

# Nottinghamshire Minerals Local Plan

## Representations - by respondent

Volume 3 of 11

Respondent numbers 1835 - 2736



## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 27 March 2016 13:19  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29432

Holme Parish (Patricia Richards),

Thank you for your representation which we received as follows:

Holme Parish (Patricia Richards) [1835] represented by Holme Parish (Patricia Richards) [1835] Representation ID: 29432

Document: Minerals Local Plan Submission Draft

Section: SP1: Sustainable Development

Support/Object: Object

This Minerals Local Plan together with other Plans across Derbyshire, Leicestershire, Lincolnshire, Staffordshire and Warwickshire collectively conceals proposals for 8,000 hectares of wetlands (roughly equivalent to the area covered by the City of Nottingham). It argues for a strategic coordinated approach yet makes the case for considering each renovation proposal on a planning application by planning application basis. A vision on this scale should surely be subject to wide community and elected County Council Members' consultation. What are the implications? Who has agreed to this vision to establish one of Britain's greatest wetlands.

### CHANGE TO PLAN

Major sustainable development proposals should be subject to wide community consultation across MPA boundaries if appropriate.

The document is unsound because it is not:

i. Positively prepared

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

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

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 27 March 2016 13:39  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29433

Holme Parish (Patricia Richards),

Thank you for your representation which we received as follows:

Holme Parish (Patricia Richards) [1835] represented by Holme Parish (Patricia Richards) [1835] Representation ID: 29433

Document: Minerals Local Plan Submission Draft

Section: DM8: Cumulative impact

Support/Object: Object

The village of Holme, which I represent, faces a further 14 years under this Plan of sand and gravel extraction at Langford South and Langford North (nearly 30 years cumulatively). Whilst the notion of considering cumulative impact is helpful, it means nothing without further definition and explanation. For example, how will this be taken into account at the planning stage? What is meant by no unacceptable cumulative impacts? What is expected of the industry?

### CHANGE TO PLAN

The Plan needs to explain how this will be implemented and achieved.

The document is unsound because it is not:

- i. Positively prepared
- iii. Effective

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

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

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 27 March 2016 13:50  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29434

Holme Parish (Patricia Richards),

Thank you for your representation which we received as follows:

Holme Parish (Patricia Richards) [1835] represented by Holme Parish (Patricia Richards) [1835] Representation ID: 29434

Document: Minerals Local Plan Submission Draft

Section: Chapter 6: Implementation and Monitoring

Support/Object: Object

Consultation and monitoring processes are taking place and are advocated in this Plan mainly with local agencies but without community involvement

### CHANGE TO PLAN

Local communities should be fully engaged in monitoring the Plan and explicitly covered in all monitoring processes. Evidence of such engagement should be covered in annual reviews.

The document is unsound because it is not:

iv. Consistent with national policy

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

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



The Coal  
Authority

## Nottinghamshire Minerals Local Plan (Submission Consultation)

**Consultation Deadline – 29 March 2016**

### Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority



Planning Email:  
Planning Enquiries:



### Person Making Comments

Anthony B Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIQB, MInstLM, MCMI, MRTPI*  
Consultant Planning Advisor to The Coal Authority

### Date of Response

18 March 2016

### **Background on The Coal Authority**

The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales;
- the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales; and
- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

### **Specific Comments on The Nottinghamshire Minerals Local Plan (Submission Consultation)**

The comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:

30007 **Representation No.1**  
**Site/Policy/Paragraph/Proposal** – Strategic Objective SO4

**Test of Soundness**

<b>Positively Prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistency to NPPF</b>	<b>Legal &amp; Procedural Requirements Inc. Duty to Cooperate</b>
<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Support** – The Coal Authority supports Strategic Objective, SO4 which sets out the high level commitment to the safeguarding of mineral resources within Nottinghamshire. This is considered to accord with the broad requirements of the National Planning Policy Framework.

30008 **Representation No.2**  
**Site/Policy/Paragraph/Proposal** – Policy SP4, Climate Change

**Test of Soundness**

<b>Positively Prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistency to NPPF</b>	<b>Legal &amp; Procedural Requirements Inc. Duty to Cooperate</b>
<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Support** – At the previous consultation stage The Coal Authority requested that in the Submission version of the Local Plan, the justification text to accompany the policy should make it clear that this policy does not presume against the future extraction of energy minerals, including coal. Together with recognising the potential benefits of indigenous mineral extraction in environmental and climate change terms. The plan now does this in paragraph 3.46 which is welcomed.

30009 **Representation No.3**  
**Site/Policy/Paragraph/Proposal** – Policy MP11, Coal

**Test of Soundness**

<b>Positively Prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistency to NPPF</b>	<b>Legal &amp; Procedural Requirements Inc. Duty to Cooperate</b>
<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Support** – The Coal Authority agrees that the use of criteria based policies to assess proposals for energy minerals is the most appropriate in light of current market circumstances.

The Coal Authority also supports the continued broadly positive and supportive approach towards coal recovery from tip washing which can provide a very useful source of coal and can help to reduce the scale and impact of historic mineral waste. It can at times also be a useful method of removing mining legacy instability in some tips and/or allowing them to be re-engineered into less artificial landforms.

The policy is considered to be flexible enough to cater for small scale prior extraction surface coal proposals, most of which will occur in existing urban areas as well as more major stand-alone surface coal extraction. The prior extraction of surface coal is a growing market and is now taking place across the Country within towns and cities, including the major urban conurbations. Much of

this prior extraction is taking place to address historic mining legacy as the removal of remaining surface coal deposits can be more economically viable than hard engineering solutions such as grout fill. As development economics become tighter the potential economic advantages of the additional income from the sale of coal extraction has seen an escalation of this business activity.

The Coal Authority considers that Policy MP11 achieves the appropriate balanced approach towards coal extraction as required by paragraph 149 of the NPPF. It also supports the objectives of paragraph 147 of the NPPF.

30010

**Representation No.4**

**Site/Policy/Paragraph/Proposal** – Policy MP12, Hydrocarbon Minerals

**Test of Soundness**

<b>Positively Prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistency to NPPF</b>	<b>Legal &amp; Procedural Requirements Inc. Duty to Cooperate</b>
<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Support** – The Coal Authority welcomes the Minerals Plan continuing the broadly supportive approach towards the provision of remediating the treatment of mine gas which is a relevant locally distinctive public safety issue.

The Coal Authority also supports the Minerals Plan continuing the broadly supportive approach towards the facilitation of proposals to use coal bed methane. The Minerals Plan needs to remain flexible in its approach towards this issue given the emerging nature of the technology and the broad nature of the current licensed areas. The PEDL licensed areas granted by DECC are broad in nature and just reflect arbitrary sub-divisions of the overall potential resource. They do not necessarily represent the full extent of the geographic areas that offer potential for coal bed methane and as such their use as spatial illustrations only offer a starting point and policies should facilitate potential extraction both within and outside the current PEDL licence areas. The plan is considered to allow for this flexibility.

30011

**Representation No.5**

**Site/Policy/Paragraph/Proposal** – Policy DM12, Restoration, After-use and AftercareXXX

**Test of Soundness**

<b>Positively Prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistency to NPPF</b>	<b>Legal &amp; Procedural Requirements Inc. Duty to Cooperate</b>
<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Support** – The Coal Authority welcomes the Minerals Plan approach towards the issue of restoration.

30012

**Representation No.6**

**Site/Policy/Paragraph/Proposal** – Policy DM13, Mineral Safeguarding and Consultation Areas (and Policies Map)

**Test of Soundness**

<b>Positively Prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistency to NPPF</b>	<b>Legal &amp; Procedural Requirements Inc. Duty to Cooperate</b>
<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Support** – The Coal Authority agrees that the whole surface coal resource within Nottinghamshire should be safeguarded from sterilisation. The Coal Authority therefore supports the inclusion of

coal as a mineral resource to be safeguarded. The Coal Authority further supports the two-stage approach towards mineral safeguarding, namely the designation of MSAs and then the consequential designation of MCAs. Given that Nottinghamshire remains a two-tier area, the use of Mineral Consultation Areas will be an effective tool for District/Borough Councils to utilise.

The Coal Authority further supports the 7 categories of exempt development set out in the justification which will help to facilitate the effective implementation of the policy. In particular the recognition that allocated sites for non-mineral surface development should only be excluded where the allocation process has taken into account mineral sterilisation, including consideration of the potential for prior extraction is welcomed. The policy is considered to broadly accord with the requirements of national planning policy as set out in paragraphs 143 and 144 of the NPPF.

The Coal Authority supports the identification in the Plan of the PEDL licensed areas for coal bed methane and other hydrocarbon minerals, we support in principle the safeguarding of hydrocarbon mineral resources. The Coal Authority notes that these resources are not illustrated on Plan 6, we support the approach not to illustrate these resources in spatial form.

30013

#### **Representation No.7**

**Site/Policy/Paragraph/Proposal** – Policy DM14, Incidenta; Mineral Extraction

#### **Test of Soundness**

<b>Positively Prepared</b>	<b>Justified</b>	<b>Effective</b>	<b>Consistency to NPPF</b>	<b>Legal &amp; Procedural Requirements Inc. Duty to Cooperate</b>
<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>

**Support** – The Coal Authority supports the policy approach. Prior extraction of surface coal resources can easily take place within urban areas without undue harm to residential amenity. Since it takes the form of activity similar to normal ground works and is undertaken by standard construction type machinery it occurs within a matter of weeks or a few months rather than any significant time. It will not lead to delays in the delivery of development nor will it result in additional costs to the developer as in most cases prior extraction is a more cost effective method to the engineering works that would otherwise be necessary to address mining legacy. In some cases prior extraction would occur where no mining legacy is present, but in these cases the income potential from the extraction of the coal can be a useful addition to the economic viability of sites in these tough economic times. The support the plan gives to the potential for prior extraction of mineral resources is therefore welcomed.

#### **CONCLUSION**

The Coal Authority welcomes the opportunity to make these comments. We wish the County Council well in the finalisation of the plan through public examination.

Thank you for your attention.

**For and on behalf of**

**Miss Rachael A. Bust** *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MInstLM, MRTPI*

**Chief Planner / Principal Manager**



## Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mr	
First name	John	
Last name	Dodwell	
Address line 1	██████████	
Address line 2		
Address line 3	██████	
Postcode	██████	
Email	██████████████████	
<i>For those replying on behalf of an organisation or group:</i>		
Organisation	Rolandon Water & Sea Freight Advisory Services (RW&SFAS)	
Job title	Managing Director	

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	Yes	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.*

RW&SFAS is a water freight consultancy which operates in many parts of the country. We support the use of barges to take aggregates from some of the proposed pits. This is environmentally better than using lorries – e.g. obnoxious emissions can be reduced by to 25% of those from lorries. Water freight in this case will also be cheaper. We are aware that public enquiries are likely to hear from local inhabitants who wish to object. We feel it will be useful for the Inspector to hear from a firm which supports the Plan.

Signature		Date	1/3/16
Name	John Dodwell		

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

## Part B – Your representation

Office use only  
Person No: 2077  
Rep No:29128

Please read the guidance note before completing this section.

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

Policy	all	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	Yes	No	
Sound?	Yes	Yes	No	

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

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

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

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

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

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

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

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

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

<b>Signature</b>		<b>Date</b>	1/3/16
<b>Name</b>	John Dodwell		

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

## Part A – Personal details

Name	Mr J. Potter	
Address		
Email	[representation ,two attachments, sent via e-mail]	

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

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**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	<input type="radio"/>	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 would like to keep available the option of Examination participation.

Signature		Date	28 <sup>th</sup> March 2016
Name	Mr J. Potter		

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

## Part B – Your representation

Office use only  
Person No: 2108  
Rep No: 29785 - 29793

Please read the guidance note before completing this section.

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

Other	SO2	Site code		Map/Plan		Paragraph		Policy	/SP2 , see at 4.
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### 2. Do you consider the identified part of the document to be:

Legally compliant?	Yes		No	
Sound?	Yes		No	partially unsound

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 [partially] unsound because it is not:

(1) Positively prepared?		(2) Justified?	<input type="radio"/>	(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.

SO2 /SP2 1.a) & 1.c) (/SP1/MP1), disagree on <sup>1</sup> the-imposition re supply, and the unnecessary over-use - or waste - of mineral resources is observed.

### Separate Part B , comments &/or concerns:

SO1 , minimizing waste could also do with being applied re the-use of recycled aggregates; aggregate recycling in-itself ought to be lessening its impacts;  
MP5 , demolition /'regeneration' does appear excessive currently.

SO8 /DM3 1.b., I question, why only the long-term potential, because unadulterated agricultural land is a finite resource too.

DM4 , it should be borne in mind that some in the-wildlife-business perhaps have other-interest(s) in this; quite different to just intrinsic appreciation of countryside & Nature.

MP12 , 'fracking' concerns, for example, re countryside visuals.

The three correspondence - in grey text, pages 5,6,7 - these are also attached, included for: earlier input/(topic coverage)/precautionary reasons.

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

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

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

<b>Yes</b>	*	<b>No</b>
<b>If Yes, please give details</b>	The three correspondence - in grey text, pages 5,6,7 - these are also attached, included for: earlier input/(topic coverage)/precautionary reasons.	

<b>Signature</b>	Mr J Potter	<b>Date</b>	28 <sup>th</sup> March 2016
<b>Name</b>	Mr J. Potter		

December 16<sup>th</sup> 2013

Planning Policy Team  
Policy, Planning & Corporate Services Dept.  
Nottinghamshire County Council  
County Hall  
West Bridgford NG2 7QP

Minerals Local Plan [Issues and Options] Consultation, Observations re .

'policy DM1:f. (/ SO5: , SO6:) The text could go further to clarify the need to protect darker landscape(s) ,& Zone E2 .  
[E.g. it would be a result to see lighting /visual -impacts reduced /minimized at the: Marblaegis Mine/ Hotchley Hill - East Leake , gypsum-depots at Leake Rd. Gotham & Pasture Ln. Ruddington ; also Ratcliffe on Soar power station, and Bunny- 'works.]  
It's noted that GYa operations may have shifted by 2026, so R.B.C. might've pencilled that-into its core-strategy plans to 2028.

'policy DM5: (/ S06: , SO7:) Just to put it in writing to the County Council that the Mature Landscape Area designation ought to be revived.

(SO6: , DM7:) The issue of 'enhancement' - re rights of way/public access - it's truly important that those who *choose to find* the countryside, it's through-a: subtle, understated, thereby respectful way - so as not to spoil it ;  
please pass this comment on to [your Countryside Access Team].  
[this/ the last two paragraphs on page 91 tie-into grave-concerns regarding the Fairham Brook, Clifton Pasture(s) ; 'did respond to the County Council's Local Flood Risk Management Strategy Survey, March 2012  
- & 'haven't been consulted on that matter since - you're left thinking: discussions behind closed-doors.]

'policy MP5: 'Did raise the problem (in no uncertain terms) at the Waste Core Strategy Examination [ - from Edwalton, to Bradmore, to Thrumpton - ] how currently 'recycled#aggregate(s)' need far stricter controls to avoid: significant/ unacceptable environmental impacts , land/soil degradation ; also 'have noticed issues of other-debris in#.

('policy DM9: obviously 'wouldn't want to see a creep-of lighting /signage on essentially-rural roads.)

('policy DM8: why confine this policy to minerals planning?)

'See what emerges next stage, on the subject of the 'Widmerpool Gulf'.

'Sincerely, Mr. J. Potter .

[REDACTED]

[MineralsLocalPlanResponse , Issues and Options stage]

22<sup>nd</sup> June, 2014

To, Planning Policy team  
Policy, Planning and Corporate Services Dept.  
Nottinghamshire County Council  
County Hall  
West Bridgford  
NG2 7QP

Consultation on sand and gravel provision - proposed policy MP2 /  
proposal MP2q / PA46 , objections:

On <sup>1</sup> the wider issue of proposed-provision (MP2), that a third to a half of amount  
extracted would be for elsewhere - while Nottinghamshire ,& NG11 Nottm.,  
would endure the-impacts - the county's Authorities  
ought instead to respect here community wishes first & foremost  
- rather than: pressing-on as exploitative-businesses in  
unduly-aiding the construction-sector.

On proposal MP2q / PA46:

- It'd be negative industrialization of interior [i.e. inner] countryside:
  - access - tarmacked - on the (Mature Landscape Area)
  - bluff between MillHill and BrandsHill is aesthetically ill-conceived ,
  - associated-lighting at relatively dark landscape ,
  - 13 years clank instead of relative quiet there ,
  - associated 'urbanizing'-structures ,
  - issues from dust, its detriment to air quality ,
  - loss of good grade agricultural land ;
- From my time-to-time walking of Barton in Fabis footpath FP2  
,with its readable/diagonal route, it has a pleasant amenity  
(Barton in Fabis BW3 wouldn't be replacement, it's different in character);
- An existing abundance of Nature at this location is *sensed*,  
the land there contrasting [& haven from] waters over the River ;
- (Youth) safety ,swimming in workings,  
& (youth) blight - through motorbikes -  
consider the consequences of the proposal here ;
- Formal notification through County Council planning-laminates advertising  
the proposed allocation, to those who utilize there,  
would appear not to have been carried out at: Barton in Fabis,  
the Beeston Lock area ,into Attenborough, and Clifton South ;  
this proposal hasn't been 'city-council , discussed  
[governmentally] with local residents in the Clifton ward(s),  
further concerns then would be their ,  
briefing possibility of extraction-extending into the Clifton area  
- faults, at this 'consultation' stage ;
- The Councils [plural] should not be trying to cumulatively-destroy the  
extant environment of NG11 .

Therefore proposal PA46 / MP2q ought to be removed / deleted from the  
emerging Minerals Local Plan.

Mr J. Potter . [MLP response at 'preferred-approach' stage]



10<sup>th</sup> December, 2015

Cllr. [generic],  
Environment and Sustainability Committee  
Nottinghamshire County Council  
County Hall  
West Bridgford  
NG2 7QP

Cllr. [generic],

**December 2015 Objections**

on proposal [MP2/ MP2q/PA46] at: Barton-in-Fabis,  
and Clifton South ward.

- Proposed processing & concrete operations at Brands Hill arrogantly obtrusive and unbalanced planning.
- Proposed conveyor-belt and access road up Brands Hill unbalanced planning;
- the essentially pleasant farmland scenery Barton-in-Fabis side, acts as balance to what's at Attenborough.
- With earlier-stage data received the County - & city - Council were able to directly / widely consult local residents on the scoping opinion request report application, reference: SC/3270(?) &/or 15/01050/EASCO - but didn't - so that's two stages of local planning authority /LPA(s) failings to consult.
- This proposal hasn't been discussed at the - mainly sham - 'area 8' committee.
- Of relevance here: deliberate and wasteful strewing of material(s) in construction-schemes, in that objections at land degradation , & HGV movements; be reminded that there is an unresolved complaint from me, lodged February 2015 with this Council  
- (and Rushcliffe Borough Council November 2015 in-sight-of that too, although were aware of the (its) matters raised August 2014 & December 2014); skewing of baseline conditions re *this* proposal has been put to the County Council in writing, in consultation response June 2015.
- Objections at the targeting of - proposed pillaging - this Green Belt area, actually, from a south-of-the-river south-west Notts. perspective what is seen as Councils' deliberate: industrialization/urbanization [... - moves at turning the County into a metropolitan one] is /are opposed.

'Sincerely,  
Mr. J. Potter .

[generic copy of letter e-mailed to seven County Councillors]

## John Wilson

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 21 March 2016 09:36  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29307

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

Gedling Borough Council (Mr Graeme Foster),

Thank you for your representation which we received as follows:

Representation ID: 29307  
Document: Minerals Local Plan Submission Draft  
Section: DM13 Justification  
Support/Object: Object

The words "which took account of minerals sterilisation" should be deleted from paragraph 5.140. The wording is insufficiently explained in terms of what information is required and potentially adds a layer of uncertainty on allocated sites in adopted Local Plans where the principle of development is for all intents and purposes is established. This could in turn lead to an additional and unnecessary burden on developers at the planning application stage there being a recent example of where this has occurred on an allocated site in Gedling Borough. Furthermore the wording underlined above is unnecessary given the Local Plan must be based on sound evidence of need for non-minerals related development and based on appropriate site selection criteria. The local plan preparation process provides the means for consultees, including the County, to make their views known on the potential sterilisation of valuable mineral resources arising from site allocations and also the practicalities of prior extraction which can then be taken account during the examination of the Borough/District Local Plans. It would be preferable to explore a protocol or mechanism with the County for ensuring that local plans conform to Policy MLP13 at an advanced stage of preparation and prior to adoption.

### SUMMARY

The words "which took account of minerals sterilisation" should be deleted from paragraph 5.140. The wording is insufficiently explained in terms of what information is required and potentially adds a layer of uncertainty on allocated sites in adopted Local Plans where the principle of development is for all intents and purposes is established.

### CHANGE TO PLAN

Delete the words - "which took account of minerals sterilisation" - in paragraph 5.140.

The document is unsound because it is not:  
iii. Effective

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

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

## Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mrs	
First name	C	
Last name	Millward	
Address line 1		
Address line 2		
Address line 3		
Postcode		
Email		
<i>For those replying on behalf of an organisation or group:</i>		
Organisation	Caunton Parish Council	
Job title	Clerk	

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

Response unanimously approved at parish council meeting on 10 February 2016

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

The submission of the Mineral Local Plan for independent examination	<input checked="" type="checkbox"/>
The publication of the recommendations of the inspector	<input checked="" type="checkbox"/>
The adoption of the Minerals Local Plan	<input checked="" type="checkbox"/>

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

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

Yes, I wish to participate at the oral examination	<input type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>
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**If you would like to participate at the oral part of the examination, please outline why you consider this to be necessary.** *Please note that participation in the oral hearing sessions is at the discretion of the Inspector.*

--

Signature		Date	23.3.16
Name	Mrs C Millward		

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

## Part B – Your representation

Office use only  
Person No: 2315  
Rep No: 29618

Please read the guidance note before completing this section.

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

Policy	<u>DM8</u>	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		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?	X	(4) Consistent with national policy?	
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You can select more than one test if you feel it is appropriate.

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

The parish council is of the view that the Minerals Local Plan is unsound being based on out of date gravel requirements which do not take account of the clear downward trend of gravel demand in the period 2006 to 2016.

They also object specifically to any extraction at Flash Farm, Averham, because of the serious negative impact of the increased HGV traffic on A617 at Kelham Bridge and consequent adverse effect on traffic flow around Newark. Any more traffic congestion around Newark will almost certainly lead to significant numbers of drivers using unsuitable country lanes and driving through villages such as Caunton to bypass Newark. This will be exacerbated whenever there are road closures, which will inevitably become more numerous with the overall increase in traffic. The cumulative impact of vehicles serving gravel extraction at this site coupled with the already increased traffic around Newark following the dualling of A46 will damage the economic viability of Newark and the surrounding area.

**The parish council therefore believes that, for these reasons, the document is unjustified and ineffective in the above respects**

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

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

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

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

<b>Signature</b>		<b>Date</b>	23.3.16
<b>Name</b>	Mrs C Millward		

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

## Part B – Your representation

Office use only  
Person No: 2315  
Rep No: 29619

Please read the guidance note before completing this section.

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

Policy	DM8	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		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?	X	(4) Consistent with national policy?	
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You can select more than one test if you feel it is appropriate.

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**The parish council therefore believes that, for these reasons, the document is unjustified and ineffective in the above respects**

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

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

<b>Signature</b>		<b>Date</b>	23.3.16
<b>Name</b>	Mrs C Millward		

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

Office use only  
Person No: 2392  
Rep Nos: 29645-29662

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



## Part B – Your representation

Office use only  
Person No: 2392  
Rep No: 29645, 29646 and 29647

Please read the guidance note before completing this section.

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

Policy	SP4 and Vision Statement	Site code	MP2r	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 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.

The significantly increased number of traffic movements created by the selection of Shelford West compared to Barton-in-Fabis has not been considered or commented on in reporting consultation responses to either the decision-making Council Committees or the public.

Insufficient attention has been paid to the major demand patterns in the county and the optimal choice of supply.

The practicality of the use of a conveyor in the manner described by the developer and the impact of moving 680k tonnes p.a. by this means has been ignored. This is an important element of the selection process.

These issues contravene the policy requirement to minimise the impact of operational practices on climate change.

**See further notes in paragraph 1, Locational Demands for Sand and Gravel on pages 2 and 3 of Attachment A.**

**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 scientific assessment of closeness of sites to market should be produced and the analysis of data provided in Attachment B should be properly considered in assessing the tonne-miles impact on the environment.

A thorough investigation and explanation of how the conveyor system for Shelford West can be buried below the water table and operated should be carried out.

The energy requirements of barge loading and conveyor transport should be properly assessed relative to those of other sites.

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

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

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

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

## Part B – Your representation

Office use only  
Person No: 2392  
Rep No: 29648 and 29649

Please read the guidance note before completing this section.

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

Policy	MP1	Site code	MP2r	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 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.

There needs to be further analysis of the need for sand and gravel in the county.

Despite the recent addendum justifying the requirement of 49.02 million tonnes this ignores projections made by others using different variables. These have not been commented on or investigated further. A "safety first" policy of over provision appears to have been adopted.

See further notes under paragraph 3 on page 2 of Attachment A.

**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.*

Further work needs to be carried out using other data submissions, more recent trend information and substitution information regarding recycled building materials.

The over-emphasis on supply-side information needs to be balanced by an examination of demand and where it occurs.

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

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

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

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

## Part B – Your representation

Office use only  
Person No: 2392  
Rep No: 29650 and 29651

Please read the guidance note before completing this section.

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

Policy	SP5	Site code	MP2r	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 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.

The effect of the number of vehicle movements onto the A6097 for aggregates from the Shelford West site has not been properly examined. In particular the Addendum to the STA dated February 2016, while recognising the possibility, fails to examine the implications of no barging of materials.

The selection of Shelford West goes against the requirements of SP5 in that sites should be close to markets and the main highway network.

The Highways authority state that the use of barging should be "thoroughly investigated" and this has not been carried out.

Although this is a critical element in the choice of this site, the investigations into the viability and practicality of this mode of transport have been minimal.

**See additional notes under Transport on pages 3,4 and 5 of Attachment A.**

**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 thorough investigation of traffic movements from potential sites serving the south of the county needs to be carried out.

The implications of barging not being used as a means of moving 180k tonnes of aggregates to Colwick need to be rigorously examined.

A proper and fact-based analysis of the practicality and viability of barging from Shelford West needs to be conducted and the probability determined of this mode of transporting materials actually being used in practice.

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

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

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

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

## Part B – Your representation

Office use only  
Person No: 2392

Rep No: 29652, 29653 and 29654

Please read the guidance note before completing this section.

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

Policy	DM2 and Vision Statement	Site code	MP2r	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 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.

The parameters of flood risk are continuously changing and the significant impact of climate change is only being coarsely estimated.

The risk to Shelford is high, a fact recognised by the developer who intends to raise the flood banks which protect the village.

The Plan Vision Statement specifically calls for a reduction in flood risk and the selection of Shelford West runs contrary to this.

The choice of this site is a high risk strategy which has implications for other villages on the north western bank and downstream of Shelford. This risk has not been properly assessed since data sets that have been used are inaccurate and out of date.

**See further notes under Flood Risk on page 5 of Attachment A.**

**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 more up to date and accurate flood risk assessment for Shelford West needs to be prepared taking into account plans for flood alleviation on the Trent flood plain.

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

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

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

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



## Part B – Your representation

Office use only  
Person No: 2392  
Rep No: 29655 and 29656

Please read the guidance note before completing this section.

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

Policy	DM5	Site code	MP2r	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 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.

Policy states that there should be no adverse impact on the character and distinctiveness of the landscape.

Clearly there will be a major impact from the selection of Shelford West and our own surveys show that the view is highly valued.

Insufficient attention has been paid to this element of the selection criteria and there is no evidence to show that the impacts have been properly assessed or that the wider communities' views have been considered.

**See further notes under Landscape on page 6 of Attachment A.**

**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.*

There needs to be further assessment of landscape impact for Shelford West and the views of the wider community need to be taken into account.

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

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

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

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

## Part B – Your representation

Office use only  
Person No: 2392

Rep No: 29657 and 29658

Please read the guidance note before completing this section.

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

Policy	DM6	Site code	MP2r	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.

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### 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 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.

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Policy states that adverse impacts on any designated or non-designated heritage assets and/or their settings should be avoided.

Historic England, in a previous consultation, has already recorded that there would be "significant and environmental effect on the historic environment" from the selection of Shelford West.

Insufficient attention has been paid to this risk for an area that is rich in sites, buildings and ancient monuments.

**See further notes under Heritage on page 6 of Attachment A.**

**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.*

Further work needs to be carried out on the risk to the historic environment by the selection of Shelford West.

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

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

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

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

## Part B – Your representation

Office use only  
Person No: 2392

Rep No: 29659 and 29660

Please read the guidance note before completing this section.

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

Policy	DM8	Site code	MP2r	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 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.

There has been a major failure to assess the cumulative impacts of an extension of the site into Shelford East.

Both NCC policy and national Planning Regulations require that this is considered for projects that are "reasonably foreseeable" and "likely to progress". Since NCC's selection policy is to extend existing sites where possible, both of these need to be addressed.

Shelford East is being treated and assessed as a separate site but its development is inextricably linked to Shelford West. The impact of this massive development (already being alluded to by the developer in emails to the Highways Authority) has nowhere been examined.

See further notes under Cumulative Effects on page 7 of Attachment A.

**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 thorough examination of the cumulative impacts of the selection of Shelford West needs to be conducted and the two sites need to be treated holistically in order to properly assess the effects on the local and wider communities.

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

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

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

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

## Part B – Your representation

Office use only

Person No: 2392

Rep No: 29661 and 29662

Please read the guidance note before completing this section.

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

Policy	All	Site code	MP2r	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 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.

Although the national Planning Framework allows for this method, the sole use of the points scoring system for the evaluation of sites is subjective and inappropriate.

**See further notes on page 2 of Attachment A.**

**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 sole use of a purely subjective points scoring system needs to be replaced with a more objective approach to site selection.

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

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

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

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



## Attachment A

### Response to Notts. CC Draft Minerals Local Plan 2016 Consultation February 2016

Shelford Parish Council and Shelford's local community action group, SAGE, wish to submit the following objections and observations to Nottinghamshire County Council's Draft Minerals Local Plan 2016.

The two groups are submitting a joint response as they did when responding to Notts. CC consultation on Shelford West in December 2014.

This current joint response includes the technical document submitted in December 2014. It will be referenced in relevant sections of our additional supporting objections as "Shelford West Consultation December 2014" (**Attachment B**) with the appropriate section.

### General Objections and Observations on the 2016 Draft Minerals Local Plan

#### We object to the Draft Minerals Local Plan on the following grounds :

1. The Minerals Local Plan Consultation Submission Draft 2016 does **NOT** include either a methodology or justification for individual site selection. This is particularly relevant in terms of site selection for new sand and gravel sites where there are numerous alternative sites available to those identified in the Draft Plan. This underlines a lack of clear strategy in the Plan leading to an apparent piecemeal allocation of sites.
2. We consider there is an over-emphasis in the Draft Plan given to ecological issues, driven by the Local Biodiversity Action Plan, at the expense of community interests. Following the catastrophic floods that hit northern England in December 2015, the Chief Executive of the Environment Agency, Sir James Bevin, under extreme criticism that the public interest had been sacrificed for wildlife protection was forced to declare that "people will always come first." Whilst **Strategic Objective SO5, Minimising Impacts on Communities, and Strategic Objective SO6, Protecting and Enhancing Natural Assets**, sit side by side in the Nottinghamshire Draft Minerals Plan there is little evidence that **Objective SO5** has had any bearing on policy or site selection. For example, there is significant detail included in **SP3, Biodiversity-Led Restoration in the Plan**, compared to **SP6, The Built, Historic and Natural Environment** where "Community amenity" merits little attention. We contend that insufficient attention has been given in the Draft Plan to community interests such as employment, social capital invested in communities, and quality of life. (See Section 10 "Employment" and Section 11 "Human Health and Quality of Life" in Shelford West Consultation December 2014.

3. We contend that **Minerals Provision Policy SP2, 1b)** has not given priority to the extension of existing sites nor under **SP, 1c)** proved the NEED to allow development on previously non-allocated greenfield sites. The need for 49.02 million tonnes of sand and gravel over the plan period, as identified in **Policy MP1, Aggregate Provision**, has not been proven and is based on considerable conjecture leading to what we believe is an over provision of sites for aggregate extraction.  
(See Section 2 “Supply” in Shelford West Consultation December 2014)
4. We note that the submitted Draft Minerals Local Plan 2016 will be accompanied by a final Sustainability Appraisal (SA) report. Our experience of involvement at an earlier stage with this latter report has led us to seriously question the approach adopted. We believe the procedure lacked transparency. There has been no published evidence for the basis of SA scoring of sites, how they were inputted, and how final scores were arrived at. It is understood that the scoring was conducted internally by NCC staff, whereas good practise would require assessment by an independent authority. We also question the validity of an arbitrary and entirely subjective points-scoring approach in site assessment and selection in the SA report. A similar subjective, weighting approach applied to landscape evaluation in the late 60s and early 70s was widely criticised and is now discredited by professionals.

It is worth noting that in their response to previous consultations, Derbyshire County Council sought clarification as to why SA was used solely as the method of assessing site potential.

### **Specific Objections/Observations to the Allocation of Shelford West**

#### **We object to the inclusion of Shelford West in the Draft Minerals Local Plan on the following grounds:**

##### **1. Locational Demands for Sand and Gravel**

The draft Minerals Plan's **Vision Statement** says “...*mineral development will be concentrated in locations that offer the greatest level of accessibility to major markets and growth areas...*”

The inclusion of Shelford West runs counter to this expressed vision. We believe that this site is a poor choice of location to satisfy future large scale developments. Most of these, such as the HS2 rail link and proposed terminal at Toton sidings, developments associated with East Midlands airport and a major housing scheme at Clifton, lie to the West of the Nottingham conurbation.

Shelford West is also a poor choice to satisfy future housing demands, particularly large schemes in Clifton and Beeston. Compared to sites to the West of Nottingham, such as Barton-in-Fabis another deliverable site, and based on tonne/miles to the markets of Rushcliffe, Broxtowe and Nottingham City then Shelford West is a significantly sub-optimal site. The situation is compounded by the imminent closure of the Cemex Attenborough site.

(See Section 2.2 “Demand” and “Appendix A Tonne/Mile Analysis” in Shelford West Consultation December 2014)

Delivery to these markets from Shelford West would involve lorry movements from either Shelford or Colwick through urban areas (Lowdham, Burton Joyce, Radcliffe-on-Trent, West Bridgford, Nottingham City, Clifton). This has a significant impact on both congestion and climate change and contravenes **SP4 Climate Change** and **SP5 Sustainable Transport**.

The Plan is **unsound** since major market weightings and closeness of sites to market have not been properly assessed.

## 2. Transport

### 2.1 Lorry movements

We believe that **Policy DM9, Highways Safety and Vehicle Movements/Routeing ( a and b)** runs contrary to the selection of Shelford West as a suitable site for sand and gravel extraction.

It is proposed to transport 64% of the annual output of 500,000 tons of sand and gravel from the site on to the A6097. This is already a highly congested single carriageway highway. We calculate that the output as forecast would lead to the movement of a Heavy Goods Vehicle every 5 minutes seeking access and egress from the site on to the road. If the proposed use of barges to transport 36% of the aggregate proves unsuccessful and operational restrictions apply then this could potentially lead to HGV movements on to and off the A6097 every 3 to 4 minutes. We believe that the level of proposed HGV movements from the site on to the A6097 is seriously underplayed. We are conscious that traffic pressure has dramatically increased recently on this section of the A6097 as the near-by and newly dualled A46 attracts more and more traffic on to the A6097.

(See Section 3 “Access and Transport” in Shelford West Consultation December 2014).

The publication of the Addendum to the Strategic Transport Assessment dated February 2016 makes a number of unfounded assumptions:

- i) *In the likely event that the material moved by barge replaces material currently imported by road and processed at the batching and asphalt plants this could therefore represent a net reduction in HGV movements equal to 35 HGV loads a day (70 HGV movements two way).*

This is not a “likely” event. It is pointed out in the next section that existing plant operators have their own source of supply and discussions with them have indicated no current plans to change this.

*ii) As a sensitivity test there are a number of other possible transportation scenarios that could be considered;*

- None of the material is moved by barge and all material is exported via road through the proposed A6097 access.*

- 180,000 tonnes of material p.a. is barged to Colwick but only half of this is then processed at the batching plants and the remaining half is exported by road from Colwick.*

- 180,000 tonnes of material barged to Colwick and all of this subsequently moved by road elsewhere, i.e. not processed in Colwick.*

None of these scenarios are tested as to their possible outcomes. It is shown below (under section 2.2 Barge Transport) and the Shelford West Consultation December 2014 (Section 3.6 Barge Movements) that the use of this method cannot be accepted as a given in any assessment of road transport.

The reliance on incomplete and patchy information on traffic impacts and the contravention of **SP5 Sustainable Transport** in two respects

**2.1.1** *...all new mineral working.... Should be located as follows: within close proximity to existing or proposed markets to minimise transport movement*

**2.1.2** *and within close proximity to the County's main highway network.... In order to avoid residential areas, minor roads and minimise the impact of road transportation.*

makes the Draft Plan **unsound**.

## **2.2 Barge Transport**

The use of barge transport from Shelford West is a key determinant in the choice of this site. It has been accepted that this method will be delivered with little investigation into

**2.2.1** Demand at Colwick for sand and gravel for concrete batching. Existing producers own their own source of aggregates and have established quality control procedures. Without a market for Shelford sand and gravel, storage facilities for 700 tonnes per day would need to be found and this is impracticable.

**2.2.2** The economics of barging and whether this gives a realistic prospect of its use

**2.2.3** The availability of suitable barges and the capability of the river infrastructure (Locks, depth of channels)

This is despite a statement from Notts. CC Highways Authority (in an email to the developer's consultants dated 25<sup>th</sup> June) that *"the removal of sand and gravel from the site via the adjacent River Trent should be **thoroughly** investigated in the first instance"*

The lack of thoroughness in checking the viability of barging as a major element in the choice of Shelford West makes the Draft Plan **unsound**.

### **3 Flood Risk**

We consider that **Policy DM2, Water Resources and Flood Risk, Flooding 2 a, b, and c** runs contrary to selecting Shelford West as a suitable site for mineral extraction and that the flood risk to this part of the Trent Valley has not been adequately assessed. There is no evidence in the Minerals Plan to show the flood occurrence or scale of flooding related to a site's sensitivity to flooding. There are numerous villages at threat from flooding in this part of the Trent Valley ie. Bulcote, Burton Joyce, Lowdham, Gunthorpe, and Stoke Bardolph, whilst Shelford itself is located in the highest risk area of the floodplain. We are also concerned that at times of flooding at a location of a meander, such as on the Trent at Shelford, then the process of "pit capture" can occur. Quarrying between the Trent and Shelford could potentially alter the course of the Trent with flood water seeking the easier route through the workings and thus bringing the river to within several metres of the village. (See Section 4 "Flood Risk" in Shelford West Consultation December 2014)

The Plan **Vision Statement** says *"Quarries will be designed, operated and managed in ways which help to reduce flood risk, particularly in the Trent Valley flood plain....."*

The potential operators of Shelford West accept that a greater flood risk will occur as they will raise the village inner defences.

The acceptance of such major risk factors without further investigation makes the choice of this site **unsound**.

### **3 Climate Change**

Policy **SP4 Climate Change** states *".....operational practices....should minimise their impact on the causes of climate change....."* and be *"...operated to reduce greenhouse gas emissions, withstand unavoidable climate impacts and move towards a low carbon economy."*

The choice of the Shelford West site goes against this policy in three respects:

- 3.1** The amount of energy required to operate the conveyor is substantial (see Shelford West Consultation December 2014; Section 5 – Climate Change). This has increased since the potential developer has made it clear that they intend to transport 180k tonnes of aggregates to the processing plant for screening and back again to the barge wharf. This means that the conveyor will now move 680k tonnes p.a.
- 3.2** It has been stated that the conveyor would be countersunk along its entire length in order to “*minimise impact on surrounding area*”. This is impractical as this would site the conveyor below the water table and cross Manor Lane along which runs a major water main.
- 3.3** Slow, stop start lorry movements along urban roads and longer routes to major markets will be a cause of significantly greater emissions than more optimal sites.

This conflict with policy and the lack of rigour in checking the routeing of the conveyor makes the choice of Shelford West **unsound**.

#### **4 Heritage**

We object to the proposed sand and gravel site at Shelford West because it would damage one of the richest and most important area of Nottinghamshire’s history and heritage. By the selection of Shelford West there is immediate conflict with **Policy DM6, Historic Environment 1a)** which purports to avoid adverse impacts on any designated or non-designated heritage assets and/or their settings. The proposed quarry together with a conveyor belt to transport aggregate to the proposed processing plant adjacent to the A6097 would both have a dramatic impact on this historic area. There are well preserved archaeological remains within and under the alluvial deposits around Shelford with Roman and Saxon artefacts already unearthed. In its response to earlier consultation on Shelford West, Historic England has already recorded that there would be “significant environmental effect on the historic environment”. In addition to the numerous catalogue of Listed Buildings and Ancient Monuments in and around Shelford, the village and surrounding area is a renowned location for events during the English Civil War. These are catalogued in (Section 7 “Historic Environment” in Shelford West Consultation December 2014).

This conflict with policy makes the choice of Shelford West **unsound**.

#### **5 Landscape**

**Policy DM5, Landscape Character** runs contrary to selecting Shelford West as a quarry site in that there is no demonstrable evidence to suggest that there will be no adverse impact on the character and distinctiveness of the landscape.

Shelford Hill overlooks the proposed sand and gravel extraction site at Shelford West. The hill is one of the highest points on the southern escarpment overlooking the Trent Valley. This is a prominent and well-known viewpoint and the view from here overlooking the valley and has been eulogised since Victorian times in paintings and writings.

To assess the value of the view to local people a community landscape survey involving local villages was conducted in 2009. Responding to the survey, 416 respondents (96%) deemed the view “Very Important” and 4% as “Important”.

All respondents recorded that this view should be protected at all costs. Quarrying below Shelford Hill would destroy one of the finest and most iconic views in Nottinghamshire.

(See Section 8 in Shelford West Consultation Document December 2014).

This conflict with policy makes the choice of Shelford West **unsound**.

## **6. Cumulative Effects**

**Policy DM8, Cumulative Impact** requires that it should be demonstrated that there would be no cumulative impacts of minerals development on the environment or on the amenity of a local community.

By selecting Shelford West as a minerals site, Nottinghamshire County Council’s Minerals Team have failed to take into account the high likelihood of an adjacent and foreseeable related development for a second quarry.

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 requires a development plan to consider plans and projects which are reasonably foreseeable and are likely to progress. The proposed developer (Brett) promoting Shelford West has already indicated a wish to develop an adjacent site in the future at Shelford East. There is a high likelihood that this would go ahead once Shelford West has been completed as the developer is currently proposing to site a processing plant for Shelford West on a future Shelford East site. This future development would also then be seen as appropriate as it would be an extension to an existing site rather than a new development. This multiple impact has **not** even been mentioned in the draft Minerals Plan even though the developer had submitted plans to the local authority for Shelford East but is not currently pursuing them to concentrate on Shelford West.

The lack of any assessment of the cumulative impact is a major weakness and makes the draft Minerals Plan **unsound**.

**This document forms part of a pack which includes the Representation Form, this attachment (Attachment A) and the Shelford West Consultation December 2014 (Attachment B).**

B Squires, Chair, Shelford Parish Council and R Whysall, Chair, SAGE  
March 2016

**Shelford and Newton Parish Council**

**and**

**S.A.G.E**



**Response to:**

**Nottinghamshire County Council  
Minerals Local Plan Consultation  
Additional Consultation on Shelford West**

**December 2014**



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**This document has been prepared for Nottinghamshire County Council by Shelford and Newton Parish Council and SAGE in response to the Consultation on the Shelford West site.**

## **Summary**

### **The Requirement for Sand and Gravel**

- Evidence has been produced which we believe shows that the forecast demand for aggregates is overstated.
- We have shown, using a tonne/miles analysis, that Shelford is not an optimum site to meet the demand in the south of the county.

### **Access and Transport**

- It has been argued that increased heavily laden, slow moving lorries, moving onto and off an already severely congested A6097, with all the attendant risks, is not acceptable as a sustainable transport solution.
- The unlikelihood of barge transport being used has been demonstrated and this has been affirmed by industry sources.

### **Flood Risk**

- The long term risk in the Sustainability Analysis is undetermined. We have argued that the long term risk is as uncertain as the operational risk. Factors that we have noted include risk of flooding from all points of the compass and “pit capture”.

### **Climate Change and Energy Efficiency**

- Because of the use of a long conveyor system, Shelford West compares unfavourably with other sites where loading and transportation are less carbon and energy intensive. Access to the main trunk road is also more energy and carbon inefficient. We cannot see any attempt to maximise renewable energy opportunities due to the high energy loads required to drive the plant and equipment.
- We also argue that in the long term climate change will be negatively impacted as a result of the permanent loss of carbon absorbing plants, trees and hedges and their replacement with open water. No renewables are mentioned in the developer’s plans to offset 14 years of negative carbon emissions.

### **Biodiversity**

- The ecological impacts following new proposals by the developer have not been adequately considered and have far reaching damaging consequences for biodiversity.

## **Historic Environment**

- The impact of sand and gravel extraction on this heritage has not been adequately considered. Not only are heritage sites themselves under threat but also the means of access to them.

## **Landscape**

- Sand and gravel extraction at Shelford West would add to the unacceptable change to the traditional and cherished landscape character of the Trent Valley.
- We have argued that at Shelford West views over the Trent Valley from Shelford Hill have not been accorded sufficient value in the landscape assessment. We also contend that with the proposed after-use, the cumulative damaging impact of yet more lagoons on the Trent Valley landscape has not been given sufficient weight.

## **Air Quality and Pollution**

- Because of the nature of the valley as a natural bowl which collects emissions and then spills them into surrounding settlements, we believe that the additions to the particulates caused by quarrying and traffic movements would be very detrimental to health of both human, plant and animal life.  
These arguments are supported by a local doctor and his evidence is included as an appendix.

## **Employment**

- It has been demonstrated that the potential job losses resulting from the development of this site are far reaching and well in excess of any minor job opportunities that are created.

## **Human health and Quality of Life**

- The villagers of Shelford are very active and strongly value their close knit community and quality of life. We strongly contend that the social capital of a community, built up over the years, should be given equal consideration alongside environmental factors when development proposals are being assessed. So far this has not been the case.
- We have argued that continuing anxieties over flood risk, loss of amenities such as the popular Trent Valley Way, access to the river, the probable extension of the site to its original size together with the development of Shelford East and the significant risk of mosquitoes breeding in the lagoons would have a very detrimental effect on quality of life.

- These effects would be in the long term as well as the operational period and the argument that increased flood defences “could have a beneficial effect” has been rejected as having no substance.

### Other Observations

- We have noted that the Shelford West should be restored to “high quality agricultural land if that is possible”.
- The restoration proposals do not allow for any agricultural land of any quality. The loss of 550 acres of food production, two farms and a family home are a very negative trade off for the excavation of gravel.

### Conclusion

As a result of the evidence and arguments that we have produced we have revised the Sustainability Analysis scores as follow:

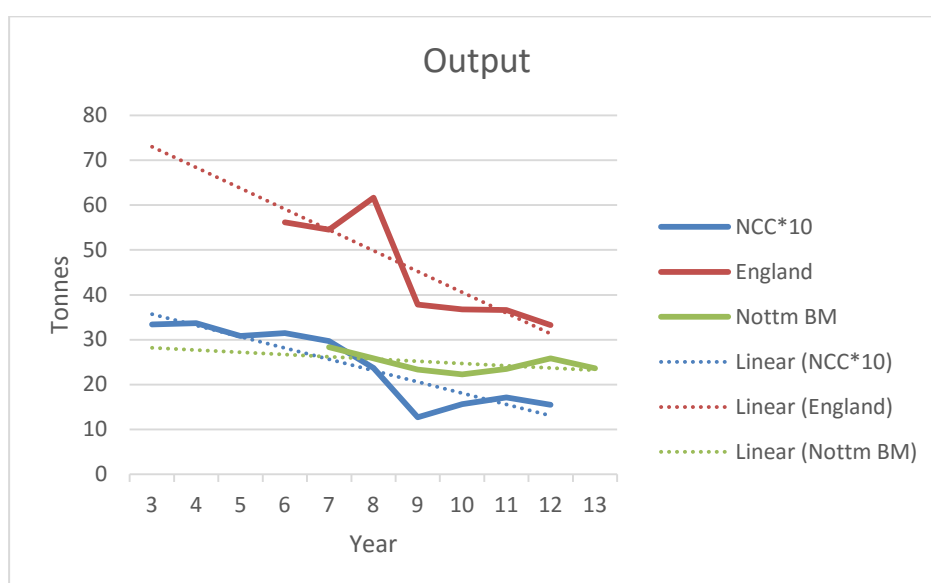
Period	Current NCC	Amended
Operational	-9	-26
Long term	0	-15

## 2 The Requirement for Sand and Gravel

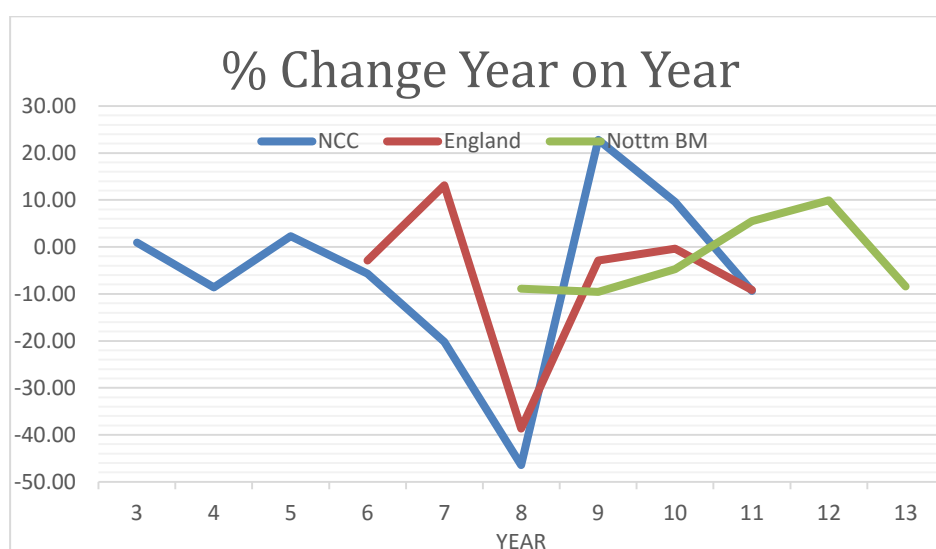
### 2.1 Supply

**2.1.1** The current numbers for the 7 year supply indicator are fluctuating very close to that figure. In 2013 the Local Aggregates Assessment was slightly above and in 2014 slightly below, based on the 10 year moving average.

**2.1.2** There is considerable doubt about the sustainability of current trends in the demand for aggregates and both national and local indicators point to a flattening of both house price indicators, new housing starts, economic growth (which it is reported co-relates closely to demand) and sales of sand and gravel. (See figures 1 and 2)



*Fig. 1 Output of Sand and Gravel (Nottm. BM is the area's largest builder's merchant)*



*Fig. 2 Change in output of sand and gravel.*

Demand at Nottingham's largest builder's merchants has remained fairly resilient over the last 6 years, only reducing slightly during the recession. It has now started to fall back along with national and local indicators. The figures from the merchant are unaffected by exceptional items like the extension of the tram network.

**2.1.3** On 24th October the BBC reported that:

*House prices in England and Wales fell by 0.2% in September - the biggest monthly fall in nearly a year, according to the Land Registry.*

*Annual house price inflation also fell, from 8.4% in August, to 7.2% in September.*

*That is the first time since May 2013 that the yearly rate has gone down, the Land Registry said.*

*The largest monthly fall was in Yorkshire and Humberside, where prices declined by 2.2%*

**2.1.4** On the same day, the Guardian reported:

*A rise of 0.7% – a slowdown from 0.9% in the second quarter – was in line with most forecasts. But after recent economic indicators showing a weaker housing market, and slower manufacturing and consumer spending, some had feared growth could be weaker.*

*Economists said that while growth remained strong, it was unlikely to return to the pace seen earlier in the year. "We expect the recovery to soften a little further in the fourth quarter as the single currency area records little growth while a confluence of factors – principally the potential for rate hikes in the next 12 months and political uncertainty – drag a little on domestic growth," said Rob Wood, chief UK economist at the Berenberg bank.*

*And on the same date The Times stated that the number of mortgage approvals were down 10% year on year and that the effects of "more stretched house price-to-earnings ratios, prospective interest rate rises and tighter checks by lenders"*

**2.1.5** It has been stated that there is a linkage between GDP and output of aggregates. This linkage was tested using ONS GDP statistics and output figure supplied in the LAA. The result is shown in both the comparative and scatter charts shown below.

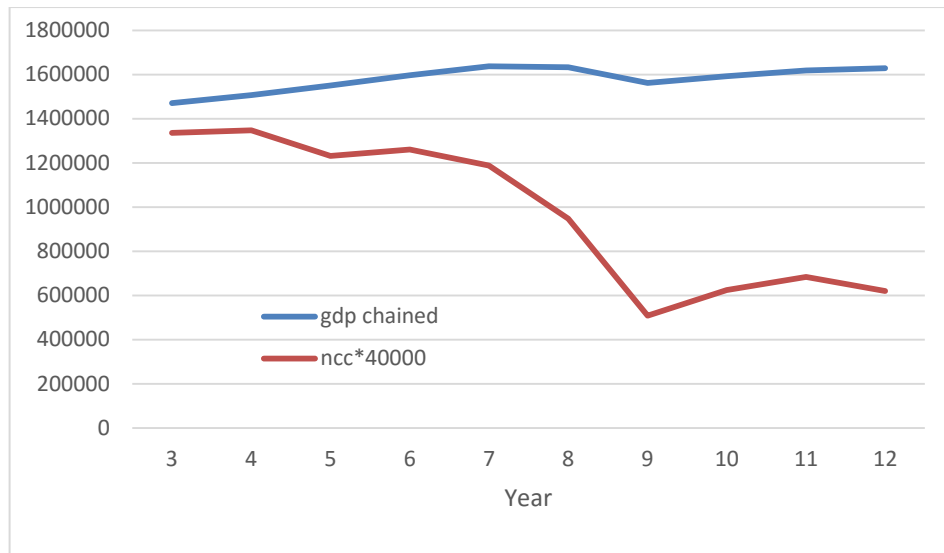


Figure 3 GDP and Notts aggregate output

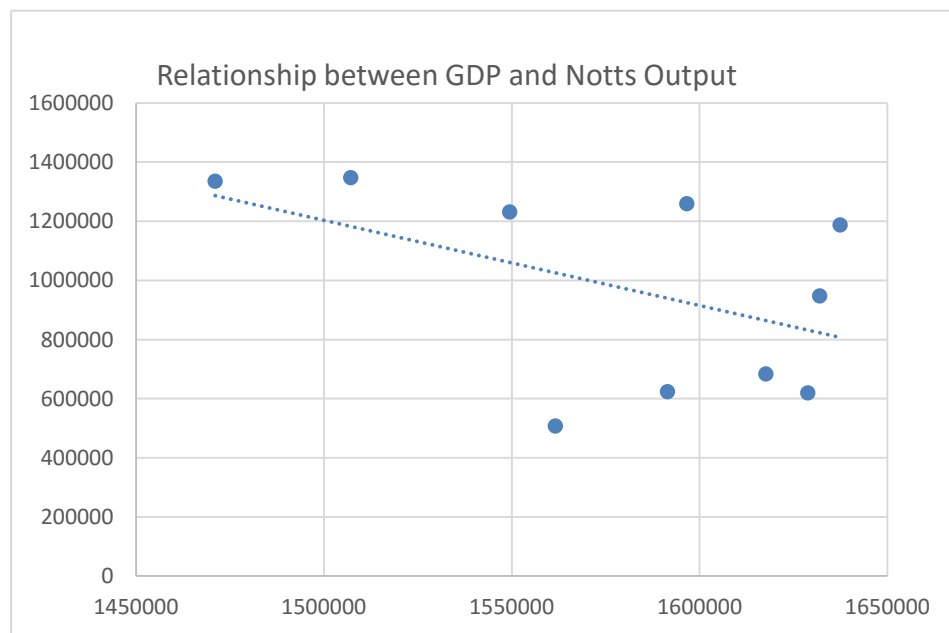


Figure 4 Scatter Diagram

It may be thought that a declining trend line would indicate a weakening of the relationship between output and GDP. However correlation analysis between the data was carried out and tested for significance. ***There exists no statistically significant relationship between GDP and Notts output of aggregates.***

**2.1.6** It appears that no allowance has been made for imports or recycled materials as a component of demand although the Local Aggregates Assessment (LAA) states that



250,000 tonnes (including sandstone) were imported in 2009 and 6.8 million tonnes of alternative aggregates are forecast to be produced in the East Midlands up to 2020.

The URL/Scott Wilson SFRA produced for the Council in 2011 notes:

*“Although resource depletion will not be a problem, finding sufficient environmentally acceptable sites to continue production at current levels much beyond the plan period is likely to be a fundamental issue for the future. This can only reinforce the need for significant long-term reductions in dependence on sand and gravel for meeting demand for aggregates”.*

- 2.1.7** Trent Farm, which is just in Derbyshire, produces around 220,000 tonnes p.a. all of which is transported to Attenborough in Nottinghamshire. Imports may well be understated.
- 2.1.8** On a population basis, an alternative aggregates figure for Nottinghamshire would be 1.5mt p.a. which is a very significant contribution to meeting demand.
- 2.1.9** It is recognised that forecasting is not an exact science and that over a period of 7 years there can be many variable shifts, **but we do believe that in view of at best, flat predictions and the evidence produced above, the requirement for new sites is overstated.**

The trend before the recession in 2008 was already downwards. Even at an annual growth rate of 10%, it would take until 2020 to reach the output levels of the beginning of the decade; at this point the 10 year rolling average would be 2.27mt. The 3 year average is 1.61mt and **the most that we can see is 2mt over the next 5 years and this would remove the need for at least one additional new allocation.**

**It is suggested, that in the light of these projections and the considerable variations and uncertainty in establishing the requirement to 2030, a shorter planning time frame is adopted and that monitoring and review of data is conducted every five years.**

## **2.2 Demand**

- 2.2.1** Analysis of housing figures for the south Nottinghamshire districts of Rushcliffe, Broxtowe and Nottingham City are shown in **Appendix A.**
- 2.2.2** Based on the projections provided by each authority and an average quantity of aggregates used in a standard three bedroomed detached house, a tonne miles figure has been calculated for each of the sites that could best serve these districts. Google maps were used to calculate distances.

**2.2.3** The average figure of 50 tonnes of aggregates used in a build was taken from three separate industry sources and is shown in **Table 1** below:

Source	Estimate of amount of concrete (m3)*	Estimate other building applications (tonnes)	Total (Tonnes)
Builder 1	40	15	65
Builder 2	35	12	57
Concrete Manufacturer	30	10	48
Average			56.6

*Table 1 Average weight of aggregates per 3 bed house*

*\*1m<sup>3</sup> of concrete weighs 2.2 tonnes and one tonne comprises 582kgs of aggregate, 286kgs of cement and 142kgs of water.*

**2.2.4** **Table 2** shows a summary of the results. In terms of meeting the needs of the principal markets in South Nottinghamshire (Rushcliffe, Broxtowe and Nottingham City), **Shelford clearly has the second highest tonne/miles total by a factor of 29%.** If Gedling is factored in, the figure reduces to 11% but a combination of Barton (for South Notts) and Averham (for Gedling) results in a 13% difference. (See **Table 3**)

Housing Tonne/Miles per District/Borough							
District	Shelford	Barton	East Leake	Coddnton	Averham	Diff. Shelford v Barton	%
Rushcliffe	4,875,119	3,747,738	4,395,833			1,127,381	
Broxtowe	4,007,240	2,703,322	3,677,341			1,303,918	
Nottm. City	5,264,750	3,616,350	6,289,450			1,648,400	
<b>Total South Notts.</b>	<b>14,147,109</b>	<b>10,067,410</b>	<b>14,362,624</b>			<b>4,079,699</b>	<b>28.8</b>
Gedling	3,640,217	5,842,828		6,959,192	5,355,276	-2,202,611	
<b>Total inc. Gedling</b>	<b>17,787,326</b>	<b>15,910,238</b>				<b>1,877,088</b>	<b>10.6</b>

*Table 2: Tonne/miles to major housing markets from selected sites*

	Shelford	Barton + Averham	Difference Shelford v Barton +Averham	%
<b>Total inc. Gedling</b>	<b>17,787,326</b>	<b>15,422,686</b>	<b>2,364,640</b>	<b>13.3</b>

*Table 3: Tonne/miles to major housing markets from selected sites*

**2.2.5** The analysis shows that house building accounts for a very small proportion of total output.

	Housing tonnes required
Rushcliffe	528,500
Broxtowe	266,350
City	659,150
Gedling	296,800
Ashfield	336,000
Mansfield	318,000
Newark	444,000
Bassetlaw	210,000
Total housing demand	3,058,500
Total extraction @ 2.58mt pa over 13 yrs	33,540,000
Exports at say 65%	(21,801,000)
Imports 260kt x 13yrs	3,380,000
Alternative Aggregates 1.5mt x 13yrs	19,500,000
Total Local Supply	34,619,,000

*Table 3 Total Local Housing Demand and Supply*

**2.2.6** This seems to indicate that Nottinghamshire housing alone is less than 10% of supply or that total demand is overstated as the previous section argues. However several other components need to be included:

- Housing infrastructure - roads, pedestrian routes, medical centres, schools etc. It is estimated that this could double the housing tonnes required.
- Industrial and Commercial infrastructure. This will be a substantial element of demand.
- Public infrastructure. This will include major public works like extensions to the tram network and the building of HS2.

All of the above additional elements of demand are likely to be significant users of recycled materials.

Although all districts/boroughs are planning employment space (which will be adjacent or within a short travel distance of housing developments), the major areas will be in Greater Nottingham.

The Nottingham City Aligned Core Strategy (ACS) states *“develop 310,000 sq. m of office space by 2028” and “develop 37 hectares of industrial and warehouse uses (Broxtowe 15 hectares, Gedling 10 hectares and Nottingham 12 hectares)”*

In addition, B1, B2 and B8 industrial premises are proposed for Clifton South and the Boots complex at Thane road has been designated an Enterprise Zone.

The development of public infrastructure will be **centred to the south of the county** and will consist of HS2 building works and associated transport links. It is not clear at the time of writing whether the Hub Station will be at Toton or Breaston. These sites are only 3 miles apart and will be best served from extraction sites adjacent to the M1 junction with the Cemex plant at Trent Farm making a major contribution.

The ACS makes the assumption that Toton is the preferred site for the HS2 hub and states *“The preferred location for an HS2 hub station at Toton will .....make the area attractive to inward investment, will lead to significant job creation and will add to the sustainability of appropriate mixed use development in close proximity to the station.”*

- 2.2.7** An analysis of the siting of concrete plants in Nottinghamshire has been conducted and the findings show that they are relatively evenly dispersed. Most major developments use on-site mixing plants and fixed plants serve smaller schemes and are generally close to the markets they serve. The average concrete plant consumes around 13,000 tonnes of aggregates p.a.

One major producer of concrete has plants in Basford, Heanor, Loughborough, Mansfield and Newark. Other manufacturers’ facilities are similarly placed around the county.

The assumption is therefore made that tonne/miles for concrete plants will broadly follow that for housing.

**In conclusion it is clear that the housing demand, together with major developments to the south of the county, point to Shelford West being a significantly sub-optimum site.**

### 3 Access and Transport

**We object to the inclusion of Shelford West as a possible excavation site for sand and gravel because of the proposed access point from site direct on to the A6097 and the additional issues referred to below:**

**3.1** The most recent Brett Proposal indicates that 36% of the 500,000 tons per annum is to be transported by barge from Shelford to Colwick and that access for all of the Brett HGVs would be directly onto or off the A6097 just south of Gunthorpe Bridge i.e.

a) Immediately adjacent to the renowned "bottleneck" for traffic travelling southwards over the Bridge and

b) Part way up the 1:33/1:35 gradient hill leading to the A46

**3.2** At a meeting with Shelford and Newton Parish Council on 16 October, an officer from NCC Highways Department confirmed that HGV processing plant access will be allowed in both directions onto and off the A6097. At the same time it was suggested that, for safety reasons, additional traffic lights would need to be installed about 800 yards downhill from the existing signals at East Bridgford and only about 350 yards from Gunthorpe Bridge. Significant congestion already occurs here from both directions (as confirmed by the longstanding Highways signs warning of congestion (see Appendix B, Picture 1). This is as a result of:

a) Vehicles travelling south being held up by those attempting to turn right in to Manor Lane across the oncoming traffic

b) Vehicles travelling north held up by those turning right into Gunthorpe

b) Vehicles exiting out of Manor Lane and Trent Lane.

**3.3** Current NCC Highways Policy:

a) On Nottinghamshire A roads, restrictions will normally be applied "*on new access for vehicles on roads with a speed limit above 40mph*".

The speed limit on the A6097 at the proposed site access point is **60mph**.

b) That "*new development is only permitted if the environment is not harmed, including through increased congestion*".

Such a policy would clearly be contravened by means of this new access as there will without doubt be **substantially increased congestion**. As a result it is difficult to see how such a new development can be contemplated and approved.

**3.4** Brett's proposal would add further congestion and safety hazards:

### 3.4.1 For southbound traffic:

- a) there are already very regular tailbacks towards Lowdham whilst waiting for vehicles attempting to turn right in to Manor Lane (and also due to vehicles exiting from both Manor Lane and Trent Lane).
- b) once past the Manor Lane junction, there will be an additional delay and backed up traffic caused by:
  - proposed new signals to allow site access and egress. If the light delay is, say 20 seconds, then the tail back would be around 12 vehicles which equates to a vehicle queue of about 60 metres.
  - once the lights have changed to green, those same vehicles will then have to follow a fully laden minimum 32 gross weight HGV carrying a 20 ton load which will be starting from a stationary position at the site entrance and immediately climbing up the 1:33/1:35 gradient hill. It is suggested that this will result in the ensuing queue not reaching 40mph (in what is a 60mph limit) by the time these vehicles reach the lights at the top of the hill, thus further adding to the delay caused by the original signals.
  - When the lights change to green, returning HGVs will be waiting to turn into the site causing further tail backs. These vehicles will be attempting to turn right across continuous northbound traffic travelling at 60mph down the hill from the East Bridgford traffic lights. We suggest that since there is not the space for a filter lane, the increased congestion would be very significant and our synchronisation modelling does not show any alleviation of this. The timing of the East Bridgford traffic lights is such that in the 1 1/2 minutes green light phase as many as 36 vehicles travel down the hill. This could prevent the returning Brett HGVs from turning right until the northbound carriageway becomes clear which would result in southbound traffic building up **by a further 36 vehicles** or an additional queue of over 325 metres. This assumption makes no allowance for the fact that subsequent traffic coming out of East Bridgford and Newton onto the A6097 has not yet caught up with the original 36 vehicles. This could create totally unacceptable delays and significantly breach the NCC Highways Policy.

### 3.4.2 For northbound traffic:

After the East Bridgford traffic lights turn green for 1 1/2 minutes, approx 36 vehicles can start down the hill at 60mph towards the proposed new signals. Since these will be installed only around 800 yards from the existing lights, the vehicles will only just have reached 60 mph before some, dependant on the synchronisation of the lights, will have to stop again. There is inevitably an increased safety risk for vehicles travelling down a hill at 60 mph as they approach the new lights, especially in conditions of poor visibility. Often there are also long tailbacks to the south; for example, on 30 Oct 2014 traffic was stationary all the way back from Lowdham roundabout to the slip road from the A46.

### 3.5 Other issues

**3.5.1** Following heavy rains in 2013 a section of the A6097 collapsed at a point where the site entry and exit is planned and there need to be serious questions raised about the proposal to allow an additional 126 HGVs weighing 32 tonnes to access this major road. There will also be very substantial earthworks necessary to create vehicular access from the processing plant which will be as much as 6 metres below the level of the A6097 (see Appendix B, Pictures 3 - 6). Such work could well have a direct impact on the adjacent land bordering the A6097 which may already be subject to future instability and floods from drainage water in periods of heavy rain.

**3.5.2** There is a significant risk of site vehicles, including wide transporters, mistakenly attempting to access the site due to satnav etc directions through narrow roads in Radcliffe, Newton or Shelford despite signposted restrictions. All of these roads are especially narrow in parts and are the main bus routes connecting local villages. There is an existing 7.5 ton maximum limit (see Appendix B, Picture 1) already applying from Shelford Hill through Shelford to Gunthorpe Bridge.

**3.5.3** In the past 10 years there have been on average 11.1 casualties annually on this stretch of the A6097 and 1.2 of these have been serious. For example, on Monday 13th October 2014, at 1.45pm on a weekday, there was a serious accident between a lorry and car on Gunthorpe Bridge when the fire brigade had to cut a driver out. We believe that a combination of 126 HGV movements per day and a new set of traffic lights on such an incline will give rise to an increased risk of casualties. It should be noted that more than half the children at a Gunthorpe school are bussed to and from the village along the A6097.

**3.5.4** This road is part of Notts Strategic Road Network and there is an inevitable risk of serious delays for Emergency Services vehicles due to the increased congestion delays likely to be caused by this new access to the development. There is no room for vehicles to move out of the way of emergency services on the west side of the A6097 due to an immediate drop of approx 6m to the fields below and also very limited room on the east side where there is only a narrow pavement adjacent to a further steep drop. This is also of course the **only access** across the River Trent between Newark and West Bridgford and the implications of such delays for Ambulances, Fire Engines and Police Vehicles could be critical.

**3.5.5** 126 HGV movements per day have been predicted but it has also been recognised that the risk of increased congestion could result in, for example, the restriction of HGVs from entry/exit to the site during peak hours. If this plan were adopted it would automatically increase the number of HGV movements per hour during the remaining hours in the day in order to maintain proposed production levels. If there was a restriction to site

access of 1½hrs am and pm, then to achieve the daily output, the HGV movements would need to increase from around every 5 minutes to every 3.75 minutes.

**The only access for residents to and from Gunthorpe village is via two junctions with the A6097.** Very recently a Gunthorpe resident counted 107 vehicles pass at 3.30pm before they could exit on to the A6097. (See Appendix B, Picture 2). Traffic flows at peak times (07:00 to 09:00 and 16:00 to 18:00) have increased slightly (4%) since 2007 but the road is already at saturation with an average of **one vehicle every 1.7 seconds at these times** (Source: NCC Traffic data June and September 2014). Any delays whatsoever cause extensive queuing, often the whole length of the A6097 in both directions.

**3.5.6** This proposal could never be regarded as "temporary". When the 1st phase at Shelford West is completed after around 14 years the site is likely to be extended into Phase 2 (The third that was removed from the original Brett proposal) and then to Shelford East as a 3rd Phase (for which there is already a plan). This would result in a total of around 25 years of operations and several years of "restoration" works.

**3.5.7** The congestion caused by the proposed site traffic lights will inevitably encourage an increasing number of vehicles to avoid East Bridgford Hill by taking the "rat run" down the narrow Manor Lane and create even longer queues for south bound traffic. This will exacerbate the bus problems noted earlier and cause difficulties for agricultural vehicles.

**3.5.8** Interestingly, the Highways Agency Design Manual for Roads provides under clause 5.9 that for single carriageways *"a climbing lane can be considered if it can be justified on hills with gradients greater than 2% and longer than 500 metres"*. The gradient on the A6097 hill up to East Bridgford is between **2.86%** and 3% and the distance is approx **690** metres but there is insufficient land available to even contemplate this (see para. 3.5.4).

**3.5.9** It is obvious that both the fuel consumption and pollution resulting from HGVs having to stop/start on the A6097 would be very considerably more than for HGVs having a straight run allowing speeds to remain constant.

**3.5.10** Using models developed in a study by Leeds University and inputting variables of 24 stop/starts over a distance of 4.8Kms and then accelerating to a speed of 15kph it can be demonstrated that 45% more fuel is used than at constant cruising speeds. A similar increase in emissions can be assumed.

**3.5.11** It is likely that however well mud, water and other debris from the site is controlled (for instance by wheel washing plant) some will find its way onto the main highway. This will increase accident risks significantly, especially for vehicles braking sharply from 60 mph when faced with a slow moving lorry.



### 3.6 Barge Movements

**3.6.1** We are extremely surprised that Brett have now suggested moving 36% of their annual production by barge after their initial proposals were considered inappropriate. At a public meeting in Shelford in January 2009 when they first submitted their proposals, Mr Mike Courts, a Director of Brett Aggregates, confirmed to village residents that they would definitely not consider barging any sand/gravel as it was uneconomical to do so.

**3.6.2** We have checked with industry sources and operators who have used barge transport in the past and discovered the following information:

- An existing operator in Nottinghamshire only uses barges “because there are no suitable roads”
- The economics of double handling and double processing make barging non-viable
- One operator provided a cost estimate of £13 to £15 per tonne for moving sand and gravel by barge which makes this a very uncompetitive solution – especially since Brett will need to develop market share in what is a new territory to them.
- There are doubts about whether the depth of the Trent would be sufficient at all times of the year to carry a fully laden barge.
- The publication “Gravel Extraction: History of the Aggregates Industry in the Trent Valley” states: *“Since the mid-1950s, haulage economics have dictated that the vast majority of sand and gravel aggregates are transported by road”*
- Lafarge Tarmac has objected to the proposal at Shelford West, saying: *“It is suggested that the 180,000 tonnes per annum to be transported to Colwick for use in concrete batching plants will be unprocessed. How will it be processed or used at Colwick? Processing at Colwick would require washing and screening, generating a significant volume of fines that will require appropriate management. Barge transport is a fundamental aspect of the Shelford proposal, and supporting evidence should be provided to clarify the existing or proposed mineral handling and processing operations at Colwick.”*

***Based on the lack of robust evidence we have strong doubts over the deliverability of the Shelford West site”.***

**3.6.3** We must as a result now seriously question whether Brett would actually use barges. A failure to proceed with barging as proposed would result in an increase of 71 to a total of 197 HGV movements per day on the A6097 i.e. every 3.5 minutes.

If restrictions in peak hour movements were applied, reducing the working day by 3 hours, this would increase the statistic to one lorry every 2.5 minutes. This clearly would be

impracticable whether or not controlled by signals at the junction of the A6097 and the site access.

**3.6.4** Inevitably if barges are used there would be very considerable noise issues for those living near and opposite the barge wharf due to aggregates being dropped in to the barges from a height. A public house and private houses are extremely close to the proposed wharf and noise travels efficiently over water. It is difficult to see how baffling could be installed.

**In concluding all the issues relating to transport and because of the major factors of:**

- increased heavily laden, slow moving lorries moving into and out of an already severely congested A6097 with all the attendant risks and
- the unlikelihood of barge transport being used

**we believe the Sustainability Analysis scores under Heading 3 “Promote sustainable patterns of movement and the use of more sustainable modes of transport” should read:**

<b>Period</b>	<b>Current NCC</b>	<b>Amended</b>
Operational	+2	-2
Long term ( <i>Shelford West only</i> )	0	0

## 4 Flood Risk

**We object to the inclusion of Shelford West as a possible excavation site for sand and gravel because the flood risk has not been assessed.**

4.1 The Environment Agency in its letter of 30<sup>th</sup> September 2014 to the Minerals team states *“It will be necessary to produce a Flood Risk Assessment (FRA) to demonstrate the risk of the development to others as well as to the site itself during times of flood. The FRA will need to demonstrate the effect of the phased operations upon neighbouring land. Any increased risk of flooding will need to clearly identify adequate and appropriate measures to manage this flood risk, in order that no property or land is placed at increased risk of flooding, without the agreement of landowners and the Minerals Planning Authority.”*

4.2 The excavation area is classed as Flood Zone 3 and therefore is assumed to be a functional floodplain (3b) until shown to be otherwise. Considerable time could be saved together with avoiding the loss of an allocated site at the planning stage if a detailed FRA were conducted early.

One of the minimum requirements (set out in Annex E, Planning Policy Statement 25) for site specific Flood Risk Assessments (FRAs) are that they should:

*“Be undertaken **early**, by competent people”.*

Further guidance states: *“The effects of flooding events (including extreme events) on people, property, the natural and historic environment and river and coastal processes should be considered”*

In 2000, Shelford village came very close to flooding with river water almost overtopping the inner flood defences. An Environment Agency letter in response to questions from the Parish Council, stated *“The sudden rise in water level which was reported, happened later in the week following the gates (at Colwick) being fully open. This may have been due to the right bank failure at Holme Pierrepont, which occurred about 9.00am on Tuesday 7<sup>th</sup> November. Other than that, **it can only be the interaction of storage areas filling and overspilling.**”*

Minerals Policy Statement 1 (MPS1) says: *“developers should consult the EA prior to planning application submission to evaluate the hydrological, chemical and ecological impact of any workings on groundwater and surface water supplies.”*

**We believe that the absence of an FRA and a more in depth analysis by the Environment Agency at this stage is a substantial obstacle to the allocation of the Shelford West site since many of the elements that need to be examined in detail would indicate an unacceptable degree of risk.**

4.3 Minerals Policy Statement 1 (MPS1) says:

-that local authorities should identify sites and preferred areas having taken account of environmental considerations to provide greater certainty of where future sustainable mineral working will take place. In addition, it states that local authorities should consider the benefits, in terms of reduced environmental disturbance and more efficient use of

mineral resources including full recovery of minerals, of extensions to existing mineral workings rather than new sites.

Paragraph 17 of MPS1 requires the following:

- In areas at risk of flooding, mineral extraction proposals should not have a significant adverse impact on flood flows or storage capacity; and
- Operators should not materially increase the risk of flooding at other properties and should increase the flood storage capacity.

4.4 URL/Scott Wilson's Strategic Flood Risk Assessment for the Council in April 2011 made the following comments: *"Stockpiles and ancillary buildings can reduce the storage capacity of the floodplain. In addition, they could alter the natural flow of the flood water by blocking flow paths and increasing flood risk to adjacent land. Typically in floodplain quarries, sand and gravel extracted in the spring and summer months are sold directly resulting in small stockpiles. However, stockpiles are often increased in late summer and autumn to provide sales during the winter months when pumps are switched off and excavation is inhibited.*

*It should be noted that aquatic habitat areas often have minimal flood storage capacity as they are already filled with water. Therefore, the potential flood risk management options using aquatic habitat may be limited."*

**The observations above are directly relevant to the proposals for Shelford West. A significantly more detailed study needs to be carried out which we believe will rule this site out of contention.**

4.5 We would question why Brett have indicated that they will provide extra flood defences. They state that this is because of the availability of spoil but our belief is that this measure is as a consequence of additional flood risk.

4.6 There are no flood defences to the east of the village and this is where floods regularly occur. Most years Manor Lane floods to some extent, particularly during a period of heavy rainfall and our concerns are that the additional flood water storage requirements of the plain as a result of quarrying would need to be accommodated by this area. The village would then be inundated from this unprotected side. Pictures of recent flood events can be seen in **Appendix C, 1 and 2.**

4.7 The Environment Agency letter to the Minerals Team referred to earlier states *"The FRA should also consider the conveyor and its route as well as the processing plant which is also located within flood zone 3. There will need to be a minimum easement of 45m between the banks of the River Trent and any excavations, to prevent against the risk of the works becoming breached. It is advised that the operating company build into their contingency plans a procedure and operations to deal with the breach of the River Trent into the working area."*

**Brett's proposed conveyor which is to be set 1 metre below ground level runs through the area which regularly floods and gives us reason to believe that this means of transporting the aggregates to the processing plant is not practicable.**

4.8 It is also noted that the proposed site of the processing plant also floods from surface and drainage water in conditions of heavy rainfall. **The effects of this on the stability of the embankment and access road make this an extremely doubtful proposition.**

4.8 British Geological Survey data from 2009 shows groundwater flooding hazard to be high in this area and through the proposed workings and conveyor route (see Appendix C, 5).

4.9 Within the last 10 years the area on Manor Lane which the proposed conveyor is to cross, suffered major subsidence caused by flood waters weakening the ground structure. A large hole appeared in the road and a car drove into this and was badly damaged. The Abandoned Mine Mapping is shown in Appendix C, 7. **The continuous pumping required for the proposed conveyor transport solution and ground instability is likely to prove uneconomical for the operator.**

4.10 Rushcliffe Borough Council's own assessment of areas liable to flood in Shelford notes the following areas and the type of risk:

- Burden Lane Surface Water flooding
- Manor Lane Surface Water flooding
- The Holmes River Water flooding
- Road off Manor Lane River Water flooding
- Manor Lane River Water flooding

4.11 In 2013 an additional flood risk was identified when very heavy rainfall caused surface water to flow down Shelford Hill flooding Main Street and West Street to a depth of 600mm (see picture in Appendix C, 3). **This, in conjunction with an increased risk of the river Trent overtopping the defences and flooding encroaching from the undefended east, creates an unacceptable situation.**

4.12 In the longer term there are considerable risks of the bend in the Trent which enfolds the proposed workings becoming an oxbow lake and diverting the river back to its previous course (see Appendix C, 4). This would reduce the flood storage area on the east bank and cause potentially increased risks not only for Shelford but also for settlements across the river and downstream. This phenomenon known as “pit capture” is described in Appendix C, 6.

4.13 The Sustainability Analysis for Shelford West currently recognises the flood risk with a score of -3 during the operational phase.

**The long term score is undetermined. We would argue that the long term risk is as uncertain as the operational risk. Factors that we have noted above, particularly risk of flooding from all points of the compass and “pit capture” cause us to believe that a score of -3 is equally applicable to the long term.**

Period	Current NCC	Amended
Operational	-3	-3
Long term	0	-3

## 5 Climate Change and Energy Efficiency

**We object to these proposals because of the impact on climate change and energy usage through the extensive use of plant and transportation methods.**

**5.1** A quotation from a large supplier of conveyors for a track 1600m long with a 45 degree bend after 600m carrying 200 – 300 tonnes per hour indicates a total motor power of 167.5 Kw. In addition, motors would be needed to lift the conveyor at both the processing plant and the barge loading wharf.

**5.2** We have established from the developers that lighting would be required throughout the dark autumn and winter hours, at both the plant and the length of the conveyor. We have also been told that normal operating hours are 07:00 until 18:00 during the week and 07:00 to 13:30 on Saturday.

**5.3** On this basis we have assumed that lighting would be required for on average 3 hours each day for 108 days. At 50m centres this would equate to 32 lamps at say, 500w.

**5.4** Total energy consumption is shown in Table 1.

Use	Estimated Kw	Annual operating hours	Kw hours
Conveyor	167.5	2750	460625
Lift units	40	2750	110000
Lighting	16	324	5184
Total	223.5	5824	575809

*Assumptions: Conveyor and lift units operate for 11 hours per day over 250 days p.a.*

*Lights operate for 3 hours per day over 108 days*

**5.5** Since, according to the Department for Energy and Climate Change (2013 statistics), an average household uses around 4170Kw hours p.a. then total energy consumption on the Shelford West site would equate to that of 138 homes.

**5.6** We have not evaluated the additional energy usage from dewatering the conveyor trench which is below the average water table. This is likely to be considerable as electric pumps would need to be operating continuously.

**5.7** Nor have we calculated the additional energy usage from the need for two operating plants (since the cost of carrying “dirty” gravel to Colwick would be prohibitive, a mobile plant would be necessary on the excavation site).

**5.8** Additionally there is the energy usage deriving from “double handling” of the barged aggregates.

**5.9** The most significant energy usage would be from the main site dewatering pumps which since they would be running continuously, are likely to use around 500,000 Kw p.a. Since other sites would be faced with similar issues we have not included this usage in our analysis, although the scale of the Shelford site would point to much higher energy consumption.

**5.7** Removal of hedges, grassland and arable fields in the excavation area on the scale proposed will have a large carbon footprint in terms of the loss of the area’s ability to absorb carbon dioxide.

**5.8** In addition, the release of carbon dioxide into the atmosphere from the carbon rich floodplain soils will have an impact greater than those areas not on a functional floodplain.

**5.9** We argue under Access and Transport (see para. 3.5.10) that the stop start nature of heavily laden lorries entering the A6097 and half of these turning right up a 1 in 34 incline will significantly effect both carbon emissions and fuel economy. Other traffic will also be subject to stop/start conditions as a result of slow moving vehicles.

**We dispute the score under both energy efficiency and climate change in the operating phase. Because of the use of a long conveyor system, Shelford West compares unfavourably with other sites where loading and transportation are less carbon and energy intensive. Access to the main trunk road is also more energy and carbon inefficient. We cannot see any attempt to maximise renewable energy opportunities due to the high energy loads required to drive the plant and equipment.**

**We also dispute the score in the long term as a result of the permanent loss of carbon absorbing plants, trees and hedges and their replacement with open water. No renewables are mentioned in the developer’s plans to offset 14 years of negative carbon emissions.**

Sustainability Analysis	Operating period score		Long term score	
	NCC	Amended	NCC	Amended
Minimise any possible impacts on and increase adaptability to climate change.	?	-1		-1
Promote energy efficiency and maximise renewable energy opportunities from new or existing development.	?	-2	?	-1

## 6 BIODIVERSITY

**We object to sand and gravel extraction at Shelford West because the ecological impacts following new proposals by the developer have not been adequately considered and have far reaching damaging consequences for biodiversity.**

**6.1** The ecological value of the land for the proposed sand and gravel site and associated activities is notable for its variety of habitats. These include floodplain meadowland, arable fields, copses, hedgerows, ditches and streams, riparian woodland and the river Trent. Together these provide important botanical and breeding sites as well as a network and corridor for wildlife.

**6.2** Natural England in their National Character Area Profile for Trent and Belvoir Vales (2013) confirm that ditches, hedges, copses and field margins in the farmed environment of the flood plain provide important connections across the landscape and provide habitats for farmland birds.

**6.3** The relevant 1Km. Grid squares covered in the biodiversity assessment are SK6442, SK6443, SK6541, SK6542 (proposed quarry site and barge wharf on the Trent), SK6642 (quarry site and conveyor), SK6743 (conveyor) and SK6843 (processing plant).

**6.4** There are four Local Wildlife Sites (formerly SINC)s within or adjacent to proposed extraction activities. Shelford Carr, a Willow Carr, hosts Mudwort (*Limosella*) which is recorded as a rare aquatic plant on the Nottingham Rare Plants Register. Similarly Field Lane Dyke supports Whorl-grass (*Catabrosa*) also recorded on the Rare Plants Register.

**Both these sites would be vulnerable to pollution from the proposed route of the conveyor belt.**

**6.5** Swallow Plantation Local Wildlife Site is located on the southern boundary of the proposed quarry. The full importance of this site is unknown as a full survey is needed to give a complete picture. Currently it is known that the site contains an impressive 43 recorded species of aquatic and woodland plants.

**This site would be vulnerable to water pollution, air particulates and disturbance from the adjacent quarry.**

**6.6** The banks of the River Trent from Burton Joyce to Lowdham are recorded as a Local Wildlife Site for the variety of aquatic plants. These include Tutsan (*Hypericum androsaemum*) recorded as a rarity on the Nottingham Rare Plants Register.

**This site would be vulnerable to pollution from the proposed barge wharf.**



**6.7** Rivers and streams are local and UK key habitats suffering from fragmentation and modification. This habitat once supported water voles at Shelford, a scarce and protected species, but now reappearing in several areas and also potentially at Shelford.

**The barge wharf on the Trent would jeopardise the ecological opportunities of this riparian habitat.**

**6.8** The Royal Society for the Protection of Birds (RSPB) reported its concern in October 2014 at the rapid decline in farmland birds. Pastureland, hedgerows and copses in the proposed site harbour Yellowhammers, Skylarks, and Grey Partridge, identified as 'Red Status' species, and therefore in serious decline, by the RSPB and are also the hunting ground for two pairs of Barn Owl identified as 'Amber Status' species.

**The proposed quarry site would remove the habitat of these declining species.**

**6.9** The Trent Valley is a recognised two-way migration route for birds flying between their northern breeding grounds and their wintering quarters further south. Such birds regularly stop to rest and feed on meadowland adjacent to the Trent at Shelford. Typically these birds include Wheatear, Whinchat ('Amber Status') and Yellow Wagtail ('Red Status') whilst Passerines (perching birds) recorded on migration here include Whitethroat, Chiffchaff and Willow Warbler.

**The proposed quarry site and barge wharf would impact upon such migratory birds.**

**6.10** During winter the meadowland fields around Shelford provide habitat for birds from their northern breeding grounds. These typically include amongst the thrushes both Fieldfare and Redwing, and in hard weather large flocks of Skylark. In winter flocks of Yellowhammer move from higher ground to feed on stubble fields around Shelford. Observations on fields adjacent to Stoke Ferry Lane recorded 22 Yellowhammers on 22<sup>nd</sup> September 2009 and more recently a flock of 11 on 1<sup>st</sup> November 2014.

**6.11** Natural England's National Character Area Profile: 48 Trent & Belvoir Vales (2013) also recognises under its Biodiversity opportunities that overwintering stubble on farmland can provide an important winter food source particularly for seed eating birds.

**Quarrying would remove this valuable winter habitat.**

**6.12** Wild geese and swan recorded on the pastureland regularly include Pink-footed Geese, resting here as they move between wintering grounds in Lancashire and Norfolk, together with the occasional White-fronted Goose. The most common wild swan to regularly winter and feed on the fields around Shelford is the Whooper Swan joining the very large numbers of Mute Swan already found here.

**Quarrying would remove these wintering grounds and the line of the conveyor belt through Hams Bridge would cause significant disturbance.**

**6.13** The river Trent is a valuable habitat for wintering wildfowl. The relatively warm water regularly attracts duck such as Goldeneye, Wigeon, and Tufted Duck; Great Crested and Little Grebes, and sawbills such as Goosander. An outflow from Stoke Bardolph sewage works brings both warm water and nutrients into the Trent and is therefore particularly attractive to wildfowl where they are joined by many Black-headed Gulls. In severe weather both the rarer Black-throated and Great Northern Diver have been recorded here near the outflow.

**The location of the barge wharf almost opposite the sewage outfall would drive away wintering birds.**

**6.14** The South Nottinghamshire Bat Group report that along the Shelford stretch of the Trent there would be as many as 8 species of bat : Daubenton's Bat, Noctule Bat, Brown Long-eared Bat, Whiskered Bat, Brandt's Bat and 3 species of Pipistrelle (Common, Soprano and Nathusius Pipistrelle).

**6.15** There are long established nesting colonies of Common and Soprano Pipistrelle and Daubenton's Bat under Gunthorpe Bridge. **These nesting colonies are very close to the proposed processing plant so could be subject to disturbance.**

The Brown Long-eared Bat was recorded March 2010 at wintering quarters in Barns at Shelford Manor. **These barns are close to the line of the conveyor belt.**

The Noctule Bat, which feeds out in the open over meadowland has been recorded both at Gunthorpe Bridge and also over Burton Meadows – **the latter location is opposite the proposed barge wharf.**

**6.16** The main foraging areas for the bats are along the woodlands, such as Swallow Plantation, and hedgerows in the area of proposed gravel extraction.

**The proposed quarrying site would destroy feeding opportunities for the bats.**

**6.17** As bats are a protected species and there are regulations against their disturbance then legal advice would need to be sought from Natural England.

**6.18** A wide range of typical farmland animal species are recorded breeding in the area including Brown Hare whilst sightings of Roe Deer are increasingly reported from woodland copses including Swallow Plantation. There is an active Badger sett off Stoke Ferry Lane and as Badgers are a protected species then Natural England would have to be informed of any potential disturbance.

**The Badger sett would be destroyed as it is located within the middle of the proposed quarry site.**

**6.19** Recently, national and local publications have emphasised the conservation and enhancement of the ecological value of the Trent Valley. Nottinghamshire County Council's

Sustainable Community Strategy 2010 –2020 emphasises “safeguarding countryside green space and animals and plants including nature conservation sites and the enhancement of wildlife corridors.” Natural England’s National Character Profile (2013) for the Trent Valley Washlands calls for management that “strengthens wildlife habitats, woodland and the hedgerow network.” They refer in SEO 3 to enhancing the rivers and flood plains for their ecological, historical and recreational importance, their contribution to biodiversity and the important role they play in underpinning the character of the area. Priority for protection and enhancement is drawn towards flood plain grazing marsh and other grassland habitats, with on Page 19 a photographic example of “Grazing land beside the River Trent near Shelford”

**Quarrying activity at Shelford West would run contrary to such guidelines and objectives.**

**6.20** The developer’s proposals for after-use at Shelford West are to return the site to open water and wetland. Whilst wetland is one of the habitats identified in national and local Biodiversity Action Plans (eg. Nottingham Local Biodiversity Action Plan) as contributing to wildlife-rich green spaces so too are species-rich grassland, woodland and hedgerows as found at Shelford. We contend that the Trent Valley is now over-supplied with wetland habitat and that it is the traditional wildlife profile associated with a mixed farming environment which now needs protection and enhancement. Recent statements by the Environment Secretary, the RSPB and HRH The Prince of Wales (October and November 2014) support the conservation and enhancement of the farmland ecology. The developer has not produced any information on the ownership and management regime for the after-use phase of the site and there is the prospect that all that will be left would be deep, cold, lakes and unmanaged wetland of little ecological value.

**The after-use proposals should be rejected on grounds of insufficient detail and over-supply of wetland in the Trent Valley.**

We contend that taking into account the impact of new proposals by the developer (now including conveyor belt, processing plant and barge wharf as well as a quarry), and following a new ecological evaluation, **the Sustainability Score for Biodiversity : Objective 2 should read as follows:**

<b>Period</b>	<b>Current NCC</b>	<b>Amended</b>
Operational	-1	-2
Long term ( <i>Shelford West only</i> )	2	0

Further detail on the ecological evaluation is provided in **APPENDIX D**, ecological impact.

## 7 Historic Environment

**The cultural and heritage stock of Shelford and surrounding area makes a significant contribution to the richness of the County's history and heritage.**

The proposals for the site at Shelford West should be rejected because the impact of sand and gravel extraction on this heritage has not been adequately considered. Not only are heritage sites themselves under threat but also the means of access to them.

**Sites that would be lost or impacted upon include the following:**

**7.1 Stoke Ferry :** the ferry at the end of Stoke Ferry Lane is of great antiquity and the name Shelford itself, recorded in the Domesday Book, derives its name from the old English for "shallow ford." A ferry is recorded here from at least the late thirteenth century. The historic stonework and landing stage still exist but **access from the village to these features and recent Local History Board would be lost.**

**7.2 The Holmes House and its barns would be lost to the proposed quarry:** The buildings are of some antiquity and possibly date back to the mid-eighteenth century. Certainly a building known as Lower Holm is shown on a map of 1776 (Plans and Surveys of the Earl of Chesterfield).

**7.3 Mill Bridge :** the area today known as the Dam was the original course of the Trent with a mill at Mill Bridge where there was a weir with an early example of a 'pound lock'. **Mineral extraction at Shelford West would impact on this medieval feature.**

**7.4 Church of St. Peter and St. Paul:** a church is mentioned at Shelford in the Domesday Book and this was a site of religious significance throughout the Middle Ages. Parts of today's church date from the thirteenth century. During church renovation work in the 1870s a fragment of Anglo-Saxon cross was uncovered, dated circa 900AD. This is considered by experts to be of great religious significance and would have stood at a crossing point over the river Trent just outside the village. Its presence in the church attracts visitors today.

The Church is listed by English Heritage as Grade II \*. The historical and architectural significance of the church would be severely compromised by quarrying a mere field away.

**7.5 Shelford Manor: is also a Grade II\* listed building.** Buildings here date back to the Iron Age. An Augustinian Priory was maintained on the site until the Dissolution of the Monasteries in 1536 with the floor of the Priory being uncovered in 2001. Shelford Manor passed to the Stanhope family after Dissolution of the Monasteries and then the Manor, together with the Church, took on major historic significance during the English Civil War. Shelford was a Royalist stronghold and Shelford Manor a Royalist garrison

during the second stage of the Parliamentary campaign of 1645. A bloody battle took place here with other skirmishes centred around the Church. **The historic significance of the whole area around Shelford cannot be underestimated and its setting within the context of the English Civil War would be jeopardised by near-by quarrying activities. The Civil War Society, the Sealed Knot, regularly re-enacts the historic events between the Church and the Manor. This attracts many visitors but their pageant between Church and Manor would be inhibited by the construction of a conveyor belt and this educational and popular event lost.**

**7.6 A Civil War gun battery**, built by the Royalists as defensive work designed to protect western approaches to Shelford, is located 50 metres to the south west of the Church (SK 466132). It is scheduled as an **Ancient Monument** by English Heritage and would be **subject to disturbance from adjacent quarrying activities.**

**7.7** A further **Ancient Monument** is found south west of Shelford Manor (SK 466875). These are cropmarks of Romano-British rectangular and sub-rectangular enclosures, ditch lines and pits. Additionally it is thought cropmarks of a ring ditch with a central cross may indicate a site of a medieval post-mill. Late prehistoric lithic implements (man-made stone artefacts such as tools and other chipped stone) have also been found here indicating a significant prehistoric archaeological site. **The significance of this Ancient Monument would be jeopardised as it falls along the route of the proposed conveyor belt.**

**7.8 Referring to gravel extraction and historic features in the Trent Valley, Natural England has expressed concern for both earthworks and archaeological sites visible from cropmarks (National Character Area Profile : 48: Trent and Belvoir Vales, 2013).**

**7.9 Pillow Mound:** a late medieval development of a low stone mound covered with earth and used as an artificial rabbit warren is situated close to Shelford Manor. **This is one of only a few left in Nottinghamshire and would be severely compromised by the route of the conveyor belt.**

**7.10 Saxon loom weights** have been found in Shelford on land adjacent to the proposed conveyor route. **These are now in Newark Museum and along with other artefacts, demonstrate significant Saxon settlement on the banks of the Trent.**

**7.11 In addition to the two Grade II\* buildings already referred to above,** there are a further nine Grade II Listed Buildings in and around the village **comprising of farmhouses, barns, and a granary, gates and walls associated with Shelford Manor. When considering the impact of quarrying, conveyor belt and processing plant upon Shelford's heritage it is**

**contended that the setting for listed buildings, ancient monuments and archaeological features is equally important for protection as their precise site location.**

Whilst the minerals developer acknowledges the area has high archaeological potential there is no detail as to its form or to any protection measures other than to suggest the use of a metal detector on the conveyor belt. **The use of metal detectors on the conveyor belt would not be sufficient to protect the full range of non-metallic artefacts that are bound to be present in such an historic area. It is unacceptable that the minerals developer provides such scant information.**

**There are risks from pollution, vibration and dewatering affecting ancient foundations, especially those of the church.**

**A detailed archaeological assessment would show that this proposal should be rejected because of the potential risk to historical sites and settings, and the damage that would be caused to potential new discoveries.**

**In view of this and the adverse impact acknowledged in the SA we would amend the scores as follows:**

<b>Period</b>	<b>Current NCC</b>	<b>Amended</b>
Operational	-2	-3
Long term	-2	-3

## 8 Landscape

**We object to the inclusion of Shelford West as a site for sand and gravel extraction as the landscape value of the area has not been adequately and appropriately assessed and if permitted would have a devastating effect on an iconic and well loved landscape.**

8.1 The Greater Nottingham Landscape Character Assessment (GNLCA) report (July 2009) identifies three landscape types/zones pertinent to the proposed site for sand and gravel extraction at Shelford.

8.2 Zone TW PZ 51, Stoke Lock Meadowlands, and Zone TW PZ 7, Shelford Village Farmlands, are both assessed with a landscape as coherent, characteristic and historic and where the character should be conserved and reinforced.

8.3 Zone SN 05, East Bridgford Escarpment Farmlands overlooks the proposed quarry site at Shelford West. The view from the escarpment between Radcliffe-on-Trent and Newton is considered by many to be an iconic view over the Trent Valley and one of the best in the County. The GNLCA acknowledges this extensive and distinctive view and recommends action to conserve and enhance opportunities for its appreciation from adjacent roads (Shelford Road) through careful management of hedgerows and woodlands so as to retain the view.

8.4 Findings from a one-day workshop held at County Hall, Nottinghamshire, on 6<sup>th</sup> April 2009 and attended by “specialist” stakeholders identified ridges providing long views over low lying farmland landscape as most valued views. Particular reference was made to Rushcliffe where linear roads provided long views over the landscape (GNLCA Report 2009).

8.5 The view over the Trent Valley from Radcliffe-on-Trent to Newton has been recorded and championed for generations. The view has been painted by professional Victorian artists such as Edward Price (1801-1889) and given national recognition in a previous edition of Michelin’s East Midlands Tourist Map, in Arthur Mee’s ‘The Kings England’ series for Nottinghamshire (1938) and more recently in Rural Community Action Nottinghamshire’s ‘Nottinghamshire’s Hidden Gems: East of the City’. **Details in Appendix E.**

8.6 The European Landscape Convention (ELC) which came into effect in the UK in March 2007 defined landscape as “landscape means an area as perceived by people”. The Countryside Agency/Scottish Natural Heritage’s Landscape Character Assessment guidance (2002) strongly promotes “community involvement” and recommends an approach which includes the relationship between people and place and the way people perceive their local environment.

8.7 Taking a lead from such guidance, and which was subsequently endorsed by Natural England's 'An Approach to Landscape Character Assessment' (2012), a group of enthusiastic villagers at Shelford organised its own community landscape assessment of the view over the valley from Shelford Hill in 2009.

8.8 People were surveyed at Radcliffe-on-Trent Carnival and East Bridgford Post Office in 2009 and again at Shelford Feast week-end in 2012. Visitors were shown a photograph of the view over the Trent Valley from Shelford Hill top and asked to rate it as 'excellent, good, fair, poor or indifferent'. A total of 416 people rated the view with most of them coming from surrounding villages. Only 84 responses came from people actually living in Shelford. 92% of respondents rated the view as "excellent" and 8% as "good". The affection and appreciation given to the view by the wider community is particularly noteworthy. When asked for reasons for their response the majority fell into the categories of 'uplifting one's spirits', 'a sense of place and belonging', 'relationship to memories', or simply 'the enjoyment afforded by the view'. Several people mentioned that the view was very accessible with one respondent saying that it was "the only accessible view of an unspoilt panorama".

**A selection of typical comments from respondents can be found in Appendix E.**

As part of the survey visitors were asked how important it was to protect the view from development. Of the 416 respondents, **96% deemed it 'very important'** and **4% as 'important'**,

Not one person was indifferent or considered protection 'unimportant'.

**Quarrying and its associated activities at Shelford West would destroy one of the finest and most iconic views in Nottinghamshire.**

Evidence from the Community Landscape Survey is available on request.

8.9 The proposed after-use for the Shelford West site of lakes and wetland would result in yet more flooded pits along the Trent Valley at the expense of the traditional farmed landscape.

The cumulative effect of so many lakes, particularly in this part of the Trent Valley, would alter its whole landscape character.

8.10 The problem of the cumulative impact of sand and gravel extraction in the Trent Valley has not gone unchallenged by Nottinghamshire Minerals Planning Team. Paragraph 6.14 of the **Nottinghamshire Minerals Local Plan** (adopted December 2005) draws attention to "the major issue of **unacceptable** change to the landscape character of the Trent Valley."

**Sand and gravel extraction at Shelford West would add to the unacceptable change to the traditional and cherished landscape character of the Trent Valley.**



We contend that at Shelford West views over the Trent Valley from Shelford Hill have not been accorded sufficient value in the landscape assessment. We also contend that with the proposed after-use, the cumulative damaging impact of yet more lagoons on the Trent Valley landscape has not been given sufficient weight.

We would therefore revise the SA scores as follows:

<b>Period</b>	<b>Current NCC</b>	<b>Amended</b>
Operational	-2	-3
Long term	-1	-2

## 9 Air Quality

**We object to the proposals because of the impact of reduced air quality in a valley environment.**

**9.1** Nottinghamshire County Council and Nottingham City Council have announced a joint initiative to reduce air pollution which in Nottingham is amongst the worst in the country (Nottingham Post 3<sup>rd</sup> November 2014).

**9.2** Shelford Valley is a natural bowl which collects both organic and inorganic allergens. The prevailing winds are generally south westerly to westerly; both of these wind directions blow directly across the proposed site and into the village.

**9.3** Air Quality UK reports *“Concentrations of pollutants can be greater in valleys than for areas of higher ground. This is because, under certain weather conditions, pollutants can become trapped in low lying areas such as valleys. This happens for example, on still sunny days when pollution levels can build up due to a lack of wind to disperse the pollution. This can also happen on cold calm and foggy days during winter. If towns and cities are surrounded by hills, wintertime smogs may also occur. Pollution from vehicles, homes and other sources may become trapped in the valley, often following a clear cloudless night. Cold air then becomes trapped by a layer of warmer air above the valley”*.

**9.4** Local doctors talk about the Shelford Valley syndrome which, because of the collection of particles in the bowl, can create respiratory problems and worsen asthma symptoms. In the Post article a Bulwell doctor states that air pollution was a concern from a GP’s point of view:

*“It can affect your cardiovascular system, which is your heart, cause problems with lungs, cause difficulties breathing and increase attacks of asthma,” he said.*

*“People who are exposed to air pollution for a long time, the chances are they will get lung cancer and also bladder cancer”.*

**9.5** Dr Chris Cope, an East Bridgford doctor makes a strong case for the negative effects on health of quarrying in the Shelford valley **(see Appendix F)**.

**9.6** There are several steps in the process of extraction that can lead to fugitive emissions – loading into the hopper, loading from the hopper to conveyors, loading into the processing plant and loading/unloading into/out of barges or lorries.

**9.7** In addition there is the significant increase in air pollutants from diesel emissions from lorries ascending the gradient to the A6097 and the hill to the East Bridgford traffic lights.

**9.8** The Traffic section of this report clearly states the stop/start nature of vehicle movements on the A6097 and this leads to both increased energy consumption and particulate emissions.

**9.9** Particulates may be seen as the most critical of all pollutants, and some estimates have suggested that particulates are responsible for up to 10,000 premature deaths in the UK each year. The extent to which particulates are considered harmful depends largely on their composition.

**9.10** The following extract is from Air Quality UK:

*Particulate matter is a complex mixture of organic and inorganic substances, present in the atmosphere as both liquids and solids. Coarse particulates can be regarded as those with an aerodynamic diameter greater than 2.5 µm (micrometres), and fine particles less than 2.5 µm. Coarse particles usually contain earth crustal materials and **fugitive dust from roads and industries***

*Particulate matter is emitted from a wide range of sources, the most significant primary sources being road transport (20%), homes (20%), construction, mining and quarrying (13%), industrial combustion plants and processes (10%) and public power generation (10%).*

UK National Air Quality Strategy (2004)

particles	50µg/m <sup>3</sup> not to be exceeded more than 35 times per year 40µg/m <sup>3</sup>	24 hour mean	31.12.04
		annual mean	31.12.04

*Percentage of Emissions from Industry and Transport in the UK*

POLLUTANT	% FROM INDUSTRY	% FROM TRANSPORT
benzene	20%	67%
1,3 butadiene	13%	77%
carbon monoxide	12%	75%
lead	18%	78%
nitrogen oxides	37%*	46%
particles	59%	26% (PM <sub>10</sub> ) 50% (black smoke)
sulphur dioxide	89%	2%
NMVOCs	53%	29%

**9.11** This information clearly shows the impact that the emissions of the construction, mining and quarrying industries and transport have on the environment.

**Because of the nature of the valley as a natural bowl which collects emissions and then spills them into surrounding settlements, we believe that the additions to the particulates would be very detrimental to health of both human, plant and animal life. We would therefore revise the Sustainability Scores as follows:**

<b>Period</b>	<b>Current NCC</b>	<b>Amended</b>
Operational	-1	-2
Long term	0	0

## 10 Employment

**We object to the case put forward in the Sustainability Analysis since we believe that there is a duplication of the national/wider economic argument and insufficient weight attached to local economic impacts.**

10.1 Under the heading “Support wider economic development”, the Sustainability Analysis (S.A.) comments about supporting the demands of the construction industry because it *“has the potential to produce a very large quantity of aggregate which is important in supporting the wider economy....”*

10.2 This comment replicates the argument under Heading 1 of the S.A. which states *“the very large estimated reserve of this site would contribute very positively to national demand.....”*

10.3 The above two points duplicate the same argument. In reality, quarrying at Shelford West would have no impact on the national economy or employment. Aggregates would continue to be used and jobs maintained in construction industries wherever the sand and gravel are sourced.

10.4 We believe the emphasis needs to be on local jobs and the local economy.

10.5 At best, around 12 operators would work on the site. It is extremely likely that some of these would be either existing Brett employees or transfers from other sites that have ceased working.

10.6 The potential job losses as a result of the Shelford West quarry could far exceed any positive employment effect. The table below shows some of the current employment and jobs at risk in the valley. Farming related jobs are based on land lost.

Business	Job type	Full time employees	Part time employees/ Contractors	Casual labour	Jobs at risk
Farm 1	Farming Harvesting Seasonal sales Maintenance Game keepers Beaters	4	8	6	8
Farm 2	Contractors		2		1
Farm 3	Farming Harvesting Equestrian	3	3		6
Farm 4	Farming Contracting	1	9		5
Farm 5	Contractors	1	4		1
Business 1	Events	4	4++	20	10
Pub1	Food/Drink	5	10		2
Pub 2	Food/Drink	5	10		2
Pub 3	Food/Drink	5	10		2

Restaurant 1	Food/Drink	6	12		
Leisure	Boats	2	2		1
Leisure	Campsite	2			2
Business 2	Caravans	2			2
<b>Total</b>		40	74	26	42

10.7 The numbers in the above table do not take account of suppliers or the economic impact of the loss of major equestrian events regularly held at Shelford Manor.

10.8 The pubs in particular rely on walkers along the Trent Valley Way (to be rerouted away from the river) or the path from Gunthorpe to Stoke Bardolph and beyond. Many pub customers enjoy a meal and then a walk on the History Trail or down to the river. One pub relies on outdoor drinking and dining by the river in the spring and summer.

10.9 Several of the farmers supply local farm shops with their produce and one is a major producer of quality lamb for these outlets.

10.10 The Countryside Agency (now no longer existing) produced a report on Rural Economies in 2003. Some of the statements from this report are shown below:

*The (rural) economies are generally strong. Their attractive environment and other qualities of life draw in migrants from urban areas. These incomers are often an important source of new businesses and new jobs and increase connections to distant markets and networks.*

**There are many self employed people in the village operating small businesses. They choose to be here because of the environment. Several of these have stated that they will not remain if quarrying were to happen.**

*We have demonstrated the link between an attractive and diverse countryside and healthy rural economies and have noted that the fabric of the countryside, its villages and its market towns – our Countryside capital – is essentially the product of economic activity.*

**Because of this loss of our “Countryside Capital” and its potential impact on local businesses and employment we believe that the SA has understated the score.**

Our revision would be:

Period	Current NCC	Amended
Operational	+3	-2
Long term	0	-1

In the long term, little would improve as farming and associated jobs would still have disappeared along with the land. There may be an increase in visitors but not to previous levels. There are too many cold lakes in the Trent Valley to attract any significant numbers to yet another one.

## 11 Human Health and Quality of Life

**The proposals should be rejected because although it is recognised in the SA that the operational phase the development could have a "very negative effect" on "a number of settlements", the long term impact has not been assessed and will be equally as negative.**

### 11.1 Quality of Life and Social capital

**11.1.1** A 'Quality of Life' report by the Audit Commission (2002) argues that at the heart of sustainable development is "the idea of ensuring a better quality of life for everyone, now and for generations to come." This should include a measurement of "what you value" as much as what is easily measurable. One of the quality of life indicators suggested is **strengthening community involvement**. The report encourages Local Authorities to produce their own Community Strategies and Nottinghamshire County Council subsequently produced their Sustainable Community Strategy 2010 – 2020 in which they declared the aspiration to see people satisfied with their communities. Included is a priority for Rushcliffe Borough Council to encourage people to "get involved in helping shape what their communities look like in the future".

**11.1.2** The concept of "social capital" arises when considering the depth of community involvement. This "describes the pattern and intensity of networks among people and the shared values which arise from those networks." "Greater interaction between people generates a greater sense of community." (Office for National Statistics, Guide to Social Capital).

**11.1.3** The community of Shelford has built up its social capital over many years and has a very energetic approach to community involvement in line with the emphasis placed by the Nottinghamshire Sustainable Community Strategy. Community involvement in Shelford is quite remarkable.

**11.1.4** The local pub has been purchased by the community to prevent its closure and to continue providing a focal meeting point in the village. This is the only community owned pub in the County. The Church has a dedicated congregation with a popular Flower Festival attracting visitors from a wide area and a well supported Harvest Supper. Various clubs and societies regularly use the village hall but perhaps the most noteworthy is the weekly community run and award winning (Rushcliffe Community Awards) 'Coffee Pot' which gives villagers a chance to meet and talk.

**11.1.5** Recently a Local History Trail has been established to disseminate information on Shelford's rich history. Initiated by the village Local History Group and supported by grant aid from Nottinghamshire County Council, the trail winds around both Shelford and the surrounding countryside. **The route and setting of this important educational resource would be lost by the proposed quarry and line of the conveyor belt.**

**11.1.6** The community regularly hosts re-enactments of the Civil War by the Sealed Knot Society. The annual Shelford Feast day and bi-annual street market brings the community

together with many villagers involved. Children of the village are catered for with a grant aided playing field and well equipped play area.

**The villagers of Shelford can therefore be seen as very active and strongly value their close knit community and quality of life. We strongly contend that in this day and age the social capital of a community, built up over the years, should be given equal consideration alongside environmental factors when development proposals are being assessed. So far this has not been the case.**

## 11.2 Human Health

**11.2.1 Physical health issues have been addressed under “Air Quality”; this section will deal with well being and mental health.**

**11.2.2** The 2000 Rural White Paper stated:

*“The countryside is an enormous recreational asset, with its high quality landscapes, fresh air, open space and tranquillity. Recreation can improve the mental and physical health of participants and the revenue from millions of visitors to the countryside every year is an important component of the economy of rural England.”*

and

*“Many people go to the countryside to admire the scenery, listen to the sounds of nature and generally feel that they are ‘away from it all’.”*

The Government renewed its commitment to the measurement of tranquillity in 2004 with the publication of the Rural Strategy which stated: *“The countryside provides many benefits. It is valued for its wildlife, landscape and cultural heritage and also tranquillity”*. The 2004 Mori Poll *“Landscapes in Britain”* revealed that 49% of those who visit the countryside do so in search of a tranquil environment.

National Planning Policy Framework is concerned with *“identifying and protecting areas which are relatively undisturbed by noise”*

**11.2.3** On 18<sup>th</sup> December 2008, Brett produced its own Noise Monitoring report on Shelford. The monitoring sites nearest Shelford West were “The Willows” off Church Street and The Ferry Boat Inn at Stoke Bardolph.

Site	15 minute noise levels		Background noise levels	
	Range dB(A)	Average dB(A)	Range dB(A)	Average dB(A)
The Willows	44.0 – 47.2	45.8	40.4 – 41.7	40.9
Ferry Boat Inn	52.6 – 59.1	56.4	43.1 – 45.2	44.2

Comments for “the Willows” location were: ***“Noise sources at this location consisted of localised traffic movements in the village, birdsong and occasional aircraft activity”.***



And at the Ferry Boat Inn: *“passing road traffic on Stoke Lane, birdsong, distant industrial noise and rail movements”*.

**11.2.4** CPRE’s Tranquillity map for Nottinghamshire identifies three areas of “most tranquillity” adjacent to the excavation site.

**We contend that the tranquillity of this area will be lost with its consequent effects on human health and well being.**

**11.2.5** In the operational phase of quarrying the communities will face:

- The loss of a family home
- The loss of two working farms
- The loss of amenities including the local History Trail and their effect on the village owned pub
- The inability of people to sell their houses or loss of value
- Continuing anxiety over flood risk
- The fear of “planning blight” as Shelford West becomes an easy option to extend and Shelford East is allocated
- The loss of river access from Stoke Ferry Lane and the rerouting of the Trent Valley Way away from the river **(See Appendix G, 2)**

All of these will have a significant effect on people’s mental state and well being.

**11.2.6** In the long term the communities in the valley will face:

- A possible scenario of quarrying for over 20 years
- The age profile of the communities affected means that many people will not live to see the restoration of the quarries
- Continuing anxiety over flood risk
- The replacement of farmland and footpaths with deep, steep sided cold water pits which are unattractive both to people and wildlife and replicate the very many which exist along the Trent valley.
- Site After-use proposals for lagoons and wetlands are causing concern amongst villagers in Shelford because of the very real threat of mosquitoes breeding in this area. **(See Appendix G, 1)**
- The permanent loss of river access from Stoke Ferry Lane and the rerouting of the Trent Valley Way away from the river **(See Appendix G, 2)**

People moved into the valley communities to enjoy well being and tranquillity in a rural setting. They accepted the lack of facilities, slow broadband, few shops, infrequent buses and no mains gas as a trade off for a peaceful farming village life.

They have made closely knit societies, buying their own pub and setting up community enterprises and entertainments.

***There is no choice about whether to buy a house next to gravel workings – we already live there.***

The comments made under “long term” in the SA are that improvements to flood defences *“could have a beneficial effect”*.

**We totally reject this statement as having no supporting evidence or basis in fact.**

**We consider the Long Term scoring in the current SA to be positively overstated.**

Period	Current NCC	Amended
Operational	-3	-3
Long term	+3	-1

## **12 Other Observations**

**12.1 Heading 8 of the Sustainability Analysis “Protection of high quality agricultural land and soil”** notes that Shelford West should be restored to “high quality agricultural land if that is possible”.

**12.2** The restoration proposals do not allow for any agricultural land of any quality. The loss of 550 acres of food production, two farms and a family home are a very negative trade off for the excavation of gravel.

**12.3 Because of the very large scale of this loss we believe the score for both the operational and long-term time frames should be amended to -3.**

## Appendix A Tonne/Mile Analysis

Capacity 000's tonnes pa Period	No. of houses	Years	Ave p.a.	Tonnes Agg.	Distance from					
					Shelford	tonne mls over build period	Barton	tonne mls over build period	East Leake	tonne mls over build period
					500 2017-2030		200 2017-2030		180 2017-2020	
Area										
Rushcliffe										
Clifton	3000	2015-2028	214	10714	15	1928571	3	450	7	900000
Edwalton	1500	2015-2028	107	5357	12	771429	8	514286	9	675000
Tollerton	2500	2016-2028	179	8929	9	964286	10	1071429	9	1044643
Newton	550	2015-2020	92	4583	2	36667	16	293333	19	348333
Cotgrave	470	2015-2021	67	3357	7	117500	11	184643	10	167857
North Bingham	1050	2015-2023	117	5833	5	204167	16	653333	18	735000
East Leake	400	2018-2023	67	3333	17	340000	6	120000	1	20000
Keyworth	450	2018-2023	75	3750	14	315000	9	202500	7	157500
Radcliffe on Trent	400	2018-2023	67	3333	3	60000	13	260000	13	260000
Ruddington	250	2018-2023	42	2083	11	137500	5	62500	7	87500
Total	10570		1025	51274		4875119		3362474		4395833
Broxtowe										
Boots Beeston	550	2018-2027	55	2750	14	385000	7	192500	12	330000
Field farm	300	2015-2017	100	5000	16	80000	9	45000	14	70000
Awsworth	312	2015-2025	28	1418	17	216982	10	127636	20	255273
Brinsley	163	2015-2027	13	627	22	151715	22	151715	23	158612
Eastwood	1018	2015-2027	78	3915	23	990592	21	904454	22	947523
Kimberley	538	2015-2026	45	2242	21	470750	19	425917	20	448333
Nottingham/Broxtowe urban	2146	2018-2027	215	10730	14	1502200	7	751100	12	1287600
Other	300	2023-2027	60	3000	14	210000	7	105000	12	180000
Total	5327		594	29682		4007240		2703322		3677341

## Nottingham City

Waterside Trent Basin	3000	2017 - 2028	250	12500	8	1200000	6	900000	11	1650000
Boots campus Thane Road	600	2017 - 2028	50	2500	12	360000	5	150000	10	300000
Stanton tip, Cinderhill Road	500	2017 - 2028	42	2083	16	400000	9	225000	18	450000
Siemens, Woodyard Lane	118	2017 - 2028	10	492	14	82600	7	41300	12	70800
City Link	1425	2017 - 2028	119	5938	8	570000	7	498750	11	783750
Padstow School, Gainsford Cres	171	2017 - 2028	14	713	14	119700	11	94050	15	128250
Bobbers Mill Road	120	2017 - 2028	10	500	15	90000	8	48000	13	78000
Lighthouse, Huntingdon St.	207	2017 - 2028	17	863	9	93150	7	72450	11	113850
Sandfield Centre, Lenton Bvd	203	2017 - 2028	17	846	13	131950	7	71050	11	111650
Land Registry, Chalfont Drive	475	2017 - 2028	40	1979	14	332500	7	166250	11	261250
Freeth Street	345	2017 - 2028	29	1438	8	138000	7	120750	11	189750
Meadows	150	2017 - 2028	13	625	8	60000	6	45000	11	82500
Nottingham Station	150	2017 - 2028	13	625	9	67500	7	52500	12	90000
Bus depots Southwell Rd	186	2017 - 2028	16	775	8	74400	7	65100	13	120900
Post Office, Huntingdon Street	120	2017 - 2028	10	500	9	54000	7	42000	11	66000
Clifton West, Hartness Rd	165	2017 - 2028	14	688	13	107250	2	16500	6	49500
Denewood Ctre, Denewood Cr	110	2017 - 2028	9	458	15	82500	9	49500	14	77000
Park Yacht Club, Trent Lane	337	2017 - 2028	28	1404	8	134800	7	117950	13	219050
1 Brook Street	244	2017 - 2028	20	1017	9	109800	7	85400	11	134200
Meadow Lane	830	2017 - 2028	69	3458	8	332000	6	249000	11	456500
Haywood School, Edwards Lane	110	2017 - 2028	9	458	11	60500	10	55000	15	82500
Speedo Ascot Road	41	2017 - 2028	3	171	15	30750	8	16400	13	26650
Severn Trent Hucknall Road	60	2017 - 2028	5	250	14	42000	10	30000	15	45000
Siegel Maiden Lane	41	2017 - 2028	3	171	9	18450	7	14350	11	22550
Huntingdon Street	86	2017 - 2028	7	358	9	38700	7	30100	11	47300
Southglade School, Ridgeway	58	2017 - 2028	5	242	14	40600	11	31900	17	49300
Playing Fields Beckhampton Rd	85	2017 - 2028	7	354	14	59500	11	46750	16	68000
Forest Mill Alfreton Road	43	2017 - 2028	4	179	10	21500	7	15050	12	25800
Radford Mill Garden Street	48	2017 - 2028	4	200	10	24000	7	16800	12	28800
Sketchley Vernon Road	87	2017 - 2028	7	363	15	65250	9	39150	14	60900
Bestwood Day Ctre Moorbridge	67	2017 - 2028	6	279	14	46900	11	36850	20	67000

Queen's House, Queen's Rd	92	2017 - 2028	8	383	8	36800	7	32200	11	50600
Bildun Site, Station St	50	2017 - 2028	4	208	8	20000	7	17500	12	30000
Cowan St/Beck St	55	2017 - 2028	5	229	9	24750	7	19250	11	30250
Eastcroft Depot	82	2017 - 2028	7	342	8	32800	7	28700	11	45100
Iremonger Rd	67	2017 - 2028	6	279	8	26800	7	23450	11	36850
Western Boulevard	55	2017 - 2028	5	229	15	41250	8	22000	13	35750
Spinney, Sturgeon Avenue	77	2017 - 2028	6	321	11	42350	3	11550	7	26950
Fairham School, Clifton	94	2017 - 2028	8	392	11	51700	4	18800	8	37600
<b>Total</b>	<b>10754</b>		<b>896</b>	<b>44808</b>		<b>5264750</b>		<b>3616350</b>		<b>6249850</b>

										Coddington	tonne mls over build	Averham	tonne mls over build
Capacity 000's tonnes pa										500	period	250	period
Period										2023-2043		2017-2130	
<b>Gedling</b>													
Top Wighay Farm	1000	2017 - 2028	83	4167	16	800000	25	1250000	27	1350000		22	1100000
North of Papplewick Lane	600	2015 - 2022	75	3750	15	450000	22	660000	25	1125000		21	945000
Bestwood Village	1010	2012 - 2028	59	2971	16	808000	20	1010000	27	962471		22	784235
Calverton	1962	2015 - 2028	140	7007	8	784800	16	1569600	22	1849886		14	1177200
Ravenshead	562	2015 - 2023	62	3122	14	393400	28	786800	24	899200		19	711867
Arnold	116	2014 - 2028	19	973	10	146000	11	160600	26	303680		21	244975
Carlton	86	2014 - 2028	14	720	8	86400	10	108000	22	190080		20	172971
Bestwood village	31	2014 - 2028	5	260	16	62400	20	78000	27	84240		22	68585
Burton Joyce	12	2014 - 2028	2	100	5	7500	12	18000	20	24000		18	21722
Calverton	26	2014 - 2028	4	217	8	26000	16	52000	22	57200		14	36605
Lambley	10	2014 - 2028	2	83	7	8750	13	16250	21	21000		19	19107
Linby/Papplewick	4	2014 - 2028	1	33	14	7000	27	13500	25	10000		20	8045
Ravenshead	34	2014 - 2028	6	283	14	59500	28	119000	24	81600		19	64965
<b>Total</b>	<b>5935</b>		<b>474</b>	<b>23687</b>		<b>3639750</b>		<b>5841750</b>		<b>6958356</b>			<b>5355277</b>

## Appendix B Access and Transport



Picture 1: Gunthorpe Bridge facing down Manor Lane



Picture 2: Congestion on the A6097. 3pm weekday

## Appendix B



*Picture 3: Embankment approaching Gunthorpe from the south.  
(Proposed site of processing plant)*



*Picture 4: Proposed site of processing plant access road from Shelford side  
(11:00 am Tuesday 18<sup>th</sup> November)*



## Appendix B



*Picture 5: Proposed site of processing plant access road from Shelford side.  
(11:00am Tuesday 18<sup>th</sup> November)*



*Picture 6: Vulnerable embankment on A6097 from Shelford side.  
(11:00am Tuesday 18<sup>th</sup> November)*



## Appendix C Flood risk

### 1. Flooding on Manor Lane



*Flooding along Manor Lane, Shelford occurs most years.*

### 2. Flooding east of Shelford village



*Flooding at the Hams, east of Shelford, another regular occurrence. This would be the route of the conveyor*

*British Geological Survey Lidar Map showing flood potential*



## Appendix C

### 3. Flooding on West Street, Shelford



### 4. The old course of the River Trent



*The probable migration of the Trent after pit capture*

## Appendix C

### 5. Ground Water (information from British geological Survey 2009 Study)

Flooding adversely affects the Trent Valley. The groundwater flooding hazard in Shelford was calculated based on the simulated hydraulic heads and the elevation of the ground surface. The assumption in this process is that there are no low permeability soil layers above the superficial deposit aquifer.

The groundwater level in the study area was highest on 31/12/2000 and 31/07/2007. In 2000 the areas around Shelford were flooded, especially where subsidence occurs due to coal mining, such as in the northwest of Shelford. The village itself however was not affected by flooding.

The groundwater flood hazard in Shelford itself is low (about 0.5 above the ground surface), **while in the area around the stream to the northwest of Shelford it is high (about 3.8 m above the ground surface)**. It is important to clarify that a positive value of flooding depth does not necessary correspond to an occurrence of groundwater flooding. For example, in Shelford, the superficial deposits are covered by 0.5 m clay layer, which could stop the water reaching to the ground surface to some extent. On 31/07/2007 Shelford village and the surrounding areas had a low groundwater flooding hazard (about 0.5m above the ground surface) except for rivers, streams, and ditches around Shelford with 2.5 m above the bed of river / stream / ditch. The model predicts that groundwater entered the surface water cycle in the form of baseflow on 31/07/2007, and that the rise in river levels at this stage could subsequently have resulted in fluvial flooding in some areas.

### 6. Pit Capture



## Appendix C

The aerial photograph above, from an American study, shows the effects of quarrying for sand and gravel in an oxbow bend in a river. The river has breached the quarry walls and “captured” it. The sediment effects noted below are causing new channels to be cut and the pit has become the new river course. The appearance is very similar to the bend in the Trent in the proposed Shelford West excavation site.

US Best Management Practices from the Department of Wildlife and Fisheries states “A sand and gravel pit shall be located in an area **that precludes pit capture**. Pit capture occurs when a natural buffer separating a pit from a river is breached by stream bank erosion, channel migration or overflowing floodwaters.”

A Texas State University study states “Many breaches into floodplain gravel mines are observed along the Colorado River. Stream bed incision, widening and channel straightening (through meander cut-offs) are documented results of gravel mining in fluvial environments.”

The phenomenon occurs when a gravel extraction site is close to an active channel. The river captures the excavation and the headcut migrates upstream as the local slope increases. The pit then refills with sediment, a lot of which is entering the pit but not much is exiting. This causes a “hungry water” effect downstream which causes the downstream channel to incise. An unstable habitat is created throughout the region until slowly, sediment transport continuity is regained and the rate becomes the same. This constant transport rate is in effect, a definition of stability in the system.

**There is a very real probability of this occurrence in Shelford West as the conditions observed mirror those on this site which in itself goes against best global practise.**

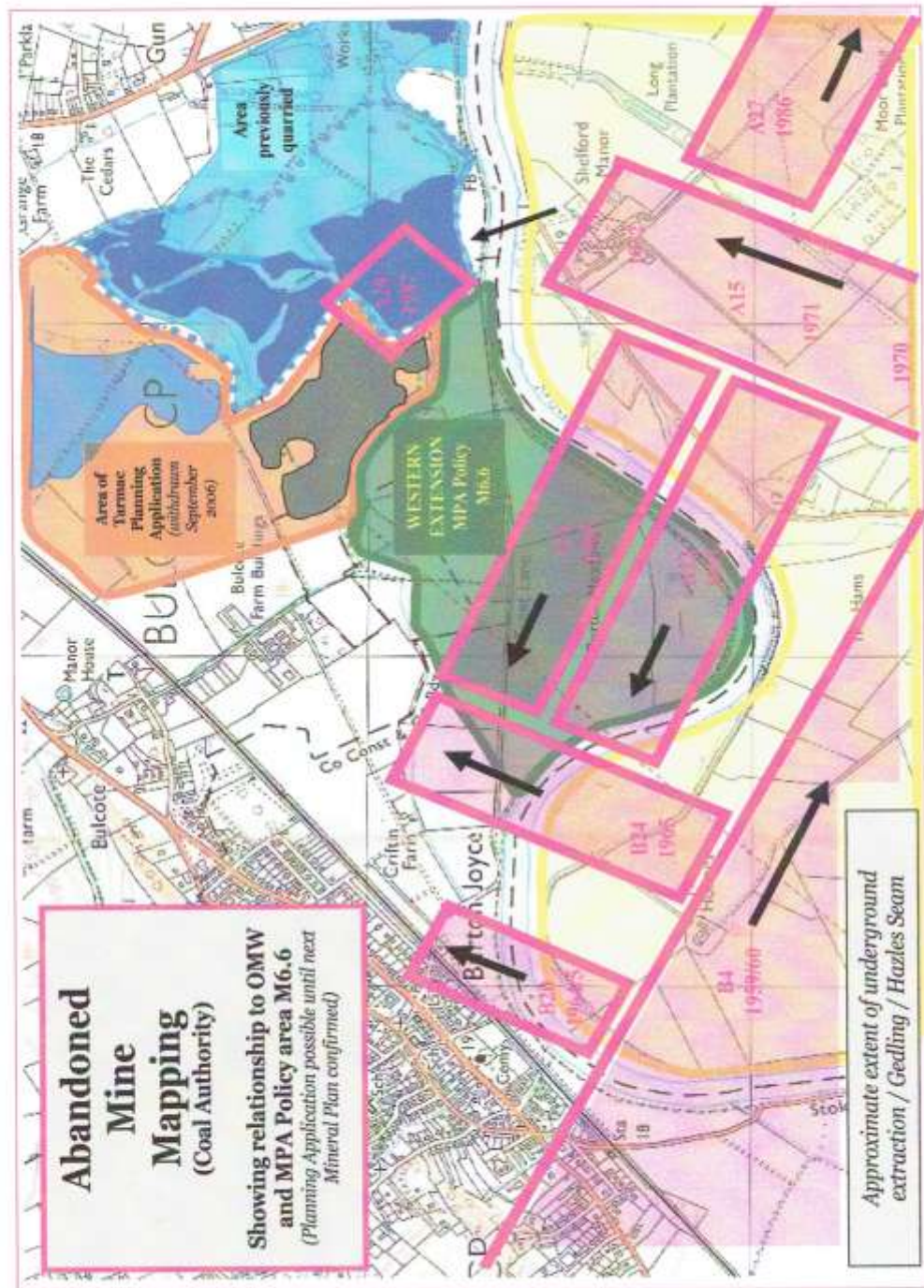
### 7. Abandoned Mining Map

This shows the extent to which Gedling Colliery seams reached into Shelford. In particular they cover much of the area where the conveyor is to be sited and which is regularly flooded.

As a further note – there is a 9 inch water main under Manor Lane and this crosses the route that will be followed by the conveyor.



## Appendix C



## **Appendix D**

### **ECOLOGICAL IMPACT**

#### **1 Methodology**

- 1.1 A Desk-top Study has been carried out around the proposed sand and gravel site at Shelford West including the area covered by conveyor belt and processing plant. This covers the 1Km grid squares SK6442, SK6443, SK6541, SK6542 (quarry site and barging wharf on the Trent); SK6642 (quarry site and conveyor); SK6743 (conveyor); SK6843 (processing plant).
  - 1.1.1 Information and survey data from:
    - 1.1.2 the South Nottinghamshire Bat Group; Nottinghamshire Birdwatchers (and Trent Valley Birdwatchers) Annual Reports and “The Status of Birds in Nottinghamshire”(2009).
    - 1.1.3 The Greater Nottingham Landscape Character Assessment report (July 2009).
    - 1.1.4 Information on SINCs as recorded by Nottinghamshire Biological and Geological Records Centre.
    - 1.1.5 Field data from the records of an experienced local birdwatcher.

#### **2. Habitat Description**

Habitats affected include floodplain meadowland, arable fields, copses, hedgerows, riparian areas and the river Trent. The meadowlands include riparian tree cover of Willow and Ash such as at Swallow Plantation and hedgerows predominantly of Hawthorn with Ash hedgerow trees. This gives an important network/corridor for wildlife and breeding habitat for numerous bird species. Copses in the area on farmed land are of mixed tree species with Beech, Oak, Ash and Hazel and Hawthorn shrubs on the periphery. There are also linear blocks of deciduous woodland such as Water Furrows Plantation and Moor Close Plantation providing habitat for wildlife. Arable field size vary from medium to large and during Autumn/Winter stubble remaining in these fields provide valuable feeding areas for flocks of birds particularly Yellowhammers.

There are four Local Wildlife Sites (formerly SINCs) covered by the Grid Squares. These are Swallow Plantation, Shelford Carr, Field Lane Dyke, and the Trent from Burton Joyce to Lowdham. These sites are predominantly of botanical interest with Shelford Carr and Field Lane Dyke both containing a County rare aquatic plant. Shelford Carr, a Willow Carr

woodland hosting Mudwort (*Limosella*) recorded on the Nottinghamshire Rare Plants Register is vulnerable to pollution from the proposed conveyor belt and vehicle access route. Similarly Field Lane Dyke, containing Whorl-grass (*Catabrosa*) a plant also recorded on the Nottinghamshire Rare Plants Register, is vulnerable for the same reason.

Swallow Plantation is directly affected being on the southern boundary of the proposed quarry site. This site contains 43 recorded species of aquatic and woodland plants but as the last survey was carried out early in the year (April 2010) a full survey later in the year will be needed to give the complete picture of the importance of this site. The banks of the river Trent from Burton Joyce to Lowdham are recorded as a local Wildlife Site due to their importance for the variety of aquatic plants including Tutsan (*Hypericum androsaemum*) which is recorded on the Nottinghamshire Rare Plants Register. This wildlife site would be vulnerable to pollution from the proposed barging wharf.

### **3 Ornithological Interest**

**3.1** The Trent Valley has been a long established two-way migration route for many bird species passing between their breeding grounds in the north and warmer wintering grounds further south. Birds such as Yellow Wagtail, Wheatear and Whinchat are regularly seen feeding and resting on pastureland on the banks of the Trent during both Spring and Autumn migration.

Passerines (perching birds) recorded on migration in the meadowland hedgerows include Whitethroat, Chiffchaff, and Willow Warbler amongst the warbler species. Both pasture and hedgerows in the proposed quarrying area would therefore provide valuable habitat.

**3.2** Resident birds on this pasture and meadowland with its hedgerows include Yellowhammer, Goldfinch, Dunnock, Great and Blue Tit, Pied Wagtail and Grey Heron on field margins with most of these found breeding in the area. There are at least two pairs of Barn Owl in the area and which use the proposed quarry site as their hunting territory. The Royal Society for the Protection of Birds reported in October 2014 that it was farmland birds that were continuing to decline nationwide. Mute Swan and Moorhen regularly breed in the streams crossing the proposed quarry site and the elusive Kingfisher has been seen from the bridge on Stoke Ferry Lane flying down the stream.

**3.3** Winter brings birds from their northern breeding grounds to the fields and river Trent covered by the 1Km grid squares. Passerines including northern thrushes such as Redwing and Fieldfare, and frequently Skylarks (in large flocks during hard winters), pass the winter feeding in the area. Wild geese from the north are attracted both on Autumn migration and especially in winter to the Hams Bridge meadowland often attracted

down by the calls of the resident flocks of Greylag and Canada Geese found here. Pink-footed Goose is the most common as they move between wintering grounds in Lancashire and Norfolk. Other geese species observed at Hams Bridge have included the scarce White-fronted Goose and Brent Goose.

Pastureland around Shelford provides winter resting and feeding grounds for Whooper Swan another breeding bird from the arctic.

**3.4** The river Trent is also a valuable habitat for wintering wildfowl. Duck species spending the winter on the Trent at Shelford regularly include Goldeneye, Tufted Duck, and Wigeon; Grebe including Great Crested and Little Grebe, and Sawbills such as Goosander.

An outflow from the Stoke Bardolph sewage works opposite the proposed barging wharf spills warm water into the Trent at this point. The warm water is particularly attractive in winter to the above wildfowl and where they are joined to feed by many Black-headed Gulls.

Disturbance from the barging wharf would drive these birds away.

**3.5** Stubble on arable fields also provide important winter feeding for Yellowhammer. Its conservation status is defined as a “red” species (rapidly declining) by The Royal Society for the Protection of Birds. This species is largely sedentary (breeding on farmland margins at Shelford) but in the winter large flocks move down from higher ground to feed on the stubble.

Flocks of Yellowhammer feeding on stubble fields along Stoke Ferry Lane in September 2009 rose to 22 on 23<sup>rd</sup> with the same number being present one week later. A flock of 11 was present on 1<sup>st</sup> November 2014.

A full list of the status of birds observed at Shelford can be found in **Appendix D1**.

Individual species observed on two one hour walks in proposed quarry area in **Appendix D2**.

## **4 Mammal Interest**

### **4.1 Bats**

The South Nottinghamshire Bat Group report that along the Shelford stretch of the River Trent there would be 8 species of bat : Daubenton’s Bat, Noctule Bat, Brown Long-eared Bat, Whiskered Bat, Brandt’s Bat, and 3 species of Pipistrelle , Common Pipistrelle, Soprano Pipistrelle, and Nathusius Pipistrelle. Their main feeding areas are woodland such as Swallow Plantation and hedgerows all of which are within the area covered by the proposed quarry.



There are long established nesting colonies of Pipistrelle (Common and Soprano) and Daubenton's Bats under Gunthorpe Bridge which would be in close proximity to the proposed site for the sand and gravel processing plant. The Noctule Bat which feeds out in the open over meadowland has also been recorded at Gunthorpe Bridge, and in 2009 over Burton Meadows, a site opposite the proposed barging wharf. The Brown Long-eared Bat was recorded in March 2010 at their wintering quarters in barns at Shelford Manor close to the proposed conveyor route.

Bats are a protected species and there are regulations against "the deliberate capturing, killing or disturbance and against the damage or destruction of a breeding site or resting place of such an animal". If planning permission is sought for a processing plant adjacent to Gunthorpe Bridge then a licence may be necessary from Natural England. As most bat activity is in close proximity to habitats such as woodland and hedgerows, as found in the proposed quarry location, then their commuting and foraging areas would disappear and could lead to a decline in bat activity in the area. The legal advice of Natural England would need to be sought in these circumstances.

#### **4.2 Mammals other than Bats**

Several species of mammal have been observed or recorded over recent years. These include, Brown Hare, rabbit, fox, grey squirrel, weasel, stoat, hedgehog, mole and a variety of species of vole, shrew and mouse. Sightings of Roe Deer are increasingly being reported particularly from the woodland copses including Swallow Plantation.

There is an active badger sett off Stoke Ferry Lane which would be lost due to its location within the proposed quarry area. Natural England would have to be informed about any disturbance which would threaten this sett.

#### **4.3 Amphibia and Reptalia**

Amphibia of the order Anura including the Common Frog (*Rana temporaria*), Common Toad (*Bufo bufo*) and Common Newt (*Lissotriton vulgaris*) are found widely in the ponds and ditches throughout the area covered by the proposed developments.

Reptalia of the order Squamata include breeding Grass Snake (*Natrix natrix*) with a juvenile found recently (22<sup>nd</sup> September 2014) dead on Stoke Ferry Lane, again within the development area.

**5 Conclusion** Nottinghamshire County Council's Sustainable Community Strategy 2010 – 2020 emphasises "safeguarding countryside green space and animals and plants including nature conservation sites and the enhancement of wildlife corridors".

The proposed developments i.e. quarry, conveyor, processing plant and barging wharf, will all have an impact on the wildlife significance of the area either through habitat loss, pollution or disturbance.

The proposed after-use of the site is open water and wetland. Whilst taken in isolation this type of habitat is highly regarded as significant to the ecological value of an area. However taking a strategic view of habitat creation elsewhere in the Trent Valley it appears that there is already over-supply of this type of habitat. A mix of habitat supporting floodplain meadowland, hedgerows and copses is the habitat which now needs protection in the Trent valley so that bio-diversity can be maintained and enhanced. It is on land such as this that the Royal Society of Birds reported in October 2014 a continuing decline in farmland birds. Natural England likewise identify priority for safeguarding and enhancing flood plain grazing marsh and other grassland habitats in their 'National Character Area Profile: 48 Trent and Belvoir Vales (2013).

If unmanaged the proposed after-use of the site at Shelford West could end up consisting of deep, cold pits and unmanaged wetland with little ecological value. The main organisations responsible for the management of wildlife sites in the Trent Valley ie Nottinghamshire Wildlife Trust and the RSPB are already heavily involved at Attenborough and Langford Lowfields respectively. Without more detail on the ownership and practical management of the after-use of the site there is the danger that any bio-diversity would be sacrificed for a more old fashioned approach of cosmetic treatment or simply abandonment.

It is interesting to note that the after-use of one of the more recent abandoned sand and gravel sites at Hoveringham falls into the category of cosmetic only treatment. This appears to have been simply grass cutting and limited tree planting. The area has become mainly an area very popular with dog walkers disturbing any wildlife that there is. The management issues and problems related to after-use can be deduced at Hoveringham where one of the lakes and surrounding land covering 18.098 hectares is currently up for sale (Autumn 2014).

#### **Appendix D1**

##### **Checklist of Birds Observed on Fields and Riverside in and around Shelford (excluding River Trent)**

**Checklist conforms to the European check-lists of Prof. Voous  
and Editors of Birds of the Western Palearctic**

<b>Species</b>	<b>Status</b>
Cormorant	Resident
Little Egret	Scarce visitor

Grey Heron	Resident breeder
Mute Swan	Resident breeder
Whooper Swan	Winter visitor
Pink Footed Goose	Scarce winter visitor
White-fronted Goose	Rare winter visitor
Greylag Goose	Resident
Canada Goose	Resident
Brent Goose	Rare winter visitor
Wigeon	Winter visitor
Shelduck	Scarce winter visitor
Mallard	Resident breeder
Sparrowhawk	Resident
Buzzard	Resident breeder
Kestrel	Resident breeder
Hobby	Summer visitor
Red-legged Partridge	Resident breeder
Grey Partridge	Resident
Pheasant	Resident breeder
Moorhen	Resident breeder
Coot	Resident breeder
Little Ringed Plover	Passage migrant
Ringed Plover	Scarce visitor
Golden Plover	Winter visitor
Lapwing	Resident
Dunlin	Scarce visitor
Curlew	Scarce visitor
Herring Gull	Scarce visitor
Black-headed Gull	Resident
Common Tern	Passage migrant
Arctic Tern	Passage migrant
Black Tern	Passage migrant
Woodpigeon	Resident breeder
Collared Dove	Resident breeder
Cuckoo	Summer visitor
Barn Owl	Resident breeder
Little Owl	Resident breeder
Tawny Owl	Resident breeder
Swift	Summer visitor & breeder
Kingfisher	Resident
Green Woodpecker	Resident
Great Spotted Woodpecker	Resident breeder
Skylark	Resident
House Martin	Summer visitor
Swallow	Summer visitor & breeder
Pied Wagtail	Resident breeder
Wren	Resident breeder
Dunnock	Resident breeder
Robin	Resident breeder
Whinchat	Passage migrant
Wheatear	Passage migrant
Blackbird	Resident breeder

Fieldfare	Winter visitor
Song Thrush	Resident breeder
Redwing	Winter visitor
Mistle Thrush	Resident
Whitethroat	Summer visitor
Blackcap	Summer visitor
Chiffchaff	Summer visitor
Willow Warbler	Summer visitor
Goldcrest	Resident
Long-tailed Tit	Resident breeder
Marsh Tit	Resident
Coal Tit	Resident
Blue Tit	Resident breeder
Great Tit	Resident breeder
Magpie	Resident breeder
Jackdaw	Resident breeder
Rook	Resident breeder
Carriion Crow	Resident breeder
Starling	Resident breeder
House Sparrow	Resident breeder
Tree Sparrow	Scarce resident
Chaffinch	Resident breeder
Greenfinch	Resident breeder
Goldfinch	Resident breeder
Linnet	Scarce resident
Bullfinch	Resident
Yellowhammer	Resident breeder
Reed Bunting	Scarce winter visitor

### **Birds Recorded on the River Trent at Shelford**

<b>Species</b>	<b>Status</b>
Black-throated Diver	Rare winter visitor
Great Northern Diver	Rare winter visitor
Little Grebe	Scarce visitor
Great Crested Grebe	Common visitor
Shoveler	Scarce winter visitor
Pochard	Common winter visitor
Tufted Duck	Common winter visitor
Goldeneye	Common winter visitor
Smew	Scarce winter visitor
Goosander	Scarce winter visitor

## **Appendix D2**

### **Bird Species Count around Shelford:**

#### **20<sup>th</sup> July 2012 (Stoke Ferry Lane)**

Yellowhammer	2	(two singing males)
Whitethroat	1	
Tree Sparrow	2	
Linnet	several	
Goldfinch	"	
Greenfinch	"	
Chaffinch	1	
Great Tit	several	
Buzzard	1	
House Martin		
Swallow		
Grey Heron		
Woodpigeon		
Jackdaw		
Crow		
Rook		
Pied wagtail	several	
Black-headed Gull	"	
Mallard	1	

#### **5<sup>th</sup> September 2014 (Western Part of Shelford West Gravel Extraction Site)**

Moorhen	3
Goldfinch	2 large flocks
Robin	several
Crow	several
Great Tit	numerous
Woodpigeon	many
Duncock	several
Pied Wagtail	numerous
Yellow wagtail	2 (passage migrant)
Whinchat	2 (passage migrant)
Wheatear	1 (passage migrant)
Yellowhammer	2 (pair)
Grey Heron	several
Jackdaw	numerous
Swallow	numerous
Green Woodpecker	1
Great Spotted Woodpecker	1
Blue Tit	numerous
Coal Tit	2
Blackbird	numerous
House Sparrow	numerous
Sparrowhawk	1
Magpie	several
Chaffinch	several

## Appendix E

### 1 Landscape Assessment

**1.1** The Greater Nottingham Landscape Character Assessment (GNLCA) Report (July 2009) identifies three landscape types/zones pertinent to Shelford and the proposed area for sand and gravel extraction.

**1.2** Zone TW PZ 51, Stoke Lock Meadowlands, is described as an area relatively undeveloped and the pattern of landscape elements as coherent. The local distinctiveness is characteristic of the Trent Valley washlands and has continuity/time depth in history (post 1600). The flat landscape allows longer distance views up and down the Trent Valley. Zone TW PZ 7, Shelford Village Farmlands, is reported as having historic field boundaries which are intact around the village. The area is described as visually unified with a coherent functional integrity/habitat for wildlife and gives a good landscape condition. The historic field pattern is largely intact and gives a good landscape condition. The landscape assessment of both these zones is described as coherent, characteristic and historic, and where the character should be conserved and reinforced.

**1.3** Zone SN 05, East Bridgford Escarpment Farmlands, is not directly in the proposed mineral extraction area. However this area has great significance for the impact the proposal would have on the landscape around Shelford. The escarpment from Shelford Road between Radcliffe-on-Trent and Newton has a steeply sloping northern edge down to the Trent washlands. The GNLCA emphasises the extensive and distinctive views across the low-lying farmland along the River Trent and to the village of Shelford. The report suggests landscape action to conserve and enhance opportunities for distinctive views across the Trent Washlands from adjacent roads (Shelford Road) on higher ground through careful management of hedgerows and woodlands to retain views. This iconic view, one of the best and most loved views in Nottinghamshire, will be addressed later under "community involvement".

**1.4** Whilst appreciative of the findings of the 2009 GNLCA where all three zones received a good commentary there is concern to the lack of stakeholder, as interpreted by **community**, involvement in the landscape assessment.

**1.5** The GNLCA approach to landscape assessment included a technical and somewhat mechanistic Desk Study followed by a Field Study carried out by both "car and foot from publicly accessible locations". There was an element of Public Consultation but this took the form of a one-day workshop of invited stakeholders on 6<sup>th</sup> April 2009. These stakeholders were "specialists" including landscape architects, planners, heritage specialists and nature

conservationists. These “specialists” saw the river valleys and in particular the Trent Valley as a key landscape asset. They identified ridges as valued for their long views they afforded over the landscape. Such a “long view” over the Trent Valley from a ridge brings us back to the view from Shelford Road over the Trent Washlands.

**1.6** The difficulty in broadening stakeholder involvement to include the “general” public and local communities is widely recognised. If however one looks to national guidance from Europe and the UK it is evident that community involvement should be sought in local landscape assessment.

**1.7** The European Landscape Convention (ELC) which came into effect in the UK in March 2007 defined landscape as “landscape means an area as perceived by people”. Locally, the Nottinghamshire Landscape and Reclamation Team declared they would review the 1997 Nottinghamshire Landscape Guidelines in line with Government advice. This advice was contained in the 2002 Countryside Agency/Scottish Natural Heritage’s Landscape Character Assessment guidance for England and Wales and with which Nottinghamshire commenced their landscape assessment in 2003. This guidance strongly promotes “community involvement” and recommends an approach which includes the relationship between people and place and the way people perceive their local environment.

**1.8** Recently guidance contained in “An Approach to Landscape Character Assessment” by Natural England (2012) stresses the importance of involving people at all stages of landscape assessment, Desk Study, Field Study, and area definition. This report emphasises that people’s links with, and perception of, place are very important. The perceptual and aesthetic factors including “memories, associations and perceptions, should be obtained via stakeholder (community) engagement.” Nottinghamshire County Council would now no doubt support community involvement in landscape assessment as their Sustainable Community Strategy 2010 –2020 seeks to “enhance community engagement and fuller participation”.

## **2 Local Community Involvement**

**2.1** Taking a lead from UK government advice (2002) a survey of local community opinion and perception was undertaken of the iconic landscape view from Shelford Road overlooking the Trent Valley flood-plain.

**2.2** This view has already been painted by professional Victorian artists such as Edward Price (1801-1889) and given national recognition in a previous edition of Michelin’s ‘East Midlands Tourist Map’ and Arthur Mee’s ‘The Kings England’ series for Nottinghamshire (1938). Mee describes the view from Malkin Hill (now known as Shelford Hill top) as “a luxuriant patchwork of pasture and ploughland and winding river, Nottinghamshire has few

prettier or more typical scenes to show us". Recently, Rural Community Action Nottinghamshire in 'Nottinghamshire's Hidden Gems : East of the City' describes for Shelford the "breathtaking view from the high road between East Bridgford and Radcliffe-on-Trent".

**2.3** Consequently, in 2009 a Landscape Community Survey Questionnaire elicited the views of local people as to their perception of the view from Shelford Hill top over the Trent Valley including surveys at Radcliffe-on-Trent carnival, East Bridgford Post Office, and in 2012 at Shelford feast week-end.

**2.4** Visitors were shown a photograph of the view over the Trent valley and asked for their evaluation of the view. A total of 416 people rated the view as "Excellent", "Good", "Fair", "Poor" or "Indifferent". 92% rated the view as "excellent" and 8% as "good". Only 84 responses came from people living in Shelford whilst the remainder, 332, came from people living in surrounding villages. The appreciation of the view by the wider public is particularly noteworthy.

**2.5** Reasons for responses included 'a sense of place and belonging, relationship to memories, a feeling of uplifting of spirits and simple enjoyment of the view'. Examples included "it raises one's spirit", "soothes and calms", "the view gives a sense of place", "and the view is part of my heritage", "one of the best views in the County". Several people mentioned that this was a very accessible view such as "only accessible view of an unspoilt panorama" as reported by one respondent. **A selection of typical comments from respondents can be found at para. 2.8.**

**2.6** When asked how important it was to protect the view from development 96% of the 416 respondents deemed it "very important" and 4% as "important".

Evidence from the Community Landscape Survey is available on request.

**2.7** Results from the Community Landscape Survey endorse the views held by the "specialist" stakeholders at the one-day workshop (6<sup>th</sup> April 2009) and from Zone SN 05 that the long views over the Trent Valley landscape were an asset and should be conserved and enhanced.

There is little doubt that the view from Shelford Hill top overlooking the Trent Valley floodplain is one of the finest views in the County. **This iconic and historic view of mixed farmland with its mosaic of hedges and copses would be lost forever if mineral extraction were to be allowed at Shelford West.** Replacement of this landscape with yet more flooded pits would culminate in a vast series of lakes down the Trent Valley all at the expense of the traditional farmed landscape. This problem of the cumulative impact of sand and gravel extraction in the Trent Valley has not gone unnoticed by Nottinghamshire Minerals Planning



Team. Paragraph 6.14 of the Nottinghamshire Minerals Local Plan (adopted December 2005) draws attention to “the major issue of unacceptable change to the landscape character of the Trent Valley”. **Sand and gravel extraction around Shelford would only add to this unacceptable cumulative change to the traditional cherished landscape of the Trent Valley.**



*View to the West from Shelford Hill overlooking the Trent valley*



*View to the North from Gibbet Hill overlooking the Shelford West quarry site*



*Painting of the Shelford Valley by Edward Price (1801 – 1889)*



*Hoveringham; one of the multiple wet pits in the Trent valley*



*Gunthorpe with National Watersports Centre in the distance; further evidence of steep sided, cold water pits which are common in the Trent valley.*

## **2.8 Selection of Comments from People Responding to Landscape Community Survey (View over Trent Valley from Shelford Hill Top)**

“ it lifts the spirit ”

“ gives pleasure to thousands of passers-by ”

“ soothes and calms ”

“ the view is part of my heritage – it represents what rural England means to me ”

“ my daughter calls Shelford ‘Toy Town’. We look across the view from Shelford top and as we drive down our troubles disappear. It looks like a toy village from the top.”

“ the view provides a changing picture of the seasons ”

“ its like a Constable painting which changes throughout the year ”

“ only easily accessible view of an unspoilt panorama ”

“ breathtaking view ”

“ one of the best views in our County ”

“ cars pull in to admire the view ”

“ many cyclists can be seen sitting on the bench admiring the view ”

“ ease of access for such a lovely view ”

“ views of this quality are few and far between ”

“ nearest view of its type close to the city ”

“ unique view, replacement by more water based environment of which Nottinghamshire already has too much, is a poor substitute ”

“ I like the view and don't want to see diggers and holes ” (Grace aged 8 years)

## **Appendix F    Air Quality**

To whom it may concern,

I write this in my capacity as a local GP working at East Bridgford Medical Centre. Our practice boundary includes Shelford, Gunthorpe, Caythorpe, East Bridgford and up the A46 to Farndon.

There is a lot of talk in the Medical Centre amongst staff and patients about what a detriment the gravel extraction will be to the locality in terms of loss of scenery, possible flood risk and large concern about effects on the traffic flows of the already saturated A6097.

One of my concerns that has not been particularly focussed upon is the worsening air quality of the area. It is well known that the Trent Valley this side of Nottingham causes a worsening of respiratory conditions. It is very common for me to see patients who have recently moved into the area and worry about a worsening of their respiratory problem such as asthma or COPD (emphysema). This often requires extra treatment to control their symptoms. This is well known and reported in the area.

I cannot offer a proven scientific reason for this but I can offer hypotheses:

1. Patients often feel that the low sloped valley funnels allergens and particulate matter so that it does not diffuse and dilute itself with surround air flow streams. I am not a meteorologist but this funnel effect could reduce pollution rising up above ground floor level.
2. This funnelling effect would be worsened by the fact that the Prevailing West, South Westerly winds bring pollution directly from Ratcliffe-on-Soar power station and the city of Nottingham up the Trent Valley towards Shelford and other villages along the Trent Valley. It was reported very recently in the Nottingham Evening Post that Nottingham was one of the worst cities for air pollution using the attention grabbing headline 'Choking to death'. For the majority of the time, the prevailing wind blows this pollution directly up the Trent Valley exacerbating point 1.

I propose that this will be worsened by the planned gravel extraction at Shelford for three reasons:

1. Diesel and particulate matter from the considerable development of the site and continued extraction of the gravel and pumping of water throughout the lifetime of the proposal.
2. Dust generation from the site which will again be blown directly along the Trent Valley for the majority of the year with the Prevailing wind.
3. Diesel and particulate matter from the A6097. This road is almost at saturation and has standing queues of traffic on a daily basis stretching from Gunthorpe bridge to Lowdham roundabout. We know from the application by Brett Aggregates that they plan to put a large number of diesel heavy goods vehicles onto the A6097 throughout the day. These will be leaving and returning on a very regular basis. Since the road is already saturated (as Gunthorpe Parish Council have pointed out to Nottinghamshire County Council on many occasions) this will lead to very real worsening of the situation as lorries pull out onto the A6097 and immediately have to accelerate up a steep incline to the East Bridgford traffic lights (where they will have to stop again and once more accelerate up the hill). Their presence will also

cause braking and accelerating of other traffic and more standing traffic which will further increase pollution levels.

I am concerned that this will further worsen the health of the surrounding villages. I am aware of the policy document produced in partnership between the Nottinghamshire Local Authorities, the Environment Agency, The Health Protection Agency and the Highways Agency. The work was led by the Nottinghamshire Environmental Protection Working Group and was entitled 'A breath of fresh air for Nottinghamshire – An Air Quality Improvement Strategy for the Next Decade'. This was produced in 2008 so is presumably still current but if it has been superseded please accept my apologies but I could not find a newer version.

I note that the policy advises that air quality is a material consideration when assessing planning applications and, where a significant deterioration in air quality is predicted, put in place conditions to mitigate the effects. I feel that this is just such an application.

The policy also states that wherever possible all new developments are accessible by alternative means of transport, minimising the need to travel by supporting mixed development schemes. I could not agree more with this and it would reduce the pollution in point 3 above. I understand that Brett Aggregates have suggested they could use a barge on the River Trent for some of the gravel to be transported to Colwick. We know from previous applications around the UK for gravel extraction that these are put into applications and then never completed as 'problems' arise further down the line so I am sceptical that this would ever happen.

According to the policy document, the Highways Agency is meant to look for solutions to:

- Avoid impact on pollution and traffic through Sustainable Location
- Minimise impact through realistic Travel Plans
- Manage access appropriately
- Capacity enhancements (e.g. building new roads) as a last resort and only where compatible with suitable principles.

If this goes ahead then I can see that the dust and pollution in the area will worsen and have a further effect on people's health. I can also see the A6097 grinding to a halt for even longer periods through the day. There is not the money to improve the road infrastructure of the A6097 in the next 5-10 years so the four points above for the Highways Agency do not see achievable.

I hope that you will see that there are better places with better road infrastructure and much lower levels of surrounding population further up and down the Trent. I am genuinely concerned about increasing air pollution down the Trent Valley; I already see the effect that it has on respiratory problems on a daily basis.

Yours Faithfully

Dr Chris Cope BMedSci (Hons), BM BS, MRCP



## Appendix G    Quality of Life and Human Health

1. The incidence of mosquitoes has been increasingly rapidly in recent years, mainly due to climate change leading to wetter winter and springs and warmer summers. A study by the Department of Biological Sciences at Reading University reports the incidence of the mosquito species *An. plumbeus* in the late season of 2012 had seen a devastating increase from the previous year. Although there are 34 different species of mosquito in the UK this species is the dominant species in rural areas.

The main habitat for mosquito larvae to breed is standing fresh water ranging from lagoons, wetlands, and marshes to ponds. "Adult mosquitoes tend to travel limited distances, thus are found nearby their breeding sites" ([www.stratford.gov.uk](http://www.stratford.gov.uk)). The Government's Public Health Agency is concerned about the continued spread of invasive mosquito species in Continental Europe and believe that the UK could be the next target (July 2014).

**The proximity of new lagoons and wetland habitat so close to Shelford village brings the real prospect of mosquito problems and future health risks.**

2. The Trent Valley Way (TVW) is a popular walking route for both serious ramblers and the casual walker. It is of significance both on a local and national scale. Several local ramblers groups regularly use the footpath along the stretch at Shelford and its popularity could well increase with the intention of extending and completing the 170mile route from its source on Biddulph Moor to Alkborough on the Humber Estuary.

The stretch of the TVW at Shelford provides a very popular circular route from Radcliffe-on-Trent and back. The site of the proposed quarry severs this route, a local route which provides opportunity for the enhancement of health and well-being. The significance of this circular route should not be underestimated as it was selected for national prominence when the journalist Mark Rowe wrote about it in 'the Independent' on 2<sup>nd</sup> December 2007 for his "Walk of the Month." He described his walk which began and ended at Shelford Church as "the setting is intensely rural", the view from Gibbet Hill "with impressive views of the River Trent" and whence he returned to the Church via Stoke Ferry Lane.

The proposed re-routing of the TVW around the proposed quarry site is a poor substitute for the views and ambience afforded by the current walk along the Trent flood bank and which would be lost with its severance on Stoke Ferry Lane. **We contend that the Minerals Planning Team's commentary that "significant improvements to the Trent Valley long-distance footpath are proposed from the beginning of the development" has little credibility in practice.**

# Heaton | Planning

Planning Consultants

My Ref: 001 / IGAS - 003 - M / SJW

Your Ref:

Date: 29 March 2016

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

**RE: Nottinghamshire Minerals Local Plan Consultation – Submission Draft 15 February to 29 March 2016. Response on behalf of IGas Energy.**

This response to the submission draft of the Nottinghamshire Minerals Local Plan is prepared on behalf of IGas Energy. IGas Energy is a leading British oil and gas explorer and developer, producing c.1m barrels of oil and gas equivalent every year from over 100 sites across the country, with significant potential yet to be delivered from assets. IGas has played a key role in Britain's onshore energy production; safely exploring, developing and producing onshore oil and gas for over three decades.

IGas currently operate around 80 sites within the East Midlands, extracting hydrocarbons from around 16 oil fields. The area accounts for c.50% of the company's current production, with more than 47 million barrels of oil recovered to date.

IGas' operations in the East Midlands area also comprises of two primary production areas: Welton and Gainsborough.

The Welton area is made up of six fields and a gathering centre where the produced oil, gas and water are separated. The produced oil is transported to Conoco Immingham via road tanker; gas is used for power generation and exported to the National Grid.

The Gainsborough area is made up of 10 fields and a processing facility. Oil is transported to Phillips 66 via road taker; gas is piped to Gainsborough 1 for power generation.

More recently IGas has submitted a planning application at Springs Road, north of the village of Misson, for permission to drill up to two exploratory boreholes targeting the Bowland Shale.

A planning application for a hydrocarbon well site to drill an exploratory borehole at Tinker Lane, near Bawtry, is currently being prepared.

Our response to the MLP focusses on the Vision and Strategic Objectives; Policy MP12 Hydrocarbons and the supporting text; and the general development management policies.

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## Vision and Strategic Objectives

### 30051 **Vision**

On page 21, the 'Vision' for the Plan is set out. The penultimate paragraph states that:

*'All mineral workings will contribute towards a 'greener Nottinghamshire' by ensuring that the County's diverse environmental assets are protected, maintained and enhanced through appropriate working, restoration and after use ....'*

We do not feel the part of the 'Vision' stating environmental assets should be "enhanced" can be made applicable for "all mineral workings" and, as a result, is not sound. For example, the site off Springs Road is located on land formerly occupied by Bloodhound Missiles during the Cold War. There is a clear expectation that the integrity of this use is protected with restoration back to original conditions. For this site, we do not feel it is possible to "enhance" environmental assets. This will be the case for many mineral operations where the operating company do not own the land as it is often a clear aspiration by the landowner to return the land to the original use, predominantly agricultural in the case of minerals development. Without landowner support the vision will be difficult to deliver.

### 30052 **Strategic Objective 03**

SO 03 seeks to *'minimise and mitigate the impact of mineral developments on climate change by encouraging efficient ways of working including reductions in transport and onsite machinery'*. We are unsure on how this can be achieved and find it difficult to see how the MPA can deliver this objective or monitor for its effectiveness.

### 30053 **Strategic Objective 06**

SO 06 states, *'Appropriate restoration will result in a net gain for biodiversity through the creation of new ecologically valuable habitats, and will contribute to the delivery of biodiversity at a landscape-scale and the enhancement of ecological networks.'* As this statement implies that restoration that cannot provide a net gain is inappropriate we do not believe this approach can be justified.

### 30054 **Policy SP4 – Climate Change**

Policy SP4 seeks to minimise the impact on climate change of all mineral development. Where applicable development should assist in the reduction of vulnerability and provide resilience to the impact of climate change by:

- (a) *Being located, designed and operated to help reduce greenhouse gas emissions, withstand unavoidable climate impacts and move towards a low-carbon economy.*

We believe it will be difficult to monitor and enforce these conditions and, therefore, we do not believe SP4 (a) is either a justifiable or effective aspiration.

30055 **Policy SP5 – Sustainable Transport**

SP5 (a) requires all mineral proposals to maximise the use of sustainable forms of transport, including barge and rail. This is an aspirational approach but, in terms of the tests of soundness, we question whether it is justifiable and, as set out in the NPPF, whether it is *‘the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’*.

Furthermore, pages 37 and 38 of the MLP setting out the justification for the Policy readily acknowledges that there are difficulties within the County of barging minerals (sand and gravel) and that rail transport is prohibitively expensive. For the majority of planning applications submitted for new mineral development, an assessment will be required to demonstrate that alternative forms of transport to road have been assessed when it is clear that the MPA already acknowledge this to be an exercise of proving the negative. Accordingly, there seems little justification in retaining this policy.

30056 **MP12: Hydrocarbon Minerals**

We do not believe that the approach being taken in the MLP in relation to hydrocarbons in section MP12 is positively prepared.

Paras 4.111 to 4.112 set out the background and approach for shale gas. It is acknowledged within the MLP that there is a potentially significant shale gas resource within Nottinghamshire but the Plan fails to make reference to the potential benefits of a shale gas industry within the UK, at the local level or the Government support within the Planning Practice Guidance to the NPPF or recent Government statements.

Para 4.112 of the MLP makes the claim that shale gas extraction “is a very intensive activity” yet fails to back up this statement with any evidence or experience. For example, the footprint taken up by the site at Springs Road, near the village of Misson, is very small in comparison to a colliery or a sand and gravel quarry or, indeed, the equivalent footprint required for wind or solar farms to realise the same energy potential. With the operation themselves having far less environmental impacts than a standard quarrying operation.

There is a clear promotion of a shale gas industry at the national level and for consistency this should be reflected within the MLP.

The Planning Practice Guidance (PPG), originally published by the Department of Communities and Local Government (DCLG) in March 2014, at Minerals paragraph 91 (reference ID: 27-091-20140306) states that *“as an emerging form of energy supply, there is a pressing need to establish – through exploratory drilling – whether or not there are sufficient recoverable quantities of unconventional hydrocarbons such as shale gas .....present to facilitate economically viable full scale production.”*

A Government supported Ernst and Young supply chain report (Getting ready for UK shale gas, April 2014) indicated *‘there could be significant benefits for jobs and growth from a successful UK Shale industry: over 64,000 jobs at peak could be supported across the wider economy, with more than 6,000 jobs on shale pads themselves. Many of these would be highly skilled, high quality jobs, with above average pay.’*

A combined shale gas and oil policy statement by DECC and DCLG (15 August 2015) stated the following:

*A national need to explore and develop our shale gas and oil in a safe, sustainable and timely way.*

*Exploring and developing our shale gas and oil resources could potentially bring substantial benefits and help meet our objectives for secure energy supplies, economic growth and lower carbon emissions.*

*The Government therefore considers that there is a clear need to seize the opportunity now to explore and test our shale potential.*

There is a clear intention at national Government level to seize the opportunity now to explore and test our shale potential and this support should be explicit within the MLP.

On a couple of points of clarity:

At para 4.117 it states that the, '*PEDL licences allow the holder to explore and develop ...*'. The PEDL licences actually place an obligation on the holder to explore and develop for hydrocarbons and ability to both explore and develop requires obtaining planning permissions and various additional environmental permits and permissions.

At para 4.118, the first bullet point makes reference to DECC who issue PEDLs. This function has now transferred to the Oil and Gas Authority.

## 30057 Development Management Policies

Policy DM5: Landscape Character.

Part 1 states:

*Proposals for minerals development will be supported where it can be demonstrated that it will not adversely impact on the character and distinctiveness of the landscape unless there is no available alternative and the need for the development outweighs the landscape interest and the harmful impacts can be adequately mitigated.*

This approach is not sound. It is not consistent with national policy seeking to place a weight on the impacts upon landscape character comparable to that of nationally designated landscapes of which there are none in Nottinghamshire.

Planning Practice Guidance recommends that Local Plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. The PPG continues by recognising that landscape character assessments can help to inform, plan and manage change and may be undertaken at a scale appropriate to local and neighbourhood plan-making.

Policy DM5 as currently worded does not provide any clarification to the degree of adverse impact that may be allowable and the tests that follow are not proportionate to the status of landscapes within Nottinghamshire.

Part 1 of Policy DM5 should be worded as follows:

*Proposals for minerals development should have regard to the County Council's three Landscape Character Assessments and seek to protect and enhance valued landscapes.*

30058 Policy DM6: Historic Environment

Policy DM6 is not sound as it is not consistent with national policy. Part 1 of the policy is a rehash of Para 133 of the NPPF, we feel that the wording within the NPPF provides greater clarity to the approach to be taken for designated heritage assets. It should be made evident that non-designated heritage assets do not hold the same planning weight unless, as set out in para 139 of the NPPF, they are demonstrably of equivalent significance to scheduled monuments. If this is so, then non-designated heritage assets are considered subject to the policies for designated heritage assets.

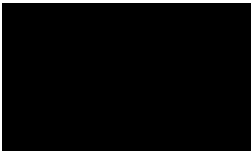
Para 135 sets out the correct approach for determining a planning application where a non-designated heritage asset may be impacted. It states:

*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

Part 1 of Policy DM5 should be re-written so that is consistent with the approach advocated in Paras 133, 135 and 139 of the NPPF. This approach is clearly recognised within Para 5.80 of the MLP.

I trust that the above response is clear. Should you require any further information please do not hesitate to contact me.

Yours sincerely,



Spencer Warren  
Heaton Planning Limited

## Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mr	
First name	Roger	
Last name	Fell	
Address line 1	██████████	
Address line 2	██████████	
Address line 3	██████	
Postcode	██████	
Email	██████████████████	
For those replying on behalf of an organisation or group:		
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?

n/a

### 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"/>
--	--------------------------	--	-------------------------------------

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 March 2016
Name	Roger Fell		

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

## Part B – Your representation

Office use only  
Person No: 2474  
Rep No: 29774

Please read the guidance note before completing this section.

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

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

Legally compliant?	Yes		No	√
Sound?	Yes		No	

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

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

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

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

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

#### Draft Mineral Local Plan / Not Legally compliant:-

The document has been issued for final consultation following voting at Sustainability and Environment Committee (4<sup>th</sup> January 2016) and Full Council (14<sup>th</sup> January 2016) which appeared to the reasonable observer to be politically decided and not – as required – a vote by Members demonstrating 'an open mind'.

The document is a planning matter created by Town & County Planning (Local Planning)(England) Regulations 2012.

Votes were cast in a 'block format' corresponding to political groups recognised by the County. A request was made for the vote to be recorded.

It was clear that Members were confused by various procedural issues. Accusation was made by Members that the Document was an officer led decision.

Voting on planning matters shall not be the subject of predetermination but shall be capable of demonstrating that each Member has been able to consider the relevant arguments.

It appears doubtful that at any future planning application stage for individual sites that those voting will be able to prove there is no predetermination and thus an open mind.

This issue has been raised with Jayne Francis-Ward (Monitoring Officer) in 2 separate e-mails but there has been no response to points raised and thus the matter is now being considered for submission to Local Government Ombudsman on ground of maladministration.

A critical set of data was challenged to be out-of-date (calculation of required mineral provision over plan period): a motion was passed requiring that Officers revisited this aspect within the period of Consultation. No further information has been made available as of 0900 27 March 2016 and thus the document relies on out-of date information which is key to the overall plan. It is required that the latest information possible shall be used to form the plan.

Consultees have been denied opportunity to cross-examine relevant data.

**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.*

Return plan to Committee and Full Council for a recorded Member vote and including latest set of data.

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

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

<b>Signature</b>		<b>Date</b>	29 March 2016
<b>Name</b>	ROGER FELL		

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

## Part B – Your representation

Office use only  
Person No: 2474  
Rep No: 29775 and 29779

Please read the guidance note before completing this section.

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

Policy	SP5	Site code	MP2r	Map/Plan		Paragraph		Other	
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### 2. Do you consider the identified part of the document to be:

Legally compliant?	Yes		No	
Sound?	Yes		No	√

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

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

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

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

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

#### **BARGING (Shelford West)**

The element of barging 180,000 tons per annum over the plan period has clearly been a major contributing factor in the sustainability analysis to permit Shelford West to be allocated (and with inference that Shelford East will subsequently be allocated)

There is no effective quantitative analysis to show the viability of this potential operation – approx 700 tonnes per operational day. There is no proven contractual arrangement to take up the 180,000 tons at Colwick.

Research has shown that gravel barging from Besthorpe Wharf ceased 31 July 2013 after merger between Tarmac and Lafarge: this used 400 / 500 ton barges which are too big for the Trent upstream of Cromwell. These units are now stored.

There is some issue about the provision of suitable dumb barges to service the Shelford West site: the general principle appear to be to use 2 or 3 dumb barges with a single "pusher" but as of yet there is no proven operator in place and there appear no units available.

There is no clarity as to how the 180,000 ton p.a volume is calculated and the actual demand at Colwick wharf which is owned by Canal and River Trust.

There is no information of usable value to indicate how the proposed conveyor system and required loading gantry will operate: it appears material excavated within the Shelford West area will be transported via conveyor to processing plant adjacent to A6097 before being returned to the proposed new wharf installation – this using a single conveyor system which is proposed to be carried in a trench. This trench is likely to be a significant scale to enclose the conveyor system and allow servicing access.

The conveyor loading gantry will be a major industrial installation within an unspoilt riverscape if designed to the same specification as at Besthorpe Wharf.

There is no statement of intention to deal with the potential lack of use of barging once permission may be granted: the 180,000 ton provision appears not to be an enforceable element of planning permission should the operator later wish to claim it is not economic: there is no funding grant to offset higher costs.



**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.*

Abandon all baring concept.

Control lorry movement by routeing agreements to minimise or totally restrict use of A612 via Burton Joyce.

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

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

<b>Signature</b>		<b>Date</b>	29 March 2016
<b>Name</b>	Roger Fell		

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

## Part B – Your representation

Office use only  
Person No: 2474  
Rep No: 29776 and 29777

Please read the guidance note before completing this section.

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

Policy	SP2 / 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	
Sound?	Yes		No	√

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

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

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

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

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

#### MINERAL PROVISION

Analysis of required sand and gravel demand is deeply flawed and simplistic over the plan period.

Schedule is out-of date and not as required in the process which requires latest data to be used – needs to be a 'living document' rolling analysis with some form of upper and lower value indicated.

Officers were required to revisit and recalculate this information within the period of consultation ending 29<sup>th</sup> March 2016. This data has not been made available to consultees despite request.

It appears that recent extensions to planning permissions may be unrecorded in the present data – for instance the 800,000 tons of unused reserves at Besthorpe now granted additional time of 8 years supply together with retention of the currently 'mothballed' loading conveyor at Besthorpe Wharf.

(see [www.nottinghamshire.gov.uk/planningsearch/plandisp.aspx?AppNo=V/3197](http://www.nottinghamshire.gov.uk/planningsearch/plandisp.aspx?AppNo=V/3197))(December 2015)

Poor analysis of market demand and geographical distribution over plan period: no substantive data to support argument to supply Nottingham market and the potential use of barging to Colwick wharf.

**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.*

Latest production and demand data required.

Detailed market requirement to justify total estimated allocations.

Detailed analysis of use of secondary (re-claimed) material required and supply.

Detail breakdown of geographical demand to establish lorry routeing etc.

Deatied amalysis of type of materai (aggregate) from different quarry locations.

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

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

<b>Signature</b>		<b>Date</b>	29 March 2016
<b>Name</b>	Roger Fell		

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

## Part B – Your representation

Office use only  
Person No: 2474

Rep No: 29778 and 29779

Please read the guidance note before completing this section.

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

Policy	DM9	Site code	MP2r	Map/Plan		Paragraph		Other	
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### 2. Do you consider the identified part of the document to be:

Legally compliant?	Yes		No	
Sound?	Yes		No	√

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

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

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

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

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

#### **HIGHWAY SAFETY (Shelford West)**

The draft proposal to link directly onto the Strategic Road Network (A609 / Bridgford Street) fails to comply with the adopted NCC Policy (1<sup>st</sup> April 2009) Section IN5: Our Access to Road Network Policy.

The road speed at the proposed location is national 60mph.

Road is already demonstrating capacity has been achieved in peak daytime (weekday) periods – single narrow carriageway with queuing traffic a major issue in both peak periods for a significant distance on both north and south bound carriageways.

Within a section of highway experiencing high road collision rates particularly to the immediate north at crossroad of A6097 / Shelford Manor Lane and Trent Lane (Gunthorpe Bridge).

Limited vision (sightline) from north on a long left hand curve.

At limit of a section of A6097 controlled by average speed cameras (40mph).

Proposed traffic light junction is on an embanked slope of highway which is known to be unstable.

A6097 is a Main Strategic Highway over Gunthorpe Bridge and has a high HGV content.

Section IN5 para 1.27 states “we will severely restrict access to the most important high standard routes”.

Background e-mail information between the operator's agent and NCC Highway is inconclusive in terms of whether planning permission is issued: there does not appear to be sufficient analysis of alternative access.

The presence of an Environmental Weight Limit does not preclude the use of minor road access to premises by commercial vehicles exceeding 7.5 tons.

False weighting has been given in the Sustainability Analysis to allocate Shelford West by an assumption that the junction is to be directly onto A6097: initial SA rejected the site on highway access grounds.

**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.*

Move site access to "C" road (Bridgford Road between Kirkhill (EB) and Newton village by using an existing private access track.

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

<b>Yes</b> ✓	<b>No</b>
<b>If Yes, please give details</b>	By various e-mails

<b>Signature</b>		<b>Date</b>	29 March 2016
<b>Name</b>	Roger Fell		

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

MARCH 8

RECEIVED

10 MAR 2016

PLACE

DEAR SIR

CONCERNING GRAVEL EXTRACTION AT CODDINGTON NEWARK. BEING CLOSE TO THE SITE I AM OBVIOUSLY CONCERNED. A 20 YEAR SENTENCE TO NOISE WHICH CAN CARRY SEVERAL KILOMETERS REGARDLESS OF BANKS AND TREES. AND THE POTENTIAL TO DEVALUE MY PROPERTY, AND OR MAKE SALE DIFFICULT, AND AN INCREASE IN HEAVY TRAFFIC ON A17. ITS DISTURBING TO KNOW THAT YOU MAY ALLOW CONTRACTORS TO HACK YET ANOTHER 400 ACRE HOLE IN THE SURFACE OF OUR PLANET. TWO THIRDS

OF WHICH IS ALREADY COVERED IN WATER. IF SOMEONE BUILT A GARDEN WALL THAT WAS A COUPLE OF BRICKS TO HIGH THEY WOULD BE MADE TO TAKE IT DOWN, BUT A 400 ACRE PIT IS VISIBLE FROM SPACE! WHAT WOULD WE DO IF THE GRAVEL DID NOT EXIST? WHEN FINISHED WE WILL BE TOLD 'ITS GOOD FOR DUCKS. BUT AS THERE ARE ALREADY A SUBSTANCIAL NUMBER OF PITS IN THE AREA (15 MILE) DUCKS HAVE 5 STAR ACCOMMODATION ALREADY AND ITS A WEAK ARGUMENT.

Faithfully

## Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mr	
First name	Derek	
Last name	Kitson	
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?**

This response represents my own personal response as owner and occupier of 2 Trinity Farm Cottages together with my professional response as a local planning agent whose offices are at Trinity College Farm, Great North Road, Barnby Moor, Retford, Notts, DN22 8QQ

**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"/>
--	--------------------------	--	-------------------------------------

**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	Derek Kitson MCIAT	Date	3 March 2016
Name	Derek Kitson MCIAT		

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

## Part B – Your representation

Office use only  
Person No: 2489  
Rep No: 29131

Please read the guidance note before completing this section.

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

Policy		Site code	MP2m	Map/Plan	Inset 5	Paragraph		Other	
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### 2. Do you consider the identified part of the document to be:

Legally compliant?	Yes		No	√
Sound?	Yes		No	√

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

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

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

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

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

I question whether parts of this application have been fully justified, in particular:-

1. The small slither of land shown blue on the attached plan should be included in the allocation and was proposed by myself previously. This northern boundary of your suggested allocation is a nominal line without clear boundary definition whereas the proposed nominal extension takes the allocation clearly to a hedge and identifiable boundary.
2. The allocation clearly shows the extraction right up to the edge of the A638 between the dwellings known as The Woodlands and the 2 small bungalows known as Fieldside and Woodholme, all on the eastern side of the A638. This portion hatched green on the returned plan should not be included. It will have a massive impact on these 3 residential properties and it should be reduced back to the existing boundary which runs north south and aligns the back edge of College Farm with the southern extent of the suggested allocation. Again this was part of my previous suggestion. None of these existing dwellings appear to have been considered within the section titled Environmental and Cultural Designations. The landscape in general is considered but these dwellings and their surroundings form part of the landscape character and, as such, should be protected. I do not see the aspect of excavation possibilities so close to these residential properties as consistent with the NPPF bullet point 6 of paragraph 143 which clearly sets out unacceptable adverse impacts on human health. These occupants will suffer greatly through all stages of the operation, if the suggested buffer was in place then the impacts would be minimised and more consistent with national policy.
3. Adjacent to the very north west extent of the allocation there is a small commercial fishery compromising 5 well stocked ponds. In the section relating to water and flooding I see no assessment of the impact of excavation or dewatering would have on this nearby commercial fishery. Any water loss could have a seriously detrimental effect on the viability and fish stocks in the existing ponds.



**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 changes are as follows:-

- The northern slither of land that has already been stripped ready for excavation should be included. This would ensure that this part of the allocation was identified and located by a known boundary situation.
- The area abutting the A638 between The Woodlands, Fieldside and Woodholme should be withdrawn back to the inline boundary. This would ensure that the proposal did not create unacceptable levels of disturbance during both the quarrying and the restoration operations to these dwellings and would make it more compliant and consistent with policies within the NPPF.

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

<b>Yes</b>	√	<b>No</b>
<b>If Yes, please give details</b>	Responses dated 20 May 2014 and 22 November 2013	

<b>Signature</b>	Derek Kitson MCIAT	<b>Date</b>	3 March 2016
<b>Name</b>	Derek Kitson MCIAT		

*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	Mr
First name	K N	Derek
Last name	Lane	Kitson
Address line 1	c/o Agent	
Address line 2		
Address line 3		
Postcode		
Email		
For those replying on behalf of an organisation or group:		
Organisation		
Job title		

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

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

The submission of the Mineral Local Plan for independent examination	<input checked="" type="checkbox"/>
The publication of the recommendations of the inspector	<input checked="" type="checkbox"/>
The adoption of the Minerals Local Plan	<input checked="" type="checkbox"/>

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

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

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

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	Derek Kitson	Date	3 March 2016
Name	Derek Kitson MCIAT on behalf of Mr K N Lane		

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

## Part B – Your representation

Office use only  
Person No: 2489 for 2754  
Rep No: 29130

Please read the guidance note before completing this section.

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

Policy		Site code	MP2m	Map/Plan	Inset 5	Paragraph		Other	
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### 2. Do you consider the identified part of the document to be:

Legally compliant?	Yes		No	√
Sound?	Yes		No	√

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

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

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

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

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

I question whether parts of this application have been fully justified, in particular the small slither of land shown blue on the attached plan should be included in the allocation and was proposed by myself previously. This northern boundary of your suggested allocation is a nominal line without clear boundary definition whereas the proposed nominal extension takes the allocation clearly to a hedge and identifiable boundary.

**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 change is as follows:-

- The northern slither of land that has already been stripped ready for excavation should be included. This would ensure that this part of the allocation was identified and located by a known boundary situation.
- The above inclusion would compensate for the removal of the area abutting the A638 between The Woodlands, Fieldside and Woodholme. This should be withdrawn back to the inline boundary. This would ensure that the proposal did not create unacceptable levels of disturbance during both the quarrying and the restoration operations to these dwellings and would make it more compliant and consistent with policies within the NPPF.

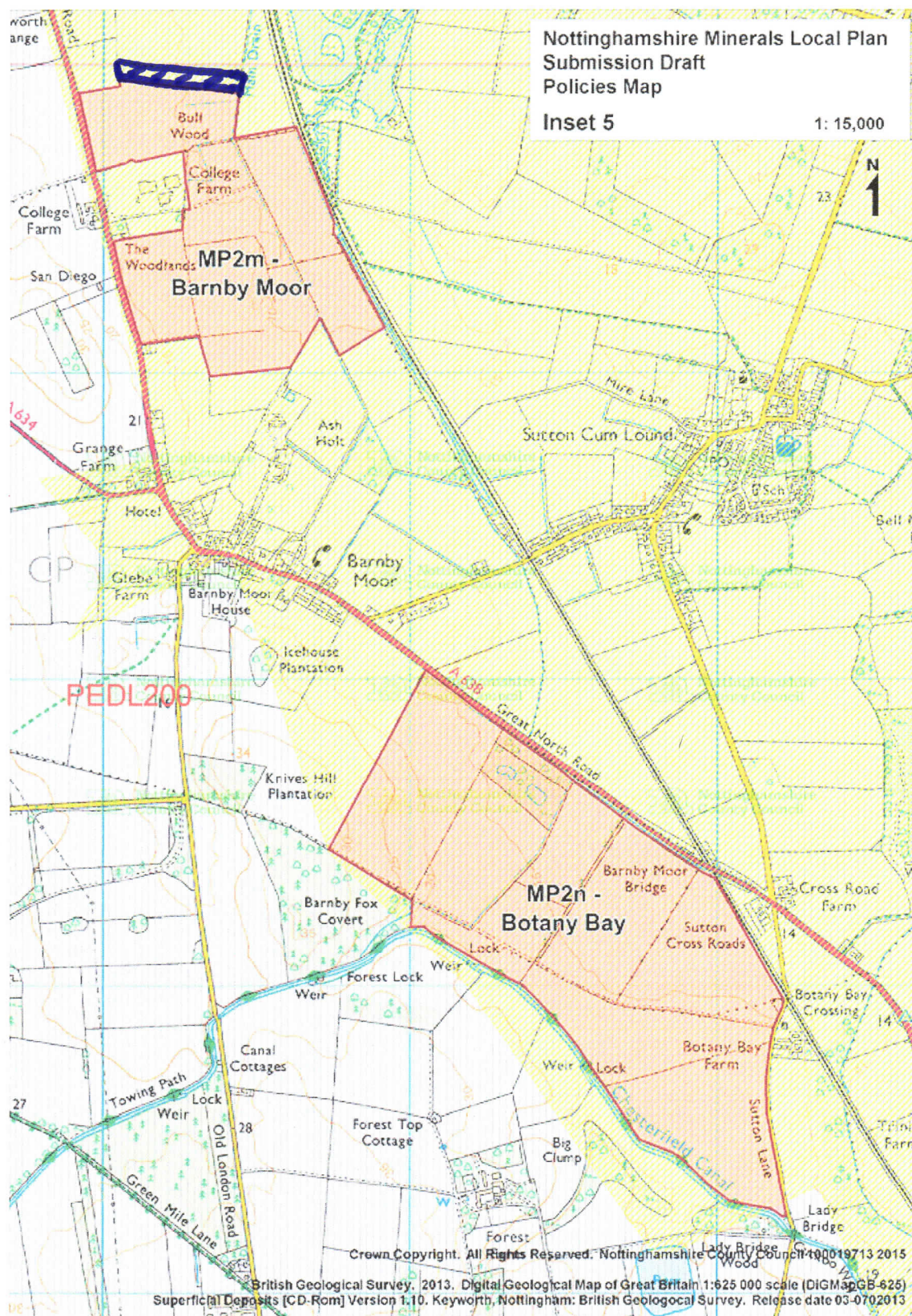
**6. Have you raised this issue previously (during earlier stages of consultation)?**

<b>Yes</b>	√	<b>No</b>	
<b>If Yes, please give details</b>	Response dated 22 November 2013		

<b>Signature</b>	Derek Kitson	<b>Date</b>	3 March 2016
<b>Name</b>	Derek Kitson MCIAT on behalf of Mr K N Lane		

*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:** 26 March 2016 17:56  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29331

Mr AS Wallace,

Thank you for your representation which we received as follows:

Representation ID: 29331  
Document: Minerals Local Plan Submission Draft  
Section: MP6: Brick clay provision, MP6a Kirton West  
Support/Object: Object

Despite the planning Inspector's previous rejection, the company are still proposing to go ahead .  
Our concerns are the same even after 12 years.  
Noise pollution:dust pollution;visual impact.  
250 metres is risible as the present activities cause noise and dust clouds especially in southerly prevailing winds is at a distance of approx 1000 metres. Dust suppression was not observed on several inspections.Noise monitoring has been very intermittent,is taken at 15 minute intervals and was in unrealistic locations picking up the traffic noise on A6075 and therefore unrepresentative of site noise.  
One of the three recent test boreholes is only 200 metres from our boundary

### CHANGE TO PLAN

Do not proceed with extraction which encroaches on the village environment

The document is unsound because it is not:

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

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

[REDACTED]

---

**From:** Clerk <[REDACTED]>  
**Sent:** 15 March 2016 14:39  
**To:** Development Planning  
**Subject:** Nottinghamshire Minerals Local Plan Submission Draft

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

**Dear Sir of Madam**

I have been authorised by West Stockwith Parish Council to state that the council have no major comments to make on this submission draft.

Kind regards

[REDACTED]

Dave Harford  
Clerk, West Stockwith Parish Council  
C.Eng B Sc. FIEE FIRSE

[REDACTED]

Tel: [REDACTED]  
Fax: [REDACTED]  
Mobile: [REDACTED]  
Email: [REDACTED]  
Personal Email: [REDACTED]  
Facebook: [www.facebook.com/weststockwith.parishcouncil](http://www.facebook.com/weststockwith.parishcouncil)  
Twitter: [www.twitter.com/@weststockwithpc](http://www.twitter.com/@weststockwithpc)

***Please consider the environment - do you need to print this email?***

This email and any files transmitted with it are confidential and intended solely for the use of the named individual or organisation . Should you not be the intended recipient or the person responsible for the delivery of this message to the recipient, please destroy this message immediately and inform the sender by email of the error. Any opinions expressed are those of the individual and not necessarily the company. You must not use, print, copy, disclose or distribute this information if incorrectly sent to you. Thank you.



**Eilidh McCallum**

---

**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 16 March 2016 13:51  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29202

Environment Agency (Mr Andrew Pitts),

Thank you for your representation which we received as follows:

Representation ID: 29202  
Document: Minerals Local Plan Submission Draft  
Section: Vision  
Support/Object: Support

We particularly welcome the inclusion within the Vision that quarries will be designed, operated and managed in a way to help reduce flood risk and management of surface water in an sustainable way. We also support the strong focus on the the protection and enhancement of environmental assets in particular biodiversity and geodiversity.

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

**Eilidh McCallum**

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 16 March 2016 13:51  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29210

Environment Agency (Mr Andrew Pitts),

Thank you for your representation which we received as follows:

Representation ID: 29210  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO3: Addressing climate change  
Support/Object: Support

We particularly welcome that the issue of flood risk stems from the Vision into Objective 3. A commitment to reducing future and existing flood risk and climate change adaptation is encouraging.

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:** 16 March 2016 13:56  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29211

Environment Agency (Mr Andrew Pitts),

Thank you for your representation which we received as follows:

Representation ID: 29211  
Document: Minerals Local Plan Submission Draft  
Section: Strategic Objectives, SO6: Protecting and enhancing natural assets  
Support/Object: Support

We fully support SO6 as it is this type of objective The Plan needs to help support national and local biodiversity targets.

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:** 16 March 2016 13:56  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29213

Environment Agency (Mr Andrew Pitts),

Thank you for your representation which we received as follows:

Representation ID: 29213  
Document: Minerals Local Plan Submission Draft  
Section: DM4: Protection and enhancement of biodiversity and geodiversity  
Support/Object: Support

We fully support Policy DM4. These are precisely the type of policies the Plans needs to help support national and local biodiversity targets

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:** 16 March 2016 13:55  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29214

Environment Agency (Mr Andrew Pitts),

Thank you for your representation which we received as follows:

Representation ID: 29214  
Document: Minerals Local Plan Submission Draft  
Section: SP3: Biodiversity-Led Restoration  
Support/Object: Support

Whilst we support the aim of policy SP3 but we are concerned with the wording of paragraph 1. This paragraph suggests that restoration to biodiversity would not necessarily be considered should other uses be needed or where biodiversity led restoration wouldn't be appropriate. To reflect this we have previously advised that paragraph 1 of SP3 (SP2 in the preferred approach consultation) is reworded as follows: \* Restoration schemes contributing to the delivery of habitat creation targets within the Nottinghamshire Local Biodiversity Action Plan and contribute to the delivery of the Trent Valley Biodiversity Opportunity Mapping Project shall be supported.

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:** 16 March 2016 13:57  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29215

Environment Agency (Mr Andrew Pitts),

Thank you for your representation which we received as follows:

Representation ID: 29215  
Document: Minerals Local Plan Submission Draft  
Section: DM2: Water resources and flood risk  
Support/Object: Support

We welcome an support this policy which will promote a sustainable approach to minerals development by considering two key important environment aspects, water resources and flood risk management.

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

## Eilidh McCallum

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**From:** Nottinghamshire County Council <nottinghamshire@jdi-consult.net>  
**Sent:** 16 March 2016 14:30  
**To:** [REDACTED]  
**Subject:** Representation received. ID:29218

Environment Agency (Mr Andrew Pitts),

Thank you for your representation which we received as follows:

Representation ID: 29218  
Document: Minerals Local Plan Submission Draft  
Section: MP2r - Shelford  
Support/Object: Support

We emphasise the importance of this site in relation to flood risk, to both the village of Shelford and the village of Gunthorpe. It must be ensured there is clear evidence that flood risk is not increased for either community. The site is protected by minor flood defences and we request as part of development of this site, the developer explores in partnership with RMAs and local communities, opportunities to improve flood risk for both communities. Where opportunities are identified, we expect that the developer will lead on the delivery of these improvements, as part of restoration of the site.

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.

RECEIVED

14 MAR 2016

PLACE

5th March 2016

Nottinghamshire County Council  
West Bridgford  
Nottingham  
NG2 7BB  
PAO Steven Osborne-James

Dear Sir,

Nottinghamshire Minerals Local Plan

We have concerns in this area for sand and gravel extraction from proposed quarry sites in Awerham & Coddington. (29993 and 29992)

There is the aspect of road safety to be considered. The problem of speeding traffic on the A17 and lorries turning in and out of the quarry at Awerham would cause concern to the general public - approximately 100 lorries a day.

Most of the lorries would go over Kelham Bridge which is old and narrow - this bridge was closed for weeks in 2013 due to an accident.

Newark is a problem area already - long delays are caused because of the volume of traffic on the A46/A17/B6325 junctions. There are accidents in this area and at every week - not just in summer.

Extraction of sand and gravel should be at existing quarries before new ones are opened and improvements to the road network are made.

We are aware new quarries will have to be opened in future and plans have to be made.

Yours faithfully



## Part A – Personal details

	Personal details	Agent details (where applicable)
Title	Mrs	
First name	Joyce	
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 type="checkbox"/>	No, I do not wish to participate at the oral examination	<input checked="" 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.*

Signature		Date	24 <sup>th</sup> March 2016
Name	Joyce 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: 2736  
Rep No: 29678

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	✓

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.

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

#### 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 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 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.

#### 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.

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

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

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

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

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

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

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**

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 *
Burridge Farm	9

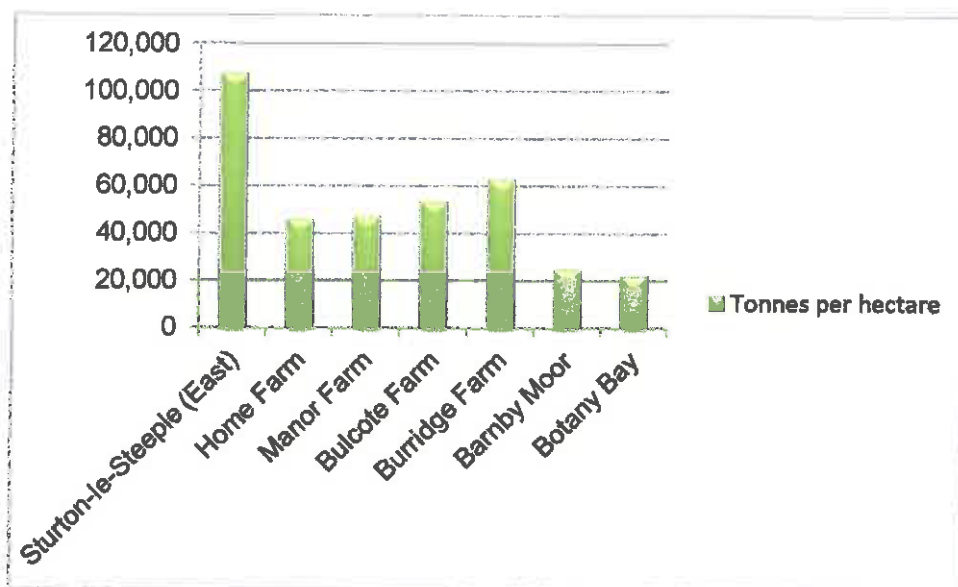
Accordingly, in respect of the environmental acceptability there are 6 sites which should be more appropriate to allocate before either Barnby Moor or Botany Bay should even be considered and two of those are extensions which are apparently the preferred option of the County Council.

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
Burridge Farm	62,500
Barnby Moor	24,690
Botany Bay	21,930



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	Shelford East	-11	-8	-19	180	5.7
	PA41	Shelford West	-11	-6	-17	243	9.5
	PA16	East Leake North	-8	-4	-10	15	1
	PA39	East Leake East	-6	-2	-8	52	2.2
Newark	PA03	Besthorpe East	-5	0	-5	34	2
	PA04	Besthorpe South	-6	0	-6	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	-6	+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	126	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	3
	PA31	Scrooby North	-9	-4	-13	12	0.6
	PA32	Scrooby South	-9	-4	-13	9	0.4
	PA02	Bawtry Road	-11	-2	-13	16	0.8
	PA01	Barnby 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