

[REDACTED]

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**From:** parishclerk@[REDACTED]  
**Sent:** 10 January 2018 12:58  
**To:** Planning Policy  
**Subject:** RE: Consultation on the Nottinghamshire Minerals Local Plan ending soon  
**Attachments:** BJPC Minerals response Jan 2018.docx

**Importance:** High

[REDACTED]

Please find attached Burton Joyce Parish Council's response to the consultation on the Local Minerals Plan.

I would be grateful if you could acknowledge receipt of the response.

Kind regards

Jessica

Jessica Sherrin  
Parish Clerk and RFO



Parish Office, The Old School Building, Burton Joyce, Nottingham, NG14 5DZ

Telephone: [REDACTED]

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**From:** [REDACTED] On Behalf Of Planning Policy  
**Sent:** 05 January 2018 10:54  
**To:** Undisclosed recipients:  
**Subject:** Consultation on the Nottinghamshire Minerals Local Plan ending soon

Dear Sir / Madam

Please note that the consultation on the Nottinghamshire Minerals Local Plan – Issues and Options consultation will end at midnight on the 14<sup>th</sup> January. If you have already responded please ignore this email.

The Issues and Options consultation document can be found at: <http://www.Nottinghamshire.gov.uk/minerals>

The online consultation system can be accessed at: <https://nottinghamshire.jdi-consult.net/localplan/index.php>

Regards

Planning Policy Team  
Place Department  
Nottinghamshire County Council

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# Nottinghamshire County Council Local Minerals Plan

## Issues and Options Consultation

### Responses of Burton Joyce Parish Council

Introduction, scope, Context etc. pp 3-9.

We accept the overall approach to the preparation of the Minerals Plan. We consider especially important the recognition that it requires balancing the economic benefits and need for minerals against the social and environmental disruption and harm that their extraction can cause. We note and would emphasise the importance given to flood risk, to which our Parish is exceptionally vulnerable – a danger which, as stated, is higher now than ever when the impact of future climate change could result in higher winter rainfall and more extreme flood events.

Q.1. Do you think any further information should be included in the overview of the area?

The overview covers all major points except the importance of landscape. Much of the area being considered for extraction lies within the Green Belt, as does this Parish. While this is no legal obstacle to mineral working, it is a recognition, by statutory definition, that landscape in such places is highly valued, and therefore deserves consideration in its own right.

We entirely reject the assertion that “As the County is quite poor in biodiversity, sand and gravel reclamation schemes have a very significant role in redressing the balance,” for which no supporting evidence is referenced; at least as far as the Trent Valley is concerned. From the Derbyshire border downstream as far as Hoveringham the Trent is virtually lined with disused gravel and sand workings, and from Newark downstream with working ones. There is if anything an oversupply of such sites in this region of the County, and any addition to them will only exacerbate the local imbalance and do nothing for areas, such as the West of Nottinghamshire, poor in wetlands. A local study in our Parish early in this decade has found that the arable and pasture land along the Trent provides a rich habitat for a varied wildlife. Topography in the Trent Valley East of Nottingham provides exceptionally wide views of great value to local people. Research for this Council’s ongoing consultation in preparation of a Neighbourhood Plan shows clearly that the local landscape is held in high regard. Moreover, abandoned extraction sites do not easily become flourishing “wetland” areas. Attenborough Nature reserve only became what it is

after great investments by Nottinghamshire Wildlife Trust and the local Council, whereas the land at Hoveringham has been left as a collection of virtually lifeless lagoons.

Q.2. Do you agree with the draft vision? Are there other things we should include?

We accept the draft vision, and the preceding paragraphs concerning national and local policy, on the basis that the restraints on extraction required by giving due attention to quality of life and health for people in the county, and protection and maintenance of the environmental and historic assets should mean that no exploitation of minerals happens that would contravene those principles whenever alternative supplies are available. The NPPF guidelines setting out the Social role and the Environmental role of the Planning Process should be maintained throughout.

Regarding biodiversity and the natural environment, especially relating to restoration of exhausted sites, see answer to Question 1 above. Regarding selection of sites and closeness to markets of sites, see answer to Question 8 below. Regarding Alternative Aggregates see answer to Questions 4 and 14 below. Regarding use of barges see answer to Question 10 below.

Q.3. Are the Strategic issues appropriate? Are there others we should consider?

The strategic issues are appropriate provided that site allocations (at a later stage) are made in a way that avoids so far as possible conflicts between the various 5 issues. Most importantly, we consider the *need to minimise impact on communities*, which is a complex but clear requirement, should override mathematically simplistic measures such as transport distances, or special pattern.

Q.4. Do you think the average 10 year sales figure the most suitable methodology for forecasting future aggregate demand in Nottinghamshire? If not, please identify any alternatives you feel are realistic and deliverable and the evidence to support this approach.

No we do not. A more pro-active independent investigation into demand questions is likely to produce a lower figure. It is apparent from the paragraphs on Estimating Future Demand that figures given by the industry have contributed to the estimate; for normal business reasons it is probable that such figures would be as high as can be justified. Further, past demand is not likely to be repeated for several reasons. The information given makes it clear that there is a lag of a few years between an economic downturn and the reduction in building activity, which is quite natural. This will mean that the economic downturn resulting from Brexit has not yet affected numbers, but will. Further, modern architectural developments suggest that there will be less demand for concrete in newer building than previously, even in times of economic revival. Practicing members of the profession tell us that they and

their colleagues are consciously seeking a reduction in concrete manufacture and use for environmental reasons, and new design systems such as suspended or metal-braced roofs reduce concrete use. At the same time we note the reference to sources outside the county and to growing use of Recycled and Secondary aggregates: the combination of these factors could combine their effects, in that the successful use of stone quarrying waste from Derbyshire, where there is more of such activity and which is closest to the City of Nottingham and the proposed HS2 hub, and from Yorkshire, closer to the Yorkshire market obviously, could displace demand for materials sourced in this County.

Q.5. Do you think the same methodology (most recent average 10 year sales) should be used for each aggregate or is there merit in using different methodologies for different aggregates?

It is appropriate to consider the overall picture for normal aggregates for concrete manufacture together, i.e. gravel, recycled material and secondary sources, but for other aggregates different approaches and calculations may work better.

Q.6. Do you think extensions to existing permitted quarries should be prioritised over new greenfield quarries?

Yes, as a rule. The overriding consideration in comparing different sites should be to prevent, entirely if possible, destruction of the environments of existing communities, with the health problems, traffic congestion, flood threats and damage to the physical surroundings and quality of life of those communities. In most cases, but not necessarily all, that will mean prioritising existing permitted quarries, but the prevention of damage to communities should always be the decisive question.

Q.7. Should different approaches (new sites/extensions to existing permitted quarries) be adopted for individual mineral types?

Yes. Extraction sites in river valleys are likely to result in the long term of almost total loss of the land concerned (since we are unimpressed by the “wetland” solution as “restoration”) whereas sites on higher ground may have a future for other forms of use. Coal, oil and other hydrocarbon extraction processes may also result in long-term loss of land. Overall, the standards stated in answer to Q.6 should apply to this question.

Q.8. How important is it to maintain a geographical spread of sand and gravel quarries across the County (i.e. Idle Valley, near Newark and near Nottingham) to minimise the distance minerals are transported to markets?

Not important. Important markets for aggregates in Nottinghamshire are the city of Nottingham and the HS2 hub planned for Toton. These are for natural and obvious reasons in a part of the county where population densities are higher, and therefore

the damage to be done from extraction sites to resident communities is greater. There would be a greater cost to local Councils and public services as well as residents from demands for road space, problems of health and pollution, as well as severe damage to the quality of life. All these are part of the real cost of putting extraction sites in such areas, so the lower cost of transport is delusory: these real costs are not a charge on the end price at the site of use, but must be included in consideration by the Planning process. Air Quality index in the Nottingham area is only “moderate,” ([aqcin.org./map/united kingdom](http://aqcin.org./map/united%20kingdom)) while in potential sites for aggregate extraction further from the city, it is still “good.” Additionally, both those developments would be an exceptionally rich source of recycled material as an alternative aggregate since much demolition would be involved, and are both also close to sources outside the County and with good transport links to bring in aggregates, whether freshly extracted or secondary, from those sources.

Q.9. Would it be more appropriate to prioritise specific areas above others?

Yes. Priority should be given to sites of low amenity value away from densely inhabited areas, though each site should be considered on its own merits. Explicitly, road systems already over-strained by commuter traffic, particularly the A612 and A6097, should not have further congestion, with its associated air and noise pollution, cost and danger, added by the large-scale transport of aggregates.

Q.10. Is it economical to transport minerals by barge, and if so should proposed quarries with the potential for moving sand and gravel by river barge be prioritised over other proposals?

Such use of barges should not automatically carry any prioritising of sites using barges. If using barges reduces to overall impact of quarrying on local communities, from road congestion and all other causes combined, if the barging is for long distances (so making a real difference to road congestion,) if infrastructure i.e. docking and wharf facilities is already in place and if the barges would not themselves cause problems to other river traffic or the stability of the bank, then such cases may be considered on their own merits. None of these requirements would be met for any sites in this area of the Trent Valley, i.e. above Newark.

Q.11 – 13. These minerals would all be extracted from areas outside our competence for comments

Q.14. Are you aware of any issues relating to alternative aggregates that should be considered through the Minerals Local Plan Review?

From the statistics supplied as well as from the application of sound ecological principles, there should be much more use of recycled and secondary materials expected, including demolition products which would otherwise go to landfill and

which should be readily available on most sites likely to be used for foreseeable new development. Other waste material from various forms of stone quarrying, inside and outside Nottinghamshire, should make an important contribution.

Q. 15-24 Again, this Parish Council has no mandate to address these questions.

Q. 25. Do you agree with the proposed development management policy areas? Are there any others that should be covered?

Yes. This Parish Council represents an area highly vulnerable to severe damage to the quality of life of its inhabitants. The Development Management policies address the proper issues which need to be considered in preserving the rights and interests of the community, so justifying the direction by democratic forces representing the public interest.

Q.26. Are you aware of any issues relating to minerals safeguarding that should be considered through the Minerals Local Plan review?

In this part of the Trent Valley the most severe threat is that of flooding. While any mineral extraction would increase that threat to an unacceptable level, the same danger means that no other form of development is appropriate; therefore mineral safeguarding does not become an issue.