Background:
The document being examined is the Staffordshire Minerals Local Plan (Final Draft June 2015). This is the document upon which public consultation took place in June and July 2015. Guidance has been provided by the Inspector to enable the “soundness” of the emerging Staffordshire MLP to be assessed.

The information below will support the submission made by Greenfield Associates and Pleydell Smithyman, on behalf of Traxx Aggregates Ltd, to suggest that the Plan in its current form is “not Sound” and should be amended accordingly.

Issue: Whether the provision in the Plan for allocated sites for sand and gravel extraction is justified: Omission sites (v) Weavers Hill: building sand:

Submission by Greenfield Associates on Behalf of Traxx Aggregates:
Policy 1.1 is not sound as it does not include a separate allocation for building sand. If there was a separate allocation, Weavers Hill would be a key provider in the area. Current reserves will be used within 4 years, but a further 1.2 million tonnes could be available if extension was permitted.

Staffs CC Response:
No change. There is insufficient evidence to justify separate provision for building sands and the proposed site extension is not certain in terms of deliverability. Site allocations in the Plan are capable of meeting the need for building sands and it is noted that the allocation for Cranebrook Quarry is a building sand site only. A planning application could be brought forward under exceptions policy (1.6) if special need is demonstrated.
Submission by Pleydell Smithyman on Behalf of Traxx Aggregates:
We support the preferred option of promoting extensions to existing quarries. There is no sound reason why an extension to Weavers Hill Quarry has not been identified through Policy 1.1. A scoping opinion has been sought, EIA is in preparation, and an application is being prepared. All significant impacts can be addressed, so an extension to Weavers Hill Quarry should be included in the plan.

Stiffs CC Response:
No change. Site is immediately adjacent to Ramsar site with direct hydrological link. We cannot be confident that adverse impacts could be avoided, and whether, under the Habitats Regulations, we would be able to grant planning permission. With such doubts over deliverability, it would be premature to allocate the proposed extension.

Rebuttal to Stiffs CC Response:
1. Weavers Hill Sand Pit was a dormant quarry for well over 10 years until Traxx Aggregates Ltd gained a new mineral lease from the Aqualate Estate (the land and minerals rights owners) in 2010. Prior to re-opening the quarry, a revised scheme of working was agreed with Stiffs CC and number of outstanding planning issues were resolved including the construction of a revised access and site entrance on to Guild Lane that feeds directly on to the A518. The old permission allowed an annual output of 80,000 tonnes per annum. New passing bays were constructed and various old conditions were updated. The site re-commenced operations in 2012/13. The site access and road improvements are shown in Plates 1 to 3, with the site operations shown in Plates 4 to 8 attached. The current site and proposed allocation area are shown in Plan 1 attached.

2. The dry screened sand is a high quality Glacial Sand (formed in a clearly defined Esker deposit) that is used solely as building sand in local housing schemes. The customers that collect the sand are builder’s merchants and sand bagging operators that provide sand products directly to local housing schemes. The market comprises Stafford, Newport, Telford and Wolverhampton, all of which lie within about 10 miles of the site. The proposed housing within the West Midlands conurbation will see an increase in demand for this high quality sand product over the next 10 years. The sales have increased over the past 2-3 years from nothing to over 50,000 tonnes per annum. Forward demand for 2016 and 2017 is anticipated to be strong due to the marked increase in house building in the West Midlands.

3. There are no local competitors supplying sand (or any other aggregate materials) in to market established by Weavers Hill Sand Pit. Plan 2 (attached) shows the location of Weavers Hill within the Stiffs (using the Stiffs MLP locations map) that confirms that Weavers Hill is the only active operation within the Stafford Borough area.
The operation is the also nearest site supplying Building Sand to the Wolverhampton conurbation. As Weavers Hill lies almost on the border between Staffordshire and Telford & Wreking, Weavers Hill also supplies major house building schemes in Telford, only 7 miles from the site.

4. When the mineral operations re-commenced at Weavers Hill in 2012 and sales started to develop in 2013, the proven reserves were known to be about 5 years at outputs of about 40-60,000 tonnes per annum. As demand continues to grow these reserves will become exhausted by 2018, thus an extension to the site will be required in the near future to satisfy the established (and growing) demand for building sand in the local housing industry. A detailed geological assessment was therefore undertaken across the identified extension area (see Plan 1 and plates 9 and 10) that proved in-excess of 1.2 million tonnes of Glacial Sand to be present within a complex Glacial Esker sequence. The rights to work these mineral deposits are held by the Aqualate Estate who has granted a long-term mineral lease to Traxx Aggregates Ltd.

5. To the north-west of weaver's Hill Sand Pit, the Aqualate Mere SSSI & Ramsar site is present. This large water area and nature reserve is actively managed by the Aqualate Estate in co-operation with Natural England and other environmental bodies. Staffs state “Site is immediately adjacent to Ramsar site with direct hydrological link. We cannot be confident that adverse impacts could be avoided, and whether, under the Habitats Regulations, we would be able to grant planning permission.”

As part of the planning permission to re-open the quarry, a series of groundwater monitoring boreholes were drilled that clearly showed that two water tables are present on the site. An upper “perched water table” within the Glacial Sand, with a lower “major aquifer” lying beneath the Glacial Sand within the bedrock Sherwood Sandstone. This has been confirmed by the Environment agency and Natural England. The under-lying Sherwood sandstone aquifer is in contact with the Aqualate Mere thus no operations within the Glacial deposits would have any direct impacts. However, due to the potential concerns raised by Staffs CC, it is proposed that the majority of the extension mineral extraction would continue to take place above the water table, with a “wet dig” where mineral lies beneath the perched water table. This involves excavating the mineral without de-watering within a developing lake. The proposed restoration would then include both exposed sand and wetland habitats. Initial discussions with Natural England are very encouraging as the Weavers Hill site could add “significant benefit to the existing habitats that are declining within the Aqualate Mere”.
The deliverability of the proposed minerals extension has also been doubted "With such doubts over deliverability, it would be premature to allocate the proposed extension". There are no clear definitions for “deliverability” in minerals planning, but the NPPF does set out clear references in relation to housing. A definition has been provided in the Essex Replacement MLP dated July 2013.

Deliverability of the sites relates to constraints of the site:

- the ownership of the sites needs to be confirmed to ensure that the site can be delivered within the Plan period,
- the estimated resources of the sites need to contribute towards planned aggregate provision for the Plan period,
- the likely timescale within which sites would be worked needs to be provided,
- information when the sites are likely to become operational to ensure steady delivery of minerals throughout the plan period to Essex is essential,
- ensuring that there are no environmental constraints which could prejudice granting of planning permission is required
- ensuring there is no impact on historic environment
- and impact of mineral sites on the local community needs to be addressed.

The Weavers Hill is compliant with all of the above criteria, as the ownership and lease to work the mineral is valid, there is an existing and growing market for the sand materials extracted and sold from the site, the timescales for the extension are clearly defined by the depletion of the currently permitted reserves, there are no environmental constraints on the site but the known constraint at the Aqualate Mere can be mitigated, there are no historic environmental impacts and there are no local residential properties within many miles of the current site or the proposed extension area.

7. Government Guidance contained in “planningguidance.communities.gov.uk” sets out the following relation to mineral plan development:

Plans should concentrate on the critical issues facing the area – including its development needs – and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability. The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. It should also be kept up-to-date. For example when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage.)
It is considered that the information from the recent development of the Weavers Hill site has not been addressed as part of the Staffs MLP plan making process, as a market for 50,000 tonnes of sand does not appear to be identified within the current plan.

8. The National Planning Policy Framework (NPPF) has also placed much stronger emphasis on viability in plan-making. It is considered that policy requirements need to be considered together in assessing whether the plan can be delivered. This gives rise to the need for “whole-plan” viability testing. Two main points are identified

- cumulative cost of policies, and that
- full account has to be taken of relevant market and economic signals.

The market and viability signals from the Weavers Hill operation do not appear to be noted within the emerging Staffs MLP. Evidence for viability can be gathered from a variety of sources (such as aggregate returns to the MPA). The operation of a profitable site, supplying an available local market without any environmental impacts confirms that the Weavers Hill site is viable and that the work already completed confirms that the site is deliverable within the timescales of the Plan.

9. The vision set out by Staffordshire within the emerging MLP is stated as:

By 2030 Staffordshire will be producing minerals to support sustainable economic development from sites that are:

- located where their impact on local communities and the environment has been minimised or mitigated;
- operating to high environmental standards; and,
- later restored and subject to aftercare to enhance local amenity and the environment.

10. The inclusion of the proposed Weavers Hill extension area as an allocated site will clearly meet the objectives of the vision for the County, as the site does not, or will not have any impact on local communities, it will continue to operate with high environmental standards, and the site and proposed extension area can be restored with a scheme that compliments the adjacent Aqualate Mere SSSI to the benefit of the wider community.

**Summary**

The Examination Guidance note states the following:

“In assessing soundness, the Inspector will consider whether he feels that the Plan has been positively prepared; is justified (the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence); is effective (deliverable and based on effective joint working); and is consistent with national policy”.
It is recommended that the Inspector should propose amendments to the emerging Staffs MLP as it is considered that the Plan in its current form is “not sound”. This conclusion is based on the review of national policy and the development of a separate, specific market for Building Sand products that is supplying the local housing industry (Stafford, Wolverhampton and Telford). If no allocation is made for an extension to the currently operating Weavers Hill site, the existing housing and builder’s merchants markets (established over the past few years) will need to source supplies of Building Sand from locations that are substantial distances away from where the material is needed.

As the planned expansion of the housing sector grows over the coming 10 years, there will be an even greater need for sources of high quality building sand. These sites supplying these essential materials can only be located where that material is present. The emerging Plan should therefore ensure that existing and emerging markets can still be supplied and that supply issues do not adversely impact on construction material procurement to slow the rate of expansion of the house building sector.

It is considered that the evidence provided confirming the development of an established building sand market of over 50,000 tonnes per annum, developed from a historically dormant quarry site, should warrant and extension allocation within the emerging MLP. The concerns about the adjacent Aqualate Mere SSSI/ Ramsar site can be addressed as dialogue with Natural England, the Aqualate Estate (Mere and quarry landowners) and the operator (Traxx) have indicated that a long-term quarry restoration may enhance the Mere and offer a range of beneficial impacts.

The proposed extension to the existing operation at Weavers Hill would not need to be brought forward under “exceptions policy (1.6)” and that a “special need” would not therefore be required to be demonstrated to ensure compliance with the Plan prior to granting any planning permission.

S J Rees B.Sc., M.Sc., C.Geol, FGS, MIQ
for Greenfield associates
Quarry Locations in Staffordshire

Plan 2

Project
Staffordshire Minerals Local Plan

Site
Weavers Hill

Legend
- Minerals Local Plan Area
- Operational Sand & Gravel Sites
- Non-operational Sand & Gravel Sites
- Operational Crushed Rock Sites
- Non-operational Crushed Rock Sites
- Mineral Safeguard Area for Sand & Gravel
- Mineral Safeguard Area for Limestone
- District Council Boundary
- Adjacent County Boundary
- City of Stoke-on-Trent Authority
- Peak District National Park
- Urban Area

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Aggregate Minerals in Staffordshire 2012

Stafford Borough
South Staffordshire District
Wolverhampton
Weavers Hill

Stafford Borough

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Weavers Hill Sand Pit

Plate 1. Site Entrance from Internal Access Road

Plate 2. Site Entrance from Guild Lane
Plate 3. Passing bays on Guild Lane - access road to Weavers Hill Quarry

Plate 4. Sand Processing Operations
Weavers Hill Sand Pit

Plate 5. Site Operations & Vehicle Loading

Plate 6. Sand Extraction Area
Weavers Hill Sand Pit

Plate 7. Dry screened sand- Processing Plant

Plate 8. Glacial Sand Deposit
Weavers Hill Sand Pit

Plate 9. Borehole drilling in the proposed extension area

Plate 10. Trial pits in the proposed extension area