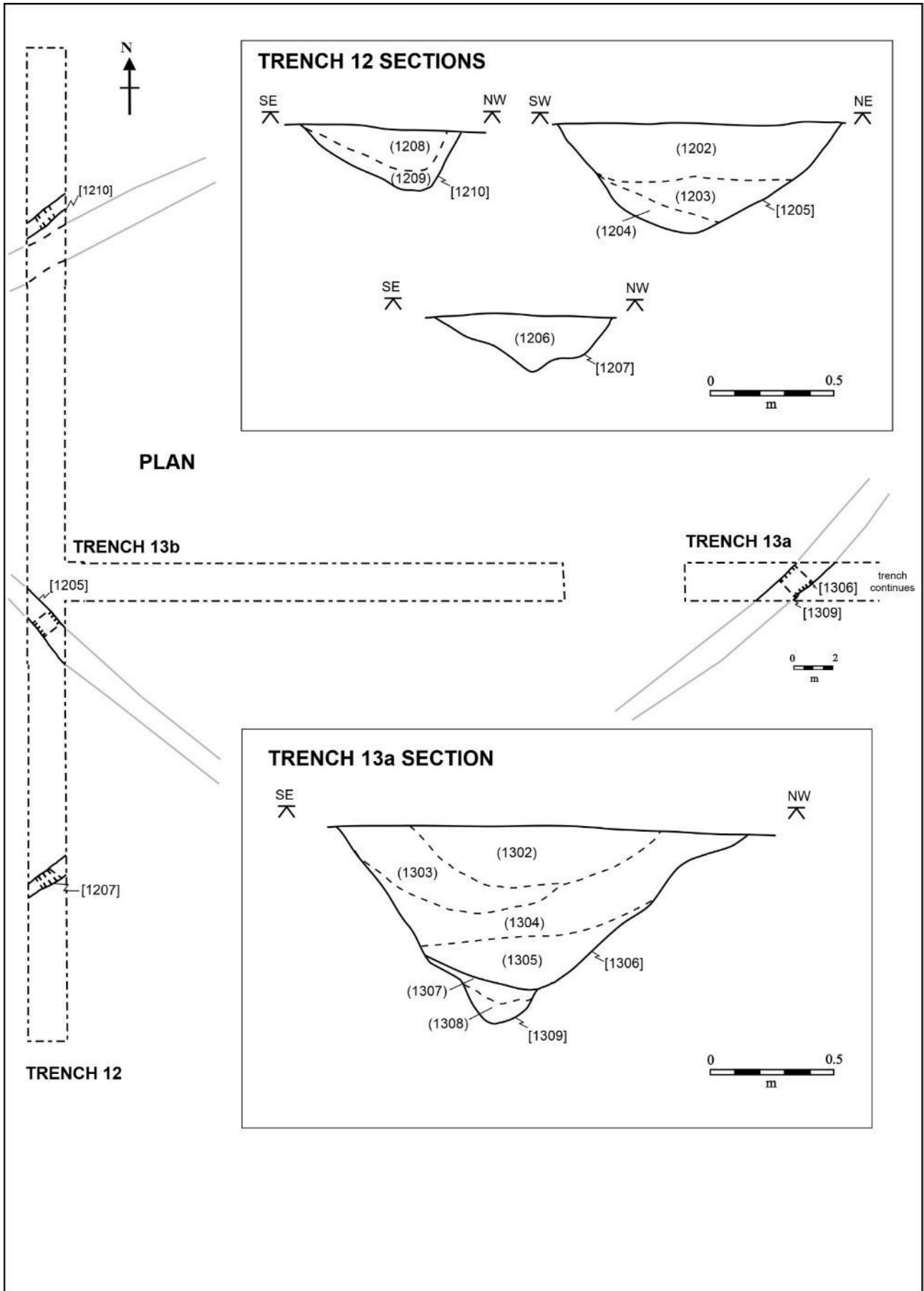


Figure 9 Trenches 12 & 13 Plan and Sections

5.11.3 Two further NE-SW aligned ditches [1207] & [1210] were investigated in Trench 12. Both ditches had uneven V-shaped profiles up to 0.7m wide filled with deposits of the usual silty sand. Neither feature contained any artefacts.

Interpretation:

5.11.4 Ditches [1205] and [1306/9] defined the square enclosure recorded from cropmark photographs. The section in Trench 13a appears to have been redefined and enlarged at some point. The lack of recovered artefacts makes it difficult to date the enclosure, but it is likely that it is part of the wider pre-Roman Iron Age agricultural landscape recorded across this part of the Site.

5.12 **Trench 14** (figure 2)

5.12.1 Trench 14 was located to investigate a number of intersecting linear cropmarks and an area where the geophysics suggested magnetic disturbance. Opening the trench identified a large NW-SE ditch [1406/19 & 1407/16] which truncated an earlier, N-S (?) aligned ditch [1405]. A further smaller ditch [1404] was identified in the middle of the trench. Two pits were located between the ditches, which contained large quantities of 18th and 19th century brick and tile. These modern pits are likely the source for the identified magnetic disturbance.

5.12.2 Ditch [1405] was only partially visible in the excavated section and appeared to have a U-shaped profile. It was truncated by larger ditch [1406/19] which appeared to have been re-defined at a later date. The features here were quite substantial, measuring 3m and 2m in width respectively. As was typical for this site, each feature was filled with silty sands with no artefacts.

Interpretation:

5.12.3 The earliest ditch [1405] appears to correspond with a continuation of a N-S cropmark, visible just to the north of the trench. The larger series of NW-SE ditches appear to be broadly on the alignment of a boundary visible on the 19th century Ordnance Survey. The date and function of the various ditches is difficult to interpret due to the absence of artefacts.

5.13 **Trench 15** (figures 3 & 10)

5.13.1 This trench was located to investigate a number of linear cropmarks, some of which appeared to form possible enclosures or part-enclosures. Five ditches, all with NE-SW alignments, were identified within the excavated trench, of which three were archaeologically investigated.

- 5.13.2 The western-most ditch [1508] had a 0.6m deep U-shaped profile and was filled with three deposits of silt sand. The upper fill (1505) had a profile that suggested it may have been a later redefinition of the original feature. Bordering ditch [1511] had similar dimensions, but with gentler sloping edges as did ditch [1504], further to the east (plate 10). No artefacts were recovered from any of the excavated sections of these similar, and potentially contemporary ditches.



Plate 10 Ditch [1504], looking south-westwards

- Interpretation:*
- 15.3.3 The ditches, both excavated and un-excavated, correspond well with the plotted cropmarks. They appear to represent the sides of rectangular enclosures or parts thereof. As no artefacts were recovered, it is difficult to know their date, but they are likely to be associated with the Iron Age activity identified in Trenches 10 and 11 to the immediate north.

5.14 **Trench 16** (figure 2)

- 5.14.1 Trench 16 was positioned to encounter two linears identified on the cropmark plot. Four ditches were identified in this trench, two of which were investigated, [1604] & [1606]. These both had a NW-SE alignment with similar shallow U-shaped profiles. Both were filled with single deposits of sterile grey silt with no finds

- Interpretation:*
- 5.14.2 The two ditches corresponded well with the two linear cropmarks in this part of the site. They are likely to be former field boundaries associated with either the nearby pre-Roman Iron Age activity or the later post-Medieval landscape.

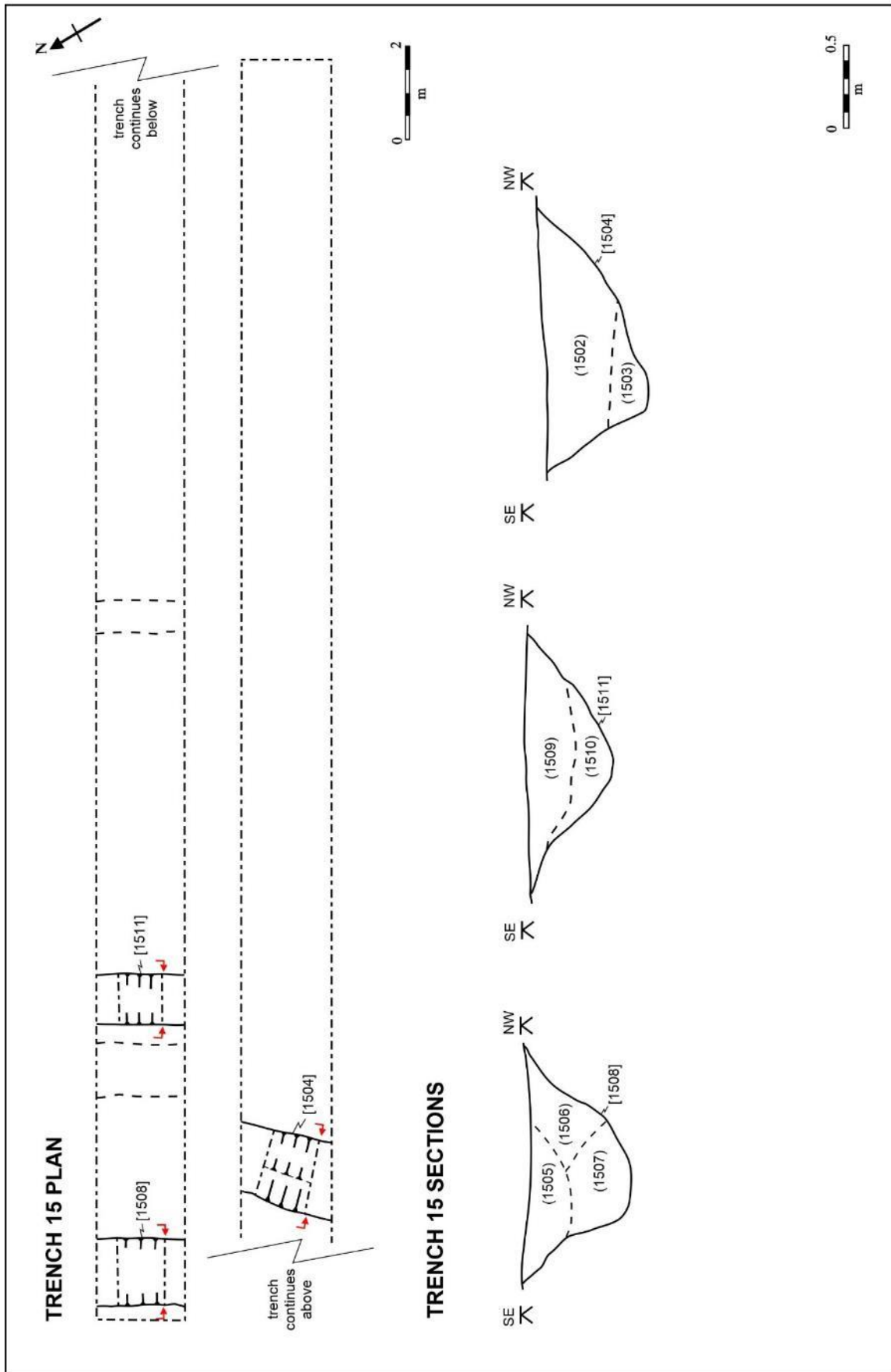


Figure 10 Trench 15 Plan and Sections

5.15 **Trenches 17 & 18** (figures 2, 11 & 12)

- 5.15.1 Trenches 17 and 18 were positioned to investigate several linear cropmarks, including part of a rectangular enclosure. Whilst visible as cropmarks, these features were not identified during the geophysical survey.
- 5.15.2 Three ditches were encountered in Trench 17, the earliest of which [1708/10/12] had a slight curving E-W alignment and a suggested entrance point. It was truncated at its eastern end by two parallel N-S ditches [1704] & [1706], which appeared to correlate with the cropmark enclosure. Four sections were excavated through [1708/10/12] showing it to have a V-shaped profile, just 0.15m deep. No finds were recovered from its silty sand fills. Sections through the two N-S ditches also failed to recover and finds, but showed these (enclosure) ditches to be slightly more substantial.
- 5.15.3 Five parallel E-W ditches were identified in Trench 18, of which three were investigated. The southern-most ditch [1805] appeared to correspond with the enclosure identified in Trench 17. It had a V-shaped profile, filled with two deposits of silt sand. To its north was ditch [1808], which had a shallow U-shaped profile, also filled with two deposits of silt sand; the latter of which contained a fragment of a medium-sized mammal bone (see Wood below). A shallow ditch [1810] investigated in the central part of the trench appeared to be the remnants of a post-Medieval plough furrow.
- Interpretation:*
- 5.15.4 The earliest ditch [1708] identified in Trench 17 was not visible on the cropmark plot or the geophysical survey. It appears to be part of a slight enclosure of unknown date, which had a narrow entrance on its southern side.
- 5.15.5 Two of the later, N-S ditches (identified in both Trenches 17 and 18) correspond with the cropmark of an enclosure. The date of the features remains unknown, with the only finds being a single animal bone. It is likely, however, that the features are part of the Iron Age agricultural landscape identified elsewhere on the Site.

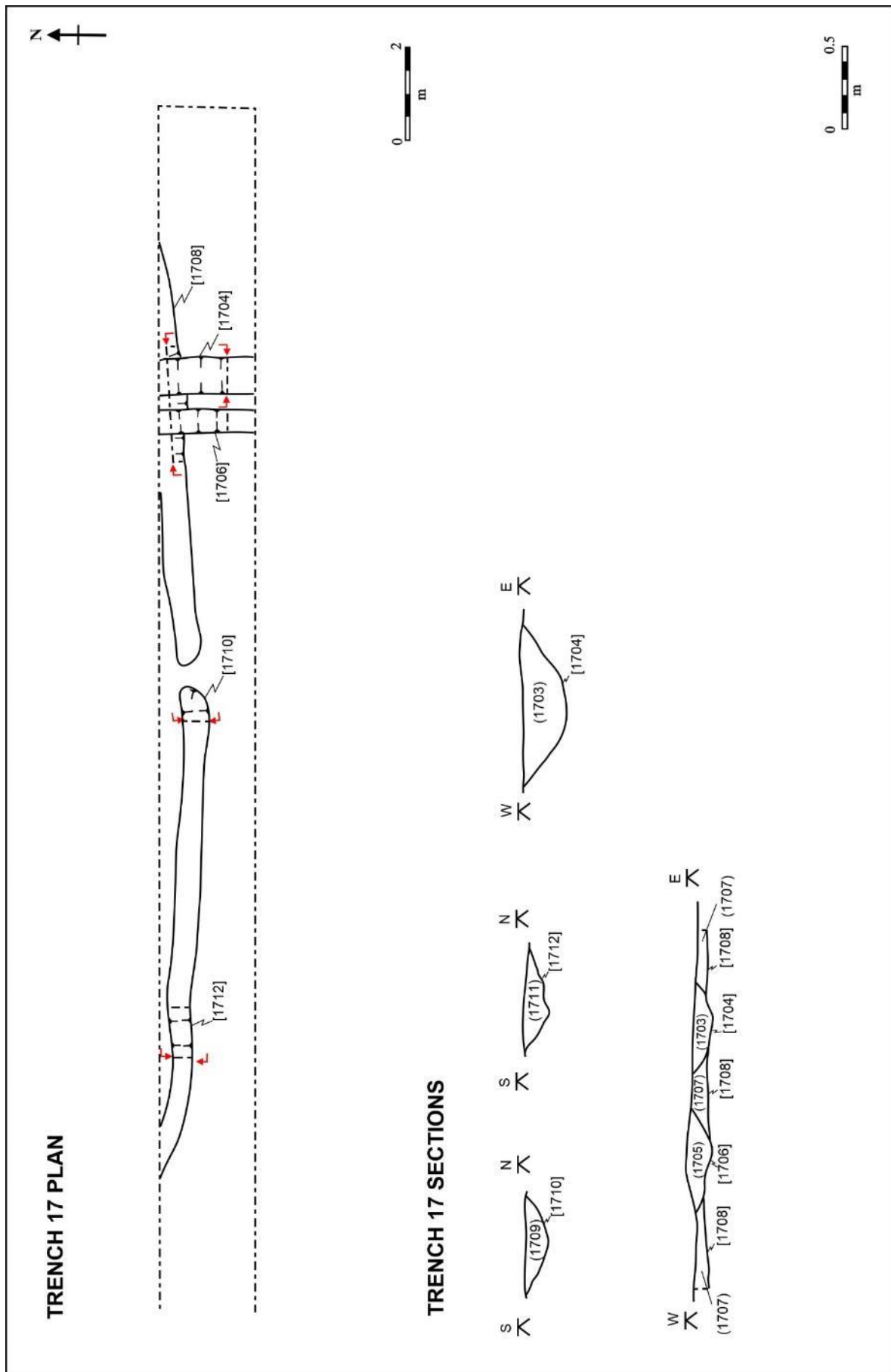


Figure 11 Trench 17 Plan and Sections

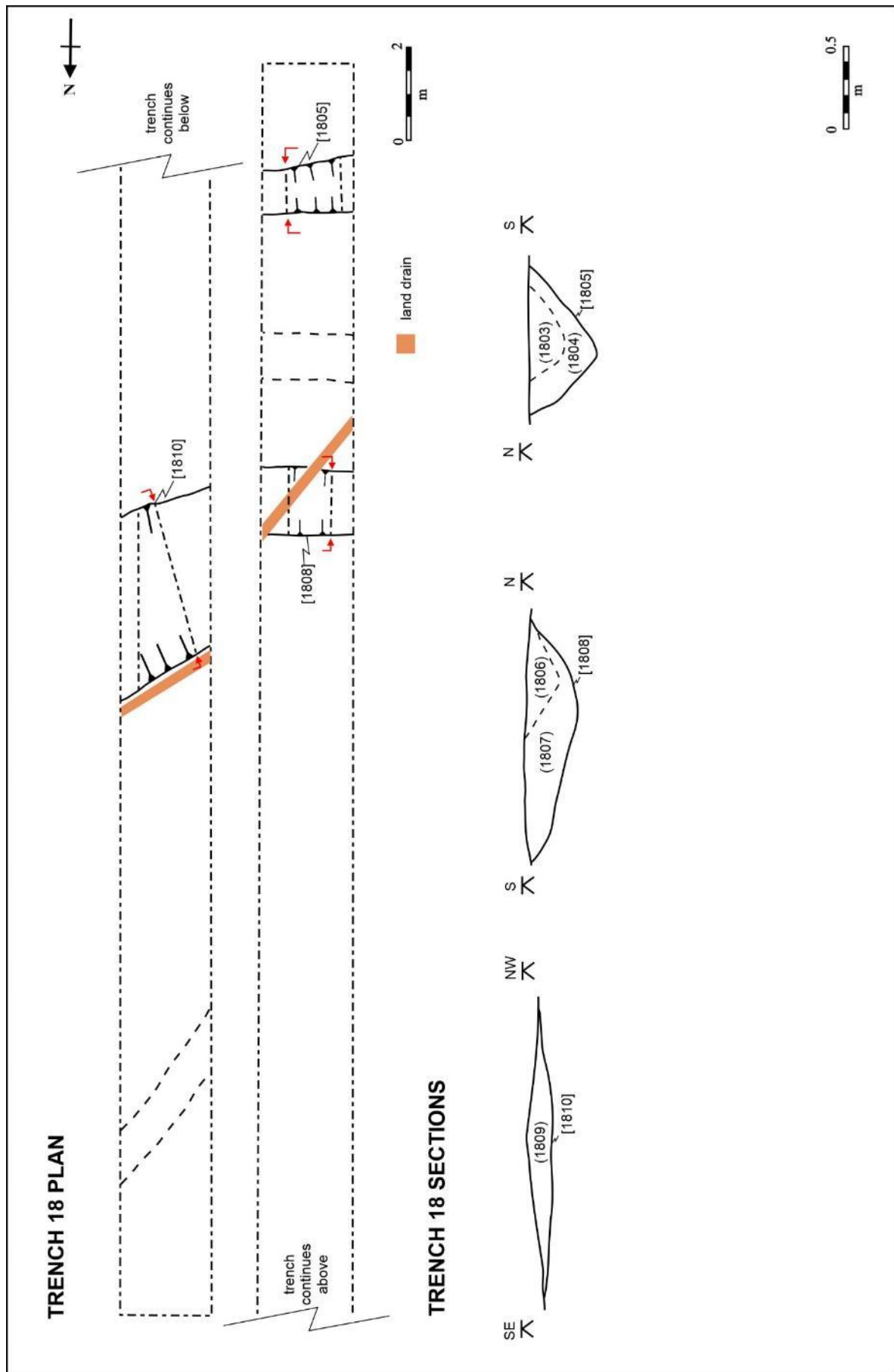


Figure 12 Trench 18 Plan and Sections

5.16 **Trench 23** (figures 2 & 13)

5.16.1 This trench was located at the northern extent of the Site and was positioned to investigate an apparently archaeologically blank area. Within Trench 23 however, were recorded a number of ditches and a pit, sealed beneath a c. 1.2m deep deposit of alluvial clay. Three sets of inter-cutting features were investigated (figure 13) showing that across this part of the Site were a number of U-profiled ditches on varying alignments (plate 11).

5.16.2 Pottery sherds were retrieved from two of the ditches (contexts 2314 and 2316), which dated to the mid-2nd century AD, showing them to be of Roman date (see Leary below). A small amount of animal bone was also recovered, and included sheep/goat species and cattle (see Wood below). Some ditch fills also contained large (unworked) blocks of stone. An environmental sample from waterlogged deposit (2315) suggested a nearby landscape of scrub and waste ground, possibly interspersed with small patches of open ground. The high level of common nettle seeds present in the sample may indicate an increased level of nitrogen, often associated with manuring (see Summers below).

Interpretation:

5.16.3 This trench was located in an area of no cropmarks or significant geophysical readings. Various ditches were, however, identified under an alluvial horizon. They are thought to be of Roman date, relating to past agricultural activities, but not too far removed from areas of contemporary settlement. It is considered that the focus of Roman activity may lie to the north, beyond the proposed site boundary.



Plate 11
Ditches [2304] & [2305], looking north-eastwards

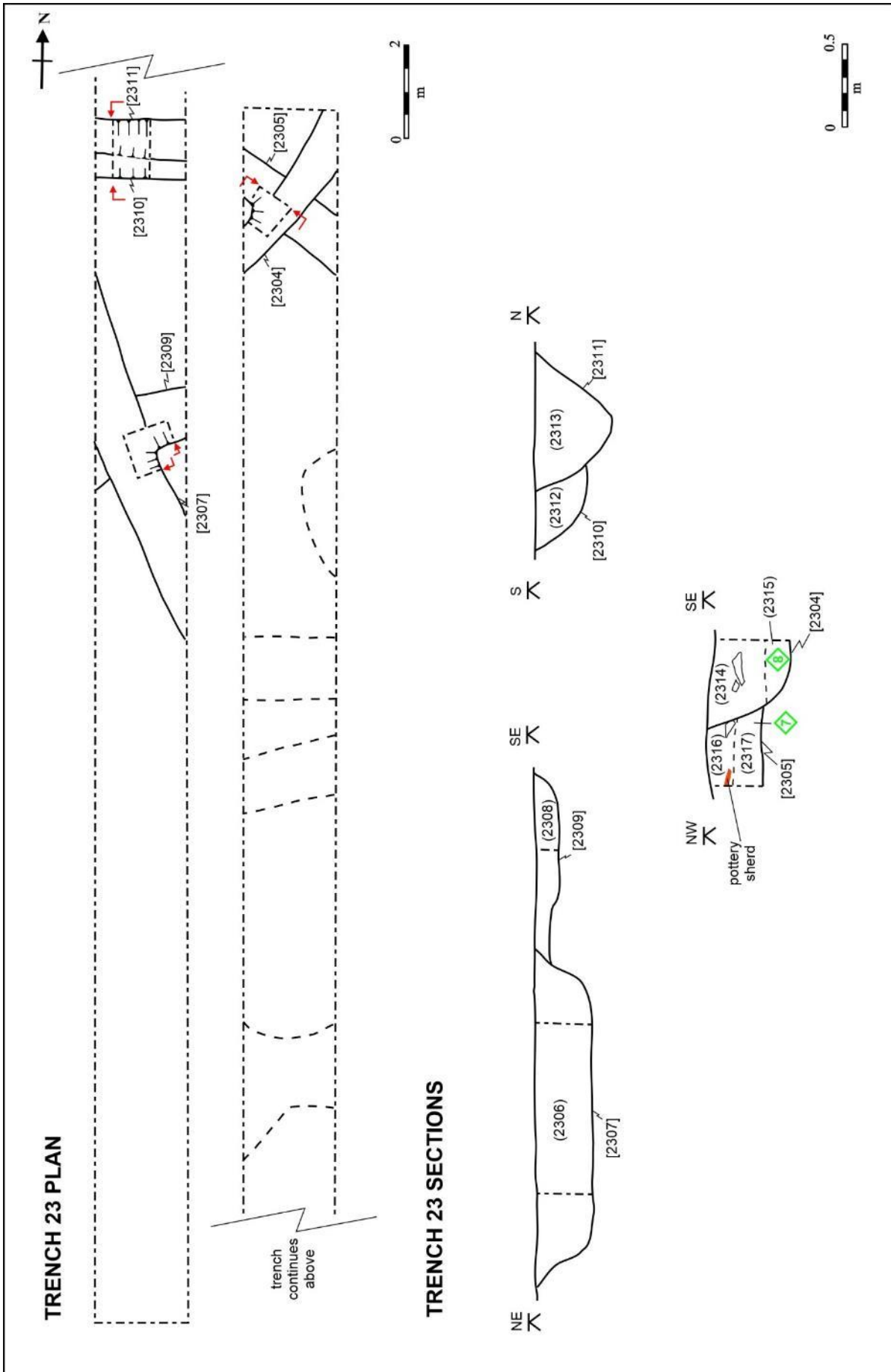


Figure 13 Trench 23 Plan and Sections

5.17 Trenches 26, 27 & 29 (figure 2)

- 5.17.1 These trenches were located in a field where no more than former field boundaries and past cultivation lines were recorded on the cropmark plot and a small linear recorded on the geophysical survey. Ditches were, however, identified in all trenches, although they contained no artefacts and therefore remain undated.
- 5.17.2 Two inter-cutting ditches [2608] & [2606] were investigated in Trench 26. They both had a NE-SW alignment, with U-shaped profiles (plate 12). The later ditch [2606] had a deeper profile, but both were filled with similar deposits of silty sand. Two furrows were also identified in the trench.
- 5.17.3 Two parallel NW-SE ditches [2705] & [2708] were investigated in Trench 27, both which again had U-shaped profiles and silty sand fills. Excavation suggested that section [2705] was the terminal of a ditch. A further U-shaped ditch [2905] was excavated in Trench 29, which had similar sterile fills with no finds. Two other ditches were identified in this trench which remained unexcavated.



Plate 12

Ditches [2606] & [2608], looking south-eastwards

Interpretation:

- 5.17.4 Several undated ditches were identified in these three trenches. They were all remarkably similar and are likely to be contemporary, being former land divisions relating to the past agricultural landscape.

5.18 Trenches 31, 32 & 42 (figure 2)

- 5.18.1 Trenches 31 and 32 were positioned in an area where there were no obvious archaeological features, except for the line of a former footpath/trackway (encountered in Trench 31). Trench 42 was located across a linear feature recorded during the geophysical survey. Following opening up, an undated pit was investigated in Trench 31 and several undated ditches were recorded in both Trenches 32 and 42.
- 5.18.2 Pit [3108] in Trench 31 had steep sides and a flat base, to a depth of 0.85m (plate 13). Ovoid in shape, its full extent was not recorded as it extended beyond the edge of excavation. It contained four silt-rich deposits, above a basal gravel-rich fill with signs of waterlogging. No artefacts were recovered.



Plate 13 Pit [3108], looking south-westwards

- 5.18.3 A shallow narrow ditch [3205] was excavated in Trench 32, which had a U-shaped profile, and two artefact-poor silty fills, whilst six parallel ditches were identified in Trench 42, which all had NW-SE alignments. Five of these were sample excavated: ditches [4207] and [4209] appeared to be two separate features, but as both had similar fills, it was not possible to discern a relationship between them. Ditch [4212] had a U-shaped profile, filled with 2 silt-sand deposits. It was truncated by a later ditch [4214]. Bordering these features was a shallow V-shaped ditch [4205]. None of the ditches contained any artefacts.

Interpretation:

- 5.18.4 The undated ditches in these trenches are likely to be former land divisions (of unknown date) relating to the past agricultural landscape. The undated pit is an anomaly; perhaps being an outlying feature associated with the farming enclosures to the SW.

5.19 Trenches 36 & 40 (figures 2, 14 & 15)

- 5.19.1 These trenches were close to the NE boundary, in an apparently archaeologically 'blank' area. After machining, several features were identified in Trench 36, including a curvi-linear ditch, two post-holes, three pits and two ditches. Two pits were also identified in Trench 40.
- 5.19.2 The curvi-linear ditch [3618] had a U-shaped profile with two fills (plate 14). It was truncated at its NW extent by larger ditch [3605]. On the inside of the curve was a row of irregular-shaped post-holes. Where excavated they had steep sides and irregular bases, to a depth of 0.25m. The slight impression of a post-pipe was recorded in one feature. To the north was an ovoid pit [3615], with steep concave sides and a rounded base. Excavation identified three silt-rich, but artefact-poor fills.



Plate 14 Curvi-linear ditch [3618], looking south-westwards

- 5.19.3 One of the two pits identified in Trench 40, [4003], was sample excavated. It has steep sides to a flat base at 1.1m depth. Its diameter was in excess of 2m. Excavation showed it to be filled with numerous thin layers of silt, clay and sand, none of which contained any artefacts.

Interpretation:

- 5.19.4 The undated features identified in these two trenches appear to relate to some form of rural settlement activity, probably relating to a former agricultural landscape. The curvi-linear ditch and associated post-hole alignment in Trench 36 may be the remains of a former enclosure and fence line. The lack of features in trenches to the west suggests that the identified archaeology may relate to the extensive cropmarks to the east, outside of the proposed development area.

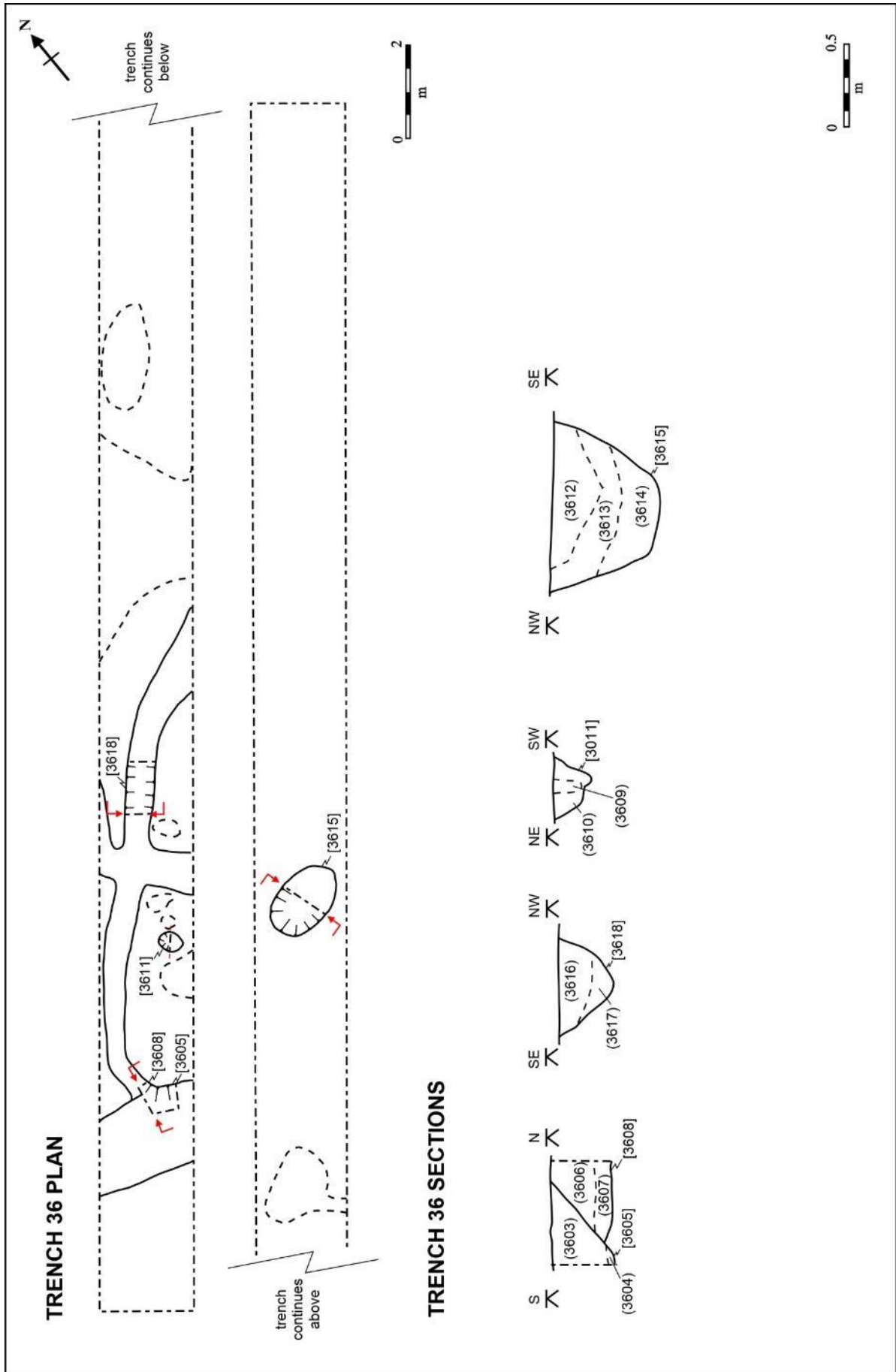


Figure 14 Trench 36 Plan and Sections

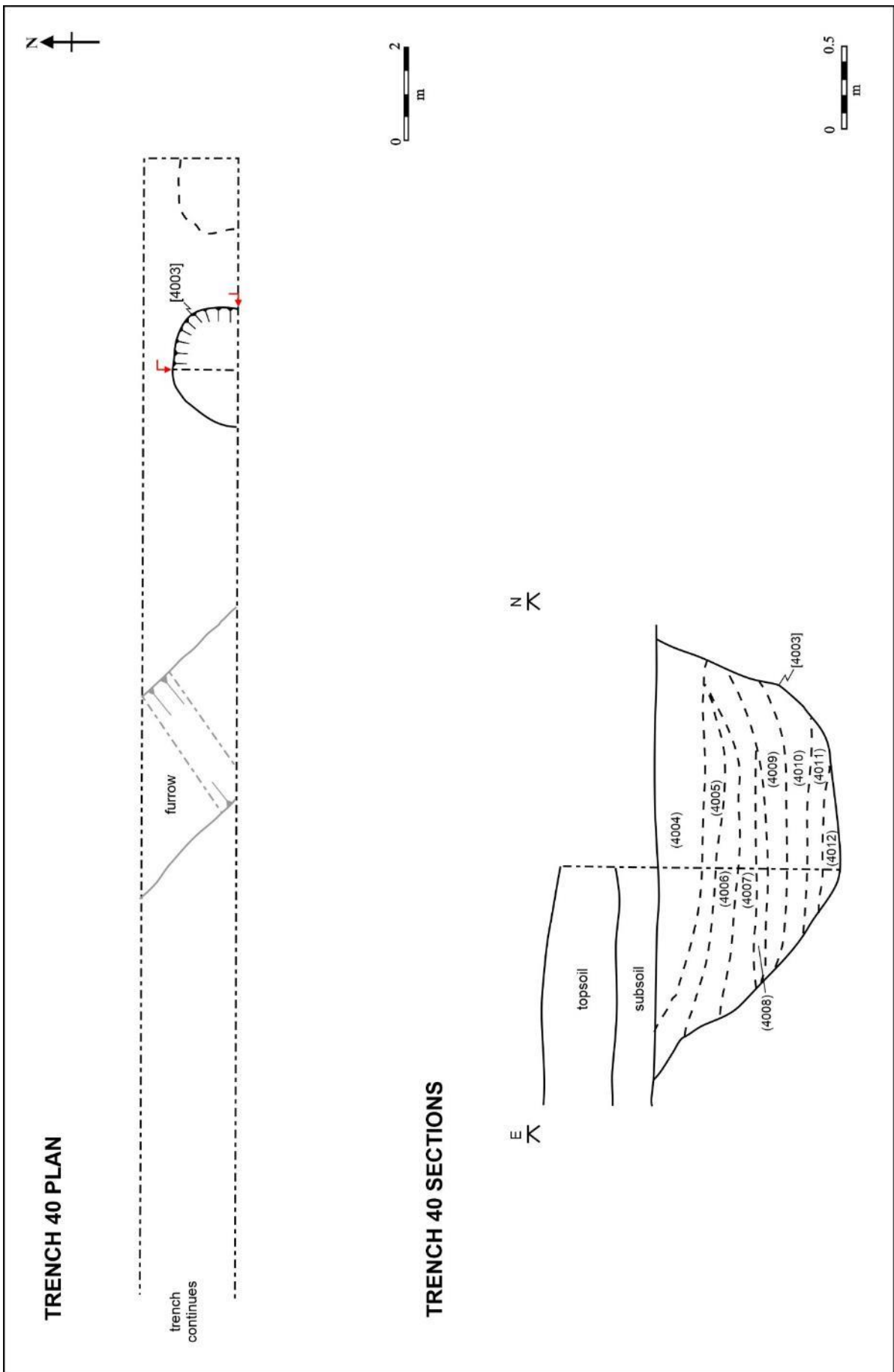


Figure 15 Trench 40 Plan and Sections

5.20 Trenches 41, 44, 46 & 47 (figures 2, 16-18)

- 5.20.1 Trenches 41 and 44 were located in an area of unknown archaeological potential, whereas Trenches 46 and 47 were located to investigate a series of enclosure cropmarks. Trench 45 was also located to encounter the cropmark enclosure, but no deposits were identified in this particular trench. Trench 41 contained just a single undated ditch [4104], at its southern end. It had an E-W alignment and was filled with a single deposit of silt sand. The other trenches contained more features.
- 5.20.2 Trench 44 had a large NE-SW aligned ditch [4419], truncated by a smaller ditch [4414] on its south-western edge (plate 15). Two shallow post-holes [4408] & [4411] were identified to the west of the ditches. Ditch [4419] had a large U-shaped profile and was 2.2m wide and up to 0.7m deep, filled with several deposits of silt sand and silt clay. The lowest deposit was waterlogged. Three fills (4415 – 7) contained pottery dated to the Late Iron Age and early Roman periods (c. 100 BC to 70 AD) along with a rib bone from a large mammal (see Leary & Wood below). The archaeology here was sealed beneath c. 1m of alluvial overburden, no doubt associated with the bordering stream.



Plate 15
Ditches [4414] & [4419], looking south-westwards

- 5.20.3 Four ditches were identified in Trench 46, two which aligned with cropmark features. Ditch [4607] had a N-S alignment, with a deep U-shaped profile, up to 0.6m deep and filled with two deposits of silt clay, which did not contain any artefacts (plate 16). [4613] was a shallow U-shaped ditch filled with two deposits of silt sand. It was truncated by [4610], a deeper and wider ditch, with a similar profile. A further ditch was not investigated. None of the features in this trench contained any artefacts.



Plate 16
Ditches [4607], looking south-east

- 5.20.4 A number of ditches, pits and post holes were identified in Trench 47, several which aligned with cropmarks. The earliest feature was ditch [4714]³, which had a NW-SE alignment with a curving NE return at its southern extent. It had a U-shaped profile up to 0.6m deep being filled with two deposits of clay silt. The upper fill (4717) contained 5 sherds of Roman pottery originating from jar and bowl forms. This feature was truncated by undated ditches [4708] and [4716].
- 5.20.5 Ditches [4714] and [4716] were later truncated by an undated bowl-shaped pit [4715], which was 1.75m in diameter (plate 17). Two shallow post-holes were located in the vicinity.

³ Equivalent [4711]

5.20.6 Environmental samples from two waterlogged deposits, 4418 and 4717, suggested a nearby landscape of scrub and waste ground, possibly interspersed with small patches of open ground. The higher level of common nettle seeds present in the sample may indicate an increased level of nitrogen, often associated with manuring (see Summers below).

Interpretation:

5.20.7 The features identified in Trench 44 represent late pre-Roman Iron Age activity possibly associated with an agricultural enclosure of some description. They are likely to relate to the extensive cropmark complex to the immediate south, beyond the site boundary.

5.20.8 Ditches and pits in Trenches 46 and 47 relate to identified cropmark enclosures in this part of the site, although an exact correlation between excavated features and cropmark plot was not always clear. It was unusual that features were not identified in bordering Trench 45. The activity here appears to be Roman in date and will be associated with the wider cropmark complex to the immediate east, outside of the Site boundary.



Plate 17

Intercutting ditches [4714], [4716] & pit [4715], looking south-west

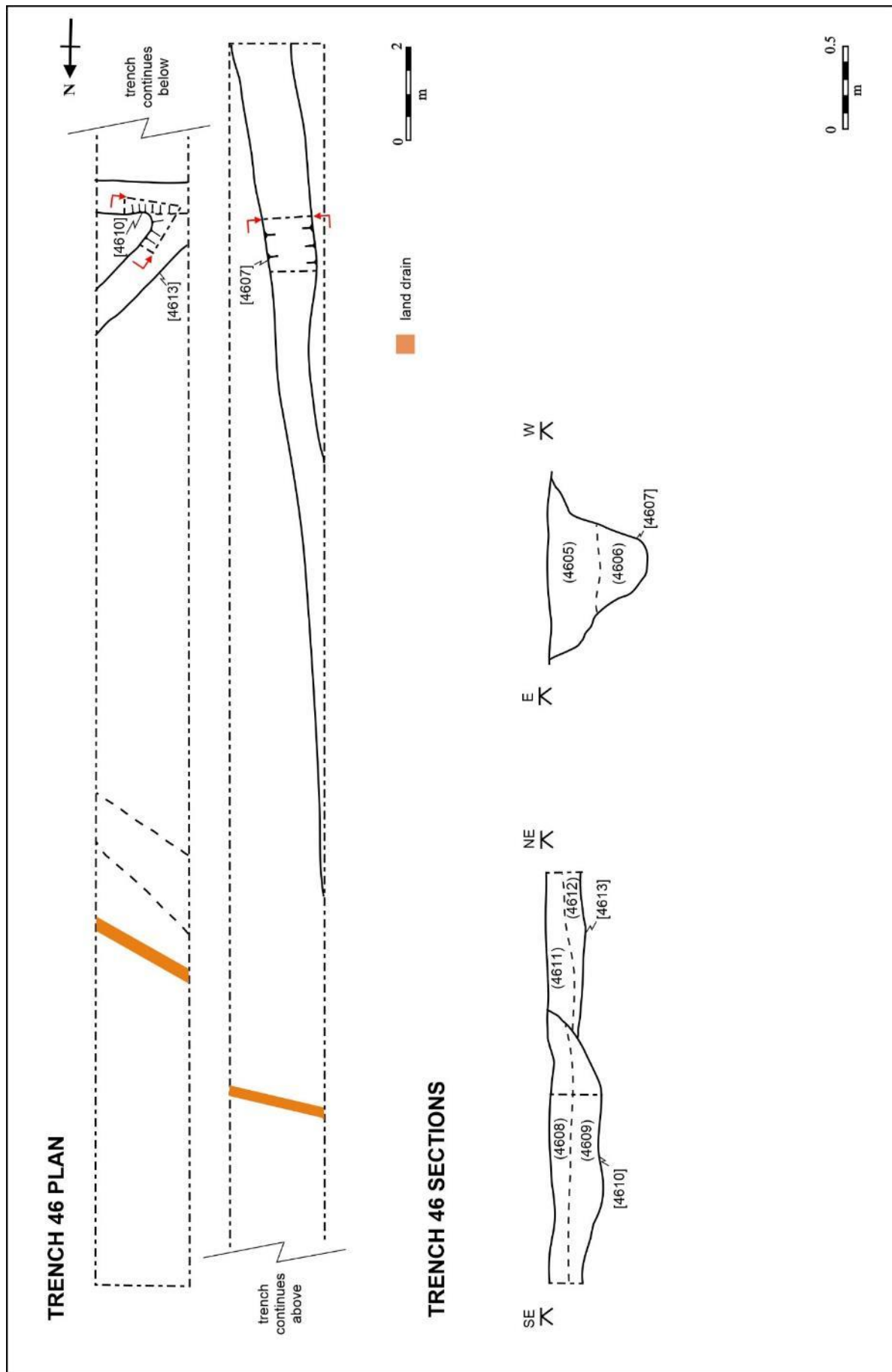


Figure 17 Trench 46 Plan and Sections

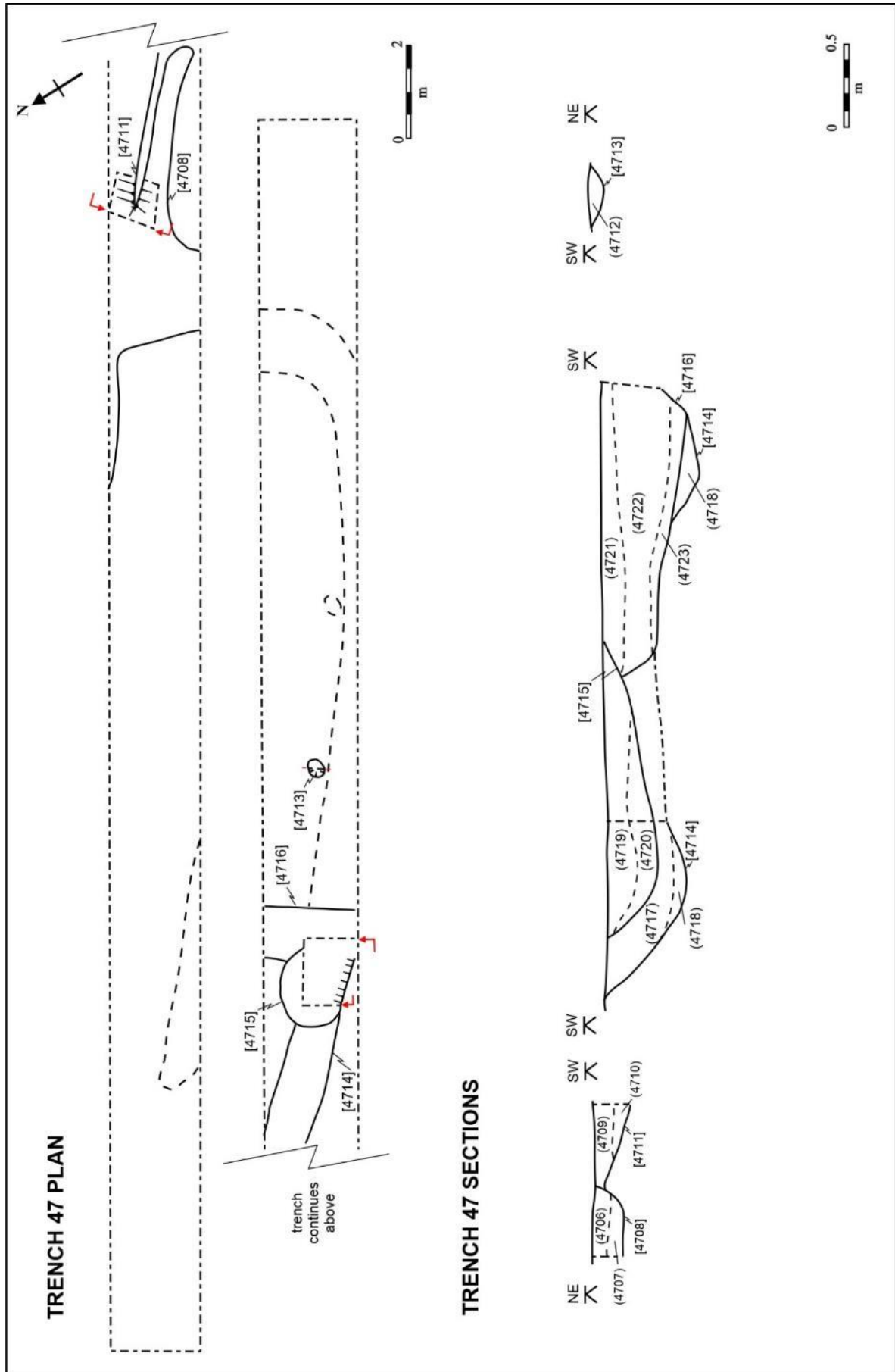


Figure 18 Trench 47 Plan and Sections

6.0 THE POTTERY

by Ruth Leary with a contribution from Emily Edwards

6.1 Introduction

- 6.1.1 A small group of pottery was submitted for assessment. Around 201 sherds, excluding tiny scraps, were examined. The pottery was assessed and recorded in broad ware groups using the Lincolnshire fabric series codes for Roman pottery (Darling and Precious 2014). The forms present were also noted and spot dates given (table 1).

6.2 Chronology

Trench 5 (Emily Edwards):

- 6.2.1 A total of 114 (1456g) sherds of largely untempered early Bronze Age pottery was recovered from trench 5; some evidence for leached shell was observed. It derived from two layers (lower fill 506 and upper fill 505) within a ditch cut 507. The upper fill contained some very large body fragments and several well-preserved, expanded rim sherds. The lower fill also comprised rim and body sherds, some of which were large. A great deal of the sherds from both contexts would appear to be from the same large vessel whilst some of the remaining rim sherds represent one or more smaller vessels. Decoration included smoothed cordons, impressed fingernail, impressed cord and incised herringbone.

Trench 10:

- 6.2.2 Five small sherds of vesicular pottery, originally shell-tempered came from 1002 and 1011 with further 3 sherds from 1012. This ware dates from the middle Iron Age into the early Roman period. Most of the fragments were undiagnostic bodysherds but a larger sherd from 1012 came from a jar with light brushing or scoring of a type found in the pre-Roman Iron Age and perhaps into the earliest Roman period, c.500BC-50AD (Knight 2002, 133-5 and table 12.2). 11 scraps of ceramic material from 1015 may be daub or fired clay, but it was not identified as pottery.

Trench 11:

- 6.2.3 Three sherds from a shell-tempered ellipsoid jar with rounded rim came from context 1107. Although shell-tempered jars such as this do continue as late as the mid-second century AD in this region, the rim form and handmade nature of this jar suggests a late PRIA date, c.100BC-50AD (Knight 1992, 50 group 3 pottery and Darling and Precious 2014, 88-90).

Trench 23:

- 6.2.4 45 sherds from trench 23 came from contexts 2314 and 2316. The 36 sherds from context 2314 included sherds from two jars with

argillaceous inclusions including an everted rim jar. This jar is of a type dated to the mid-1st to early 2nd century AD (Darling and Precious 2014, 104-107) and this particular example is probably early to mid-2nd century. A wide-mouthed jar with cordon on the neck in a fine grey ware, one oxidised sherds, and eight abraded sherds in a dark medium quartz tempered fabric typical of the mid 1st-early 2nd century and eight scraps, probably of daub or fired clay. Overall this group would fit a date in the late 1st to mid-2nd century with a date range of c.AD100-150 most likely.

- 6.2.5 The nine sherds of pottery from 2316 included another everted-rim jar in the grit-tempered ware of the same type and date as in 2314. Four sherds in a similar dark quartz tempered ware as that found in 2314 included one with what appeared to be a carination and this may belong to the very common carinated jar form found in this area dating from the late 1st to 2nd century AD (Darling and Precious 2014, 136 type B334). Two Roman grey ware sherds were also present and four indeterminate oxidised sherds. The group from 2316 suggests a date in the early to mid-2nd century AD.

Trench 44:

- 6.2.6 45 sherds from this trench came from contexts 4415, 4416 and 4417. In context 4415 two sherds came from a jar base with a handmade footring (Knight 1992 no. 14). These sherds were badly affected by iron panning and it was difficult to determine their fabric in detail but they were quartz tempered. The handmade character combined with the footring base would fit a date range in the late PRIA, c.100BC-70AD. Four indeterminate oxidised sherds came from 4416 and could not be identified.

- 6.2.7 In 4417 10 sherds and scraps came from a well abraded jar in a quartz-tempered dark grey ware of early Roman type. Several sherds were adjoining although breaks were not fresh. The vessel was a narrow necked jar with two zones defined by horizontal grooves in which close lattice decoration had been incised. This fits with the kind of vessels made in the first century after the Roman Conquest, or possibly the early second century.

Trench 47:

- 6.2.8 Five sherds of Roman grey ware came from context 4717. These came from a jar and at least one bowl or dish and could not be dated closely.

6.3 **Discussion**

- 6.3.1 This small group ranges in date from the Bronze Age to the early Roman period. There is nothing to suggest more than a rural site during the Roman period and all the pottery could have been obtained fairly near the site within the area of the Trent Valley.

trench	context	ware	Darling & Precious codes	nos	comment	date
5	505	Shell-t ware		63	impressed decoration of very large urn	Early Bronze Age
5	506	Shell-t ware		51	flat topped rim necked jar with criss cross incised dec on rim top and round impressions on neck	Early Bronze Age?
10	1002	Shell-t ware	IASH	3	bodysherds	Prehistoric-early Roman
10	1011	Shell-t ware	IASH	2	two small scraps	Prehistoric-early Roman
10	1012	Shell-t ware	IASH	3	two scraps and one larger sherd from a jar with faint brushing. ? Part of scored ware group	500BC-100AD?
10	1015	?ceramic material		11	scrap- probably fired clay	
11	1107	Shell-t ware	IASH	3	"native jar", ellipsoid jar with rounded rim	c500BC-100AD. Most likely to be later Iron Age
23	2314	Shell-t ware	IASH	6	bead-rim jar with flat sloping rim top	Late PRIA-mid 2nd AD
23	2314	grit-tempered ware, argillaceous inclusions	IAGR	2	bodysherds	Post Conquest,cAD50-150
23	2314	transitional dark grey ware, quartz-tempered	GREY	8	bodysherds	cAD50-150
23	2314	oxidised ware	OX	1	scrap	Roman
23	2314	fine grey ware	GFIN	4	wide-mouthed jar with cordon at base of neck	optimum date late 1st-early 2nd AD
23	2314	grit-tempered grey ware, Trent Valley type	IAGR	1	large everted rim jar or deep bowl	c70-150, opt 100-150
23	2314	grey ware	GREY	6	bodysherds	Roman
23	2314	?ceramic material		8	scrap- probably fired clay	
23	2316	Handmade?		2	scraps	PRIA?
23	2316	grit-tempered grey ware, Trent valley type	IAGR	1	large everted rim jar or deep bowl	c50-150, opt 100-150
23	2316	dark quartz-tempered sherds of transitional type	GREY	4	bodysherds, one is carinated. These could belong to well-known carinated beaker type of late 1st-2nd century AD	L1st-2nd AD
23	2316	grey ware	GREY	2	bodysherds	Roman
44	4415	quartz-tempered ware, fine	IASA	2	Badly affected by iron panning. This appears to be a handmade footing base	Late PRIA
44	4416	oxidised	OX	4	two scraps and two joining fragments. Very flat, very stained. Unidentified	?
44	4417	transitional dark grey ware, quartz-tempered	GREY	10	abraded and adjoining sherds from a necked vessel with two zones of incised lattice decoration, defined by horizontal grooves. No rim survives. This is likely to come from an early jar, perhaps related to the barrel jars at Dragonby.	Optimum AD50-130
47	4717	grey ware	GREY	5	bodysherd and basal sherds of open vessel and jar	Roman

Table 1: Pottery occurrence by trench

7.0 ANIMAL BONE by Jennifer Wood

7.1 Introduction

7.1.1 A total of 27 refitted fragments (50g) of animal bone were recovered during the programme of trial trenching. The remains were recovered from undated ditches [1808], [4711] and ditches [2304], [2305], and [4419] provisionally dated from the pre-Roman Iron Age/Roman period.

7.2 Methodology

7.2.1 Identification of the bone was undertaken with access to a reference collection and published guides. All the animal remains were counted and weighed, and where possible identified to species, element, side and zone (Serjeantson 1996). Also fusion data, butchery marks (Binford 1981), gnawing, burning and pathological changes were noted when present. Ribs and vertebrae were only recorded to species when they were substantially complete and could accurately be identified. Undiagnostic bones were recorded as micro (mouse size), small (rabbit size), medium (sheep size) or large (cattle size). The separation of sheep and goat bones was done using the criteria of Boessneck (1969) and Prummel and Frisch (1986). Where distinctions could not be made, the bone was recorded as sheep/goat (s/g).

7.2.2 The condition of the bone was graded using the criteria stipulated by Lyman (1996). Grade 0 being the best preserved bone and grade 5 indicating that the bone had suffered such structural and attritional damage as to make it unrecognisable.

7.3 Results

7.3.1 The remains were generally of a poor overall condition, averaging at grade 4 on the Lyman criteria (1996).

7.3.2 No evidence of gnawing, butchery, burning or pathology was noted on any of the remains.

7.3.3 As can be seen from Table 2, only single fragments of cattle and sheep/goat remains were identified to species. The remaining assemblage was not identifiable beyond size taxa.

7.4 Discussion

7.4.1 Due to the size and nature of the assemblage, little further information can be gained. In the event of further works, more bone of a similar nature is liable to be recovered, with a moderate potential to provide further information on site diet and underlying animal husbandry practices.

Context	Taxon	Element	Side	Number	Weight	Comments
1807	Medium Mammal Size	Long Bone	X	5	3	
2314	Sheep/Goat	Tibia	L	1	10	In two pieces
	Large Mammal Size	Long Bone	X	1	1	Shaft
	Medium Mammal Size	Atlas	B	1	2	Dorsal surface
	Unidentified	Unidentified	X	4	5	
2316	Medium Mammal Size	Long Bone	X	3	2	Shaft
	Large Mammal Size	Long Bone	X	3	5	
	Cattle	Tooth	X	1	1	Molar infundibulum
	Unidentified	Unidentified	X	6	1	
4416	Large Mammal Size	Rib	X	1	18	Fragmentary
4710	Unidentified	Unidentified	X	1	2	

Table 2 Summary of Identified Bone

8.0 ENVIRONMENTAL EVIDENCE by Dr. John Summers

8.1 Introduction

8.1.1 During trial excavations eleven bulk soil samples for environmental archaeological assessment were collected. The samples were submitted for processing and archaeo-botanical assessment. This report presents the results from the assessment of the bulk sample light fractions and discusses the significance and potential of any remains recovered.

8.2.1 Methods

8.2.1 Samples were processed using standard flotation methods. The light fractions were washed onto a mesh of 500µm (microns), while the heavy fractions were sieved to 1mm. The dried light fractions were scanned under a low power stereomicroscope (x10-x30 magnification). Botanical remains were identified and recorded using a semi-quantitative scale (X = present; XX = common; XXX = abundant), utilising reference literature (Cappers *et al.* 2006; Jacomet 2006) and a reference collection of modern seeds where necessary. Potential

contaminants, such as modern roots, seeds and invertebrate fauna were also recorded in order to gain an insight into possible biological disturbance of the deposits.

8.3 Results

8.3.1 The assessment data from the bulk sample light fractions are presented in Table 3 (Appendix A).

Carbonised plant remains:

8.3.2 Carbonised plant material was recorded in three of the samples, in the form of carbonised cereal grains. Wheat (*Triticum* sp.) was recorded in 1011 and 1304, barley (*Hordeum* sp.) in 1304 and a single oat grain (*Avena* sp.) in 708. The number and range of cereals was too small for any meaningful interpretations but their presence demonstrates the use and carbonisation of cereals in the vicinity of the excavated features. Only one of these features (1013) was dateable and has the broad attribution of late prehistoric/ early Roman.

8.3.3 A small number of charcoal fragments were also identified in 1304 and 708. However, the concentrations were low and no identifications were attempted.

Waterlogged plant remains:

8.3.4 Waterlogged seed remains were recorded in three of the samples (sample 8 of 2315, sample 9 of 4717 and sample 10 of 4418), all of which are dateable to the early Roman period (c.AD50-130/150). It appears that all three of these ditches had permanently waterlogged fills. All three features were excavated from beneath an alluvial layer and is likely that this has helped maintain anaerobic conditions within the deposits.

8.3.5 All three samples of waterlogged remains contained a comparable range of plant taxa. The richest was 4418, which contained common nettle (*Urtica dioica*), meadow/ bulbous buttercup (*Ranunculus acris/ bulbosus*), buttercup (*Ranunculus* sp.), blinks (*Montia fontana*), common chickweed (*Stellaria media*), dock (*Rumex* sp.), bramble (*Rubus* sp.), sloe (*Prunus spinosa*), wild plum (*P. domestica*), hemlock (*Conium maculatum*), thistle (*Carduus/ Cirsium* sp.) and sedge (*Carex* sp.). Most abundant were seeds of common nettle. This plant produces large volumes of seeds, although such a significant presence could also indicate increased nitrogen levels in the vicinity, encouraging its growth. This could reflect animal activity, such as grazing, with dung enriching the soil. Overall, the range of taxa in all three deposits is characteristic of scrub and waste ground conditions, perhaps with patches of more open ground indicated by common chickweed and blinks, which were present in small numbers. These are likely to

represent natural deposits, with no evidence to suggest an anthropogenic origin.

- 8.3.6 Fragments of waterlogged wood and other indeterminate vegetative plant material was present in these three samples, although no identifications were made. Insect remains of possible archaeological origin were also recorded.

Terrestrial molluscs:

- 8.3.7 No terrestrial mollusc shells were recovered due to the acidic, free-draining nature of the site's sand and gravel geology.

Contaminants:

- 8.3.8 Modern rootlets, seeds, insects and earthworm egg capsules were recovered from most of the non-waterlogged samples. However, these were mostly present in low concentrations and are unlikely to represent significant biological disturbance of the deposits.

8.4 Conclusions

- 8.4.1 Evidence for the use of cereals in the form of carbonised cereal remains was restricted to three deposits (708, 1011 and 1304), which contained low densities of carbonised remains. The specimens indicate the use and possible local cultivation of wheat, barley and oats, although the density of material was too low to address the relative significance of the different cultivars. No evidence of non-cereal weed taxa was present to allow an investigation of crop husbandry practices.
- 8.4.2 Waterlogged remains from 2315, 4418 and 4717 indicate conditions of scrub and waste ground in the immediate vicinity of the sampled features during the early Roman period. The dominance of nettle seeds in the samples may indicate local soil enrichment, perhaps in the form of animal dung.

9.0 DISCUSSION

9.1 Summary (figure 20)

- 9.1.1 The programme of trenching was successful in its aims. It confirmed the presence of archaeological activity across parts of the site and demonstrated that other areas were archaeologically blank. The main concentrations of archaeology appeared to relate to the previously identified cropmark complexes along the south-western and eastern edges (figure 19). Some further areas of activity were identified at the northern and north-eastern extents of the Site (figure 20). Many of the

features lacked correlating artefactual evidence and remain undated, although a number of features can reasonably be dated by association. The main periods of activity identified were the late pre-Roman Iron Age and the Roman period, although evidence of Bronze Age activity was recorded within one trench. Large parts of the Site appeared to have no surviving evidence of archaeological activity.

- 9.1.2 Although overburden deposits were generally made up of top and subsoils above the sand and gravel geology (c. 0.4m deep), there were deeper alluvial clays to the south-east (bordering the brook) and north-west (at the foot of the slope) - (see figure 20). Alluvial clays were recorded at between 1m and 2.6m in depth.

9.2 Bronze Age

- 9.2.1 The earliest dated activity on Site was represented by a single pit in Trench 5, which contained Bronze Age pottery and two undiagnostic flints. That no other Bronze Age activity was recorded, suggests that this represents an isolated episode, pre-dating the main phases of utilisation of the Site.

9.3 Pre-Roman Iron Age

- 9.3.1 The most significant activity identified relates to the establishment of a series of agricultural enclosures and field boundaries during the pre-Roman Iron Age (c. 500 BC to AD 50). In the majority of cases, identified archaeology corresponded to the previously recorded cropmark plot (Trenches 6, 7, 9-13, 14, 15) (see point A on figure 19). Most features were artefact poor, however two trenches (central to the cropmark complex at the SW edge of the Site) contained pottery assemblages, providing a secure date for the identified activity in this part of the Site.

9.4 Roman period

- 9.4.1 Two areas of Roman activity were identified, being close to the northern extent (Trench 23) and at the eastern extent (Trenches 44, 46-7). The eastern activity corresponds (in part) to two previously identified cropmark enclosure complexes, although the majority of both lie outside of the proposed development area (see points B and C on figure 19).
- 9.4.2 The activity identified in Trench 23, in the northernmost field, was unexpected. Several ditches with Roman pottery were identified, sealed beneath a fairly deep alluvial/colluvial horizon. The features appear to be agricultural enclosures, although it was suggested that contemporary

settlement may not be too far away. The likely area for associated settlement would be outside of the proposed development area, to the NE. Environmental evidence from waterlogged deposits suggested a scrub and open landscape.

9.4.2 Trench 44, to the east, contained features dated to the late Iron Age and Roman periods. Deeper alluvium across this part of the Site no doubt prevented the archaeology from being expressed as a cropmark, however to the immediate south, beyond the brook (and outside of the proposed development area) an extensive cropmark complex is recorded (cropmark B).

9.4.3 Close by, is recorded a further cropmark complex of overlapping enclosures which were encountered in Trenches 46 and 47 (Cropmark C). Recovered artefacts from Trench 47 places the activity in the early Roman period, but similar features in adjacent Trench 46 are likely to be contemporary.

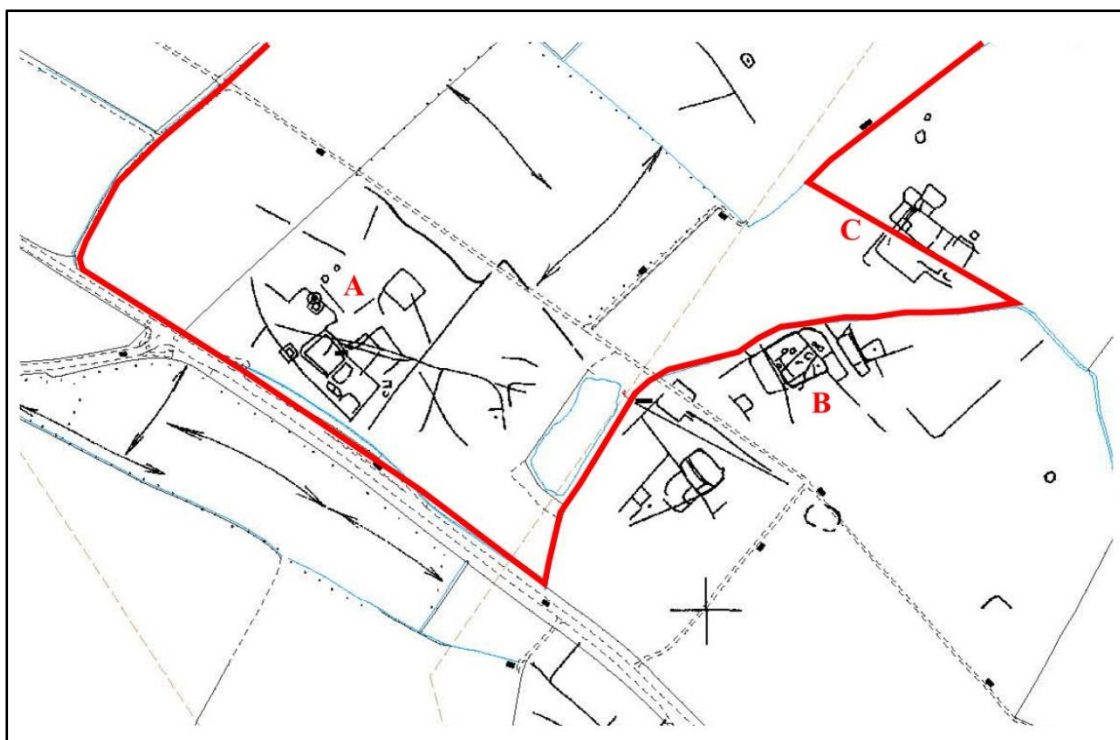


Figure 19 Location of the three main cropmark groups discussed in text

9.5 Undated features

9.5.1 Across various parts of the Site, features were identified that remain undated. In many cases they were not easily associated with the more securely dated activity. In most cases the features were merely former

field ditches, no doubt relating to the past agricultural utilisation of the landscape during different periods.

- 9.5.2 More notable amongst the undated features were a curvi-linear ditch with associated post-holes in Trench 36 and two large pits in Trench 40. These features were all in the Site's NE field, close to its eastern extent. Surrounding trenches, were, however, archaeologically blank.

9.6 Discussion

- 9.6.1 The trial trenching exercise was successful in identifying archaeological activity across several parts of the Site. The recorded archaeology frequently correlated with the cropmark plot and at time with the geophysical survey readings.
- 9.6.2 Three main phases of activity were identified, dating from the Bronze Age, the pre-Roman Iron Age and the Roman period. The nature of the deposits encountered and artefacts recovered suggest agricultural activities defined by enclosures, pits, post-holes and field boundaries. Contemporary settlement appears to lie outside of the Site, although seasonal occupation may well have taken place in and around the denser cropmark grouping at location A (see Figure 19). Within the focus areas as detailed on Figure 20, suitable mitigation will need to be implemented prior to development. Outside of these areas little impact is envisaged.

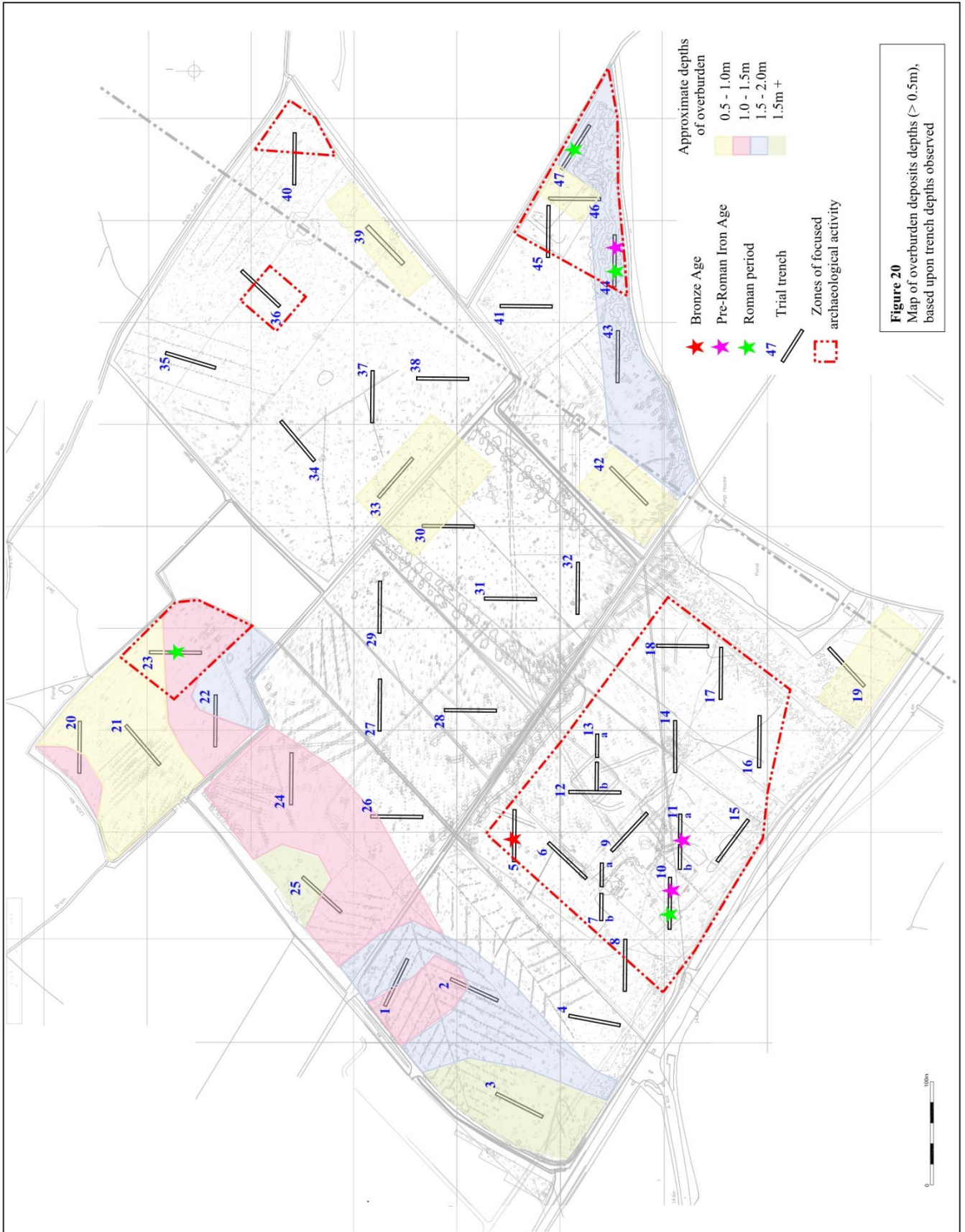


Figure 20
Map of overburden deposit depths (> 0.5m),
based upon trench depths observed

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Appendix A

Table 3 Results from the assessment of bulk sample light fractions from environmental samples.

Sample number	Context	Feature	Description	Trench	Spot date	Volume taken (litres)	Volume processed (litres)	% processed	Cereals			Non-cereal taxa (Carbonised)		Non-cereal taxa (Waterlogged)		Hazelnut shell	Charcoal		Molluscs		Contaminants				Other remains				
									Cereal grains	Cereal chaff	Notes	Seeds	Notes	Seeds	Notes		Charcoal > 2mm	Notes	Molluscs	Notes	Roots	Molluscs	Modern seeds	Insects		Earthworm capsules			
1	505	507	Fill of Ditch	5	BA	10	10	100%	-	-	-	-	-	-	-	-	-	-	-	-	X	-	X	-	-	-	-		
2	506	507	Fill of Ditch	5	BA	10	10	100%	-	-	-	-	-	-	-	-	-	-	-	-	X	-	X	X	X	-	-		
3	1709	1710	Fill of Ditch	17	-	20	20	100%	-	-	-	-	-	-	-	-	-	-	-	-	XX	-	X	-	X	-	-		
4	1011	1013	Fill of Ditch	10	Prehistoric-early Roman	20	20	100%	X	-	Trit (1)	-	-	-	-	-	-	-	-	-	XX	-	X	-	X	-	-		
5	1304	1306	Fill of Ditch	13	-	20	20	100%	X	-	Hord (1), Trit (2), NFI (3)	-	-	-	-	-	X	-	-	-	XX	-	X	X	X	-	-		
6	708	709	Fill of Ditch	7	-	20	20	100%	X	-	Oat (1)	-	-	-	-	-	X	-	-	-	XX	-	XX	-	X	-	-		
7	2317	2305	Fill of Ditch	23	PRIA?	20	20	100%	-	-	-	-	-	-	-	-	-	-	-	-	X	-	X	-	-	-	-		
8	2315	2304	Fill of Ditch	23	AD50-150	20	20	100%	-	-	-	-	-	XX	<i>Urtica dioica</i> (XX), <i>Ranunculus</i> sp. (X), <i>Stellaria media</i> (X), <i>Persicaria</i> sp. (X), <i>Rumex</i> sp. (X), <i>Sambucus nigra</i> (X)	-	-	-	-	-	X	-	-	-	-	-	-	-	Waterlogged wood (X), Insects (X)

9	4717	4714	Fill of Ditch	47	AD50-130	20	20	100%	-	-	-	-	-	-	XXX	<i>Urtica dioica</i> (XXX), <i>Ranunculus</i> sp. (X). <i>Montia fontana</i> (X), <i>Stellaria media</i> (X), <i>Sambucus nigra</i> (X), <i>Carduus/ Cirsium</i> sp. (X), <i>Carex</i> sp. (X)	-	-	-	-	-	X	-	-	-	-	Waterlogged wood (X), Insects (XX)
10	4418	4419	Fill of Ditch	44	AD50-130	20	20	100%	-	-	-	-	-	-	XXX	<i>Urtica dioica</i> (XXX), <i>Ranunculus</i> sp. (XX), <i>Ranunculus acris/ bulbosus</i> (X), <i>Montia fontana</i> (X), <i>Stellaria media</i> (X), , <i>Rumex</i> sp. (X), <i>Rubus</i> sp. (X), <i>Prunus spinosa</i> (XX), <i>Prunus domestica</i> (X), <i>Sambucus nigra</i> (X), <i>Conium maculatum</i> (XX), <i>Carduus/ Cirsium</i> sp. (X), <i>Carex</i> sp. (X)	-	-	-	-	-	X	-	-	-	-	Waterlogged wood (XXX), Insects (X)
11	3106	3108	Fill of Ditch	31	-	20	20	100%	-	-	-	-	-	-	-	-	-	-	-	-	X	-	X	-	-	-	

Abbreviations: Hord = barley (*Hordeum* sp.); Trit = wheat (*Triticum* sp.); Oat (*Avena* sp.); NFI = not formally identified (indeterminate cereal grain).



PHOENIX CONSULTING
Archaeological Consultancy

HERITAGE ASSESSMENT

**LAND AT FLASH FARM
AVERHAM
NOTTINGHAMSHIRE**

On behalf of:

MICK GEORGE LTD

Prepared by:

A Richmond BA PhD MCIfA FSA

20th August 2015

1.0 Introduction

1.1 Mick George Ltd are promoting a site known as 'Land at Flash Farm in the Parish of Averham' for mineral development. It is a prospective sand and gravel quarry identified within the emerging Nottinghamshire Minerals Local Plan. The area under consideration for extraction and soil/landscape bunding covers approximately 47 hectares, being centred at NGR SK 7577 5546. The proposals have highlighted the need for an appraisal of surrounding heritage assets, to include Listed Buildings, Scheduled Monuments and Conservation Areas, with regard to issues of setting. This assessment forms part of the application submission.

2.0 The Planning Framework

2.1 National Planning Policy Framework (NPPF 2012 – Chapter 12: *Conserving and Enhancing the Historic Environment*) states that local authority development documents and plans should include policies for the protection, enhancement and preservation of sites of heritage interest and their settings. The policies in NPPF 2012 are a material consideration which must be taken into account in development management decisions.

2.2 NPPF 2012 also gives backing to local planning authorities, at the stage of applying for planning permission, to request additional information from prospective developers about their site before determination of any submitted planning application. The information contained in this document forms part of that additional information.

2.3 This document also takes account of the related guidance given in the National Planning Practice Guide (PPG) 2014 and Historic England's recent publication, *Historic Environment: Good Practice Advice in Planning: Note 3: The Setting of Heritage Assets* (2015).

- 2.4 Historic England state that '*conservation decisions are based on the nature, extent and level of a heritage asset's significance and are investigated to a proportionate degree*' (2014.6). Local planning authorities should require an applicant to provide a description of the significance of the heritage assets that are potentially affected by a development, and the contribution of their setting to that significance. The level of detail should relate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset.
- 2.5 The National Planning Practice Guide (2014) states that the conservation of heritage assets in a manner appropriate to their significance is a core planning principle. Plan making to ensure that heritage assets are conserved in a manner consistent with their significance helps to achieve sustainable development.

3.0 Methodology

- 3.1 A development can result in two types of impact upon a cultural heritage asset: direct and indirect impacts. **Direct impacts** arising from a quarry development are likely to only affect heritage assets within the site boundary. **Indirect impacts** are defined as any impacts upon the settings of built and other heritage features as a result of the presence of the proposed development. Policy guidance recognises the need to protect the 'setting' of historic buildings and heritage features.
- 3.2 English Heritage (now Historic England) have previously published guidance on how to define the extent of the setting of heritage assets: The Setting of Heritage Assets: English Heritage Guidance (October 2011 – with revision notes to take account of NPPF – June 2012). The methodology below draws

upon that published document, guidance contained within the NPPF (2012), the National Planning Practice Guide (NPPG 2014) and Historic England’s recently published document entitled Historic Environment: Good Practice Advice in Planning, Note 3: The Setting of Heritage Assets (2015).

3.3 The full methodology for the assessment of settings impacts used during this analysis is detailed under Appendix A, at the end of this document.

Significance Criteria

3.4 The significance of potential impacts is assessed by taking into account the sensitivity of the heritage asset and the potential magnitude of change. Magnitude of change is a function of the nature, scale and type of disturbance or damage to the feature. For example, a high magnitude of change may result in the loss of or damage to a feature of built heritage. Criteria for assessing the magnitude of predicted change are provided in **Table 1**.

Table 1: Criteria for assessing magnitude of change on receptors

Magnitude of Change	Definition
High	Total loss or major alteration to key elements or features of the pre-development conditions, such that its post-development character, composition or setting would be fundamentally changed.
Medium	Loss or alteration of one of the key elements or features of the pre-development conditions such that its post-development character or setting would be partially changed.
Low	Slight alteration from pre-development conditions including alteration of the setting of a built heritage feature.
No Change	Very slight or no change from pre-development conditions.

3.5 The sensitivity/significance of the archaeological and/or built heritage feature will depend on factors such as the condition of the site and the perceived heritage value/importance of the site. The sensitivity of the receptor (heritage asset) is defined by its importance in terms of national, regional or local statutory or non-statutory protection. **Table 2** sets out the criteria for assessing sensitivity and significance.

Table 2: Criteria for assessing sensitivity & significance of receptors

Sensitivity & Significance	Criteria
High	<ul style="list-style-type: none"> • SMs and their settings. • Archaeological sites of schedulable quality and importance. • Listed Buildings of Grade I and II* status. • Registered Parks and Gardens and their settings.
Medium	<ul style="list-style-type: none"> • Undesignated sites of demonstrable regional importance. • Listed Buildings of Grade II status. • Local Authority designated sites such as Conservation Areas and their settings.
Low	<ul style="list-style-type: none"> • Sites with specific and substantial importance to local interest groups. • Sites whose importance is limited by poor preservation and poor survival of contextual associations.
No Importance	<ul style="list-style-type: none"> • Sites with no surviving archaeological or historical component.
Unknown	<ul style="list-style-type: none"> • Importance cannot be ascertained.

3.6 The sensitivity of the heritage asset, together with the magnitude of change, defines the significance of the impact (**Table 3**). Impacts of 'major' or 'moderate' significance are considered to equate to significant impacts in the context of the EIA Regulations. Scheduled Monuments and Grade I and II* Listed Buildings and their setting are all of high sensitivity and so even low levels of predicted magnitude of change to these features will be significant in EIA terms.

Table 3: Criteria for assessing significance of impact

Sensitivity	Magnitude of Change			
	High	Medium	Low	No Impact
High	Major	Major	Moderate	Negligible
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Minor	Negligible
No importance	Negligible	Negligible	Negligible	Negligible

4.0 An Assessment of Heritage Assets in vicinity of Flash Farm

- 4.1 In the wider surrounds of the application area there are a number of heritage assets, comprising of Listed Buildings, Scheduled Monuments and Conservation Areas (see **Table 4**). The majority of the assets are within the historic settlements of Averham and Kelham. Those assessed include three Listed Grade I buildings, two Listed Grade II* buildings, seven Listed Grade II buildings, two Scheduled Monuments and two Conservation Areas (Averham and Kelham). Upton Conservation Area, and its associated Listed Buildings are not considered in this assessment as the settlement is sufficiently removed from the proposed development area, and is fully screened by the topographic characteristics of the landscape.
- 4.2 An assessment has been carried out to review the impact that the proposed quarry would have on the setting of these cultural heritage assets. The following assets were assessed (see **Figure 1** for locations).

Table 4: Heritage assets assessed

Plan No	Name	Grade	UiD
1	Yew Tree Cottage, Averham	II	242706
2	Rectory Cottage, Averham	II	242707
3	The Old Rectory, Averham	II	242708
4	Church of St Michael, Averham	I	242710
5	The Manor, Staythorpe	II	242035
6	Averham Park House	II*	242704
7	South Farm, Averham Park	II	242705
8	The Gables, Little Carlton	II*	242813
9	Church of St Wilfred, Kelham	I	242755
10	Kelham Hall	I	242751
11	Monastic Buildings, Kelham Hall	II	242857
12	Farm Buildings, Home Farm, Kelham Hall	II	242762
13	Averham Moat and Enclosure	SM	1017687
14	Little Carlton Medieval Village	SM	1019870
15	Averham Conservation Area	CA	
16	Kelham Conservation Area	CA	

5.0 Listed Building Assessment

The Listed Buildings reviewed as part of this assessment are described under **Table 5**. The assessment of Impact is detailed under **Table 8**.

Table 5: Listed Buildings assessed in the vicinity of the proposed Flash Farm Quarry

Number	Name and Parish	Distance from Site Boundary	Grade	Description (D) and Analysis (A) of building and its setting. NB: descriptions taken from List Description and on-site observation.
Plan No 1 UID 242706	Yew Tree Cottage, Averham.	0.9km	II	<p>D: Cottage, formerly a pair. C18 and C19. Brick with pantile roof. Coursed rubble plinth, dentillated eaves, 2 coped gables with kneelers, single gable and single ridge stacks, 2 storeys, 4 bays. Cottage to left has continuous rear outshut. South front has off-centre door flanked by single Yorkshire sashes, all with segmental heads, and to right, single small light and blocked doorway. Rear elevation has to left, door with C20 lean-to timber porch, flanked to left by single and to right by 2 Yorkshire sashes, all with segmental heads.</p> <p>A: The <u>primary setting</u> of the house extends to the building's surrounding gardens, with the principal views to the north and west. The gardens are partially bordered by mature trees and hedges, beyond which are modern, infill houses. The <u>secondary setting</u> takes in this part of the historic settlement of Averham especially along Church Lane. There are no views from the building to the site due to distance, intervening buildings and topography.</p>
Plan No 2 UID 242707	Rectory Cottage, Averham.	1.1km	II	<p>D: House. C18 and C19. Brick, partly rendered, with gabled and hipped interlocking tile roof. Rebated and dentillated eaves. 2 gable and single ridge stacks. 2 storeys, 3 bays. L-plan. South front has C18 wing to west. Off-centre door flanked to left by a glazing bar sash and to right by a Yorkshire sash. C19 east front has off-centre panelled door with over-light. C18 wing has principal rafter roof with collars and clasp purlins.</p>

				<p>A: The <u>primary setting</u> of the house extends to the building's surrounding gardens to the north, east and south. Tall mature trees and hedging form the visual extent to house and gardens which remain largely enclosed. The <u>secondary setting</u> takes in this part of the historic settlement of Averham especially along Church Lane, together with partial views across open countryside to the south. There are no views from the building to the site due to distance, intervening buildings and topography.</p>
<p>Plan No 3</p> <p>UID 242708</p>	<p>The Old Rectory, Averham.</p>	1.2km	II	<p>D: Rectory. 1838-39. By William Patterson. Brick, stuccoed, with slate roofs. Ashlar plinth, deep eaves, lead rainwater heads with peacock motif, 3 side wall and 2 ridge stacks. 3 storeys, 6 unequal bays. L-plan. West front has projecting wing to right, and to its left, 2 storey square porch tower with pyramidal roof. At each end, a lean-to porch with bracketed eaves. Porch tower has central moulded ashlar architrave with flanking pilasters and margin stile door. Above, square panel and lintel band with Arms, inscribed '1839'. East front has 2 projecting hipped bays, each with a full-height canted bay window. Recessed central bay has C19 gabled conservatory with central door with fanlight.</p> <p>A: The <u>primary setting</u> of the former rectory takes in its surrounding gardens to the east (front elevation) and the north. The gardens are bordered to the south and north by mature tree belts and to the west by a high brick wall and hedging. The <u>secondary setting</u> takes in this part of the historic settlement of Averham, including the Parish Church to the immediate east. Views from the building are predominantly to the east, towards the Church and the river beyond. There are no views from the building to the site due to distance, intervening buildings, mature vegetation and topography.</p>

<p>Plan No 4</p> <p>UID 242710</p>	<p>Church of St Michael, Averham.</p>	<p>1.2km</p>	<p>I</p>	<p>D: Parish Church, C12, C13, C14, C15, C16, C19. Chancel restored 1857 by C. Bailey. Further restored 1858 and 1907. Re-roofed 1865. Herringbone rubble, coursed squared rubble, ashlar, brick, rendered, with plain tile roof and leaded chancel gable. West tower, C13 and C15, 2 stages, has chamfered plinth, coved string course, coved eaves band with 8 Romanesque style gargoyles, crenellated parapet with shields in panels and 8 crocketed pinnacles. 4 diagonal buttresses, 5 and 3 setoffs, those to east engaged with nave. That to south west has rebus with moulded hood. First stage has to south, clock. To west, C14 double lancet with cusped heads and decorated tracery, chamfered mullion, chamfered and rebated reveal, and hood mould. Second stage has 4 C14 double lancet openings with cusped heads, decorated tracery, coved mullions, chamfered and rebated reveals with hood moulds. The lych gate of the Church is also Listed Grade II, for group value.</p> <p>A: The <u>primary setting</u> of the Church takes in the graveyard to north, east and south, up to the defined boundaries which are demarcated by hedges, iron railings and mature trees. The <u>secondary setting</u> takes in this part of the historic village including the Old Rectory, together with views to the south and east, and along the bordering river corridor. There may be temporary obscured glimpses of parts of the proposed quarry in long-distance views from the upper Church tower, but these would only constitute a minor backdrop, and not an integral part of the setting of the building.</p>
<p>Plan No 5</p> <p>UID 242035</p>	<p>The Manor, Staythorpe.</p>	<p>1.2km</p>	<p>II</p>	<p>D: Late C17, some later C19 brick patching. Red brick. Decorative machine tile roof with decorative ridge cresting. Single ridge red brick stack. Originally a hall house with baffle entrance. Single storey plus attic, 6 bays, the left single bay projecting cross wing, is gabled and is of 2 storeys. Doorway with plank and part glazed door and gabled wood and plain tile hood. There are 2 gabled dormers each with narrow bargeboard finial and single similar cross casement.</p>

				<p>A: The <u>primary setting</u> of the house takes in its surrounding gardens to the south and west, including a recently constructed landscaped lake. The gardens are bordered by mature trees and hedges providing the property with an enclosed, inward setting with few views across the wider rural landscape. There is little discernible <u>secondary setting</u> to the house, although there is some association with the historic layout of Staythorpe. There are no views from the building to the proposed quarry.</p>
Plan No 6 UID 242704	Averham Park House, Averham	1.4km	II*	<p>D: House, formerly hunting lodge. 1718-20, additions C20. For Robert Sutton, Lord Lexington. Brick with hipped and gabled plain tile roofs. Brick plinth, first floor band, 2 ridge and single side wall stacks, 2 storeys plus garrets, 7 plus 2 bays. Windows are mostly glazing bar sashes with rubbed brick heads. Main south front has projecting gabled central bay with stone steps over semi-circular opening. To right, service wing, 1924, 2 storeys, 2 bays, with first floor band. Main west front has central projecting gabled bay with gabled C20 brick porch with French window with over-light.</p>
				<p>A: The <u>primary setting</u> of the house takes in its associated gardens to the north, east and west, with views predominantly to the west over rolling countryside. The <u>secondary setting</u> takes in the surrounding Averham Park complex (now an equestrian facility), including the former service ranges (also Listed) to the south. Due to extensive trees belts, distance and topography there are no views from the house to the site.</p>
Plan No 7 UID 242705	South Farm, Averham	1.4km	II	<p>D: Farmhouse, former service wing of Averham Park, c.1720, with large C19 and C20 additions to south and west. For Robert Sutton, Lord Lexington. Brick with hipped and gabled pantile and plain tile roofs. First floor band, dentillated eaves, 2 ridge, single gable and single side wall stacks. 2 storeys, 6 bays. C- plan. Cellar at east end formerly connected by tunnel to Averham Park.</p>

				<p>A: The <u>primary setting</u> of the former service wing extends to the associated gardens and brick outbuildings, including former stable blocks to the south. The <u>secondary setting</u> takes in the surrounding Averham Park complex. There are no views from the building to the site due to distance, topography and intervening tree belts.</p>
<p>Plan No 8 UID 242813</p>	<p>The Gables, Little Carlton</p>	<p>2.2km</p>	<p>II*</p>	<p>D: Farmhouse. c.1600. Altered C18 and C19. Timber framed, with steep pitched plain tile roofs. Rubble and brick plinths, brick nogging; partly rendered, with remains of pargetting at east end. Tile hung north gables. Single coped gable with kneelers. Single ridge and 2 gable stacks, one external. 2 storeys, 4 bays. Hall with 2 cross wings and cross passage. H-plan. North front has a projecting gabled wing at each end. Central bay has 2 C19 openings with rubbed brick segmental heads, and to left, a square opening. To right, a panelled door with rubbed brick head and over-light.</p>
				<p>A: The <u>primary setting</u> of the former farmhouse is confined to its immediate location, with gardens to three sides and former stable ranges to the east. The <u>secondary setting</u> takes in the wider rural landscape, with views to the south towards Kelham, across pasture fields. There are no views from the building to the site due to distance, topography, intervening buildings and tree belts.</p>
<p>Plan No 9 UID 242755</p>	<p>Church of St Wilfred, Kelham</p>	<p>1.1km</p>	<p>I</p>	<p>D: Parish church. C14, C15, Early C18, restored 1874 by Hodgson Fowler. Ashlar, dressed stone and coursed rubble with ashlar dressings and slate roofs. Continuous crenellated parapet. West tower, 4 stages, moulded plinth, 3 string courses, moulded eaves band, 4 gargoyles, 4 crocketed pinnacles. Pair of clasping buttresses to west, changing to diagonal buttresses in third stage. Pair of similar buttresses to east, engaged with aisles. Perpendicular tracery, coved mullions, coved, rebated and roll moulded reveals and hood mould with mask stops. Nave, 3 bays, has crenellated east gable with cross, and moulded eaves band. North east</p>

				<p>corner has octagonal stair turret with 2 chamfered doorways. Chancel, 2 bays, has partial deep moulded plinth. South chancel Lexington chapel, c.1723. Tower arch, C15, double chamfered and rebated, with octagonal responds with moulded bases and billeted, crenellated capitals.</p> <p>A: The <u>primary setting</u> of the Church takes in the graveyard to all sides, up to the defined boundaries which are demarcated by hedges, iron railings and low brick walling. The churchyard has a very enclosed setting, with mature trees surrounding all sides. The <u>secondary setting</u> takes in the wider Kelham Hall complex, including Kelham Hall to the immediate north. There are no views from the Church to the proposed quarry.</p>
<p>Plan No 10 UID 242751</p>	<p>Kelham Hall, Kelham</p>	<p>1.1km</p>	<p>I</p>	<p>D: Country house. Gothic revival style. 1859-61 By (Sir) George Gilbert Scott for John Manners-Sutton. Incorporates service range, 1844-46 by A. Salvin for the same client. Service range in Renaissance revival style. Brick and ashlar with ashlar dressings, gabled, hipped and pyramidal slate roofs. Fireproof design with iron and concrete structure. Moulded and chamfered plinths, sill and lintel bands, machiolated and moulded eaves, moulded balustrades with some crocketed finials, coped gables. 4 side wall and 4 ridge stacks grouped and with decorative brick and ashlar caps. Polychrome brick bands, opening heads and diaper work. Windows are lancets, mostly with shafts with foliate capitals and hood moulds, and mullioned and transomed casements, some with shafts. Glazing is plain sashes or plate glass casements. All facades are asymmetrical. 3 storeys plus attics. 9 bays wide by 3 bays deep. Irregular L-plan with spinal corridors. Main west front has 4 bay central block flanked to left by square tower with extruded corner tower to its left. To right, gabled projecting wing and to its left, gabled extruded corner.</p> <p>A: The <u>primary setting</u> of the Hall takes in the former formal (now public) gardens to three sides and the associated historic outbuildings to the north. A number of associated listed elements add to the buildings (group) value (including the Listed Grade II* gazebo and garden walling). The <u>secondary setting</u> takes in the wider Kelham Hall complex, including the Church of St</p>

				Wilfred (also Listed Grade I), the wider surrounding grounds (now largely playing fields) and the rural landscape alongside the river. There may be temporary obscured glimpses of parts of the proposed quarry in long-distance views from the upper parapet of the Hall's 3 rd storey, but these would only constitute a minor backdrop, and are not considered an integral part of the setting of the building.
Plan No 11 UID 242857	Former Monastic buildings at Kelham Hall, Kelham	1.1km	II	D: Former monastic buildings and chapel, now offices and function room. Designed 1927-9 by Charles Clayton Thompson. Brick and concrete. Three ranges of buildings around a courtyard with the chapel to the north. 2 storey, 7 bay, south range, has plain tile roof with 2 stacks. The main, west range, 3 storey plus attics, has a plain tile half-hipped roof and 3 ridge stacks. West front, 10 bays with 2 projecting blocks with hipped roofs. Symmetrical front has a central section topped by a round arched parapet, with tall brick side buttresses and single bay wings.
				A: The <u>primary setting</u> of the former monastic range takes in the surrounding historic buildings of Kelham Hall, and associated gardens to the south. The <u>secondary setting</u> takes in the wider Kelham Hall complex, with views across playing fields to the tree belts bordering the A617. There are no views from the building to the site due to distance, topography and intervening tree belts.
Plan No 12 UID 242762	Farm Buildings at Home Farm, Kelham Hall, Kelham	1km	II	D: Late C18 with extensive alterations and additions mid C19 and renovated for domestic occupation in early C21. Possibly by George Gilbert Scott for John Manners-Sutton. Brick with gabled and pyramidal patterned and plain tile roofs, plus tile hanging and shingles. Blue brick diaper work and details, dentillated eaves, coped gables with kneelers. Single and 2 storeys. 11 bays. H-plan. To west, late C18 barn forming wing. East front, 4 unequal bays, has an off-centre pair of barn doors with lattice panel above. South gable has a triple leaded light. Main range has to south off-centre carriage entry. To right, square tower, 3 stages, with blue brick band, patterned tile pyramidal roof and wind vane.

				<p>A: The <u>primary setting</u> of the former farm buildings takes in this part of the Kelham Hall complex. There is little discernible <u>secondary setting</u> to the buildings, with modern houses having been constructed to the south and east. There are no views from the buildings to the proposed quarry.</p>
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6.0 Scheduled Monument Assessment

The Scheduled Monuments reviewed as part of this assessment are described under **Table 6**. The assessment of Impact is detailed under **Table 8**.

Table 6: Scheduled Monuments assessed in the vicinity of the proposed Flash Farm Quarry

Number	Name and Parish	Distance from Site Boundary	Description (D), Analysis of feature and setting (A), and Significance (S).
Plan No 13 UID 13392 List Entry 10176867	Averham Moat and Enclosure, Averham.	1.1km	<p>D: The monument includes the moated site of Averham manor and the adjacent enclosure which extends to the south-east. Earthworks visible in the ploughed field to the south-west, and concentrations of brick further to the south-east, indicate the existence of a second enclosure and probable building remains. The extent and survival of these additional features is not sufficiently understood for them to be included in the scheduling. The moat includes a rectangular island measuring 12m from north-west to south-east by 69m from north-east to south-west. Enclosing it is a steep-sided ditch, 3m deep and varying between 8m and 9m wide. The ditch levels out near the south corner, indicating a bridging point leading from the enclosure to the south-east. The visible remains of this enclosure consist of two parallel banks of which the south-western is the best preserved. It is roughly 2m wide by 100m long and projects south-eastwards from the south end of the moat. The second bank lies c.70m to the north but has been disturbed by the creation of the gardens behind the houses on Church Lane. Only its south-east end is now visible, projecting into the paddock adjacent to the two houses.</p> <p>A: The monument largely comprises below ground remains with few discernible remains above ground. The <u>primary setting</u> of the monument is confined to the arable field in which it lies (albeit the scheduled area has been taken out of cultivation), bounded on two sides (NE and SW) by the gardens of modern properties. The site's <u>secondary setting</u> takes in views across surrounding open fields to the south and east, towards the River Trent. Its setting does not extend to the Site. Due to distance, topography and intervening built development, there are no views from the scheduled monument to the proposed development.</p>

			S: All scheduled monuments are high sensitivity receptors.
Plan No 14 UID 29991 List Entry 1019870	Little Carlton Medieval Village & part field system, South Muskham	2km	D: The monument includes the earthwork and buried remains of the abandoned areas of Little Carlton Medieval village. The monument is situated on flat ground, 1km north of the River Trent and 1km west of the village of South Muskham. It is in two separate areas of protection. Little Carlton is first mentioned in the Domesday survey of 1086 when it was owned by the Archbishop of York. In the area east and south of Manor House Farm the monument is characterised by a series of rectangular enclosures arranged around a sub-rectangular open green. The green is bounded on its east side by a brook and on its south, west and north sides by a gully which is interpreted as a sunken track. Those enclosures which contain no internal features, were probably used for stock control or allotments. Those south of Manor Farm Cottages, however, contain internal features, which are interpreted as the remains of medieval buildings.
			A: The monument largely comprises below ground remains with few discernible remains above ground. The <u>primary setting</u> of the monument is confined to the various pasture fields in which it lies. The site's <u>secondary setting</u> takes in views across surrounding open fields, especially to the east and NE, towards the River Trent. Due to distance, topography and intervening built development, there are no views from the scheduled monument to the proposed development.
			S: All scheduled monuments are high sensitivity receptors.

7.0 Conservation Area Assessment

The Conservation Areas reviewed as part of this assessment are described under **Table 7**. The assessment of Impact is detailed under **Table 8**.

Table 7: Conservation Areas assessed in the vicinity of the proposed Flash Farm Quarry

Name	Distance from Site Boundary	Description (D) and Analysis (A) of Character, Appearance and Setting
Averham	400m	<p>D: Averham was designated as a Conservation Area in recognition of the special architectural and historic interest of the area. Its boundary was designed to enclose the majority of the historic settlement pattern of the village, together with the moated site of Averham Manor, which is within fields to the south of Church Lane, and which is Scheduled. It includes the original plots of the village along Church Lane and Pinfold Lane, creating a linear arrangement based, primarily, on these two roads. At the far eastern end is the Church of St Michael, Listed Grade I. Four, of Averham's five Listed Buildings are at the eastern extent of the village. Averham is mentioned in the Domesday Survey of 1086 suggesting it has Saxon origins. The village is quite closed in, within a decidedly inward focus along Church Lane and Pinfold Lane. Much of the settlement has an irregular pattern of development and a mix of architectural styles and dates.</p> <p>A: The character and appearance of the Conservation Area is derived from its historic pattern, the use of traditional materials and buildings. The character is not uniform throughout. Four of the five Listed Buildings within the settlement are at the eastern extent, close to (and including) the Church, which is the most easterly building within the village. Most buildings have an inward focus, along Church Lane and Pinfold Lane. The gardens to a number of properties provide a transition between the historic village centre and the countryside surrounding. This is especially evident at the village's eastern extent. The river, which runs close to the Church, is a focus of the settlement, with views to the east and south-east.</p>

		<p>Few buildings have an outward focus. The village is located on predominantly flat ground, which limits views out of the Conservation Area to the north and north-west. In many directions hedges and banks of trees also restrict views out. Significant views are generally along streetscapes. There are no significant views toward the proposed development site, due to modern development and intervening vegetation. Much of the modern development within the village is alien to the character of the area, being inappropriate in plot size and shape, material and design.</p>
Kelham	360m	<p>D: The village of Kelham lies along the banks of the River Trent, being a small village on the main road between Newark and Farnsfield, which is famed for its involvement in the Civil War. When King Charles I surrendered at Southwell in 1647, he was held at Kelham Hall by the Scots. The Conservation Area boundary was designed to enclose the majority of the historic settlement pattern of the early village, around Blacksmiths Lane, Manor Farm and Corner Farm (all areas at the settlement's northern extent), as well as the Kelham Hall complex to the south, that comprises nine Listed elements, including the Hall (Grade I) and Church of St Wilfred (Grade I) and their surrounding grounds. Kelham Hall is a landmark for the village, sitting within 52 acres of park land, much now converted to modern playing fields. The hall has had several incarnations, having been destroyed twice and re-built over time. The current Kelham Hall was completed in 1863. The designated area also included Kelham Bridge to the east and Kelham House Hotel to the west, as well as Oak Plantation to the west of the hotel and part of an arable field to its south. Throughout the Conservation Area there is a range of building styles, meaning that there is no overriding architectural style.</p>

		<p>A: The character and appearance of the Conservation Area is derived from its historic pattern based along Main Road, Blacksmith Lane and Broadgate Lane, and its association with the Church and Kelham Hall to the south of the main settlement, set within former parkland. The character is not uniform throughout, and there are two main areas of interest, being the historic loop of Blacksmith Lane and the Kelham Hall complex to the south. At the northern extent, the settlement is quite closed in, with significant views along streetscapes. Views from Kelham Hall, however, are predominantly towards the river, and along the river corridor. The bordering Church has a very enclosed settling, with dense mature tree belts surrounding.</p> <p>Kelham is likely to have become established here as it was a suitable place to cross the river. The river, and the views across and along it, can therefore be considered part of its setting. Due to distance, topography and vegetation (specifically Oak Plantation and Cottage Plantation) there are no significant views from the Conservation Area to the proposed development site.</p>
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8.0 Heritage Impact Assessment

The assessment of Impact is detailed under **Table 8**.

Table 8: A summary of the potential indirect impacts during construction/establishment of Flash Farm Quarry

Site	Predicted Indirect Impact	Mitigation
<p>Yew Tree Cottage, Averham</p> <p>Plan No 1</p> <p>UID 242706</p> <p>Grade II</p>	<p>The special interest of this building is derived from its fabric, age and preservation. Its setting does not extend to the site.</p> <p>The proposed quarry will have no impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>
<p>Rectory Cottage, Averham</p> <p>Plan No 2</p> <p>UID 242707</p> <p>Grade II</p>	<p>The special interest of this house is derived from its fabric, age and preservation. Due to distance, intervening built development and vegetation there are no sight-lines from the building to the site</p> <p>The proposed quarry will have no impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>

<p>The Old Rectory, Averham</p> <p>Plan No 3</p> <p>UID 242708</p> <p>Grade II</p>	<p>The special interest of this building is derived from its date, built-form and fabric. There are no views from the building to the site.</p> <p>The proposed quarry will have no impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>
<p>Church of St Michael, Averham</p> <p>Plan No 4</p> <p>UID 242710</p> <p>Grade I</p>	<p>The special interest of the Church is derived from its survival, fabric, age and preservation. The Church's setting takes in the surrounding churchyard. There may be obscured glimpses of the site in long-distance views from the upper Church tower, but these would only constitute a minor backdrop, and not an integral part of the setting of the building.</p> <p>The proposed quarry will have no impact on the setting of this high sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p> <p>Whilst no significant impacts are envisaged, it is worth stating that the quarry operations will be temporary in nature. Surrounding soil storage bunds will also be grassed over during operation allowing them to blend into the agricultural landscape. Following site workings, approved restoration will take place.</p>
<p>The Manor, Staythorpe</p> <p>Plan No 5</p> <p>UID 242035</p> <p>Grade II</p>	<p>The special interest of this building is derived from its date, built-form and fabric. There are no views from the building to the proposed development site.</p> <p>The proposed quarry will have no impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>

<p>Averham Park House, Averham</p> <p>Plan No 6</p> <p>UID 242704</p> <p>Grade II*</p>	<p>The special interest of this building is derived from its date, built-form and fabric. There are no views from the building to the proposed development site.</p> <p>The proposed quarry will have no impact on the setting of this high sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>
<p>South Farm, Averham</p> <p>Plan No 7</p> <p>UID 242705</p> <p>Grade II</p>	<p>The special interest of South Farm is derived from its survival, fabric, age and preservation. There are no views from the building to the proposed development site.</p> <p>The proposed quarry will have no impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>
<p>The Gables, Little Carlton</p> <p>UID 242813</p> <p>Plan No 8</p> <p>Grade II*</p>	<p>The special interest of this building is derived from its date, built-form and fabric. There are no significant views from the building to the site due to distance, topography, intervening buildings and tree belts.</p> <p>The proposed quarry will have no impact on the setting of this high sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>

<p>Church of St Wilfred, Kelham</p> <p>Plan No 9</p> <p>UID 242755</p> <p>Grade I</p>	<p>The special interest of the Church is derived from its date, built-form, fabric and associations. There are no views from the building to the site.</p> <p>The proposed quarry will have no impact on the setting of this high sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>
<p>Kelham Hall, Kelham</p> <p>Plan No 10</p> <p>UID 242751</p> <p>Grade I</p>	<p>The special interest of Kelham Hall is derived from its date, built-form and fabric. There may be temporary obscured glimpses of parts of the proposed quarry in long-distance views from the upper parapet of the Hall's 3rd storey, but these would only constitute a minor backdrop, and are not considered an integral part of the setting of the building.</p> <p>The proposed quarry will have no impact on the setting of this high sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p> <p>Whilst no significant impacts are envisaged, it is worth stating that quarry operations will be temporary in nature. Surrounding soil storage bunds will be grassed over during operation allowing them to blend into the agricultural landscape. Following site workings, approved restoration will take place.</p>
<p>Former Monastic buildings at Kelham Hall, Kelham</p> <p>Plan No 11</p> <p>UID 242857</p> <p>Grade II</p>	<p>The special interest of this building is derived from its survival, fabric, age and historic association. There are no views from the building to the proposed development site.</p> <p>The proposed quarry will have no impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>

<p>Farm Buildings at Home Farm, Kelham</p> <p>Plan No 12</p> <p>UID 242762</p> <p>Grade II</p>	<p>The special interest of this building range is derived from its survival, fabric, age and historic association. There are no views from the buildings to the proposed development site.</p> <p>The proposed quarry will have no impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>
<p>Averham Moat and Enclosure, Averham</p> <p>Plan No 13</p> <p>UID 13392</p> <p>Scheduled</p>	<p>The interest of this site is derived from its archaeological potential in that it contains the remains of a Medieval moated enclosure associated with Averham Manor. A buried archaeological monument with few surviving remains on the surface. Currently a patch of set-aside pasture on the southern edge of the village.</p> <p>Due to distance, topography and intervening built development, there are no views from the scheduled monument to the proposed development.</p> <p>The proposed quarry will have no impact on the setting of this high sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>
<p>Little Carlton Medieval Village & part field system, South Muskham</p> <p>Plan No 14</p> <p>UID 29991</p> <p>Scheduled</p>	<p>The interest of this site is derived from its archaeological potential in that it contains the remains of a Medieval village and its associated field enclosures, hollow-ways and fish ponds. A buried archaeological monument with few surviving remains on the surface. Currently pasture fields on the edge of the settlement.</p> <p>Due to distance, topography and intervening built development, there are no views from the scheduled monument to the proposed development.</p> <p>The proposed quarry will have no impact on the setting of this high sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p>

<p>Averham Conservation Area</p> <p>Plan No 15</p>	<p>The character and appearance of the Conservation Area is derived from its historic pattern, the use of traditional materials and buildings. The character is not uniform throughout. Four of the five Listed Buildings within the settlement are at the eastern extent, close to (and including) the Church, which is the most easterly building within the village. Most buildings have an inward focus.</p> <p>There are no significant views toward the proposed development site, due to modern development and intervening vegetation. Significant views are generally along streetscapes, and to the east and south of the Church.</p> <p>The proposed quarry is not anticipated to have an impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p> <p>Whilst no significant impacts are envisaged, it is worth stating that quarry operations will be temporary in nature. Surrounding soil storage bunds will be grassed over during operation allowing them to blend into the agricultural landscape. Following site workings, approved restoration will take place.</p>
<p>Kelham Conservation Area</p> <p>Plan No 16</p>	<p>The character and appearance of the Conservation Area is derived from its historic pattern to the north of Main Street (around the Blacksmith lane loop) and its association with Kelham Hall and the Church, the use of traditional materials and buildings set in a fairly diffuse arrangement. Kelham Hall is a landmark for the village, sitting within 52 acres of park land, much now converted to modern playing fields. Throughout the Conservation Area there is a range of building styles, meaning that there is no overriding architectural style.</p> <p>There are no significant views toward the proposed development site, due to distance and intervening vegetation, specifically Oak Plantation and Cottage Plantation.</p> <p>The proposed quarry is not anticipated to have an impact on the setting of this medium sensitivity receptor and therefore the predicted impact is of negligible significance.</p>	<p>As the predicted impact is of negligible significance, no mitigation is considered necessary.</p> <p>Whilst no significant impacts are envisaged, it is worth stating that quarry operations will be temporary in nature. Surrounding soil storage bunds will be grassed over during operation allowing them to blend into the agricultural landscape. Following site workings, approved restoration will take place.</p>

9.0 Concluding statement

- 9.1 The assessment of indirect impacts on heritage assets (including Listed Buildings, Scheduled Monuments and Conservation Areas) within the study area shows that there are no significant impacts in planning terms with regard to the proposed establishment and operation of Flash Farm Quarry. Quarry operations (including the placement of storage bunds) will be temporary in nature, prior to approved progressive restoration back to agricultural use taking place.
- 9.2 The proposed quarry is not located within the primary setting of any surrounding built heritage asset. There will be minor changes to long distance and obscured views in some circumstances, but none of these changes are relevant to planned views or vistas, and those changes are not assessed as compromising the understanding or historic importance of any heritage asset.

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Appendix A

Defining Setting

The NPPF (2012 - Chapter 12: Conserving and Enhancing the Historic Environment) refers to the setting or surroundings of designated cultural heritage assets as being of importance in the assessment of impacts. It states that '*setting is the surroundings in which an asset is experienced*'. The section below sets out to define the concept of setting and how it can be assessed. It takes into account the recent advice provided in the National Planning Practice Guide (2014) and the Good Practice Advice in Planning document (2015).

As stated under the NPPF (2012), the issue of setting is most relevant to designated features of national importance, such as Scheduled Monuments, Listed Buildings and Conservation Areas, although certain other aspects of the historic environment, for which there are no specific statutory controls, such as historic parks and gardens, can also be deemed to have a setting.

Historic England's policy documentation and guidance states that setting is made up of a number of constituent elements which include:

- views from, towards, through and across an asset;
- the experience of an asset in its setting;
- the spatial association of an asset; &
- the understanding of the historic relationship between places;

There is the suggestion that the setting of a heritage asset would often be associated with areas in close proximity to the asset and the spatial quality and relationship between an asset and its surroundings. It is clear, however, that some degree of interpretation is required; not all development within the wider landscape of, say a listed building, can reasonably be assumed as falling within its setting. Unless there are clear functional or significant historic associations with the wider landscape, the surrounds will comprise a 'backdrop' rather than an integral part of the setting of a heritage asset.

The NPPF (2012) is concerned with the 'significance' of an asset and whether this significance will be altered by a development. It suggests that any development capable of affecting the significance of a heritage asset or people's experience of it can be considered as falling within its setting. It is the degree of harm to the asset's significance rather than the scale of the development that should be assessed (NPPG 2014.017).

Local Authorities need to come to an opinion as to whether a proposed development affects the setting of a heritage asset. Guidance states that 'understanding the significance of the asset will enable the contribution made by its setting to be understood'.

There is certainly room for interpretation, reinforcing the essentially undefined scope and nature of settings. The NPPF defines setting as:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounds evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.

Historic Environment Good Practice Advice in Planning, Note 3:
The Setting of Heritage Assets (2015.2)

There is some degree of interpretation required in assessing the setting of any given heritage asset, and accordingly there is potential for conflicting definitions as to the exact extent and composition of the setting of it. By implication an assessment of the setting of a heritage asset may reflect a particular interpretation rather than an absolute conclusion. It is nevertheless considered possible to present a balanced and informed view on the setting of an asset through assessment and whether a proposed development will adversely affect it.

Policy guidance implies that the setting of a heritage asset, such as a Listed Building, would normally extend in all directions. Nevertheless, it is also clear that:

- The setting of most heritage assets will not be of equal importance in all directions. There is, for instance, a clear hierarchical difference between the frontage and rear elevations of formally designed buildings, and planned views will be of much more importance than unintended or 'incidental' views.
- There are seldom physical features which will denote the exact extent of the setting of heritage assets, particularly in rural landscapes. Field or land parcel boundaries, for instance, may theoretically be useful to denote historic associations, although these often bear little or no direct relation to existing conditions or features and may have little relevance in terms of defining the physical setting of a building or cultural heritage feature. Associated boundary walls and planted boundaries, however, can sometimes clearly define the settings of features.
- The setting of some assets will be confined to their immediate surroundings, which, in some cases, can be very limited. Examples of such structures include headstones, mile stones, footbridges, steps, war memorials, boundary walls, gates and gate posts.
- What is of importance in assessing the setting of a heritage asset is its qualitative relationship with its surroundings, and in some instances also significant historic associations and relationships with surviving physical features, particularly planned vistas and interrelated buildings. The latter will normally be recognised in published literature, list and schedule descriptions.
- A building set within a rural landscape will normally have a close spatial relationship with its immediate context and surroundings (such as a farmhouse and its outbuildings; a church and its church yard). Unless there are clear functional or significant historic associations with the wider landscape, the rural landscape will comprise a 'backdrop' rather than an integral part of the setting of a building.

In turn it is important to differentiate between the setting of different types of heritage asset according to their characteristics and constituent parts. For example, the setting of Listed Buildings differs from the setting of Scheduled Monuments, which in turn differ from the setting of Conservation Areas. A summary of the definitions of setting used as a basis for this assessment are set out below.

Setting of Listed Buildings

For the purposes of this assessment the setting of a listed building has been divided into primary and secondary. The primary setting of a listed building is formed of land which materially relates or contributes to the understanding and interest of the listed building. For example, a country house may have formal gardens and associated outbuildings which contribute to the overall historical evolution and understanding of the site and the interest of the building itself. In this manner, the primary setting contributes to the heritage asset's significance.

The secondary setting of a listed building can be defined as land outside the primary setting of the building but still adjacent and with a visual relationship to it. The secondary setting should have some kind of historical connection to the listed building, such as surrounding parkland, but will often not be as clearly defined as the primary setting.

Harm to a heritage asset through development within its setting is assessed against the same policies as for physical harm to the significance of designated heritage assets generally (NPPF 2012 paragraph 132). Any identified harm should be judged against the public benefits delivered by the development proposal (paragraph 133 & 134).

Setting of Scheduled Monuments (SM's)

The NPPF (2012) does not explicitly define what the setting of a monument is, but it is accepted that where nationally important remains and their settings, whether Scheduled or not, are affected by development there should be a presumption in favour of their physical preservation (ibid. 31). The setting of some SMs, such as those that are represented by buried remains that have no discernible understanding on the ground-surface, is generally more limited than that for listed buildings. In these circumstances the wider landscape surrounding the SM does not necessarily contribute to the understanding of the feature, although where a SM encompasses upstanding remains which might have specific relationships with the surrounding land these may have a wider setting than most.

Setting of Conservation Areas

The setting of a conservation area is made up of land surrounding the boundary of the designated area and is often considered to either detract or enhance the characteristics of the area, including views into and out of it. The setting of a conservation area is not usually taken to extend very far as it is the intrinsic value of the area which is of most importance. Therefore views into or out of conservation areas can, in some circumstances, contribute to the character or appearance of an area. In many circumstances conservation areas fall within village or town centres with a distinctly inward looking character and are often screened from view by surrounding buildings and trees.

It is the quality and interest of areas, rather than that of individual buildings, which should be the prime consideration in identifying conservation areas. It is recognised that the desirability of preserving or enhancing an area should be a material consideration in the planning authority's handling of development proposals which are outside the conservation area but would affect its setting, or views into or out of the area.

Vistas and Sightlines

A built heritage feature, for example a listed house with associated formal gardens, may have planned vistas and views, for example avenues of trees centred on a landmark or point on the horizon which are intended to provide a pleasing aspect. Historic England's guidance document 'Seeing the History in the View' (2011) defines a Designed View as:

A view that is the product of a deliberate design, usually intended to create a particular effect, illustrate a particular aspect of a landscape or focus on a particular feature or features in a landscape. Such a landscape and its features do not themselves have to be designed, but they may be.

Incidental Views

Many heritage assets set within a rural landscape may be seen from a number of locations, on footpaths, down streets and from the surrounding landscape. Views to and from such assets, where incidental and not intentionally designed (except where this forms part of the setting) are not covered here because incidental views are not considered integral to their special architectural or historic interest.

Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mr	
First name	Brian	
Last name	Davey	
Address line 1	██████████	
Address line 2	██████████	
Address line 3	██████████	
Postcode	██████	
Email	██████████████████	
<i>For those replying on behalf of an organisation or group:</i>		
Organisation	N/a	
Job title	N/a	

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 checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input 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.*

The issues are complex and very wide ranging and require proper discussion to tease out.

Signature		Date	
Name			

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

Part B – Your representation

Office use only Person No: 2763 Rep No: 29854

Please read the guidance note before completing this section.

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

Policy	MP 12	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	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?	x	(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.

See submission sent by email. In summary, the document is unsound as (a) it does not properly into account the scale that unconventional hydrocarbons would have to be developed at in order to have any chance of being economic; (b) it does not take into account up to date information from peer reviewed academic research on health and environmental impacts of unconventional gas development and (c) it does not take into account the evidence that regulation would be incapable of making this industry safe and therefore precautionary principles should apply.

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.

See documentation already submitted

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
If Yes, please give details	I raised issues about the likely scale and impacts of unconventional hydrocarbons id developed in Nottinghamshire		

Signature		Date	
Name			

**Comments on the Submission Draft of Notts Minerals Plan (Feb 2016)
(relating to section MP12: Hydrocarbon Minerals - starting p74, para 4.105)**

Submission by Brian Davey, 2 Mount Hooton, off Forest Road East, Nottingham NG1 4JF

I am a retired ecological economist and commented on an earlier draft of the Mineral Plan. It is my view that the revised plan is unsound for the following reasons:

Response to the response to earlier comments on the draft plan

Many objections made to an earlier draft about unconventional hydrocarbons have been brushed aside in order to write latest draft of the plan essentially unchanged. To ignore all the points and submissions that many people have made without properly replying makes a complete mockery of the consultative process. I put a lot of work into my submission as did many other people. Not to reply except with a brief paragraph that mentions virtually nothing that was said is to generate a great deal of anger, cynicism and conflict. It undermines the spirit of the democratic process. I appreciate of course that officials who have to draft responses are currently put into difficult positions but the issues here are profoundly ethical because they concern the health and wellbeing of a great many people now and in the future.

For unconventional gasfield development in Nottinghamshire to have any chance of being economic in the narrow financial sense it would have to happen on a scale and intensity that would completely transform land use throughout Nottinghamshire. To attempt to ignore this fundamental transformation as not worthy of any special consideration brings discredit to the Minerals Planning Process.

There would have to be hundreds of wells, pipelines, compressor stations and a huge amount of intrusive and disruptive surface activity. Given this SCALE issue it is an absolute nonsense to say, as in paragraph 4.115 that "It is considered that there is no justifiable reason in planning policy terms to separate shale gas from other hydrocarbon development" This is simply flying in the face of a mass of evidence. To compare a few nodding donkeys dotted about the environment with the development of an unconventional gasfield is quite simply ridiculous.

New Evidence ignored

The evidence on all of this has accumulated in the last few years and renders earlier reports of the Royal Society/Royal Academy of Engineering and that by Public Health England redundant. By June 2015 there were 550+ peer reviewed articles that had been written after 2009 connecting shale gas development with public health and the environment. Of these 25 were on health impacts directly of which 21 indicated actual or potential negative health impacts. 48 were on water quality of which 33 indicated potential, positive association or actual incidence of water contamination. There were 34 studies of air quality of which 30 studies indicated elevated air pollutant emissions and/or atmospheric concentrations.

See in particular www.psehealthyenergy.org/site/view/1233 (A Compendium of findings upto June 2015 can be downloaded from <http://concernedhealthny.org/compendium/>)

For the UK there is also now a huge amount of evidence accumulated from the experience of exploratory drillings elsewhere and evidence presented to the Lancashire Inquiry. To ignore this UK experience makes no sense other than as political opportunism, a shameful bowing to the pressure of central government whose policy making on unconventional gas has been completely co-opted by the oil and gas industry. Not to face up to the destructive reality, as evidenced in peer reviewed academic studies, could lead to devastation across wide areas of Nottinghamshire if fracking goes ahead. It would wreck the credibility of the entire land planning system.

Sanctioning unconventional hydrocarbons would also make the legal requirement for plan policies to reduce climate emissions in Policy SP4 completely beside the point. It would further ignore specific issues for Nottinghamshire – like the need to protect its aquifers and the dangers of seismic activity given its history of mining.

Failure of other regulatory agencies

Further to this the Mineral Planning Authority should take into account that other regulatory agencies have had difficulties properly performing their functions whether because of shortage of staff resources or other pressures. This has considerable implications for policy which should be based on the assumption that real world conditions will prevail. Such real world conditions should be assessed by what has happened in comparable situations rather than optimistically biased assumptions that good practice will prevail, that the regulators will succeed in their job, that operators will do everything that they should do and that no accidents and mishaps will occur. To illustrate what I mean by this Nottinghamshire Mineral Planning Authority should take cognisance of the following examples of what has really happened in gas field development elsewhere in the UK:

For example the Environment Agency released information showing that the Rathlin Energy exploratory well North of Hull breached eight permit conditions between early July and September 2014, followed by a further breach of six conditions between late September and mid October of the same year. Three involved venting gas to the atmosphere in breach of permit conditions.

<http://drillordrop.com/2015/02/19/investigation-underway-into-more-breaches-at-rathlin-energys-westnewton-drill-site/>

Again, all the exploratory shale gas wells drilled by Cuadrilla in Lancashire had some technical difficulty. In addition to 10 breaches of planning conditions there were five examples of drilling problems, including the now well-known fracking-induced earthquakes. There were also three reprimands, as well as accusations of well integrity failure, trespass and damage and several cases where it wasn't clear whether or not Cuadrilla had broken regulations.

“A DECC Landwells spreadsheet and a [map](#) from the UK Onshore Geophysical Library shows that two wells were spudded at Beconsall, even though permission was granted for only one. Beconsall 1 was spudded 23rd August 2011 and Beconsall 2 was spudded on 13th October 2011. The HSE said: “The Beconshall well is vertical. Beconshall 1z was a side-track drilled to bypass equipment which had become stuck in the original borehole and could not be recovered. It was drilled to the original planned depth. A side-track is a planned deviation from a previously drilled section of the wellbore.”

<http://drillordrop.com/2015/05/05/investigation-finds-multiple-planning-breaches-and-technicalproblems-at-cuadrillas-drilling-sites/>

More recently at Horse Hill in Surrey residents have complained about smells and feeling unwell coinciding with a flow test – in a way that matches earlier experience in West Newton in Yorkshire where residents complained of noxious smells leading the Environment Agency to admit that this was a breach of the Environmental Permit.

<http://drillordrop.com/2016/02/18/environment-agency-statement-on-horse-hill-smell/>

<http://drillordrop.com/2015/03/11/rathlin-blamed-for-bangs-smells-and-traffic/>

The Mineral Planning Authority it should therefore take heed that the mere existence of conditions imposed by the Environment Agency or examination by the Health and Safety

Executive, does not make the processes concerned 100% safe.

Replacing Paragraph 4.115

For these reasons the first paragraph of paragraph para 4.115 should be deleted and replaced with a text that explicitly spells out how the many dangers associated with unconventional gas field development are to be addressed, for example:

Water contamination. On this a precautionary approach should be taken in line with EU regulations which does not permit fracking if there is *any* danger to aquifers. This should take into account academic evidence about the incidence of well leakage and spills from peer reviewed studies, as well as taking into account the scale at which an unconventional gasfield would operate. (e.g. a 6% chance of failure of one well is not the same as a 6% chance of each well failing when there 100 wells). Evidence from peer reviewed literature should be used as a guide not unevicenced assertions of safety by the industry and its consultants.

Atmospheric contamination. Here again the planning authority should not permit any development that is at odds with its climate obligations by the likely venting of methane, nor from the venting of other gases which are harmful to public health like benzene, toluene, ethyl benzene and zylene as well as radon. It should be guided in its assessment by peer reviewed literature about risks not be assertions and assurances by the companies.

Current regulations say that the mineral planning authority should also satisfy itself on a variety of issues by taking advice from the relevant regulatory body like the Environment Agency. Since the Environment Agency has shown itself incapable of preventing multiple breaches of its conditions in a number of exploratory wells the Mineral Planning Authority should also take *that failure* into account too - so that its decisions are grounded in the real world rather than fantasies of good practice and illusions of nothing ever going wrong. Such fantasies and illusions are propogated by the staff of these agencies if and when they have been subjected to what, in the academic literature, is called “regulatory capture” where the regulators are co-opted by the organisations that they are supposed to be regulating. (As documented above).

Underground coal gasification

As regards underground coal gasification the following should be taken into account. Apart from Usbekistan where it has operated for decades but where there are no health records to document the damage, there have been sporadic trials in the USA, in Australia, in Belgium, Spain and the UK. This experience suggests that UCG processes are difficult to control underground, can be unstable and can easily run out of control. The partial burn can create a cavity that collapses creating subsidence above. Large volumes of carbon monoxide are extremely dangerous if they come to the surface in an uncontrolled way. The heat and the pressure caused by the partial burn process is a force tending to spread the pollution. Highly contaminated water containing BTEX is produced by the partial combustion process that comes to the surface with the syngas and pollutants. Of three recent test projects in Australia, two have been shut down following toxic compounds being released into the biosphere. Of 30 trials in the USA, 2 released contaminants – a fact reported by researchers as if that was a good result – although it does not seem likely that this would be a chance that nearby communities would want to take.

Perhaps the most serious of the possible problems associated with UCG would be if fires started underground could not be extinguished. In the areas where UCG is likely to be tried there are also likely to be underground coal mine workings. The Nottinghamshire coalfields are littered with underground mine workings and natural faults. If a supply of oxygen through

uncontrolled sources like old mine workings reaches the combustion process, which is supposed to be partial, the coal seam could catch fire and burn indefinitely – some underground coal fires have been known to burn for decades. If the Mineral Planning Authority feels inclined to even consider permitting a development that would risk that happening then..well, at this point, words fail me.

Suggested addition to Policy MP12:

Planning permission for hydraulic fracturing or for shale gas, coal bed methane or tight oil operations (including test drilling and extraction) will not be granted unless:

(a) it has been demonstrated that all reasonable scientific doubt that there is any risk of adverse impacts has been eliminated. The evidence on this should be the peer reviewed scientific literature;

(b) the proposal will not compromise the Council's duties in relation to climate change mitigation; and

(c) it does not give rise to any unacceptable impacts on the environment or residential amenity.

(d) It has been demonstrated that Environment Agency and the Health and Safety Executive are able to dramatically increase their track record of enforcing their conditions and are prepared to shut down operations that do not abide by conditions, refusing any subsequent permissions to the companies concerned.

Any application for hydraulic fracturing or for shale gas, coal bed methane or tight oil operations (including test drilling and extraction) must demonstrate by appropriate evidence and assessment that reasonable scientific doubt can be excluded as to adverse impacts of the proposed development alone or in combination with other developments:

- on the quality and quantity of water resources, including groundwater and water courses;
- on air quality (including through emissions of methane and sulphur);
- on seismic activity;
- on local communities;
- on greenhouse gas emissions and climate change.

From: Geoff Sawle <[REDACTED]>
Sent: 19 March 2016 19:57
To: Development Planning
Subject: minerals local plan

Follow Up Flag: Follow up
Flag Status: Flagged

Geoff Sawle
[REDACTED]


Re mineral extraction Collingham

Part of one of the new excavation sites lies immediately adjacent to our property (ref.MP2F). We have major concerns with the proximity/closeness to our home due to the impact this will have on my wife,s (Mrs Brenda Sawle) current health problems. Brenda had breast cancer in 2007 resulting in the removal of both her right breast and all her lymph glands underneath her right arm, leaving her immune system very weak. Over the years since her operation she has constantly been troubled by chest/ lung infections which annually appear to be worse. We are now are at a stage where our local medical practice felt it necessary to refer Brenda to a respiratory specialist (Dr.K.Amsha Kingsmill hospital). She is currently awaiting appointments for an in depth respiratory test plus a CT scan on her lungs followed by a consultation with Dr. Amsha on the 9th of May.

To say we are both worried/concerned is an understatement, and even more worried / concerned re the proposed workings. The impact the dust pollution could have on Brenda,s health is unthinkable. We do hope you take all our concerns into consideration.

Many thanks
Geoff Sawle

Part A – Personal details

	Personal details	Agent details (where applicable)
Title	MR	
First name	PETER	
Last name	DOYLE	
Address line 1		
Address line 2		
Address line 3		
Postcode		
Email		
<i>For those replying on behalf of an organisation or group:</i>		
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 checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input type="checkbox"/>
--	-------------------------------------	--	--------------------------

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.

I would like to be present in the oral examination to find out why those sites with favorable SA scores have been withdrawn and to why those sites reflecting the worse SA scores in the county have been allocated into the Mineral Local Plan.

Signature		Date	25/3/16
Name	PETER AMBROSE DOYLE		

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

Part B – Your representation

Office use only Person No: 2788 Rep No: 29922-29924

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	
--------	--	-----------	--	----------	--	-----------	--	-------	--

2. Do you consider the identified part of the document to be:

Legally compliant?	Yes		No	
Sound?	Yes		No	<input checked="" type="checkbox"/>

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?	<input checked="" type="checkbox"/>	(2) Justified?	<input checked="" type="checkbox"/>	(3) Effective?	<input checked="" type="checkbox"/>	(4) Consistent with national policy?	<input checked="" type="checkbox"/>
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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.

Please see attachment. Barnby Moor graft.
Pensk council

Please refer to pages marked 1-4 in regard to our submission of the unsoundness of the plan.

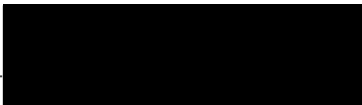
5. Please set out what change(s) you consider necessary to make the identified part of the document legally compliant or sound, having regard to the test(s) identified in question 3 (if applicable). Please state why this change will make it legally compliant or sound and suggest revised wording of policy 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.

Please see attachment. (Please refer to pages marked 4/5)

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

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If Yes, please give details	We have raised some of these issues in previous consultations

Signature		Date	25/3/16
Name	PETER A DOYLE		

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

We would like to submit our objection of the Nottinghamshire Mineral Local Plan as being unsound on the following grounds.

29922

**POSITIVELY PREPARED
JUSTIFIED**

There are quarries proposed in the Idle Valley which have not been positively prepared or justified in regard to why they have been allocated into the Mineral Local Plan. The Notts County Council are trying to make a case for choosing sites in the Idle Valley due to the proximity of serving Doncaster and the Yorkshire Markets which they say will reduce the transport cost as well as pollution.

However It is important that the criteria used in choosing sites is based purely on the evidence of the Sustainability Appraisal score, than purely on the proximity to how close the site is from the market it serves. As the aim of the Mineral Local Plan specifically is to meet the mineral needs of the County, then the Sustainability Appraisal reflected in its score should be the first priority.

The sites in the Idle Valley and those in particular on the A638 have got the worse Sustainability Appraisal scores of all the sites submitted by the Mineral Local Plan compared to those quarries in the Newark and the Notts area.

In regard to the summary of representations received and responses April 2014 The Notts County Council concluded that "The Sustainability Score for the Barnby Moor site is significantly negative" -15, yet this site was still allocated into the Mineral Local Plan.

This was a contrary action to the proposed site in Little

2
Carlton, Newark (PA26) regarding the same negative score of -15 whereas it was stated "Although the site is considered to be deliverable within the plan period, however due to the very negative score resulting from the Sustainability Appraisal, the County Council are not proposing to allocate this site".

The sites which have been allocated into the Mineral Local Plan from the Idle Valley area all reflect a negative Sustainability Appraisal score. However there is one site within the Idle Valley which would if allocated into the Mineral Local Plan sufficiently meet the mineral needs of the County.

This site requires less mitigation as it has less adverse consequences than other sites proposed, it's Sustainability Appraisal Score is -8. and has an output of 500,000 tonnes per annum and can produce more than Barnby Moor and Botany Bay combined.

The site is at Sturton-le-Steeple and was initially allocated into the Mineral Local Plan in 2004 as well as Botany Bay.

Although the Independent Inspector rejected the Botany Bay site in favour of Sturton-le-Steeple, however the site never went into production, and as not been allocated into the Mineral Local Plan. As the planning on this site does not expire until 2017 this site is still a viable choice..

The Barnby Moor Parish Council shares these same concerns and commented on the above situation in consultations 2013, they also included a detailed graft regarding why those sites which reflected a negative Sustainability Appraisal have been allocated into the Local Mineral Plan, whereas those with less adverse issues, and improved SA Scores have been withdrawn. Attachment enclosed.

EFFECTIVE

There has been considerable concern regarding the safety issues regarding the increase in HGV traffic this will generate. In respect of the Barnby Moor site, the operator Hanson UK

will effectively be required to transport the mineral extracted to their plant in Auckley. The comments made on this subject by the Notts County Council are as follows:-

"The Barnby Moor proposal would access the A638 which is part of the strategic road network to supply unprocessed material to the company's existing plant site at Auckley. This will result in the majority of HGV traffic leaving the site to go north on the A638 avoiding the village of Barnby Moor."

Although this may be a fact, the issues raised are more important than just avoiding the village of Barnby Moor. The proposed site is at the north of the village, where there is already an existing business which is a pig rearing farm, and is next to the proposed quarry site entrance and (opposite residential properties). This firm too has HGV traffic entering in and out of site which resulted in a fatality of a motorcyclist resulting from HGV activity, (there is a permanent memorial stone placed opposite the site entrance).

It has also been confirmed on calculation that there will be HGV movements in and out of the proposed quarry site every fifteen minutes so the increase of HGV traffic to the A638 will significantly be increased not only affecting our village but also those adjoining villages north of Barnby Moor and those who reside in Bawtry.

As the A638 goes through the town of Bawtry, the main street gets extremely congested most of the day as it is not only the main route into Doncaster but it is also the main access route into Lincolnshire. At peak times the town gets gridlocked.

The route to Auckley can be accessed by only two routes, either down Station Road passing the primary school which gets extremely congested at peak times and the other route is remaining on the A638 to Doncaster. This route passes the Yorkshire Caravans of Bawtry and which has seen some horrendous accidents outside the entrance of this business, the

4
owner Jonathon Goulden feels very strongly that the safety of his customers and commuters may be compromised if this proposal is passed.

The Parish Council in Bawtry have also shown grave concerns of the effects it will have on the nature of the town and especially regarding the route in which these HGV's will take, as both routes (especially passing the primary school) could have serious consequences.

29924

CONSISTENT WITH NATIONAL POLICY

We do not believe that the plan should depart from national policy in using high quality best and versatile agricultural land in the use of quarrying

The aim of the Mineral Local Plan is to sufficiently meet the mineral needs of the County. This can be achieved by selecting the most sustainable sites based on the evidence of their Sustainability Appraisal Score. If the aim is changed from not finding the most sustainable sites, but choosing sites which are the closest to the market, then by changing the criteria we would not be delivering the most sustainable sites and hence will not sufficiently meet the mineral needs for the county.

The sites in the Idle Valley are reflective in the SA Score of their unsuitability and therefore it would not be justified to depart from national policy to use this valuable resource of high quality best and versatile agricultural land for this purpose.

SECTION 5- HOW TO MAKE THE DOCUMENT SOUND

There are sites in the Nottinghamshire and Newark area which have demonstrated their suitability but have been withdrawn.

We feel these sites should be re-assessed as it would be beneficial for the County to make these site operational. If the

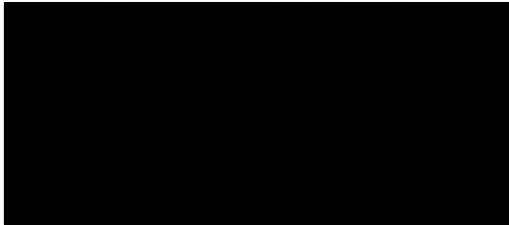
sites have been withdrawn due to having no operator then more publicity and encouragement should be made to include these sites into the Mineral Local Plan. If these sites have been withdrawn due to other reasons then justification needs to be demonstrated why these sites are not being used. We would like to know the reason why the Sturton-le-Steeple PA35 has been withdrawn.

The route to be taken to the Auckley Plant will be required to use the A638. We do not believe this journey can be undertaken without it creating an unacceptable impact on the environment and local amenity. We believe this makes the plan ineffective.

SECTION 6

We have raised some of these issues on previous consultations

SIGNATURE



NAME *PETER A DOYLE.*

DATE *26/3/16.*

SUBMISSION TO MINERAL LOCAL PLAN

OBJECTION FROM PETER DOYLE
WOODLANDS, GREAT NORTH ROAD,
BARNBY MOOR, RETFORD, NOTTS.

INSERT PHOTO

Barnby Moor Parish Council

**Objection to Barnby Moor (PA01) and Botany Bay (PA06)
site allocations within the Nottinghamshire Mineral Local Plan
(Preferred Approach Consultation)**

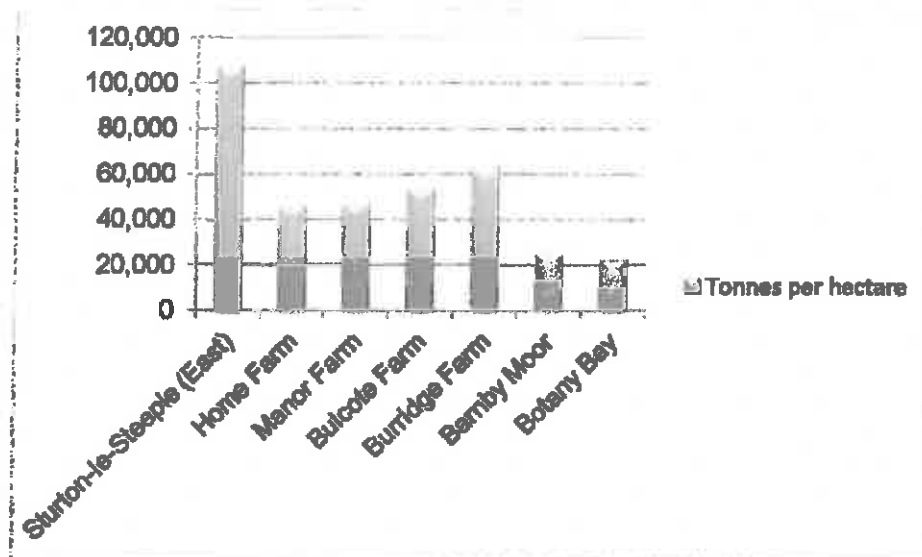
December 2013

RECEIVED

30 DEC 2013

P. P. & C.S

POST OFFICE DATE STAMPED 16TH



From the above it is blatantly obvious that both Barnby Moor and particularly Botany Bay will recover significantly less tonnage per ha than all the other potential sites and in comparison between Sturton-le-Steeple and Botany Bay the former will recover nearly 5 fold more.

The land at both the sites at Barnby Moor and Botany Bay is prime agricultural land and to effectively destroy this valuable resource when alternatives are available which would disturb far less land flies in the face of sustainable development objectives that should underpin all planning decisions.

In summary, when taking both potential sites either side of the village together, there are clear alternatives that should be considered in preference and the most obvious is that of Sturton-Le-Steeple (East).

In respect of the individual sites we offer the following comments on each site.

Botany Bay (PA06)

Landscape

Chesterfield canal

Noise

Dust

Traffic

Mrs Ann Fraser

Clerk Barnby Moor Parish Council



Table 1

	Site Code	Site Name	Score Operational	Score Post Quarrying	Combined Score	Area (ha)	Reserve (m tonne)
South Notts	PA07	Bulcote Farm	-6	-2	-8	150	8
	PA40	Sheiford East	-11	-8	-19	180	5.7
	PA41	Sheiford West	-11	-8	-17	243	9.5
	PA16	East Leake North	-8	-4	-10	15	1
	PA39	East Leake East	-8	-2	-8	52	2.2
Newark	PA03	Besthorpe East	-5	0	-5	34	2
	PA04	Besthorpe South	-8	0	-8	63	5
	PA11	Cromwell South	-12	+1	-11	52	?
	PA23	Langford North	-7	+3	-4	30	1.5
	PA22	Langford East	-9	-2	-11	6	0.2
	PA24	Langford South	-8	+1	-5	70	5.4
	PA25	Langford West	-8	0	-8	34	1
	PA08	Burridge Farm	-9	0	-9	56	3.5
	PA10	Coddington	-6	-3	-9	128	9.5
	PA17	Flash Farm	-11	-2	-13	71	4
	PA21	Home Farm	-7	+1	-6	177	8.1
	PA26	Little Carlton	-10	-5	-15	115	3.5
	PA19	Girton West	-4	+1	-3	13	0.3
	PA27	Manor Farm	-3	-1	-4	149	7
	Idle Valley	PA35	Sturton Le Steeple East	-5	-3	-8	28
PA31		Scrooby North	-8	-4	-13	12	0.6
PA32		Scrooby South	-8	-4	-13	9	0.4
PA02		Bawtry Road	-11	-2	-13	16	0.8
PA01		Bamby Moor	-13	-2	-15	45	1.1
PA06		Botany Bay	-8	-2	-10	114	2.5
PA38		Finningley Extension	-12	+2	-10	32	0.7

	New "greenfield" Sites Allocated
	Extensions to site allocations

Barnby Moor Parish Council wish to OBJECT to the allocation of both the following sites which are in close proximity to the village.

BARNBY MOOR (NCC ref PA01)

BOTANY BAY (NCC ref PA06)

Within the Consultation Document (Preferred Approach) there is an apparent policy of promoting extensions to existing permitted quarries in preference to developing new "greenfield" sites; a general policy which is supporting by Barnby Moor Parish Council as clearly existing infrastructure on operational quarries can be used and appears to be a sustainable use of resources.

The Consultation Document does however identify three new "greenfield" sites and two of those are located either side of the Barnby Moor community which is wholly unreasonable especially when other options are available.

As part of the consultation exercise, a Sustainability Appraisal has been undertaken by the County Council in part to ascertain the environmental acceptability of various quarry developments coming forward in the plan. Each potential site is "scored" both during the operational phase and post-restoration. The attached Table 1 summarises the relevant scores for each site. The table has been colour coded to indicate sites which are "extensions", "new greenfield" sites and those which have been rejected.

The Barnby Moor site (PA01) has a total environmental score of -15, whereas Botany Bay (PA06) has a score of -10.

When such "scores" are compared with those sites that have been rejected this process appears illogical in the conclusions it has come to.

The sites excluded are as follows with their respective sustainability appraisal score. (The * denotes "extension" sites)

Manor Farm	4
Home Farm	6
Sturton le Steeple East	8 *
Bulcote Farm	8
Langford West	8 *
Burrige Farm	9

Accordingly, in respect of the environmental acceptability there are 6 sites which should be more appropriate to allocate before either Barnby Moor or Botany Bay should even be considered and two of those are extensions which are apparently the preferred option of the County Council.

Langford East has a limited tonnage (at 200,000 tonnes), whereas Sturton-le-Steeple has an estimated reserve of 3,000,000 tonnes which is not too distant from the combined tonnage of the Barnby Moor and Botany Bay sites especially when compared with the "target" tonnage figure of some 49 million tonnes for the Plan Period.

In terms of a comparison of area of land to be disturbed with the amount of mineral to be extracted, again both Barnby Moor and Botany Bay potential sites do not fair well in that an excessive amount of prime quality land will be dug up compared with the mineral that will leave the site.

If one compares the site area with the stated tonnage to be recovered the figures are as follows (Langford West has been excluded due to limited tonnage estimate):

Sturton-le-Steeple (East)	107,140 tonnes per hectare
Home Farm	45,760
Manor Farm	46,980
Bulcote Farm	53,330
Burrige Farm	62,500
Barnby Moor	24,690
Botany Bay	21,930

Eilidh McCallum

From: Nottinghamshire County Council <nottinghamshire@jdi-consult.net>
Sent: 28 March 2016 22:18
To: [REDACTED]
Subject: Representation received. ID:29511

Mr David Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29511
Document: Minerals Local Plan Submission Draft
Section: Chapter 1: What is the Minerals Local Plan
Support/Object: Object

The Health Impact Assessment makes recommendations for policy actions (Paragraph 6.3) which it is stated have been included in the submission draft. Several recommendations have been omitted which are listed in the changes to be made before submission, or explanations provided in the submission draft for their omission.

CHANGE TO PLAN

Strategic Objectives:

SO5

- add reference to the promotion/encouragement of community benefit funding schemes.

Development Management Policies:

DM1

- add reference to sensitive locations/features. The justification text should set out that for noise, schools and nurseries are sensitive locations.

Consider inclusion of new policy requiring community benefit funds for all minerals development.

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.

Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mr	
First name	Adrian	
Last name	Hatton	
Address line 1	██████████	
Address line 2	██████████	
Address line 3	██████████	
Postcode	██████████	
Email	████████████████████	
<i>For those replying on behalf of an organisation or group:</i>		
Organisation	P.L. and A. P Hatton	
Job title	Partner	

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

P.L and A. P Hatton are partners running an arable farming business and airstrip at Rectory Farm, Averham.
 The partners are Peter Luke Hatton and Adrian Hatton.
 The views expressed in this response are the views of both partners.

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 checked="" type="checkbox"/>	No, I do not wish to participate at the oral examination	<input 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.

I (Adrian Hatton) have undertaken significant amount of research into MLP preparation and have furnished that data to County Councillors, local working groups and MPs (at their request). They have all used that information as part of their objection to MLP in current format and I feel that I could make useful contribution at oral hearing should Inspector require it.

Signature		Date	21/3/2016
Name	Adrian Peter Hatton (on behalf of P.L. and A. P Hatton)		

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

Part B – Your representation

Office use only Person No: 2828 Rep No: 29720-29722

Please read the guidance note before completing this section.

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

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

Legally compliant?	Yes		No	X
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?		(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.

A) The Policy is not legally compliant in preparation by means of failure of duty to Cooperate.

An FOI requesting disclosure of information regarding legal opinion sought by NCC as directed by Item 2 of Motion 10 at Full Council Meeting on 14th January 2016 as below:

ITEM 10 – MINERALS LOCAL PLAN SUBMISSION DRAFT CONSULTATION

Motion as agreed:-

- 1) That County Council note the Consultation Statement set out in Appendix C.
- 2) That the County Council approve the publication of the Submission Draft document for the Minerals Local Plan for a 6 week public consultation period and that during this period Officers will verify the legitimacy of the methodology used to determine the need and apportionment figures for sand and gravel within Nottinghamshire and review the strategic transport assessment.
- 3) That the Corporate Director, Place, be authorised, in consultation with the Chairman of Environment and Sustainability Committee, to agree any minor editing changes prior to publication.
- 4) That an information document updating the public and councillors on onshore oil and gas development (including unconventional hydrocarbons) in Nottinghamshire will be published in order to keep the public and councillors up-to-date on this significant issue.

The FOI request was returned (late, and after reminder of NCC's obligation to respond within statutory timescales) with notice that information requested was being withheld so as not to affect the course of justice.

NCC Duty to cooperate has not been adhered to and therefore makes MLP process not legally compliant.

B) The MLP in current format is not prepared in line with NPPF rules requiring use of latest LAA data – NCC have requested clarification of legality of methodology used in preparing plan to current state which includes provision for considerably greater apportionment for sand and gravel than their evidence base suggests is required.

The plan is contrary to NPPF guidance and therefore not legally compliant.

C) Policy DM10 has not identified all airfields with safeguarding.

NCC have a duty to include such and therefore plan is not legally compliant.

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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.

A) NCC must disclose QC opinion to all and allow sufficient time extension to consultation period thereafter to permit residents to respond with access to all relevant data made freely available.

B) The plan must use latest available LAA data to apportion sand and gravel for plan period.

C) NCC must identify all airfields with airfield safeguarding packages in place (normally lodged with local district council planning offices). Those airfields must be included within MLP at DM10.

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

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If Yes, please give details	At various stages in MLP preparation and consultations – at meetings with Mark Spencer MP and Robert Jenrick MP PA – at NCC MPA officer/CAG meeting at Kelham Hall and in verbal and written communication with MPA officers.

Signature		Date	21/3/2016
Name	Adrian Hatton (on behalf of P.L. and A. P Hatton)		

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

Part B – Your representation

Office use only
 Person No: 2828
 Rep No: 29723-29737

Please read the guidance note before completing this section.

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

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

Legally compliant?	Yes		No	x
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?	x	(2) Justified?	x	(3) Effective?	x	(4) Consistent with national policy?	x
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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.

Chapter 2

297 SO2 – Not sound.
 23 Figures used are out of date and result in apportionment of sand and gravel that is too high for current and projected market requirements during plan period.

297 SO5 – Not sound.
 24 A plan that allocates too many sites will result in unnecessary impact on local communities with opening of quarries that are not needed and increase in traffic flow. Surplus sand and gravel availability results in mothballed quarries and developers seeking extensions of planning time limits to permit working out of existing quarries.

297 SO8 – Protecting agricultural soils - Not sound
 25 Opening new greenfield quarries that are not required will result in destruction of best and most versatile agricultural land. Restoration of such land is never done to the standard required to bring it back to pre-quarrying state.

Chapter 3

297 SP1 Sustainable development. Not sound.
 26 Apportioning too high a figure for sand and gravel results in more rapid extraction of a finite resource of mineral.

297 SP2 – Not sound
 27 MLP design in current format uses out of date figures and over estimates requirement for sand and gravel in Nottinghamshire.
 The proposed plan is strongly reliant on historical success on Notts in extracting and selling minerals – in simple terms a successful history of mineral extraction would appear to generate apportionment for higher than required provision for future extraction.
 MLP does not use most up to date LAA figures and does not reflect changes in increased secondary use of recycled materials.
 MLP has provision in national policy to provide additional sites as required during plan period and is directed to use Latest LAA to monitor usage and adapt plan as required throughout its life.
 MLP has mechanism in place via LAA annual review to look forward rather than backwards and should be aiming to provide steady release of minerals as required by market balanced with long term protection our assets.

297 SP5 – Traffic. Not sound.
 28 Over apportionment of sand and gravel would result in unnecessary increases in traffic volumes on roads.

Specifically Flash Farm site would have large negative impact on A617 traffic through local communities and further contribute to well known congestion at Newark pinch points.

Chapter 4

297 MP1 – Not sound. Not Justified. Not consistent with national policy.

29 Calculated figures for sand and gravel requirement use out of date figures and result in to high an estimated amount required during plan period. Current MLP figures over estimate amount by more than 30% when compared with 2015 10 yr average – and by more than 70% when compared with current county sales for last 3 yrs.

Following the line of argument above, Lincolnshire MLP was directed to revise downwards apportionment figures by Inspector (Andrew S Freeman) in November 2015. Staffordshire and Warwickshire CC both have revised apportionment figures downwards in respective emerging MLP in recent months following Lincolnshire hearing findings and now use latest LAA figures as directed.

297 Para 4.16 – justification argument takes no account of recycled materials and does not justify expected 70% growth in demand to need apportioned amounts of sand and gravel.

30 Para 4.51 – Presumes opening of Flash Farm in 2016 – new MLP will not have been examined for soundness by that time and therefore, given adequate landbank reserves currently in place, that presumption of grant of Planning Permission for new quarry to be opened in 2016 is therefore not appropriate and in direct contravention of MLP process.

297 MP5 – recycled aggregates – Not sound

31 No provision made in MLP for increasing use of recycled aggregates and the effect of that on reducing the requirement for new sand and gravel resources to me made available.

Chapter 5

297 DM 1 – Not sound. Not justified.

32 MLP over estimates requirement for sand and gravel with consequent increased impact on local communities.

297 DM2 – Policy Flooding 2.c. – Not sound. Not justified..

33 Preferred sites are included in plan without site specific information to address impact re DM 2 – e.g. Flash Farm MP2p is dependant on use of existing drainage to dispose of surplus water – Mission drain and Pingley dyke are the only two watercourses available to use and would result in increased flooding risk to Kelham and Averham residences.

297 DM8 – Cumulative impact - Not sound. Not Justified.

34 Cumulative impact of preferred sites not properly addressed. E.g Cumulative impact of traffic arising from several large industrial developments along A617 will incrementally increase traffic by individually acceptable amounts, but cumulatively will add up to very significant increased and unacceptable level of HGV daily movements.

297 DM10 – Airfield Safeguarding. Not sound. Not positively Prepared.

35 Not all safeguarded airfields are included in list.

Rectory Farm airfield at Averham has Safeguarding document in place at Newark and Sherwood District Council – no account of this has been made for this in the plan – the airfield operator at Rectory Farm (and any others not included on list) must be contacted and all aviation safety related mitigation measures incorporated before considering including Flash Farm as a preferred site.

297 Para 5.108 – factually incorrect.

36

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.

Chapter 2

SO2 - Use most up to date figures as directed by national policy.

Use LAA as intended as management tool to manage MLP throughout its life – rather than trying to predict ahead of 15 yr lifespan requirements as in past. LAA has 10yr and 3yr rolling average sales figure presented for exactly that reason – Otherwise, why bother to prepare and annual LAA if it is not to be used (Rhetorical question!)?

SO 5 - Use up to date figures and re-assess requirement for opening new greenfield quarries.

Enforce planning time limits to ensure effective MPA management of quarry lifespan and restoration programmes.

SO8 – re-consider requirement for opening new greenfield quarries.

Chapter 3

SP1 Use most up to date figures and protect finite resources

Sustainability would be better served by conservation of county's valuable resources with long term view to future self sufficiency.

SP2 MLP has provision in national policy to provide additional sites as required during plan period and is directed to use Latest LAA to monitor usage and adapt plan as required throughout its' life.

forward rather than backwards and aiming to provide steady release of minerals as required by market and long term protection our assets.

SP5 – Use up to date figures to re-assess requirement for opening up new quarries.

Remove Flash Farm from preferred sites.

Chapter 4

MP1 – Use up to date figures to monitor sales trends and apportion correct amount of material to be required during plan period

Much has been said about effect of recession on sand and gravel aggregate use and the anticipated increases in future years, but it is very important to note that sand and gravel use has been in steady decline for many years since peaking in Nottinghamshire at 3.6million tonnes per annum in 1989. In 2007 at the height of the boom before the most recent recession sales were already well down and current sales are now steady at 40 % of the 1989 level, averaging around 1.5 million tonnes per annum, with little sign of significant increase, largely due to increased use of recycled materials within construction industry.

Para 4.16 Justification of how 70% growth to make use of apportioned sand and gravel must be made available – or more realistic and achievable growth figures used.

Para 4.51 – Proposal for opening of new quarries, such as Flash Farm, ahead of adoption of MLP should be removed. Operators should not be given inferred approval to apply for PP ahead of adoption of MLP and NCC should be wary of opening themselves to commercial repercussion should an operator deem them to have granted implicit permission to develop a site outside of MLP and subsequently, on examination, for that site to have been found not to be required.

Chapter 5

DM1 – Re assess requirement for sand and gravel using latest available figures – consider removal of new sites from plan to reduce impact of increased HGV on road networks – particular around A617/A1/A46 focus area.

DM2 – Policy Flooding 2.c. –

Preferred sites are included in plan without Site specific information to address impact re DM 2 – e.g. Flash Farm MP2p is dependant on use of existing drainage to dispose of surplus water – Mission drain and Pingley dyke are the only two watercourses available to use and would result in increased flooding risk to Kelham and Averham residences.

DM8 – Cumulative impact -

Cumulative impact on some preferred sites should be properly addressed. E.g Cumulative impact of traffic arising from several large industrial developments along A617 will incrementally increase traffic by individually acceptable amounts, but cumulatively will add up to very significant increased HGV flow.

DM10 – Rectory Farm airfield at Averham has Safeguarding document in place at Newark and Sherwood District Council – no account of this has been made for in the plan – the airfield operator at Rectory Farm (and any others not included on list) must be contacted and all aviation safety related mitigation measures incorporated before considering including Flash Farm or any other preferred sites.

Para 5.108 – revise to include all safeguarded airfields.

General Comment re Flash Farm

Flash Farm is not required as a new site if correct apportionment of sand and gravel is made for plan period utilising latest LAA and recent sales trends figures.

Flash Farm is not a suitable site for mineral extraction at present due to poor traffic situation in the area. A1/A46/A617 converge at Newark which is a well known traffic pinch point . Highways England have identified the Newark area as part of its proposed roads improvement scheme but not before 2020

A617 is main HGV route since introduction of Environmental weight limits in 2014 there is no other route away from Flash Farm.

Cumulative impact of several other major developments along A617 corridor are individually contributing to increased HGV traffic on A617. Planning permits for up to 10% HGV traffic increases on A617 through Kelham and Kirklington for any one development before triggering traffic mitigation measures. Three such proposed developments will result in up to 25% increase in HGV without being considered significant but cumulative effect is much greater than sensible for that road.

Kelham Bridge is not suitable for increased HGV movements.

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
If Yes, please give details	I have raised most points above in both verbal and written communications at various stages of plan development with NCC planning officers and County Councillors.		

Signature		Date	27/3/2016
Name	Adrian Peter Hatton (on behalf of P.L. and A. P Hatton)		

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

Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mr	
First name	Frederick	
Last name	Cook	
Address line 1	████████	
Address line 2	████████████████████	
Address line 3	████████	
Postcode	████████	
Email	████████████████	
<i>For those replying on behalf of an organisation or group:</i>		
Organisation	Campaign to Protect Rural England Nottinghamshire Branch	
Job title	Chairman	

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

By prior consultation with our executive committee and membership.

300 people

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	F A Cook	Date	28 March 2016
Name	FREDERICK COOK		

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

Part B – Your representation

Office use only
 Person No: 2833
 Rep No: 29806-29807

Please read the guidance note before completing this section.

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

Policy	SP2 MP2r	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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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?	<input checked="" type="checkbox"/>	(2) Justified?	<input checked="" type="checkbox"/>	(3) Effective?	<input checked="" type="checkbox"/>	(4) Consistent with national policy?	<input type="checkbox"/>
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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.

SP2 29806
 This ignores the ability of developers to re-cycle existing aggregates and the incentives provided by landfill taxes to do so. Furthermore, the draft Minerals Plan bases its estimates of future primary sand and gravel extraction on a simple model that fails to take into account that construction methods are changing as many new buildings (particularly commercial construction) use modular steel architecture in preference to concrete and brick. The Minerals Plan ought to have regard to the Nottinghamshire County Council Waste Core Strategy (Jan 2014).

The supply of minerals should follow the following pattern:

- reduce the quantity of minerals used as far as is practicable
- use the maximum amount of recycled and secondary minerals as possible
- only then, use primary extraction to fill the gap.

According to the Waste Core Strategy 2014 estimate (based upon 2010 data) there were 1 million tonnes per year of construction and demolition waste available annually for recycling, rising to a forecast 2.75 million tonnes per annum from 2015 to 2030. The strategy is that 70% of construction and demolition waste was to be recycled by 2025, which would give an annual figure for recycled aggregates of 1.905 million tonnes.

In addition, Nottinghamshire power stations currently produce 900,000 tonnes of fly ash and bottom ash per year suitable for recycling — although this may reduce as EU regulation on coal-fired electricity generation escalates.

The draft Minerals Local Plan takes none of this into account in its estimation of potential demand for primary extraction and the allocation of new green-field sites to be turned into quarries. Given that several current extraction sites are requesting time extensions and other previously allocated sites have yet to have ground broken on them it is clear that the Minerals Plan has overestimated the amount of fresh material which needs to be extracted. Contractors are struggling to find buyers for minerals from existing sources.

MP2r 29807
 Although CPRE questions the need for a number of new mineral extraction sites, we are particularly concerned about the inclusion of the Shelford site.

Shelford should be removed because -

- There would be difficulty in removing material from the site;
- Inadequacies in the conveyor belt system (which would stretch for a mile & a quarter) ending at a congested area;

- There would be a large number of additional number of lorries entering onto the A6097. According to 2014 data there were 19,400 vehicles per day using the A6097 between the A612 Lowdham and Trent Lane, East Bridgford, of which 5.3% of lorries; the 19,400 figure represents a rise of around 1,000 vehicles in four years;
- The access down to the Wharf on the Colwick side of the Trent is unsuitable;
- Colwick Loop Road into the City is already extremely congested;
- There would be Knock-on logjam potential for surrounding road networks;
- The encouragement this would give for recycling to take place at sites that are already extracting Gravel.
- There are already sites allocated with planning permission
- Cemex having 2.5 million tonnes allocated north of Cromwell;
- Recent approval by the Planning committee of the Besthorpe site adding an extra 800,000 tonnes to the extraction over the next six years;
- Sites should be allocated as close to need as possible i.e. the main market areas of South Yorkshire, South Nottinghamshire and the A1 corridor.
- Some of the sites to be considered have more potential for road improvements than others;
- Number of developers own interests in preferred sites at better locations than Shelford and should be encouraged to develop those sites.
- The references to “restoration” are based on a misuse of the word “restoration” as the proposal is not to restore what is good agricultural land and landscape but to replace it with something entirely different.

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.

SP2

Mineral provision should

- replace the old 'predict and provide' approach to minerals planning with more positive planning policies which use the principles of 'plan, monitor and manage' and environmental capacity assessments to govern where quarrying may be required. Such a change should also promote more sustainable construction techniques which reduce reliance on mineral extraction;
- achieve the more prudent use of natural resources through reuse, recovery and recycling, use of alternative (including non-aggregate) materials and techniques, and closer integration with land use planning. Suppliers would be responsible for providing the right material for the right purpose, and not over-specifying in order to win contracts or meet timeframes.

MP2r

Remove all the references to Shelford.

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

Yes	√	No	
If Yes, please give details	Please see my responses on the Preferred Approach Response Form. Please see my letter of 4 November 2014 about Shelford West.		

Signature		Date	29 March 2016
Name	Frederick Cook		

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: 15 March 2016 16:05
To: [REDACTED]
Subject: Representation received. ID:29200

Follow Up Flag: Follow up
Flag Status: Flagged

Mr Graham Collyer,

Thank you for your representation which we received as follows:

Representation ID: 29200
Document: Minerals Local Plan Submission Draft
Section: MP2: Sand and gravel provision, MP2o Coddington
Support/Object: Object

In my opinion the plan is unsound. The Strategic Traffic assessment in the document is now years out of date. The volume of traffic around Coddington & Newark has increased and the road infrastructure already struggles to cope with the volume of traffic. The exit point from the proposed site is expected to be onto the A17. No consideration appears to have been given to the seasonal increase in traffic on the A17 to the east coast resorts or to the event traffic at Newark Showground, which is adjacent to the proposed site. I have personally carried out traffic counts on the A17 where it is intersected by Drove Lane, Coddington. On 08/08/14 at 16.40 hr. I recorded 1563 vehicles passing in one hour. On 11/08/14 at 1300 hr. I recorded 1110 vehicles passing in one hour. On average that is one every 2.5 seconds. To add the expected additional 200 HGV movements daily from the proposed site to an already overloaded road, for a period of approx. 20 years is untenable and will increase the amount of noise and pollution in the area.

The A17/A46/A1 junction at Newark where this additional traffic will be joining is ranked in the top 10% nationally for casualties per billion vehicle miles. These major routes converge at the main crossing point, in the area, over the River Trent and the slightest traffic incident caused road chaos. additional quarry traffic would compound the situation, resulting in longer delays and potentially causing financial implications for commercial businesses, including any company quarrying at Coddington MP2o.

SUMMARY

The Strategic Traffic assessment in the document is now years out of date. The volume of traffic around Coddington & Newark has increased and the road infrastructure already struggles to cope. The exit point from the proposed site is expected to be onto the A17. No consideration appears to have been given to seasonal increases in traffic to the east coast resorts or to event traffic at Newark Showground, adjacent to the proposed site. To add the expected additional 200 HGV movements daily to an already overloaded road, for a period of approx. 20 years is untenable.

CHANGE TO PLAN

The MP2o site should be removed from the proposed minerals plan for numerous reasons, but mainly due to the negative impact additional traffic would have on everything and everybody in, around and travelling through the Newark 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: 24 March 2016 14:28
To: [REDACTED]
Subject: Representation received. ID:29364

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29364
Document: Minerals Local Plan Submission Draft
Section: DM1: Protecting local amenity
Support/Object: Object

The MLP Strategic Transport Assessment (STA, Dec 2014) identifies 26 accidents near the (unidentified) site entrance whilst the NCC STA Addendum recognises a cluster of accidents at the Drove Lane / A17 staggered crossroads but states that none of them involved HGVs. Locals know that this junction is under designed and dangerous for cars, cyclists and walkers and many of them avoid using it (or Newark bypass). An additional 200 HGV movements/hr leaving even from a well-designed junction/roundabout within 500m will make intimidation, severance and accident rates at Drove Lane much worse.

Existing traffic flows along the A17 (with high proportions of LGV and HGVs) already produce intimidation in pedestrians, dog walkers, cyclists and horse riders, resulting in and partial severance (GEART pg20) between the village (450m away) and Drove Lane N, where there are important leisure amenities, and access to footpaths, bridleways and cycle tracks. The accident records for the junction confirm residents' fears. We know that lorries have been involved in accidents and fatalities at this junction (19th December 2008, 23rd December 2008, 28th March 2011, 3rd January 2013). In 2000 a child cyclist died crossing to Drove Lane N in an accident involving 2 child cyclists and a lorry. There have been no junction improvements and ever increasing traffic flows since then.

SUMMARY

Drove Lane/A17 staggered junction next to Coddington MP2o is a dangerous undersigned junction needing manual management during events at Newark Showground. The accident statistics are worse than stated in the STA Addendum, and include two separate lorry-related fatalities of a child cyclist and a car driver. Traffic flows already intimidate all classes of road user – pedestrians/cyclists from Coddington are intimidated by the traffic volumes, accident record, and crossing design, and are effectively severed from leisure amenities and public rights of way North of the A17.

Adding a further junction and 200 HGVs/day within 500m is highly irresponsible.

CHANGE TO PLAN

Inclusion of Coddington MP2o is not sound with regard to Policy DM1 Protecting Local Amenity and does not take account of severance (GEART P.20) from amenities due to the intimidation of pedestrians and cyclists.

Remove Coddington MP2o from the Minerals Local Plan, until substantial local infrastructure and safety improvements have been delivered, including a safe pedestrian and cyclist crossing - such as a pelican crossing with a central refuge, and all the transport issues resolved.

The 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: 24 March 2016 15:49
To: [REDACTED]
Subject: Representation received. ID:29367

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29367
Document: Minerals Local Plan Submission Draft
Section: Strategic Objectives, SO5: Minimising impacts on communities
Support/Object: Object

The inclusion of Coddington MP2o is not sound with regard to Strategic Objective 5, Overview Para 2.19 Health, NPPF 8 Promoting Healthy Communities Paras 73-77, nor with Policy DM1 Protecting local amenity, nor DM7. Additional HGV traffic from the site will MP2o will make the A17 an even more intimidating barrier between Coddington and Drove Lane N amenities and displaced local traffic will also make local roads less safe and attractive for walking, cycling etc.

The MLP Strategic Transport Assessment (STA, Dec 2014) quotes the Local Transport Plan (LTP3 2011-2026) targets to improve health by encouraging people to walk and cycle (and address and improve their personal safety, and the perception of safety, when doing so.) Roads surrounding Coddington MP2o - Drove Lane (N&S), Langford Moor Farm Lane, Beckingham Rd and Stapleford Lane have been identified as 'new strategic routes' in Newark & Sherwood's DC Green Infrastructure Strategy (Figure 6.5). The GI Strategy identifies a lack of connectivity between Newark and the surrounding countryside and Stapleford Woods as the most important publicly accessible woodland East of Newark (targeted for improvement investment by N&SDC). A huge quarry in the middle of these routes would discourage walking because of noise, dust, pollution and intimidating traffic. The local Coddington & Winthorpe Tigers football club (with pitch adjoining) and children's playing fields (within 400m of the site) will be subject to dust and health hazards and the fears of local residents will discourage their use. The club organisers fear that it will cause the club to close and children (and their parents) to be deprived of the social and health benefits it provides. The ancient woodlands (Stapleford Woods and Moor Brats Woodland) will suffer because of wind-blown dust choking the leaves and the effects of the quarry on the water table and wildlife will habitat will be damaged, including declining farmland birds.

In 1989 the A17 Newark Bypass cut across Drove Lane, separating the village from major amenities within easy walking distance (Newark & Notts Showground and the Air Museum) and from public footpaths and bridleways leading to Danethorpe Hill and Brough. For many years we used to walk to the Showground along Drove Lane but crossing the road has now become too intimidating so we now have to use the car. During events Newark Showground has to employ a traffic management company to control the junction to help to ensure the safety of vehicles and pedestrians.

We are walk leaders for the Barnbygate Strollers (an award-winning walking group run mainly for retired people, under the 'Walking For Health' scheme attached to Barnbygate Surgery, Newark). We cannot programme walks from Coddington to Winthorpe or Brough because of the dangers of crossing the A17. An additional 200 HGV movements/hr leaving even a well-designed junction/roundabout within 500m will make the situation much worse.

SUMMARY

Traffic levels on the A17 Bypass already intimidate pedestrians/cyclists from Coddington, severing them from leisure amenities, footpaths, bridleways and cycleways accessed from Drove Lane North. Adding a roundabout and 200 HGVs/day on this road will make this situation worse.

Although STA claims to support the Local Transport Plan (encouraging active transport for health benefits), the traffic and other impacts of quarry Coddington MP2o act against the aims of Newark & Sherwood's Green Infrastructure Strategy, and will actually discourage physical activity and reduce opportunities for people of all ages in Coddington and Newark.

CHANGE TO PLAN

Inclusion of Coddington MP2o is not sound with regard to Strategic Objective 5 – Minimising impacts on communities, Overview Para 2.19 Health, nor with Policy DM1 Protecting local amenity nor DM7 Public Access.

Remove Coddington MP2o from the Minerals Local Plan, and develop an alternative site with fewer effects on the local and wider community.

If the site were to be included (once the transport and other issues have been resolved) ensure that:

- 1 community health is protected,
- 2 sport facilities are relocated within the village (where appropriate),
- 3 a light-controlled pedestrian crossing or a foot/cycle-friendly bridge/tunnel is constructed to reconnect Coddington to Drove Lane N,
- 4 additional public footpaths are provided to provide a circular walk connecting Drove Lane S, Drove Lane N, to Stapleford Woods and to the pavement along Beckingham Rd.

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: 28 March 2016 14:45
To: [REDACTED]
Subject: Representation received. ID:29452

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29452
Document: Minerals Local Plan Submission Draft
Section: Chapter 1: What is the Minerals Local Plan
Support/Object: Object

The information readily available to the public from the developers about the sand and gravel allocations considered for inclusion in the MLP is very variable across sites.

The 'Site Information Request Form' data (Site Selection Background Paper, Appendix 1) is vital evidence needed by local communities to make a meaningful, balanced assessment of sites. A note indicates that all information provided will be publicly available. The information requested by NCC is:

"The information required must be capable of demonstrating that the potential allocation is deliverable and can be worked and reclaimed in an environmentally acceptable way. This should be based on a concept working and reclamation scheme (or schemes) that illustrate how the site would most likely be worked."

As such the information for all sites ought to have been placed in the papers for all three informal consultations (Oct 2013, May 2014 and Oct 2014), and for the formal consultation. The basic 'Site Information' was gathered in 2008, updates requested in 2012 - other developers presumably supplied it when lobbying for their sites to be considered.

Although used by NCC workstreams producing the evidence base being reviewed, the information itself was not presented transparently - it had to be inferred by looking through all the documents. The absence of the data will have lowered the quality of public contributions.

NPPF Paragraphs 12 and 14 state the presumption that once a development accords with an up-to-date Local Plan it should be approved, unless other material considerations indicate otherwise. Publication of the Site Information Request responses from developers is just as important for sites at the end of the plan period as for those early in the plan.

In studying consultation representations, it became clear that some developers had supplied a lot more information to NCC than others and were engaging in debate in the public domain via the consultation process. Some communities had much more information allowing them to better understand the issues and their own situation. The developer of the site at Coddington (a village with no history of modern industrial extraction) has declined to engage with either the Parish Council or Coddington Against Gravel Extraction at this time.

Late in the current formal consultation process we contacted NCC to ask about this data and were rapidly sent a copy of a 17 page document received from Hanson date stamped Nov 2008. This provided much more information than we had ever seen before, but only contained a fraction of the data listed in the Site information request form.

With a new 300 acre site it is not possible for the public to make a credible, balanced assessment on the sustainability or impact of the operation without knowing as a minimum the likely location of processing plant and site exit, the likely depth of the excavations, approximate split/location of the target market (to assess the impact on

proposed export routes), the extent of on-site overburden (to understand the rough likely balance between water and land-surface on restoration) and any intention on importing fill.

SUMMARY

Site Selection Background Paper, Appendix 1 gave a list of the information required of each developer and stated that 'all information provided will be publicly available'. The 'Site Information Request Form' responses from developers were not published in the consultation papers at any stage. The lack of this essential data prevented communities from making fully informed representations about their own and other sites.

NCC should have published all of the Site Information Request responses from developers at every stage of the consultation process, including the formal stage, as part of the evidence base, rather than providing them on request.

CHANGE TO PLAN

All developers should provide a comprehensive level of information, guided by the Site Information Request Form. Developers failing to do so should not be considered in the MLP.

All of the site information request responses provided by developers should be placed in the public domain with the rest of the consultation papers to provide a transparent and comprehensive evidence base.

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: 28 March 2016 15:19
To: [REDACTED]
Subject: Representation received. ID:29454

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29454
Document: Minerals Local Plan Submission Draft
Section: DM12: Restoration, after-use and aftercare
Support/Object: Object

The very limited availability of suitable inert fill, becoming progressively more restricted through environmental regulations and taxes, has become a critical factor in the sustainability of gravel extraction on sites with high water tables and low overburdens – severely limiting the proportion of land-surface in any restoration. Unless hole deepening is used to provide additional on-site fill these sites are effectively condemned to an excessively high proportion of water restoration, whether or not this is appropriate to the landscape.

This shortage acts against Notts MLP policies DM12: 2, 5.125, policy 7, 5.125, 5.127, 5.128, 5.134. This should be openly acknowledged and the consequences clearly reflected in MLP Development Management policies. The public deserves to be told that in the majority of such cases the sites will be restored to open water, as can clearly be seen from the existing maps of sand and gravel sites in the Trent Valley, and not oversell the benefits of a land-surface restoration which will be minor, even if it is of the highest quality.

It also means that biodiversity competes with agricultural/employment, local amenity and heritage-led restorations for the available land-surface.

In some cases, these alternatives are clearly preferable and the policy of biodiversity-led becomes inappropriate dogma. It should be explicitly stated in DM12 that in some cases a pure biodiversity-led approach is not always the optimum restoration.

To develop public understanding and manage expectation it is vital that NCC requires developers to roughly quantify the likely balance between water and land-surface on restoration at the earliest consultation stages. (This would be based on-site overburden, aggregate cover and thickness and water table depth, and rely on likely on-site infill unless other information were made available.) For transparency in site comparison and to aid public understanding during the consultation, a rough estimate of this ratio should be visible to the public, either in the site development brief or in the site description.

Some landscapes are already fundamentally altered by cumulative unnaturally-shaped lagoons of open water. As the entire East Nottinghamshire Sandlands have been set as a Mineral Safeguarding Area it has now become an endangered landscape type. The landscape 'value' of the areas should be re-considered (along with prejudice against agricultural landscapes and the value of farmland birds). This makes it all the more vital that NCC do not initiate new greenfield sites in the Notts Sandlands if there are any alternative sites without the direst need – especially where examples such as Coddington are currently in unspoilt settings.

The availability of potential recyclable-aggregate fill within a reasonable transportation distance will become an important factor in evaluating potential allocations. Government and society will have to choose whether the community benefits of restoring a worked out quarry are preferable to allowing a nearby brownfield site to be redeveloped more cheaply by recycling demolition materials.

SUMMARY

The availability of suitable inert fill has become a critical factor in the sustainability of gravel extraction on sites with high water tables and low overburdens – severely limiting the proportion of land-surface in any restoration. MLP Development Management policies should clearly state this and spell out the consequences. Consultation site information should provide transparency, prominently displaying a rough quantitative measure of the likely balance between water and restored land-surface, based on onsite fill, overburden, and depth of extraction. Understanding the conflict between enforced water restoration and other desirable methods, and cumulative impact would inform expectations when developing the MLP.

CHANGE TO PLAN

1. The consequences of the lack of a suitable inert fill on many sites should be openly acknowledged and the consequences clearly reflected in MLP Development Management policies.
2. NCC should require developers in their Site Information Request Form to supply data and a calculation that roughly quantifies the likely ratio between water and land-surface on restoration, at the earliest consultation stages.
3. In MLP consultations NCC should provide transparency in this aspect by prominently displaying the rough quantitative ratio between water and land surface on restoration in the site information or site development brief and in other appropriate site selection papers. The developers' 'Site Information Request' data for all sites should be included in the public papers.
4. Remove Coddington MP2o site allocation from the MLP, as it is unsuitable for this endangered Notts Sandlands landscape.

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

From: Nottinghamshire County Council <nottinghamshire@jdi-consult.net>
Sent: 28 March 2016 16:00
To: [REDACTED]
Subject: Representation received. ID:29463

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29463
Document: Minerals Local Plan Submission Draft
Section: DM3: Agricultural land and soil quality
Support/Object: Object

NPPF Paragraph 143 requires that in preparing Local Plans, local planning authorities should put in place policies to ensure worked land undergoes high quality restoration and aftercare including the safeguarding the long term potential of best and most versatile agricultural land (BMVL) and conserving soil resources.

Nottinghamshire MLP, DM3 5.43 Suggests "In some circumstances the relocation of soils of sufficient quality to ensure better agricultural use elsewhere may be appropriate to protect this important resource. Policy DM12: Restoration, After-use and Aftercare provides further information."

This is flawed - relocation of soils to other sites cannot guarantee that they can be re-laid as equivalent quality land. Transporting the soils in HGVs also has environmental and traffic impacts at the source, along the route, and be degraded by segregation when arriving at the destination.

Best and Most Versatile Land is site specific. Factors affecting the agricultural grade of soil are climate, site and soil characteristics.

- Climate factors include, temperature, rainfall, aspect, exposure and frost risk.
- Site factors include land gradient, micro-relief, depth of the water table and flood risk from adjacent sites and watercourses.
- Soil character factors include texture, structure, depth, subsoil and bedrock properties, particle size distribution and stoniness and chemical properties which cannot be corrected.

Best and Most Versatile Land is sensitive to disturbance – as soon as it is stripped, separated and banked some soil character factors are potentially changed – even if it were to be immediately re-laid on the gravel bed from which it was stripped. Soil and site factors would be changed if the soil/subsoil were re-laid at the same site on a new fill substrate, replicating the original land surface. If the soils are removed to another site: climate, site, and soil character factors would all be different and the performance of the soils could be markedly different from that of the undisturbed site. This would be true whatever levels of care and expertise were employed in handling the soils.

Although Notts MLP DM3 5.41 and 5.42 and are necessary safeguards in protecting the quality of soils for agricultural quality, the management of rain infiltration/flood management, water quality and landscaping/leisure uses, the only way to guarantee the soil quality is not to extract the gravel and disturb the soil.

SUMMARY

Notts MLP DM3: Agricultural land and soil quality 5.43 (relocating soils from Best and Most Versatile Agricultural Land (BMVL) which are surplus to requirement for a specific chosen restoration method), does not comply with the requirements of NPPF Paragraph 143 to safeguard the long term potential of BMVL and conserve soil resources. The

argument is flawed because factors in soil quality are site and location specific, so relocated BMVL sourced soils may not perform as well in their new environment. Transporting the soils in HGVs also has environmental and traffic impacts.

CHANGE TO PLAN

Acknowledge in all relevant places that best and most versatile land is site specific and any disturbance of soils from best and most versatile land (BMVL) can affect their quality. This must be considered when evaluating the impacts of working any allocations with significant proportions of BMVL, and in determining the most desirable and optimal restoration schemes for such sites.

Remove from the MLP sites with high proportions of best and most versatile land, including Coddington MP2o, which cannot reasonably expect to be restored to a similar high proportion of agriculture. Site selection should give priority to include sites in the MLP where it is practicable to restore BMVL in situ.

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 16:25
To: [REDACTED]
Subject: Representation received. ID:29466

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29466
Document: Minerals Local Plan Submission Draft
Section: DM12: Restoration, after-use and aftercare
Support/Object: Object

NPPF Paragraph 143 requires that in preparing Local Plans, local planning authorities should put in place policies to ensure worked land undergoes high quality restoration and aftercare including the safeguarding the long term potential of best and most versatile agricultural land (BMVL) and conserving soil resources.

Nottinghamshire MLP, DM12 5.127 Suggests "Where the proposed after use is to be one which requires little or no soil, e.g. a lake or a nature reserve requiring impoverished soil resources, it would be better for soils to be removed from site and used beneficially elsewhere."

This is flawed - relocation of soils to other sites cannot guarantee that they can be re-laid as equivalent quality land. Transporting the soils in HGVs also has environmental and traffic impacts at the source, along the route, and be degraded by segregation when arriving at the destination.

Best and Most Versatile Land is site specific. Factors affecting the agricultural grade of soil are climate, site and soil characteristics.

- * Climate factors include, temperature, rainfall, aspect, exposure and frost risk.
- * Site factors include land gradient, micro-relief, depth of the water table and flood risk from adjacent sites and watercourses.
- * Soil character factors include texture, structure, depth, subsoil and bedrock properties, particle size distribution and stoniness and chemical properties which cannot be corrected.

Best and Most Versatile Land is sensitive to disturbance - as soon as it is stripped, separated and banked some soil character factors are potentially changed - even if it were to be immediately re-laid on the gravel bed from which it was stripped. Soil and site factors would be changed if the soil/subsoil were re-laid at the same site on a new fill substrate, replicating the original land surface. If the soils are removed to another site: climate, site, and soil character factors would all be different and the performance of the soils could be markedly different from that of the undisturbed site. This would be true whatever levels of care and expertise were employed in handling the soils.

SUMMARY

Notts MLP DM12: Restoration, after-use and aftercare 5.127 (relocating soils from Best and Most Versatile Agricultural Land (BMVL) which are surplus to requirement for a specific chosen restoration method), does not comply with the requirements of NPPF Paragraph 143 to safeguard the long term potential of BMVL and conserve soil resources. The argument is flawed because factors in soil quality are site and location specific, so relocated BMVL sourced soils may not perform as well in their new environment. Transporting the soils in HGVs also has environmental and traffic impacts.

CHANGE TO PLAN

Acknowledge in all relevant places that best and most versatile land is site specific and any disturbance of soils from best and most versatile land (BMVL) can affect their quality. This must be considered when evaluating the impacts of working any allocations with significant proportions of BMVL, and in determining the most desirable and optimal restoration schemes for such sites.

Remove from the MLP sites with high proportions of best and most versatile land, including Coddington MP2o, which cannot reasonably expect to be restored to a similar high proportion of agriculture. Site selection should give priority to include sites in the MLP where it is practicable to restore BMVL in situ.

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 19:18
To: [REDACTED]
Subject: Representation received. ID:29473

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29473
Document: Minerals Local Plan Submission Draft
Section: MP2: Sand and gravel provision, MP2o Coddington
Support/Object: Object

Newark & Sherwood District Council have strongly objected to the greenfield allocations of Coddington MP2o and Flash Farm MP2p because of severe concerns over their cumulative transport impact on the Newark bypass (and in particular on A1/A46/A17 junctions, the A617 and Kelham bridge) and the resultant effects on the economy of Newark and nearby Lincolnshire. The District Council has expressed serious reservations about the transport work carried out by the Minerals Authority. N&SDC have strongly opposed proposals likely to impede delivery of its key objective of planned growth in the Local Development Framework. The allocations should be properly considered in depth in a comprehensive strategic plan involving Highways Agency, Lincs County Council, N&SDC, EMAS, major local employers and organisations.

Highways Agency's N&E Midlands Route Strategy Evidence Report (April 2014) has already recognised capacity & safety issues, stating capacity improvements would be urgent by 2021, and that addressing the Newark A46 pinch point was also vital to Lincolnshire prosperity and Central Lincolnshire growth. It also identifies the A46 in the Newark area to be in the top 10 for unreliable journeys (A617 to A1 section, and A1133 to A1 section).

The Newark Bypass has complex temporal and seasonal usage patterns beyond the main local weekday rush hours. The STA addendum annex contains a single day's traffic count for the A17 of Drove Lane– Mon 24th June 2013 7am – 7pm. The A17, which carries more traffic than it was designed for, is heavily used route during the Newark Sugar Beet Factory Processing season, September to March. The A17 is a major route for HGV's travelling between Norfolk from Northern England and the Midlands and one of only two direct routes that links Norfolk with the A1. It is also a major holiday route in the summer months for cars and caravans making their way to the resorts of East Anglia and the Lincolnshire coast.

The Newark Bypass has rapidly evolving congestion patterns. The dualling of the A46 Newark to Lincoln route has resulted in a 37% increase in traffic at the A1/A17/A46 junctions, with 10% increase in A1 north of the A46, 17% increase in A1 south of the A46, 8% increase through Newark on the B6166 and 22% increase on C208 Beacon Hill to Coddington (data from first year after completion, collected for Sept 2014 Petition by CAGE). The dualling of the A46 from Windmerpool to Farndon could have even greater impacts, since it allows interchange between long distance N-S traffic on the M1 and A1 (when news breaks of problems ahead on their routes), sucking in traffic to Newark roundabouts from a vast new hinterland. The A46 Windmerpool to Newark Dualling One Year After Study (Aug 2014) indicates a 21% increase in AWT (4,500 vehicles/day) on the A46 Newark Bypass (Fig 2.4, point B). Growth on the A46 northern section is not restricted to the peak flow times (6-10am southbound and 15-19 northbound). A46 HGV traffic between A46097 and B6166 increased from 4,900 to 5,600 AWT – a 14.3% increase. GEART states that increases in traffic of more than 5% are likely to be significant in capacity terms.

Newark's relief road is the only single carriageway on the A46 trunk road between Lincoln and Leicester M1. It has to accommodate traffic from the A1, A17, A616, A617, A1133 and B6326. A level-crossing at Newark Castle Train Station regularly produces tailbacks to the bypass, and a recent improvement in service on the Lincoln to

Nottingham route have made this worse. The frequency and levels of congestion experienced in the Newark area, and examples of gridlock resulting from any accident on the A1 are constantly appearing in articles and letters in the Newark Advertiser, local radio and television. The MP has organized a transport summit and brought pressure to bear on central government. The MLP may quote Highways England that a major improvement scheme will begin between 2020 and 2025 but only funding to investigate this is in place, estimated at about 1% of funding required to deliver the improvements. Even the much vaunted 'southern link road' is not likely to be completed as far as the A1 until almost the end of the minerals plan period. This single carriageway road with 6 roundabouts has been designed solely to cope with the extra local traffic generated by Newark Growth Point – not as an extra bypass to relieve the failing commercial trunk routes as MLP seems to fondly hope.

We also understand that there are plans to relocate additional operations to the Mastercare Distribution site drawing more traffic to the roundabout near the proposed site Coddington MP2o.

Local people are fully aware of the bypass infrastructure difficulties - the slow or stationary traffic, tailbacks, delays and unpredictable journey times - many also find the high levels of large lorries stressful. Locals revert to minor roads to bypass trouble spots, sometimes via quite lengthy rat runs used before Newark was bypassed – Drove Lane-Main St- Balderton Lane is part of this network. High HGV levels from a quarry at Coddington, increasing A17 HGVs rates by more than 11%, would make this much worse.

Routing agreements only apply to the quarry HGVs. During accidents or planned stoppages, the police regularly divert trunk road traffic (including high percentages of lorries) through unsuitable minor village roads ignoring the weight restrictions in place – haulage drivers then adopt them at other times without police authorisation. Locals fear the safety impacts of both displaced flows on village streets. We have seen 2-directional trunk road traffic flows using narrow, winding Stapleford Lane to interchange between the A46 Lincoln and A17 - then using the Coddington C208 to get to the A1 junctions. Similarly, Drove Lane N (narrow winding sections and a small weak bridge) to Drove Lane S/Main St/C208/A1 sliproads (narrow, double bend, awkward right turn at a bend, with many elderly residents, pubs and a school).

SUMMARY

The STA and STAA seriously underestimate the current capacity crisis of the road network around Newark, affecting congestion, road safety and journey reliability, and takes little account of planned growth. Newark & Sherwood District Council believe that the traffic impact of Coddington MP2o and other sites will harm their LDF planned growth targets. The STAA provides only 1 day's traffic data from June 2013 for A17 SE of Drove Lane, although the bypass has rapidly evolving and complex seasonal usage patterns. Dualling the A46, first Newark-Lincoln, then Widmerpool-Farndon has had massive impacts on the 27 year-old Newark bypass.

CHANGE TO PLAN

Remove site allocation Coddington MP2o from the MLP, until major improvements have been completed on the A17/A46/A1 junctions and the Newark Bypass issues have been resolved.

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

From: Nottinghamshire County Council <nottinghamshire@jdi-consult.net>
Sent: 29 March 2016 10:33
To: [REDACTED]
Subject: Representation received. ID:29528

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29528
Document: Minerals Local Plan Submission Draft
Section: Sustainability Appraisal
Support/Object: Object

In the MLP Sustainability Appraisal (Submission draft Jan 2016) the Sustainability Objective 3: 'Promote sustainable patterns of movement and the use of more sustainable modes of transport' was assessed against these criteria:

- Will the plan/proposal reduce overall transport distances for minerals?
- Will it reduce road haulage of minerals?
- Will it promote alternative forms of transport?
- Will it reduce/increase road congestion?
- Will it result in sites that are well related to the main highway network?
- Will it require new transport infrastructure to be developed?

The assessment of sites against SA Objective 3 was detailed in Pg 71, items 6.16 – 6.19, which states, "The scoring for the operational period was based primarily on the form of transport to be used and whether the site was well-related to the main highway network."

The sites should have been assessed against the same criteria as the Objective, or the assessment is inconsistent and flawed. The impact of sites against 'reducing transport distances for minerals' has not been incorporated into the assessment in any form, yet the vehicle kilometres determine, or are most strongly related to, many of the negative impacts of HGV activity (such as fuel consumption, carbon footprint, pollutant emissions, contribution to congestion, number of casualties, noise, vibrations and visual intrusion). (Ref Road freight transport and sustainability in Britain 1984-2007, J Allen & M Browne 2010). This will also strongly impact upon Objective 7 (minimise impacts on and adaptability to climate change).

'Site Information Request Forms' ask developers to supply NCC with information including, "What is your planned market ie main destination/economic limits? Is this an optimum location in terms of serving the markets? If so why?"

It should therefore be practicable for NCC to incorporate this significant aspect into a site's assessment against SA Objective 3. Without doing so it is doubtful that the site assessment scores against SA Objective 3 are a proportionate accurate measure.

The Sustainability Appraisal document comments in 6.18, "6.18. Whilst it would be noted in the commentary if the site is in close proximity to an urban area which could be its main market, it was considered that attempting to score sites on the basis of transport distances for the minerals would be misleading as there is too great a degree of uncertainty involved, given that the mineral could be transported from any site to any market within an economic distance and that the locations of markets for any specific site are likely to change during the Plan period."

However, in general SA Objective scale points are broad and fairly subjective - whilst other assessments within the SA, such as all the impacts that relate to the site restoration schemes, are based on information of even greater uncertainty and largely scored optimistically.

The current scoring system underplays the negative impacts of operators of large allocations that transport gravel to distant processing plants or choose to service distant markets (when closer more sustainable allocations may be available to do so).

SUMMARY

The scoring of sites in MLP Sustainability Appraisal against SA Objective 3: 'Promote sustainable patterns of movement more sustainable modes of transport' is flawed. Based primarily on the export mode and site proximity to the main highway network, it fails to capture several criteria against which the objective must deliver. Site impacts against 'reducing transport distances for minerals' are not covered, yet vehicle kilometres determine/strongly relate to many of the negative impacts of HGVs, including carbon-footprint (Objective 7, climate change). Information on markets and their appropriateness to site location is collected in 'Site Information Request Forms'.

CHANGE TO PLAN

Sustainability appraisal of sites against Objective 3: Sustainable transport need to be revised to take account of the available market information from developers to capture environmental impacts of transport to and from the forecast market locations.

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: 29 March 2016 11:18
To: [REDACTED]
Subject: Representation received. ID:29532

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29532
Document: Minerals Local Plan Submission Draft
Section: MP2o - Coddington
Support/Object: Object

The assessment of sites against SA Objective 3: 'Promote sustainable patterns of movement and the use of more sustainable modes of transport' was detailed in Pg 71, paragraphs 6.16 – 6.19. It states, "The scoring for the operational period was based primarily on the form of transport to be used and whether the site was well-related to the main highway network."

However, the sites should have been assessed against the same criteria as the Objective, or the assessment is flawed. The impact of sites against 'reducing transport distances for minerals' has not been incorporated into site scoring in any form, yet the vehicle kilometres determine, or are most strongly related to, many of the negative impacts of HGV activity (such as fuel consumption, carbon footprint, pollutant emissions, contribution to congestion, number of casualties, noise, vibrations and visual intrusion). (Road freight transport and sustainability in Britain 1984-2007, J Allen & M Browne 2010)

Paragraph 6.18 states that this is too uncertain to assess, but other assessments which relate to the impacts of site restoration are incorporated, and this is equally uncertain. Information relating to main markets and justification for this being the optimum location to serve them are collected in the Site Information Request Forms.

Coddington MP2o has been scored by NCC as +1 during the operational period, 0 long term, against SA Objective 3, with the comment: "The site is well-related to the main highway network with direct access off the A17"

The discussion below analyses the site Coddington MP2o, for the decision making criteria against which SA Objective 3 is required to deliver, using information recently obtained from the site information request responses by Hanson in 2008.

- Will the plan/proposal reduce overall transport distances for minerals?

No, this doesn't look like an operation to keep transport distances low.

According to Hanson the site is to supply current markets and fixed outlets across the East Midlands, an important reserve to supply Hanson's concrete plants in the South Yorkshire (which were supplied by sites in the Idle valley) and other new markets. NCC states MP2o is to serve the South Yorkshire and Nottinghamshire markets. The delivered distance from Coddington to Doncaster in South Yorkshire is 55km. British Geological Survey (Mineral Planning Factsheet) states that the average delivered distances are about 40km (25miles) whilst The Mineral Products Association website reports the average road delivery distance for aggregates was: in 2012: 49.9km, in 2013: 51.5km (with average loads of 22ton and 22.7ton).

The site is projected to export 500,000 tonnes/yr for 20 years – around 200 vehicles/day.

- Will it reduce road haulage of minerals?

No. The site is distant from any wharf and the river Trent's closest approach is over 4km away. The East Coast main line is 3-4km away at Newark. All the material will be hauled by HGVs.

- Will it promote alternative forms of transport?

No, all the material will be hauled by HGVs.

- Will it reduce/increase road congestion?

Yes, it will increase road congestion on a notoriously congested road network (Newark bypass with A17/A1/A46 junctions) with capacity issues and high journey time unreliability. Newark & Sherwood District Council have strongly opposed the allocations of Coddington and Flash Farm because of cumulative traffic impacts on Newark Bypass.

- Will it result in sites that are well related to the main highway network?

Yes, the site has a frontage onto A17, a single-carriageway portion of the main highway network, but there is no existing site access. However, the immediate export route for all stated markets takes HGVs along Newark bypass and its congested roundabouts (or possibly even over the A617 via Kelham Bridge for Mansfield and Hucknall).

- Will it require new transport infrastructure to be developed?

Yes. A new site entrance junction/roundabout will be required and safety modifications to adjacent A17/Drove Lane junction. Coddington Moor roundabout will require resurfacing and probably widening. Newark & Sherwood District Council believe that a drastic overhaul of Newark bypass and its junctions will be required before the local infrastructure will be fit to support two new quarries at Coddington and Flash Farm.

SUMMARY

The scoring of sites against SA Objective 3 is flawed. Based primarily on export mode and site proximity to the main highway network, it fails to reflect 'reducing transport distances for minerals' - yet vehicle-kilometres correlate strongly with many negative impacts of HGVs.

Site Coddington MP2o scores negatively against many of SA Objective 3's decision making criteria, including transport distances, increasing congestion and requiring new infrastructure. Yet Coddington has been scored +1 during the operational period, 0 long term.

The current scoring underplays negative impacts of operators of large allocations transporting gravel to distant processing/concrete plants or markets.

CHANGE TO PLAN

Sustainability appraisal of all sites against Objective 3: Sustainable transport need to be revised to take account of the available market information from developers to capture environmental impacts of transport to and from the forecast market locations. The site information for Coddington has recently become available, and has been used to demonstrate the changes required.

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: 29 March 2016 14:12
To: [REDACTED]
Subject: Representation received. ID:29551

Mrs Jackie Armstrong,

Thank you for your representation which we received as follows:

Representation ID: 29551
Document: Minerals Local Plan Submission Draft
Section: Sustainability Appraisal
Support/Object: Object

In the MLP Sustainability Appraisal (Submission draft Jan 2106) the Sustainability Objective 8: 'Protection of high quality agricultural land and soil' was assessed against these criteria:

- Will the plan/proposal have an adverse impact on soil quality?
- Will it lead to the irreversible loss of best and most versatile land?

The assessment of sites against SA Objective 3 is detailed on page 73, paragraphs 6.29. 6.30. The scoring is based on the proportion of the site classified as best and most versatile land (BMVL, ie grades 1, 2 & 3a).

Information on agricultural land classification is mostly obtained to evaluate a development – recent assessment data splits grade 3 to allow a more detailed assessment of BMVL, older data is less valuable for this. (Most of the sites have older less detailed or accurate classifications in the public domain.)

The area of BMVL permanently lost during site working lost is critically dependent on the amount of land-surface which can be regenerated on restoration, based upon the level of the water table, the depth of overburden, gravel depth and % waste aggregate. Assuming that sufficient area is available to bank the soils safely and according to best practice, availability of suitable inert fill is a critical factor in what restoration routes are possible. The 'Site Information Request Form' requires developers to give site geology and mineral quality information with a discussion of the proposed restoration scheme details. The majority of proposed sites, in common with historic practice in Nottinghamshire, are expected to be "restored" to large areas of open water. The score for SA Objective 8 needs to measure the quantity of economic damage caused by loss of BMVL by including a weighting based on the area of productive land lost forever.

NCC should require developers in their 'Site Information Request Form' to supply data and a calculation that roughly quantifies the likely ratio between water and land-surface on restoration, at the earliest consultation stages. This would clarify many comments and aid rational site scoring for many of the SA Objectives, but especially for Objectives 4,5, 6, 8.

Incredibly, the flawed scoring of SA Objective 8 makes no attempt to take account of the actual quantity of agricultural land lost. Sites of 9Ha to 228Ha of roughly comparable land are given the same scores for the operational period. Without additional information about the likely proportion of land surface restored and its nature the long-term scores are meaningless.

SUMMARY

The scoring of sites in MLP Sustainability Appraisal against SA Objective

8: Protection of high quality agricultural land and soil is flawed. It takes no account of the amount of agricultural land lost only the overall quality of the land, whereas SA Objectives 1 and 13 give the maximum positive score for a large area of quarry.

CHANGE TO PLAN

Sustainability appraisal of sites against SA Objective 8: Protection of high quality agricultural land and soil - need to be revised to take account of the amount of agricultural land lost and not just the overall quality of the land, to provide a balanced appraisal against the scoring of SA Objectives 1 and 13 where these score +3 for a large area of quarry.

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.

Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mrs	
First name	Jackie	
Last name	Armstrong	
Address line 1	██████████	
Address line 2	██████████	
Address line 3	██████████	
Postcode	██████████	
Email	██████████	
<i>For those replying on behalf of an organisation or group:</i>		
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	✓
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	✓
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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	28/3/16
Name	Jackie Armstrong		

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

Part B – Your representation

Office use only
 Person No: 2881
 Rep No: 29750

Please read the guidance note before completing this section.

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

Policy		Site code	MP2o	Map/Plan		Paragraph		Other	
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2. Do you consider the identified part of the document to be:

Legally compliant?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Sound?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	(2) Justified?	<input checked="" type="checkbox"/>	(3) Effective?	<input checked="" type="checkbox"/>	(4) Consistent with national policy?	<input checked="" type="checkbox"/>
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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.

Summary:

Site restoration for Coddington should be historically appropriate to the location, and not create landscape inappropriate for the area. The Parish has less than 0.17% open water so a mainly water restoration of 126Ha is not compatible with the Landscape Character Policy PZ recommendation 'conserve and create', nor with Policy DM12, Paragraph 7.

As a high proportion of the site is Grade 2 and 3a, Best and Most Versatile Land, a significant area of land surface should be restored as agricultural land. A restoration based solely on biodiversity and water is not compatible with DM12, Paragraphs 6 and 7.

Submission:

The current site development brief for MP2o Coddington is not consistent with DM12: Restoration, after-use and aftercare points 6 & 7. NPPF Paragraph 112 states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land, and that poorer quality land should be developed in preference to it.

The restoration of Coddington MP2o must take account of the high quality agricultural land on this site. A recent assessment (post-dating the 2008 information supplied by Hanson) shows the majority of the 126 Ha of agricultural land is Grade 2 and 3a (best and most versatile land) – see map below. The unclassified land nearest Drove Lane is likely to be Grade 2 also, as it is adjacent to this classification. Ideally the site should be restored as part agricultural land and part biodiversity open landscape. It is not acceptable to remove the high quality soil to another site, where it may not perform as well.

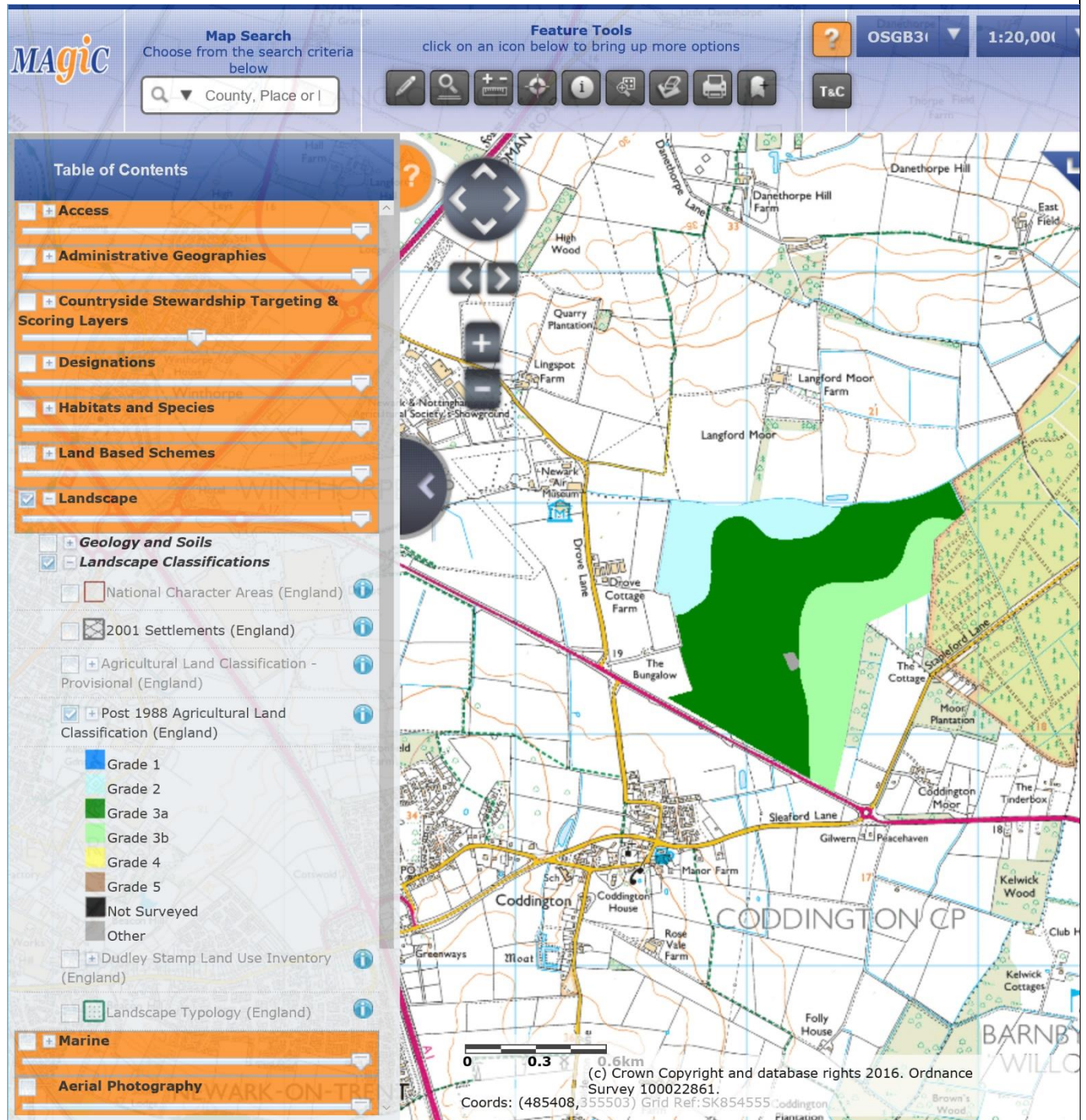
Policy DM12, 6 "The after-use will be required to have regard to the wider context of the site, in terms of the character of the surrounding landscape and historic environment and existing land uses in the area." There are currently no heavy-industrial activities in the Parish. The area is residential, farming and forestry, with equestrian centres.

The site is part of the East Nottinghamshire Sandlands (Policy Zone 04 Winthorpe Village Farmlands) with landscape actions 'conserve and create'. This sub-area is recognized as better suited to agriculture than other parts of the sandlands. The Landscape Character Assessment of this site need to be added to the site development brief (every other brief in the MLP now includes this, only Coddington is excluded in error).

Open areas of water are alien to the landscape, distant from both the River Trent and River Witham. The largest areas of open water in the Parish are a medieval moat and fishpond, both below 0.45Ha in area, with only 1.37 Ha

in the entire Parish – about 1% of the area of the 126Ha site. Restoration to open water would be totally inappropriate to the landscape.

The water table on the site lies around 1.0 to 1.5 metres below ground level, within the mineral overburden (of average thickness 2.0 metres). The continuous mineral deposit has an average thickness of 5.3 metres so working this site will inevitably result in a very large area of open water even with hole deepening unless significant quantities of inert fill can be brought in.



Agricultural Land Classifications for site MP2o at Coddington

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.

The importance of best and most versatile land (BMVL) must be considered when evaluating the impacts of working any allocations with significant proportions of BMVL, in the selection of sites, and in determining the most desirable and optimal restoration schemes for allocated sites.

Remove from the MLP sites with high proportions of best and most versatile land, including Coddington MP2o, which cannot reasonably expect to be restored to a similar high proportion of agriculture. Site selection should give priority to include sites in the MLP where it is practicable to restore BMVL.

Remove Coddington MP2o site allocation from the MLP, as it is unsuitable for this endangered Notts Sandlands landscape.

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

Yes		No	✓
If Yes, please give details			

Signature		Date	28/3/16
Name	Jackie Armstrong		

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

Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mrs	
First name	Jackie	
Last name	Armstrong	
Address line 1	██████████	
Address line 2	██████	
Address line 3	██████████	
Postcode	██████	
Email	██████████	
<i>For those replying on behalf of an organisation or group:</i>		
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	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
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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	29/3/16
Name	Jackie Armstrong		

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

Part B – Your representation

Office use only	
Person No:	2881
Rep No:	29825

Please read the guidance note before completing this section.

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

Policy		Site code	MP2o	Map/Plan		Paragraph		Other	
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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?	X	(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.

Summary

The AMES (Areas of Multiple Environmental Sensitivity) analysis has used a 1989 inappropriate boundary to evaluate allocation Coddington MP2o, which has artificially stripped it of all its village context and heritage associations (although cropmarks, finds and information indicate a high potential for non-designated archaeology. This has falsely devalued it and this should be recognized and corrected.

If the site is worked, restoration is likely to produce very little land-surface, with little likelihood of recovering either the high quality agricultural land or opportunity for heritage mitigations.

Representation

Hanson's 2008 'Site Information Request Form' submission states that their archaeological consultant's initial assessment has located 4 potential crop mark features within the allocation area. The Site Development Brief acknowledges a high potential for non-designated archaeological on the site, to be managed through appropriate survey methods. The site is known to be within the area in which there was a Civil War fight and an annual horse race documented for the period 1612-1877 (Newark Races at Coddington). A Neolithic jadeite axe was found in a nearby field in 1955 and a Bronze-Age burial pot from the area are both in Newark Museum (Civil War Centre).

Because of the high water table, shallow overburden and depth of gravel it is likely that the 126Ha site restoration will include very little restored land-surface. There will be very little opportunity to create landscape or heritage mitigations, and most of the 127Ha of the high quality agricultural land will be irretrievably lost, along with its stratigraphy. Recording archaeology is not a substitute for preserving it.

Consider the supporting analysis of the site allocation selection process, evaluating historic environment, townscape and landscape characters and biodiversity. In the Areas of Multiple Environmental Sensitivity (AMES) analysis Dark Red and Red Zones were listed adjacent to the allocation site, including:

DARK RED (areas with the greatest environmental constraint)

- To the east of Newark is an area which is not associated with the river, which extends from the eastern perimeter of Newark almost as far as the County boundary with Lincolnshire, and surrounds the village of Coddington.

RED ZONE (Area of high environmental sensitivity)

- To the east of Newark is an area which forms a fringe to the larger dark red zone extending as far as the Lincolnshire border around the village of Barnby in the Willows

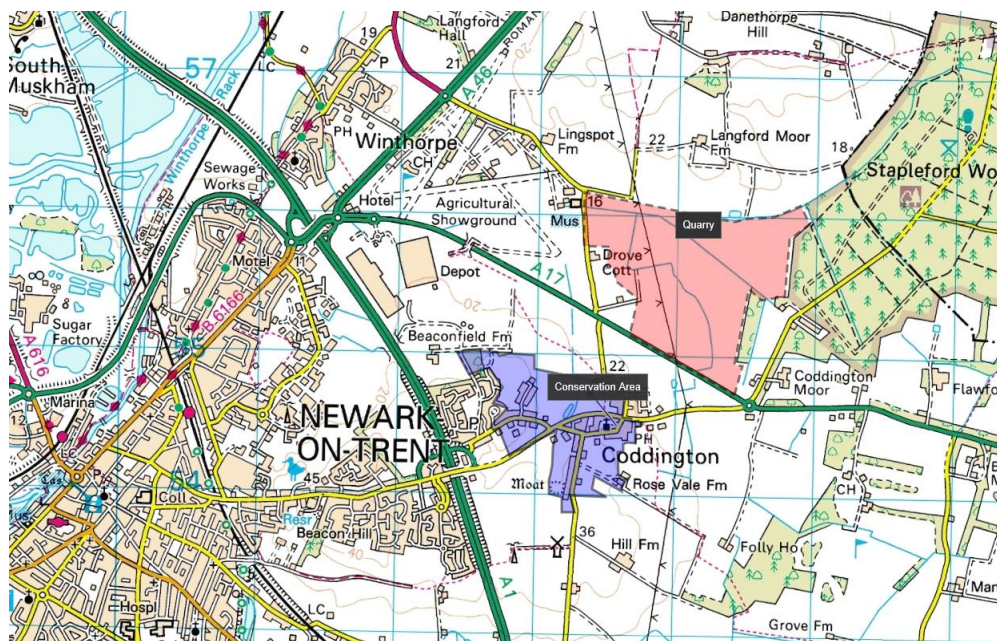
Site Coddington MP2o is just 300m from the village envelope, and 400m from the farmhouse/maltings complex from which the land was farmed (within Coddington's Conservation Area). The site was only severed from its village context by building Newark's bypass through it as recently as 1989. This new feature has been used as a boundary in assessing the site against historic environment in AMES. This unfairly downgrades it, to a rating Medium AMES – pink with no hotspot within. The multiple rating assigned the same scores and indicated landscape interest. The map indicated high ecology sensitivity but low historic sensitivity. The site is part of the village and deserves the same assessment as the rest of the land surrounding Coddington – Dark Red, or Red at least.

The allocation derives its land mainly from holdings created in the Codington (Thorpe) Estate Sale 1918 - Lot 6, 'A Compact Farm of 151a, with farmhouse/maltings/house and cottages on Well Green and stackyard and house (lot 58) on Drove Lane corner. These buildings comprise the old properties in this part of the Conservation Area, including one of Coddington's Grade II listed buildings, The Laurels. The break-up of this estate was a formative event in Coddington's development, cultural identity and sense of place.

The parish landscape is likely to have been fully utilised since Iron-age times although the village itself is probably of late Anglo Saxon origin, being listed in Domesday Book as having two manors. In late medieval times the village worked four open fields with Common on Coddington Great Moor or Old and New Carr. Site MP2o occupies a large part of a pre-enclosure field, pasture, and common - Berkley's Field and Coddington Great Moor. The medieval system endured until an early-Parliamentary enclosure in 1760-2. The first detailed map, Sanderson's 20 Miles round Mansfield 1835, records the village within 75 years of enclosure (omitting the medieval moat and civil war siegeworks) but shows near to the site 'cover', wooded areas Moor Brats (on the boundary of MP2o) and 'Coddington Plantation' (now SINCs) and Stapleford Woods (including ancient woodland). The fields in the NE quadrant of the parish (defined by Drove Lane and Beckingham Road) were smaller than elsewhere, but survived well until the mid 20th Century. They can still be easily mapped to existing boundaries in aerial photographs (the drainage dyke crossing the site, Moor Brats on the site boundary, Drove Lane, Cross Lane and Waites Lane – lost but still visible as a double row of hedgerow trees near Drove Lane/A17 staggered crossroads). Working the site MP2o will damage these landscape links with the medieval village.

Coddington's lands, history, built environment and landscape heritage are intimately connected, and site MP2o is still an integral part of it - Coddington Conservation Area (CCA) faces the site, only 350m away. Working the allocation will damage the heritage associations, landscape setting and tranquillity of the CCA, a feature of which is the importance of a variety of landscapes, including the open rural approaches to the village from North, South and East and the mature Parkland Landscape deriving from Coddington Hall and Coddington House. Parkland aspects are shared with nearby Winthorpe's Conservation Area, physically connected to the site MP2o by the watercourse which passes through it and under Newark Air Museum and Showground. This was formed from WWII site Winthorpe/Coddington Air Base and derives from Thorpe holdings that straddled Coddington-Langford-Winthorpe-Newark.

See below for map showing Coddington Conservation Area and MP2o:



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.

NCC should acknowledge that The AMES (Areas of Multiple Environmental Sensitivity) analysis has used a 1989 inappropriate boundary to evaluate allocation Coddington MP20, which has artificially stripped it of all its village context and heritage associations. This has falsely devalued the site, whose rating should be corrected along with all subsequent scores resulting from it.

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

Yes		No	<input checked="" type="checkbox"/>
If Yes, please give details			

Signature		Date	29/3/16
Name	Jackie Armstrong		

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