

**NOTTINGHAMSHIRE MINERALS LOCAL PLAN – SUBMISSION DRAFT CONSULTATION**  
**FINAL REPORT**

**1.0 Purpose of Report**

- 1.1 To set before the Committee the District Council's proposed response to the Nottinghamshire Minerals Local Plan Submission Draft.

**2.0 Background Information**

- 2.1 Nottinghamshire County Council are in the process of preparing a new Minerals Local Plan to replace the current plan which was adopted in December 2005. Once adopted this new plan will cover the period to 2030 and provide the land use planning strategy for mineral development within the County, identify site allocations to meet future need as well as containing development management policies against which future development proposals will be assessed.
- 2.2 The Submission Draft is the last stage before the plan is formally submitted for Examination by the County Council to the Secretary of State for independent examination and unlike in previous stages the County Council are now seeking formal representations rather than consultation comments.
- 2.3 Therefore in preparing this report officers have highlighted those particular aspects of the Plan which it is justified for the District Council to make formal representations.

**3.0 Proposals**

**Representations Concerning Overall Aggregate Provision and Site Selection**

- 3.1 The National Planning Policy Framework (NPPF) requires the County Council to plan for a steady and adequate supply of aggregates. Key to this is the preparation of an annual Local Aggregate Assessment (LAA) which considers the demand for and supply of aggregates within a Mineral Planning Authority's (MPA) area. This should be based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources).
- 3.2 Sitting alongside the NPPF is the national Planning Practice Guidance (PPG) which provides supplementary information on the preparation of a LAA. Helpfully the guidance clarifies whether the MPA can prepare its LAA solely on the basis of a 10 year average supply. It is indicated that LAA's must also consider other relevant local information in addition to the 10 year rolling supply, which seeks to look ahead at possible future demand, rather than rely solely on past sales. Relevant local information could for example include the levels of planned growth within and external to the County area. The guidance also details that MPA's should look at average sales over the last three years in particular to identify the general trend of demand to guide the consideration of whether it may be appropriate to increase supply.

- 3.3 Taking account of the outcome of the LAA the County Council are also required to maintain a landbank of at least 7 years for sand and gravel provision. This is comparable to the five year housing land supply requirement placed on the District Council as part of its planning responsibilities. Aggregate Landbanks are taken to be an essential component of the minerals planning regime, providing the basis on which the level of provision of new areas for aggregate extraction should be calculated in preparing a Minerals Local Plan, and indicating when an MPA should conduct a review of the current levels of aggregate provision in its area and whether to undertake a review of its Local Plan.
- 3.4 Policy MP1 'Aggregate Provision' of the Submission Draft Minerals Local Plan (SDMLP) sets out the headline levels of demand for aggregate provision over the plan period (2012 – 2030) which the Minerals Authority intends to plan for. In terms of sand and gravel this equates to 49.02 million tonnes. Policy MP2 'Sand and Gravel Provision' then details the MPA's approach to meeting this overall requirement through the extraction of remaining reserves at existing sites and identifying extensions to existing sites, as well as the making of new greenfield allocations. Members will no doubt already be aware that this continues to include the proposed allocation of the Coddington and Flash Farm, Averham sites despite the District Council's previous objections (see Appendix A which details previous consultation responses regarding transport, Coddington and Flash Farm proposals).
- 3.5 This proposed approach is based on a LAA which draws on sand and gravel supply and demand data from between 2002 – 2011. However a more up-to-date LAA has been published by the MPA (April 2015), which includes supply and demand data for the period 2004 – 2013. This more recent information does not therefore factor into the approach to future sand and gravel provision being put forward within the submission draft Plan. At this point I would therefore draw Members attention back to the requirement for a MPA's LAA to be based on a rolling average of 10 years sales data, with a particular emphasis on data from the last three years. The difference from using data in the MPA's more recent LAA is clear from tables 1 and 2 below.

**Table 1 Sand and Gravel Production 2002 - 2011**

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	Avg
<b>Production (million tonnes)</b>	2.95	3.34	3.37	3.08	3.15	2.97	2.37	1.27	1.56	1.71	2.58

**Table 2 Sand and Gravel Production 2004 - 2013**

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Avg
<b>Production (million tonnes)</b>	3.37	3.08	3.15	2.97	2.37	1.27	1.56	1.71	1.55	1.39	2.24

- 3.6 By using the most recent data the annual average demand for sand and gravel drops from 2.58 million tonnes to 2.24 million tonnes. This would not be insignificant on its own, and is even more dramatic when rolled out across the remainder of the plan period (2014 – 2030 (17 years)). This would equate to 38.08 million tonnes as opposed to the 49.02 million tonnes which the draft plan is currently seeking to meet. Table 3 outlines the MPA's proposed approach to sand and gravel provision over the plan period.

**Table 3 MPA's proposed approach to Sand and Gravel Provision over the Plan Period**

	<b>Million Tonnes</b>
<b>Permitted reserves as at December 2011</b>	19.31
<b>Subsequent permissions</b>	3.98
<b>Proposed extensions to existing sites</b>	11.93
<b>Proposed new allocations</b>	16.75
<b>Total</b>	51.97

- 3.7 The Coddington and Flash Farm allocations have combined reserves of 6.75 million tonnes within the plan period. Were the Minerals Local Plan to proceed on the basis of the most recent LAA figures then there would be a projected overall requirement of 38.08 million tonnes. Accordingly on the basis of the above the loss of the two proposed greenfield allocations in Newark & Sherwood could be accommodated and the plan still go on to provide for 45.22 million tonnes of sand and gravel overall.
- 3.8 However in order for any representations from the District Council, made on this basis, to be credible regard will need to be given to the MPA's requirement to provide for a steady and adequate supply of sand and gravel over the plan period. Principally this can be taken to mean the need to maintain a rolling 7 year land bank. The District Council would also need to acknowledge that being able to service growth aspirations within the County (including those of Newark & Sherwood itself) is a local requirement which could affect demand for sand and gravel provision. Whilst it is undeniable that a portion of the period 2004 – 2013 would have been subject to depressed economic conditions it is suggested that the assumption over a quick return to previous levels of demand is not certain. Economic activity has been increasing in recent years and the trend over demand for the past three years is moving in a downwards direction. This may well be reflective of supply coming from secondary and recycled sources for instance, which it is not clear how the Plan has taken account of this. Significantly what it does serve to underline is that there is uncertainty over the ability to accurately forecast future levels of demand for sand and gravel.
- 3.9 The PPG advises that an aggregate landbank is the sum in tonnes of all permitted reserves for which valid planning permissions are extant, divided by the annual rate of future demand based on the latest LAA. The ability of the emerging plan to demonstrate that a 7 year sand and gravel land bank will be key to its Examination. Given that the MPA is not currently able to make this demonstration the impact of the proposed site extensions and allocations in the submission draft plan needs to be considered. Table 4 below details those sites which are anticipated to gain permission within the current 7 year period (2015 – 2021 inclusive).

**Table 4 Site Extensions and New Allocations Assumed to Gain Consent Within 7 Year Period (2015 – 2021 inclusive)**

<b>Site</b>	<b>Operational period (inclusive)</b>	<b>Total reserves within plan period (million tonnes)</b>
MP2b Bawtry Road North	2018 – 2030	0.52

MP2c Scrooby North	2018 – 2025	0.64
MP2e Besthorpe East	2018 – 2027	2
MP2g Langford Lowfields South	2018 – 2022	2.5
MP2m Barnby Moor	2018 – 2023	1.1
MP2n Botany Bay	2019 – 2030 (	2.4
MP2r Shelford	2016 – 2029	6.5
<b>Total</b>		<b>15.66</b>

- 3.10 Taking account of the above the ability of the MPA to demonstrate a 7 year landbank, based on the most up-to-date data and with the Coddington and Flash Farm sites having been deleted, is illustrated in Table 5 below.

**Table 5 Ability to Demonstrate 7 Year Sand and Gravel Land Bank**

<b>Permitted reserves (including permissions post December 2011 (million tonnes)</b>	23.29
<b>Reserves at site extensions and new allocations assumed to gain consent during 7 year period (2015 – 2021 inclusive) (million tonnes)</b>	15.66
<b>Total (million tonnes)</b>	38.95
<b>Annual rate of future demand</b>	2.24
<b>Sand and gravel landbank (permitted reserves / annual rate of future demand)</b>	17.39
<b>7 year land bank requirement (overall sand and gravel requirement / remainder of plan period x 7 years) (38.08/17x7)</b>	15.68

- 3.10 On this basis taking the most up-to-date LAA data and the reserves from new sites, anticipated to gain consent within the current 7 year landbank period, the Plan would be likely to meet the landbank requirement without the need for the Coddington and Flash Farm sites. It is therefore recommended that the District Council make representations deeming the approach to calculation of future sand and gravel requirements as unsound due to it not drawing on the most up-to-date information on sand and gravel supply and demand. The representation would detail that in the view of the Authority the Minerals Local Plan has failed the test of soundness concerning justification. In order to be justified the Plan would need to be deemed the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- 3.11 In terms of providing further justification for this position, the recently issued Inspectors report on the Lincolnshire Minerals and Waste Local Plan is potentially helpful. The approach of that MPA with respect to future aggregate requirements was also closely scrutinised as part of the process. Ultimately the Inspector recommended that significant modifications were required to that part of the Plan in order for it to be sound in planning

terms. The Inspector noted (paragraph 26) that ‘an accurate assessment of the on-going need for aggregates within the County is of fundamental importance to the provisions of the Plan’. Before going on to state that planning for a steady and adequate supply of aggregates should be informed by an annual Local Aggregate Assessment, based on a rolling average of 10 years sales data and other relevant matters (paragraph 27).

- 3.12 The Lincolnshire Inspector came to the view that the MPA’s latest LAA (October 2015) represented the most sound basis on which to Plan for future aggregate provision. This is despite the figures from the LAA being much lower than those from the sub-regional apportionment, which the plan had previously been based on. The Inspector noted ‘at the time of preparation of the Plan, there were expectations of economic growth with a consequent increase in demand for new built development. However, the latest evidence does not support the ambitious assumptions’ (paragraph 29). The Inspector goes on to conclude that, ‘the appropriate way forward would be to make provision for aggregate supply based on the sales figures in the LAA and with proportionate distribution across the three Production Areas. In addition, careful monitoring of the situation would lead to early review of the provisions if there were significant variations’ (paragraph 29).
- 3.13 On this basis it is proposed that the District Council’s representations make reference to the recent decision in Lincolnshire and advocate the need for a similar approach to be taken within Nottinghamshire. As previously mentioned, to stand a reasonable chance of success the Authority will, in my view, need to demonstrate a responsible approach which ensures that growth aspirations within the District and wider County can be met. It should also acknowledge the uncertainty over sand and gravel demand linked to economic conditions, which may well change moving forwards. In terms of recommending the modifications necessary to make the Minerals Plan sound, it is suggested that the District Council provide appropriate rewording of the relevant policies drawing on the most up-to-date LAA data, and that the facility for the review of the Plan be built in to policy should the situation regarding supply and demand for sand and gravel significantly alter. To do otherwise risks the Plan over-allocating given the aforementioned uncertainty with forecasting demand.
- 3.14 It is also proposed that the District Council’s representations identify the MPA’s approach to the selection and spatial distribution of future sand and gravel sites as unsound. This would again be made against the justification test and on the basis that the Plan has failed to demonstrate itself as the most appropriate strategy, when considered against the reasonable alternatives. It has been demonstrated that an approach can be provided which will meet the requirements which the MPA is subject to without the need for the two new greenfield allocations within Newark & Sherwood. It is considered that an approach based around the extension of existing sites remains the most sustainable approach and the one which is likely to have least impact on the District’s residents, highway network and local environment. The recommended modifications necessary to make the Minerals Plan sound will therefore include the deletion of the Coddington and Flash Farm allocations.
- 3.15 There is also the issue around proportionate distribution of future extraction across the three Production Areas within Nottinghamshire – as the Inspector made reference to on the Lincolnshire Minerals & Waste Local Plan. As has previously been reported to this Committee, the balance of future sand and gravel sites proposed in the Minerals Local Plan is overwhelmingly loaded towards Newark & Sherwood District as opposed to the Nottingham and the Idle Valley and Trent Valley north Production Areas. The deletion of the Coddington and Flash Farm allocations would go some way to redressing the balance

and to providing for a more spatially equitable distribution that is better placed to serve the various markets that the Plan identifies.

- 3.16 Finally it is recommended that the representations draw attention to the approach taken in Lincolnshire and the benefits which would arise from a consistent approach between neighbouring MPA's. There are clear geographical and market links between the two mineral areas. Indeed many of the existing and proposed sand and gravel sites within the District are located extremely close to the Lincolnshire border. Therefore by adopting the same approach as that taken in Lincolnshire, i.e. the use of the most up-to-date information and the facility for review, this will ensure that a potential over allocation within Nottinghamshire does not act to redress any shortfall within Lincolnshire without that MPA's plan also having been reviewed.

#### Representations Concerning Highways Issues

- 3.17 To support the Minerals Local Plan the MPA commissioned URS to undertake a Strategic Transport Assessment (December 2014). This assesses site accessibility and cumulative impacts on the highway network of the proposed allocations in the plan. An Addendum to the original study has been produced alongside the Submission Draft Plan.
- 3.18 In terms of the additional sites of particular interest to the District Council the study and its addendum identifies that:

MP2o Coddington – Access would be via the A17 due to existing HGV restrictions on Drove Lane and Beckingham Road. Whilst the details of access are not yet specified a roundabout on the A17 is currently believed to be the most appropriate method. Overall it is concluded that there are no overriding road safety issues or concerns with the proposed quarry at Coddington. As with any new site it will be subject to a full 3 stage Road Safety Audit which may subsequently identify the need for suitable mitigation measures. A suitable junction with the A17 can be formed to serve the quarry to the satisfaction of the County Council as local highway authority.

MP2p Flash Farm Averham – Access to the site will be via a ghost island on the A617. With regards to road safety there are no clusters of HGV accidents in the vicinity of the site access or along the proposed haulage routes along the A617. The traffic signals at the A617/A612 and A617/Averham bypass junctions are expected to assist with opening gaps in the traffic flow and to regulate vehicle speeds past the proposed site access. Kirklington and Kelham are recognised as sensitive locations. The A617 between the A46 and A614 contains some accident cluster sites and in the past accident remediation schemes have been introduced in these villages. High Friction Surfacing (HFS) and chevron signs have been installed in some locations. Although the Flash Farm site will generate additional HGV traffic it is not felt that this would lead to a significant detrimental impact upon road safety given the relatively low number of additional vehicles. As part of any subsequent planning application it would be necessary to consider whether the existing road safety features need to be augmented or refreshed as part of a package of mitigation measures for this site.

- 3.19 Whilst the review of the immediate environs in the form of the individual site assessments concludes that there are no insurmountable access issues there are wider transport issues which the District Council remains concerned about. The Addendum provides an assessment of the in combination effects of the quarries located around Newark. The Addendum conclusions from paragraphs 6.4 to 6.6 are set out below:

*“the A46 trunk road around Newark has witnessed a marked increase in traffic since the dualling of the A46 between Newark and Widmerpool (June 2012). The A46 Newark Relief Road around Newark remains the only single carriageway section of trunk road between J21 M1 in Leicestershire to Lincoln. As a result of the recent increase in traffic the existing single carriageway section and the roundabout junctions upon it suffer from traffic congestion which regularly extends outside traditional commuter peak hours. The congestion is worsened when there is an accident or incident on either the A46 or the adjoining A1. Highways England have announced that a major upgrade of the A46 Newark Relief Road is planned for the future and although there is no date for implementation it is anticipated that a major improvement could be delivered in the period 2020 -2025, subject to feasibility and financing. In the meantime Highways England are considering a number of smaller scale safety and capacity initiatives to address existing road safety issues which should lessen the frequency and severity of incidents and accidents and lessen the congestion issues around the town. It is expected that a series of interim improvements could be implemented in the period 2016 to 2020.*

*6.5 Notwithstanding the above the additional traffic generated jointly by the proposed Flash Farm and Coddington quarry sites amounts to 362 HGVs per day in total of which probably no more than 75% (270 trips two way per day) will appear on the trunk road network, since some of the traffic will be destined to use the A617 west (from Flash Farm) and A17 east (from Coddington site). Given the likelihood that the generated HGV traffic that does circulate around Newark will be split between the A46 north and south and the A1 in both directions the impacts will be further diluted on any one single link or junction. It is not possible to be certain as to the likely traffic numbers (more detail would be required to support planning applications) but even if it is assumed that half the generated traffic appeared on any one length of the A46 Newark Relief Road this would equate to 130 two way trips per day or 11 two way trips per hour. In the context of the existing traffic volumes on the A46 Relief Road this would represent a very small and imperceptible increase, for example the A46 Newark Relief Road between Cattlemarket roundabout (A617) and Brownhills roundabout (A1) has an AADT in 2015 of 29,550 vehicles and an 2015 AADF (HGV) of 3,250 vehicles, the additional traffic would constitute a 0.4% increase in overall traffic and a 4% increase in HGVs.*

*6.6 In summary whilst the addition of traffic around Newark will add to existing traffic levels and peak period congestion this is not considered a material and significant impact, furthermore there are proposals to alleviate existing road safety issues by Highways England and during the life of the Minerals Local Plan to provide a significant upgrade to the trunk road network which should accommodate all the forecast MLP generated traffic on the trunk road.”*

- 3.20 The report goes on to conclude that the Newark Southern Link Road and the proposed Kelham Bypass (if/when implemented) will also have positive impacts on the local highway network and therefore assist in alleviating the impact of the schemes.

- 3.21 The conclusions of the Strategic Transport Assessment and Addendum do not fully address the transport context of the Newark area. Highways England have acknowledged that the interim measures will not address overall issues of capacity in and around Newark nor will the Southern Link Road be able to solve these matters as the road's main purpose is to provide better access to the development and between different parts of the town. Notwithstanding the objections set out earlier in this report relating to the allocations of Flash Farm and Coddington; if the MPA wishes to continue to allocate the sites the District Council believes significant safeguards need to be included within the Minerals Local Plan.
- 3.22 With regard to Coddington it is noted that this site is already placed at the end of the plan period and as the Transport Assessment Addendum notes Highways England are intending to carry out significant highways improvement to the A46 Newark Bypass and its junctions and of particular importance here, to the A1/A46/A17 junctions. Given this it is proposed that the Minerals Plan is amended to reflect the need for the Highways England proposals to be implemented before the Coddington site can be worked. To that end Policy DM9: Highways Safety and Vehicle Movements/Routeing should be amended to reflect this by including an additional bullet point relating to the A1/A46/A17 improvements and the site allocation development brief in Appendix 3 should be amended accordingly.
- 3.23 With regard to Flash Farm the District Council has already indicated to the MPA (see Appendix A) that Kelham Bridge is a bottleneck and the type of additional vehicles which will be using the A617, namely HGV's, will create additional delays and highway safety issues. Furthermore such delays may well encourage HGVs to use other routes, northward on the A617 or on other minor roads to avoid Kelham Bridge. The District Council believes that it would not be appropriate to allow Flash Farm to be worked until the issue of Kelham Bridge is resolved. It should also be noted that traffic from Flash Farm will for the most part need to access the A1/A46 routes and therefore as with Coddington the requirement for the A1/A46/A17 improvements to be undertaken should also be considered appropriate for the Flash Farm site.
- 3.24 It is proposed that the Minerals Local Plan is amended to reflect the need for the Kelham Bypass to be built and to reflect the need for the Highways England proposals to be implemented before Flash Farm can be worked. To that end Policy DM9: Highways Safety and Vehicle Movements/Routeing should be amended to reflect this by including reference to this site in the proposed additional bullet point in 3.22 and an additional bullet point relating to the Kelham Bypass. The site should be placed at the end of the plan period in Table 3 of the Minerals Local Plan, and the site allocation development brief in Appendix 3 should be amended accordingly.

#### **4.0 RECOMMENDATIONS that:**

- a) the contents of the report is noted; and**
- b) the proposals set out in Section 3 of this report form the basis of the District Council's formal representations to the Nottinghamshire Minerals Local Plan.**

#### **Reason for Recommendations**

To allow the District Council to submit formal representations to the Minerals Planning Authority on the Nottinghamshire Minerals Local Plan.

## Background Papers

Nottinghamshire Minerals Local Plan Consultation Submission Draft 15 February – 29 March 2016  
Nottinghamshire Draft Minerals Local Plan – Strategic Transport Assessment December 2014  
Nottinghamshire Minerals Local Plan – Strategic Transport Assessment Addendum February 2016

For further information please contact Matthew Norton on Ext 5852 or Matthew Tubb 5850.

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**MINERALS LOCAL PLAN – PREVIOUS CONSULTATION RESPONSES IN RELATION TO TRANSPORT, CODDINGTON (MP2o) & FLASH FARM AVERHAM (MP2p)**

**Preferred Approach Consultation Response 17 December 2013**

**Coddington Site Allocation - MP2o**

In terms of the greenfield allocation proposed at Coddington a key concern of the District Council regards the proposed access arrangements and the protection of local residents amenity. Whilst the Development Brief proposes access to the site itself from the A17 and would restrict HGV access from Stapleford Lane and Drove Lane it is noted that the section of Beckingham Road which runs through the village would remain available to such traffic. It is considered that this would significantly impact on the amenity of local residents. Therefore in order to avoid such detrimental impacts the introduction of routeing restrictions on this stretch of Beckingham Road is viewed as necessary. Strong concerns were raised by the Committee on this issue with Councillor Maureen Dobson, the local Ward Member, highlighting the negative in-combination impacts of directing traffic through the centre of the village, the existing traffic issues connected to the Nottinghamshire Showground and the additional pressure which the allocation would place on the A1/A46/A17 junctions. Further to the Committee meeting Councillor Mrs Dobson has questioned the overall appropriateness of the proposed allocation

The transport evidence base brought together to support the production of the District's Core Strategy and Allocations & Development Management DPDs has provided an understanding of the cumulative impact of committed and allocated development across the District. This work has informed the identification of the infrastructure improvements necessary to support planned growth and the development of the Community Infrastructure Levy to assist in delivering such improvements. Importantly the impact of growth on the A1/A46/A17 junctions has been highlighted as a particular issue, with junction improvements being identified in response.

It is understood that a detailed Transport Study is being prepared to inform the Minerals Local Plan moving forward. The assessment and addressing of potential impacts from both the proposed Coddington site and those in the Besthorpe and Langford areas on the A1/A46/A17 junctions should be integral to this work, and be able to properly inform the site selection process and approaches for bringing suitable sites forward. In carrying out this work it is therefore important that the assessment is not carried out in isolation and takes account of the work already carried out as part of the Newark & Sherwood Local Development Framework to establish the cumulative impact of committed and allocated development.

With regards to the proposed screening of the site it is noted that the site is host to a number of trees subject to Tree Preservation Orders, the majority of which are located close to the boundaries of the site or the Moors Brat Drain SINC. It is therefore suggested that where possible these trees should be sought to be retained and included within the proposed screening of the site. The augmentation of screening to the south of the site along the A17 and of the processing plant is supported and will assist in limiting the visual impact of the allocation from the road itself and from Coddington village.

The reference within the Development Brief to protection of the SINC within the site and of the ancient woodland, Moor Brats and Stapleford Woods (also a SINC) which adjoin the site is welcomed. It is important that the impact on these areas is minimised and mitigated where necessary.

With the proximity of the site to Stapleford Wood this offers the opportunity for the restoration scheme to increase access to the piece of green infrastructure. Indeed the Green Infrastructure Strategy identifies the introduction of a new route linking the Land East of Newark strategic site to the woods as a key intervention to increase the connectivity of the Newark Urban Area with the surrounding countryside. It is therefore suggested that the restoration scheme contribute towards its delivery.

The site is partially located within Flood Zone 3 so it is crucial that it does not lead to increased flood risk. This is reflected within the proposed Development Brief which requires a Flood Risk Assessment. The priority of wetland open habitats as part of the restoration scheme may also provide flood risk alleviation benefits and so is supported.

### **Additional Consultation on Sand & Gravel Provision Response 10 July 2014**

#### Flash Farm Allocation (MP2p)

The District Council has significant concerns over the identification of the Flash Farm site and wishes to raise strong objections to its proposed allocation. There are known capacity issues on the A617 between Newark-on-Trent and Kelham with the narrow nature of Kelham Bridge a contributing factor. Indeed the District-Wide Transport Study, prepared to support the Newark & Sherwood Local Development Framework, highlights that taking account of committed development the route would by 2026 be operating at a stress level of 90% or more. The implication being that, even without any future growth, measures would be required to either reduce travel demands within the District to levels which can be satisfactorily accommodated on existing transport networks or that infrastructure improvements would be required to increase capacity

Once planned growth is factored into the forecast then the stress level on this section of the A617 rises to 138%. Given that the route is presently operating at close to capacity and the need to facilitate and support planned growth within the District the Study highlights that link capacity improvements will be required. Such improvements would most likely need to be in the form of a revised wide-single or dual carriageway aligned to the south of Kelham, north of Averham with a new bridge across the River Trent, a line for which continues to be protected within the development plan.

Given the significant issues around the capacity of the A617 and the suitability of Kelham Bridge the District Council challenges the idea that the bridge would be able to accommodate additional HGV traffic from the quarry. The narrow nature of the bridge means that large scale HGV's are unable to pass one another which given the volume of traffic results in bottle necks and also gives rise to significant safety concerns. These concerns over safety are borne out by a number of serious accidents which have occurred in recent years, the most significant of which resulted in the bridge being closed for six weeks last year.

The unsuitability of Kelham Bridge and the presence of weight restrictions on the A612 between Lowdham and the A617 junction near Averham along with those on the B6386 from Oxton to Southwell are considered as likely to direct the majority of the sites traffic northwards on the A617. In the view of the District Council this would result in considerable impacts on residential and environmental amenity within villages along this route.

Therefore until the highway issues outlined above are satisfactorily resolved either through the implementation of the Kelham Bypass, or another solution which maintains standards of amenity within villages along the A617, the District Council objects in the strongest possible terms to the proposed allocation of the Flash Farm site.

Notwithstanding the strong objections raised over highway issues the topographical conditions of the site and its surroundings contribute to the site having a fairly high level of visibility. As a result the District Council has significant concerns over the visual impact that the proposed allocation would have. This is particularly the case given that the site development brief does not include arrangements for the screening of the site or over the siting of processing plant.

I would also wish to highlight that concerns reflecting those outlined above have been made by the Councillor Mrs Susan Saddington, District Member for the Muskham Ward and County Councillor for the Farndon & Muskham Division. The District Council is also aware and supportive of the objections raised by Averham, Kelham and Staythorpe Parish Council.

Finally with regards to the Flash Farm site whilst I appreciate that the County Council is to some extent responding to the findings of the earlier consultation, some Members were concerned that whilst other communities had had a number of opportunities to comment on proposed allocations, because this site has emerged at this late stage, they have had only six weeks to do so.

### Cumulative Transport Impact

As you will be aware the District Council highlighted significant concerns at the Preferred Approach stage over how cumulative transport impact has been addressed as part of the preparation of the Minerals Local Plan. Significant growth in an around the Newark Urban Area (Newark, Balderton and Fernwood) has been identified through the District's development plan with this including strategic urban extensions (to the south and east of Newark as well as around Fernwood) and a mixed use allocation at the Newark Showground (north of the A17). To facilitate and support this level of growth, and based on input from the Highways Agency, the improvement of the major A1/A46/A17 junctions has been identified as a crucial requirement. This is reflected in the policy approach for the mixed use allocation at the Showground (and the wider showground area) which sets out that until these improvements have been implemented then employment development would not be considered appropriate.

The comments made by the District Council therefore stressed the importance of the transport work being undertaken to support the Minerals Plan taking account of the growth anticipated through the District's development plan. This work should properly inform the site selection process and not be carried out in isolation taking into account the work already carried out by the District Council to establish the cumulative impact of committed and allocated development.

Responding to these comments the Minerals Authority set out that a Strategic Transport Assessment has been undertaken for the proposed allocations with no significant issues being raised and that more detailed site specific Transport Assessments would be carried out as part of the planning application process. However the District Council remain unconvinced by this response. Outside of identifying broad locations for access points and in some cases the detailing of routing arrangements the potential highway impacts of the proposed sites are not clear from the emerging plan, and the Strategic Transport Assessment is not available to view. It is therefore not possible to establish whether the Strategic Transport Assessment carried out by the Minerals Authority has addressed cumulative impact of the sites, or taken account of the work carried out by the District Council to establish the impact of committed and planned growth over the plan period.

The realisation of planned growth is a key objective of the District Council and it would object to any proposals which would impede its delivery. The Council is therefore disappointed that the Strategic Transport Assessment is not freely available to view, and as a result retains severe concerns over the cumulative transport impact on the A1/A46/A17 junctions from the proposed Coddington site and extensions to those in Besthorpe and Langford.

Accordingly the District Council objects to the proposed allocation at Coddington until such time that these concerns are resolved. In designating a Newark Showground Policy Area through the District's development plan a commitment has been made to work alongside stakeholders to produce a Master Plan which will allow for its coherent planning and the resolving of various issues. Clearly the addressing of transport impacts in and around the Policy Area is central to this. To help find a solution to the Council's concerns it is therefore proposed that the intended scope of the Master Planning be widened to include the Coddington minerals allocation and that this be reflected within the approach for site in the emerging Minerals Local Plan.

### **Shelford Consultation Response 2 December 2015**

The District Council would wish to re-emphasise its strong objections to the potential Flash Farm and Coddington sand and gravel allocations. With regards to the Flash Farm these objections are principally focussed on the known capacity issues on the A616 and the ability of Kelham Bridge to accommodate additional HGV traffic from the quarry. Until such time as these highways concerns are satisfactorily resolved either through the implementation of the Kelham Bypass, or another solution which maintains standards of amenity within villages along the A617, the District Council objects in the strongest possible terms to the proposed allocation of the Flash Farm site. In addition to the highways objections you will also recall that strong concerns have been highlighted over the potential landscape and visual impact of the site.

In terms of the Council's response to the potential allocation of the Coddington site it remains that the District Council is unconvinced by the transport work carried out by the Minerals Authority. Particularly in respect of whether adequate regard had been given to the work undertaken by this Council to establish the impact of committed and planned growth over the plan period (much of which is focussed in and around the Newark Urban Area). Strong concerns over the cumulative impact on the A1/A46/A17 junctions from the Coddington site and the extensions to those in Besthorpe and Langford are also highlighted. The realisation of planned growth is a key objective of the District Council and it is emphasised that any proposals likely to impede its delivery would be objected to. Accordingly the stance of the Council is that until such time as these concerns are resolved then the proposed Coddington allocation is strongly objected to.

Turning to the current consultation the District Council welcomes the introduction of Shelford West as a potential sand and gravel allocation. In the view of the Council the site benefits from a number of key characteristics which mean that the site represents a more sustainable option than either of the two potential greenfield allocations within Newark & Sherwood (Flash Farm and Coddington). Significantly Shelford West is the only proposed allocation where the ability to barge extracted mineral resource is reflected in an anticipated level (180,000 tonnes per annum). Furthermore the figure itself is significant and represents 36% of the anticipated annual output from the site.

Through the use of the conveyor the extracted mineral would be transported beyond the village of Shelford to a processing plant directly adjacent to an A road. With the effect being that the residents would be unaffected by HGV movements, processing could take place away from the settlement and access could be gained directly onto the A6097. Given the nature of the District Councils previous concerns these characteristics represent significant advantages over both the Flash Farm and Coddington sites and lead to the site representing a far more sustainable option.

In preparing its response the District Council has had regard to the Minerals Authority's need to provide for a steady and adequate supply of sand and gravel over the plan period. The table below sets out the range of potential allocations currently under consideration by the County Council moving into the Submission Draft stage.

Potential allocation	Local Authority	Mineral reserve (million tonnes)	Authority totals (million tonnes)
MP2a Finningley	Bassetlaw	0.77	5.83
MP2b Bawtry Road North	Bassetlaw	0.52	
MP2c Scrooby North	Bassetlaw	0.64	
MP2d Scrooby South	Bassetlaw	0.40	
MP2m Barnby Moor	Bassetlaw	1.10	
MP2n Botany Bay	Bassetlaw	2.40	
MP2e Besthorpe East	Newark & Sherwood	2.00	18.03
MP2f Besthorpe South	Newark & Sherwood	0.60	
MP2g Langford South	Newark & Sherwood	3.80	
MP2h Langford North	Newark & Sherwood	2.50	
MP2i Langford West	Newark & Sherwood	1.25	
MP2l Cromwell South	Newark & Sherwood	0.80	
MP2o Coddington	Newark & Sherwood	4.00*	
MP2p Flash Farm	Newark & Sherwood	3.08	11.88
MP2j East Leake North	Rushcliffe	0.18	
MP2k East Leake East	Rushcliffe	2.34	
MP2q Barton-in-Fabis	Rushcliffe	2.86	
Shelford West	Rushcliffe	6.50	
<b>Total reserves from potential allocations (above)</b>		<b>35.74</b>	
<b>Reserves available from currently permitted sites</b>		<b>19.30</b>	
<b>Combined mineral reserve provided for</b>		<b>55.04</b>	
<b>Reserve required over plan period (2012-2030)</b>		<b>49.00</b>	

\* Total mineral reserve of 10 million tonnes with 6 million tonnes of this total reserve to be extracted beyond the end of the plan period (2030)

Taking account of the mineral resource available from the identified sites and that from currently permitted sites the combined mineral reserve available would comfortably exceed the 49 million tonnes required over the plan period. Given the flexibility that this provides it is the view of the District Council that the Minerals Authority now possesses genuine choice over the location of future sand and gravel extraction. Given the advantages of the Shelford West site the District Council would strongly support its identification as a sand and gravel allocation at the expense of the two greenfield allocations in Newark & Sherwood (Flash Farm and Coddington). It is though acknowledged that in order to meet the plan target of 49 million tonnes Shelford West (6.5 million tonnes) would only be sufficient to compensate for the removal of either Flash Farm (3.08 million tonnes) or Coddington (4 million tonnes within the plan period). The removal of both sites following the introduction of Shelford West would leave a shortfall of 1.04 million tonnes.

However in discounting the Shelford East site the District Council would question whether sufficient weight has been given to the potential cross benefits available from the western site. Clearly the eastern site could also gain from the ability to barge a substantial amount of mineral resource, allow processing to take place away from a settlement and have direct access to the A6097. On the basis of the information available the site seems to have been principally ruled out due to landscape and heritage impact and the District Council would therefore query whether these constraints rule out the site in its entirety. Given that the heritage constraints relate to the presence of a scheduled ancient monument, to the west of the manor, there could be the potential for a less sensitive portion of the site away from the asset to also be worked. In order to address the small shortfall from the loss of the two Newark & Sherwood greenfield sites this area would not need to be particularly extensive. Such an approach would also make best use of the investment in site infrastructure made by the operator in providing for an extensive conveyor from the western extraction site to the A6097.

The District Council recognises the need for the Minerals Authority to provide for a steady and adequate supply of sand and gravel over the plan period. Therefore to meet this need it is suggested that Shelford West could act as a straight replacement for Flash Farm, anticipated to operate between 2016-2028, whilst a portion of Shelford East could be phased towards the end of the plan period in the place of Coddington (due to be commenced in 2023).

Furthermore this approach would also provide for a more equitable distribution of future sand and gravel extraction across the County with Newark & Sherwood presently being the single biggest contributing area by some distance (see table above). Whilst the Council acknowledges that mineral resource can only be worked where it is found there is now a degree of choice over where future sand and gravel extraction should take place. It is notable that Newark & Sherwood (14,800 dwellings between 2006-2026), Rushcliffe (13,150 dwellings between 2011-2028) and Nottingham City (17,150 dwellings between 2011-2028) represent the focus for significant housing growth within the County. Accordingly a more even distribution between Newark & Sherwood District and Rushcliffe Borough would constitute a more effective and sustainable fit with the locations of substantial future housing growth and also provide for quick and efficient access to likely markets.

The strong support for the inclusion of the two Shelford sites is however qualified on the basis that the anticipated level of barging is confirmed as a site requirement and that the A6097 – A46 route southwards will provide the principal route for site traffic. The Newark & Sherwood District-Wide Transport Study highlights congestion at the A612/A6097 junction at Lowdham as a particular issue. Furthermore with the addition of committed development traffic flows on the A6097 between the A46 at East Bridgford and the A612 at Lowdham are expected to operate at over 90%

stress level. Issues around the highway capacity to support the proposal and related impact on the 'Lowdham Roundabout' are therefore key concerns for the Authority.

It is however considered that these concerns can be addressed through the introduction of routeing arrangements as part of the site development briefs requiring transportation via the A46 and restricting the movement of traffic northwards along the A6097. As the intention is for the Shelford West site to serve the Nottingham market transportation southwards along the A46 would continue to provide for quick and efficient links to the identified market.

On the basis of the above, and the firm objections previously raised, the District Council provides strong support for the deletion of the Flash Farm and Coddington sites with Shelford West and a suitable portion of Shelford East being identified as sand and gravel allocations in their place.