Staffordshire County Council's Statement

Day 5:

PROVISION FOR SAND AND GRAVEL

Issue: Whether the provision in the Plan for allocated sites for sand and gravel extraction is justified

OMISSION SITES

1. Why have the following sites not been allocated in the Plan?
(iv) Swindon Golf Course: sand and gravel: MJCA
The new Minerals Local Plan for Staffordshire 2015 to 2030  
Response to Inspector’s Questions – Provision for Sand and Gravel

Site History

- The site option is located adjacent to a former sand and gravel site known as Blackhills Quarry.
- The site option was initially submitted by FGD Limited for consideration in response to consultation on the first draft of the new Plan and was subsequently subject to public comment as part of the Additional Site Options consultation in October 2014. Representation was received from local residents.
- In response to a request from Swindon Golf Club, a scoping opinion ref: SCO.73/692 M dated 24/12/2015 was given in relation to proposals extraction for sand and gravel.

SA Profile

<table>
<thead>
<tr>
<th>Site</th>
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<th>RIGS</th>
<th>Maintaining supply</th>
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</tr>
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<tbody>
<tr>
<td>Swindon Golf Course</td>
<td>0</td>
<td>0</td>
<td>?+</td>
<td>+</td>
<td>?</td>
<td>-</td>
<td>?+</td>
<td>?-</td>
<td>0</td>
<td>?+</td>
<td>?-</td>
<td>?-</td>
<td>0</td>
<td>0</td>
<td>?-</td>
<td>-</td>
<td>0</td>
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</tbody>
</table>

For justification of scores, please refer to detailed assessment sheets

SA Summary Points

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<tr>
<td>Swindon Golf Course</td>
<td>Smaller site with close proximity to market but resource is uncertain. Negative scores are predicted for SA Objective 6 (Transport), as a result of the location, and for SA Objective 15 (Landscape). It may be difficult to mitigate these fully. There are also few other potential adverse impacts.</td>
<td>Not a preferred site at present</td>
</tr>
</tbody>
</table>

Development Considerations

Not prepared as this is not a preferred site

Key representations, points raised, and outline responses

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<tr>
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<tr>
<td>MJCA on behalf of Swindon Golf Club</td>
<td>The representation finds the Plan unsound on there being justification to allocate sand and gravel resources at Swindon Golf course. A site assessment report systematically reviews the scores awarded for each of the SA objectives and, in many cases, proposes and</td>
<td>No change. The additional information and assessment does not justify inclusion in the Plan at this stage given the provision available from existing and planned sites. The site option is also dependent on</td>
</tr>
</tbody>
</table>
The new Minerals Local Plan for Staffordshire 2015 to 2030
Response to Inspector’s Questions – Provision for Sand and Gravel

Malcolm Timmins
Objects to the proposal to extract sand and gravel from the Swindon Golf Club site on the grounds of the detrimental effect it would cause on our wide range of wildlife and green belt. Also on a historical point which should not be ignored is the Roman Road that passes straight through what would be the potential quarry.

No change. The site option at Swindon Golf Course is not allocated.

<table>
<thead>
<tr>
<th>Attempts to justify an alternative score, concluding that the site should be allocated.</th>
<th>Significant backfilling to achieve the intended restoration.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malcolm Timmins</td>
<td>No change. The site option at Swindon Golf Course is not allocated.</td>
</tr>
</tbody>
</table>

Fuller responses

MJCA on behalf of Swindon Golf assert that Plan is unsound on there being justification to allocate sand and gravel resources at Swindon Golf course

It is the County Council’s position that the allocation is not required to maintain supply, and the site is not favoured by the site selection process (of which more discussion later.

MJCA have reviewed the scores awarded for each of the SA objectives and proposed alternative scores, concluding that the site should be allocated.

The County Council maintains that the SA process has been refined in the light of repeated consultations, and is based on closely defined criteria and scoring systems which have been used consistently across all sites. The SA forms one part of the site selection process which has also been applied consistently across all sites. Changes to the SA score may not lead directly to changes in the suitability of a site for selection.

MJCA state that the scores are appropriate and consistent for the following SA Objectives: 1, 2, 4, 8, 14,

The proposed changes to the SA scores are considered below:

**SA Objective 3: (Maintaining supply)**

MJCA suggest that this objective should be scored as “+”

Whilst we recognise the benefits of the location for supplying adjoining areas both within Staffordshire and further afield, we are aware that, at about 1.2 million tonnes, this is a relatively small site, and so has limited capacity to make a significant contribution to the market. Our records from mineral working in the immediate vicinity also suggest that, despite the evidence from boreholes, the resource may prove very difficult to work. These elements of doubt lead to our score of “?+”

**SA Objective 5: (Tranquility)**

MJCA suggest that this objective should be scored as “+”

Our assessment guide does not allow for scores higher than “0”, as we do not consider that any form of mineral development will enhance the tranquillity of an area. The area has a medium level of tranquillity at the moment. Development of the quarry is likely to reduce this during the operational phase, but appropriate
restoration should lead to a return to original levels. Greater use of the area may have an impact on tranquillity, so this was reflected in the score of “?”

**SA Objective 6: (Transport impacts)**
MJCA suggest that this objective should be scored as “+”
Whilst we recognise that the immediate site access has been improved, our assessment for all sites is based on distance from the primary road network. Swindon Golf Club falls into the category of: “More than 1km away from primary network. Settlements, more sensitive developments, and/or narrow stretches between”. Accordingly, we gave the site a score of “-”. We do not consider that a change in the score would be justified.

**SA Objective 7: (Greenhouse gasses)**
MJCA suggest that this objective should be scored as “+”
Our assessment noted that the site is close to a part of the West Midlands Conurbation which is not conveniently supplied by other quarries in Staffordshire. However, the scale of the site limits the scale of the impact that the site might have on reducing overall greenhouse gas emissions. As a result, we gave the site a score of “?+”. We do not consider that a change in the score would be justified.

**SA Objective 9 (Biodiversity)**
MJCA suggest that this objective should be scored as “+”
Our assessment suggested that the site has some features which may be of biodiversity importance, and that appropriate restoration could make a valuable contribution to heathland connectivity. Because we cannot be sure that the full benefits of such restoration will be achieved, we gave the site a score of “?+”. We do not feel that a higher score could be justified.

**SA Objective 10 (Ground and surface water)**
MJCA suggest that this objective should be scored as “0”
Our assessment noted that the site falls within a Source Protection Zone 3, but the Environment Agency report that the groundwater is classified as not available for licensing. Whilst impacts on the groundwater should not arise if the site is well managed, the lack of available abstraction licenses could impose constraints on mineral processing operations etc., and this is reflected in our score of “?-”

**SA Objective 11 (Soil)**
MJCA suggest that this objective should be scored as “0”
We found that the soils in the area are all Grade 3, leading to a score of “?-”. This has been wrongly transcribed as “?-”, and this should be corrected.
SA Objective 12 (Air quality)
MJCA suggest that this objective should be scored as “0”

Our assessment noted that, while there were no Staffordshire AQMAs nearby, the whole of Dudley is designated as an AQMA, so transport impacts are possible where any mineral is transported in this direction. Given that Dudley is identified as one of the areas that the proposed quarry is well placed to supply, such impacts may well arise. This is reflected in our score of “?-”, and we see no reason to make any changes.

SA Objective 13 (Historic environment)
MJCA suggest that this objective should be scored as “+”

Our assessment noted that this proposed allocation site straddles the projected route of a Roman road thought to extend northwards from the Greensforge Roman fort. Though there are no further finds or sites in the surrounding, there remains the potential for such remains to be present along the line of the road within the current application site. Whilst we recognise that all appropriate steps would be taken to mitigate any impacts arising from the proposed extraction, the possibility of such impacts justifies the score of “?-”. We see no reason to change this score.

SA Objective 15 (Landscape)
MJCA suggest that this objective should be scored as “+”

Our assessment notes that the site falls within an area of the highest landscape sensitivity. It lies just below the ridge line and would be likely to be visible from considerable distances. Mitigation would be hard to achieve during the extraction phase, so we gave the site a score of “-”.

SA Objective 16 (Recreation and greenspace)
MJCA suggest that this objective should be scored as “+”

The site is not crossed by any rights of way, and has limited public access. While there is a suggestion that restoration might lead to greater access, it is difficult to be certain that this will be achieved. We reflected this potential with a more cautious score of “?-”.

SA Objective 17 (Health and amenity)
MJCA suggest that this objective should be scored as “+”

Our assessment was based on the proxy measure of the number of properties within 250m of the proposed site. We found only 2 such properties, so we gave the site a score of “0”. This is the “best” score available within the scoring system as it is assumed that no quarry will enhance people’s health or amenity.
Overall, we consider that, with one minor exception, the scoring is appropriate. The site selection process noted that the available resource is smaller than for many sites, and that the difficulty obtaining suitable fill material for an adjacent driving range development calls into question the deliverability of the proposed restoration scheme. The location of the site is also at variance with the general location strategy for the new Minerals Local Plan.

Overall, the site does not perform as well in the site selection process as many other sites, and its allocation cannot be justified.
The new Minerals Local Plan for Staffordshire 2015 to 2030
Response to Inspector’s Questions – Provision for Sand and Gravel

(v) Weavers Hill: building sand
Site History

- The existing site is subject to a ROMP permission ref: S.EA/2 issued 1-7-97 that is subject to periodic review but that application (ref. S.13/13/400 M) for determination of conditions has been held in abeyance since September 2013 awaiting information from the applicant in respect of up-to-date ecological surveys.
- In response to a request from Traxx Aggregates Limited, a scoping opinion ref: SCO.71/400 M dated 5-6-15 has been given in relation to proposals for an extension to the site.
- The Weavers Hill site option was initially submitted for consideration by the Aqualate Estate, owners of the site, and was considered as part of the Issues and Options consultation in 2008.
- Comments were received in respect of the site option as reported to Planning Committee on 5 March 2009.

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<tbody>
<tr>
<td>Weavers Hill</td>
<td>0</td>
<td>?-</td>
<td>?+</td>
<td>?</td>
<td>0</td>
<td>?-</td>
<td>-</td>
<td>0</td>
<td>?-</td>
<td>0</td>
<td>0</td>
<td>?</td>
<td>0</td>
<td>-</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>Not a preferred site</td>
</tr>
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For justification of scores, please refer to detailed assessment sheets

SA Summary Points

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<tr>
<td>Weavers Hill</td>
<td>Small site capable of producing building sand, but with uncertainties over deliverability. Location immediately adjacent to Ramsar site makes predicted adverse impacts for SA Objective 9 (Biodiversity) and SA Objective 10 (Ground and surface water) particularly significant. Predicted negative impact for SA Objective 15 (Landscape) would also be difficult to mitigate. Much more work would be needed before this site could be considered development.</td>
<td>Not a preferred site at this stage</td>
</tr>
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Development Considerations

Not prepared as this is not a preferred site
## Key representations, points raised, and outline responses

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<td>Pleydell Smithyman Limited on behalf of Traxx Aggregates</td>
<td>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.</td>
<td>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.</td>
</tr>
<tr>
<td>Greenfield Environmental Ltd on behalf of Traxx Aggregates</td>
<td>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.</td>
<td>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.</td>
</tr>
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## Fuller responses

As discussed on Day 1, the Plan does not recognise the need for a separate allocation for building sand.

The SA process has identified a number of adverse impacts that might arise as a result of the proposed extension. In particular, clear negative impacts are predicted with regard to SA Objectives 9 (Biodiversity), 10 (Ground and surface waters) and 15 (Landscape), along with potential adverse impacts on SA Objectives 2 (RIGS), 7 (Greenhouse gases), 8 (Flood management), 11 (Soils), and 16 (Recreation and greenspace). Together, these suggest that it would be difficult to avoid unacceptable adverse impacts should the site be developed.

The Habitats Regulations Screening process identifies that the proposed allocation is immediately adjacent to a Ramsar site. We have not received sufficient information to give us confidence that a future planning application would be able to demonstrate that there would be no adverse impact on the integrity of the Ramsar site, so we cannot allocate the site.

The site allocation process also highlights the relatively small and specialised nature of the mineral resource, and casts doubt on the deliverability within the timescale of the plan, and consistency with the overall strategy.
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(vi) Lodge Farm: building sand:
The new Minerals Local Plan for Staffordshire 2015 to 2030
Response to Inspector’s Questions – Provision for Sand and Gravel

Site History
- The Lodge Farm site option was submitted by the owner of the site for consideration as part of the Issues and Options consultation in 2008.
- Comments were received in respect of the site option as reported to Planning Committee on 5 March 2009.

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<tr>
<td>Lodge Farm, Weston</td>
<td>0</td>
<td>?-</td>
<td>?+</td>
<td>+</td>
<td>?</td>
<td>-</td>
<td>-</td>
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<td>?+</td>
<td>-</td>
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<td>Lodge Farm, Weston</td>
<td>A smaller site, with uncertain potential to supply the market. Site is being promoted by estate trustees. Negative impacts are anticipated for SA Objective 10 (Ground and surface water) and SA Objective 15 (Landscape). Former results from SPZ3 and may impact on how the site can be worked. There is also potential for secondary impacts on low flow rivers, so full mitigation may not be achievable. There are 2 other potential adverse impacts, relating to access (SA Objective 6 (Transport)) and the geomorphological interest in the site, so mitigation may again be hard to fully achieve</td>
<td>Not a preferred site at present</td>
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Development Considerations
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<td>Bidwells on behalf of The Trustees of Lord Bradford’s 2000 Settlement</td>
<td>The representation seeks the inclusion of a site option referred to as Lodge Farm on the grounds that the Plan is not effective in addressing the need for building (soft) sands and not justified in view of the option to fulfil a predicted shortfall by allocating the Lodge Farm site</td>
<td>There is no evidence to suggest that the demand for building sands is not being met or cannot be met from proposed allocations. In any event, policy 1.6 provides opportunity for proposals to be made in the event that there is a specialist demand to be met and the monitoring framework provides for monitoring of</td>
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building sand sales. The Lodge Farm proposal is not an extension to an existing site and would introduce mineral working into a new area. The scale and nature of its reserve and its location relative to markets does not compare favourably to the area of search and no allocation is justified.

Fuller responses
As discussed on Day 1, the Plan does not recognise the need for a separate allocation for building sand.

The SA process has identified a number of adverse impacts that might arise as a result of the proposed extension. In particular, clear negative impacts are predicted with regard to SA Objectives 6 (Transport impacts), 10 (Ground and surface waters), 11 (Soils), and 15 (Landscape), along with potential adverse impacts on SA Objectives 2 (RIGS) and 7 (Greenhouse gasses). These scores suggest that there may be difficulties in developing an acceptable scheme for developing the quarry.

The site allocation process also highlights the relatively small and specialised nature of the mineral resource, and the incompatibility of its location with the strategic approach of the Plan. In addition, the absence of an identified operator, and the remoteness from other mineral workings, cast doubt on the contribution that the site could make within the timescale of the plan.