

CODDINGTON PARISH COUNCIL

Nottinghamshire County Council - Minerals Local Plan Consultation - October 2013.

1. Introduction.

There is a requirement for some 30 million tons of sand and gravel in Nottinghamshire over the period 2012-2030. This Plan indicates the preferred locations for meeting this need. One such location is at Coddington, referred to as MP20 in the Plan and shown on Inset 15. Extraction would be programmed for 2023 to 2040. These submissions test this allocation against the objectives and policies of the Plan.

2. Strategic Objectives (page 22).

The most relevant objectives in relation to Coddington are SO1, SO5 and SO6. It is submitted that the allocation at Coddington is at variance with these objectives:

- a. SO1 - There is no possibility of barge transport from Coddington.
- b. SO5 - The community of Coddington will suffer severe adverse impact in terms of noise, light and air pollution, increased traffic and traffic congestion, and visual intrusion.
- c. SO6 - The SINC, Stapleford Woods, will be put at risk due to a reduced water table and the close proximity of the workings.

3. Policy SP1-The National Planning Policy Framework (NPPF) (Page 25).

This policy sets out the requirements in the NPPF that there should be presumption in favour of sustainable development. It is submitted that mineral extraction at Coddington would not be sustainable based on the issues set out in 2 above and in the following submissions.

4. Policy SP5 – Sustainable Transport (Page 37).

The Coddington allocation conflicts with this policy. It does not maximise the use of alternatives to road transport – there are none. It is not close to one of its proposed markets, South Yorkshire (page 55 of the plan). Whilst it would have access to the A17 and thence to the A46 and A1, the junctions between these roads are already overloaded and under-designed, leading to numerous accidents and subsequent congestion in Coddington and Newark. The A17's difficulties are further exacerbated by the newer mini-roundabout giving access to the Currys' warehouse complex. These junctions need substantial improvements now to meet existing needs. (See further submissions in relation to Policy DM9).

5. Policy SP6 – The Built and Natural Environment (Page 40).

- a. The proposed allocation immediately abuts and would potentially have an extremely damaging effect on Stapleford Woods, a Site of Important Nature Conservation (SINC). The woods are a valued and well used recreational and ecological asset for not only Coddington but for

Newark and the surrounding area, and the potential harm through the lowering of the water table and physical proximity of extraction would represent an irreplaceable loss to the public.

- b. The adverse impact on the highway network has already been referred to and further submissions are made in relation to Policy DM9.
 - c. The living environment of the residents of Coddington would be severely affected. They already suffer from noise emanating from activities on the Newark Showground, which is further away from the village than this allocation. The additional noise, coupled with light and air pollution and traffic congestion would impact very substantially on quality of life and in particular, the effects of airborne dust during dry periods with prevailing winds are of great concern.
- 6. Policy MP2 – Sand and Gravel Provision (Page 50).**
It is submitted that in terms of distance from its market in South Yorkshire, damage to community amenity, danger and environmental harm arising from increased traffic generation and harm to the environment, allocation MP2o at Coddington should be deleted.
- 7. Policy DM1- Protecting Local Amenity (Page 86).**
It is not accepted that any of the adverse impacts identified could be either avoided or adequately mitigated.
- 8. Policy DM2 – Water Resources and Flood Risk (Page 89).**
There is potential damage to Stapleford Woods from a reduced water table and from water pollution. The same adverse effects could arise in respect of the Moor Brat Drain which also abuts the allocation.
- 9. Policy DM4 – Protection and Enhancement of Biodiversity and Geodiversity (Page 94):**
The Justification for this policy states:-
“Ancient woodlands are designated as SINC’s... ..and are one of the most diverse habitats for wildlife, being home to more species of conservation concern than any other habitat. These designated sites form part of the country’s irreplaceable natural capital.”
- These statements only serve to reinforce the unacceptable threat that this allocation presents to Stapleford Woods.
- 10. Policy DM5 – Landscape Character (Page 97).**
The loss or partial loss of Stapleford Woods would do irreparable damage to the landscape character of this part of Coddington.
- 11. Policy DM8 – Cumulative Impact (Page 104).**
The extraction of sand and gravel would have a cumulative impact on Coddington. The first paragraph of the Justification of this Policy sets out the situation admirably:-

“Mineral developments have significant environmental impacts during their operational phases; for instance, the generation of noise and dust, impact on the landscape, loss of biodiversity and fragmentation of habitats and HGV transport impacts.”

12. Policy DM9 – Highway Safety and Vehicle Movements/Routeing (Page 106)

This policy sets out four requirements which need to be met if mineral development is to be supported. For reasons already set out in this submission relating to the inadequacy of the road network to accommodate increased heavy traffic, these requirements would not be met at Coddington. Moreover, the current design of the A17 east of the A1 and A46 is not satisfactory. This modern, fast, single carriageway trunk road already has a poor accident record. Its junctions with Drove Lane are recognised as staggered, dangerous crossroads in need of improvement, even before the potential advent of a nearby 180 HGV movements on and off it per day. The A17 is also a busy tourist route every year.

13. Policy DM10 – Planning Obligations (Page 108).

The Council should not seek to negotiate planning obligations. It should require them, as a prerequisite of any permission. Whilst Government policy, as set out in the NPPF, may emphasise that developers and landowners should not be disadvantaged by obligations, this should not be allowed to override the paramount planning requirement to protect the amenity of communities and the future of the natural environment.

14. Policy DM11 – Restoration, After-use and After-care (Page110).

Whilst supporting the provisions of this policy, it is submitted that the plan should include a policy requiring remedial works to be carried out prior to the commencement of development; for example, the landscaping of the boundaries, installation of noise attenuation measures and improvements to highways.

15. Appendix 3 – Site Allocation Briefs – MP2o Coddington.

These submissions set out why this allocation is unacceptable, namely:

- a. Noise and disturbance to the residents of Coddington. Noise from activities at the Newark Showground, which lies to the north-west of the allocation, is already experienced in the village. The allocation lies much nearer to the settlement.
- b. Light and air pollution adversely affecting the village.
- c. The potentially disastrous impact on Stapleford Woods.
- d. Noise, disturbance, congestion and potential hazards arising from the use by HGVs of an inadequate road network.

16. Conclusion.

For the reasons set out in this submission, Coddington Parish Council requests that the allocation at Coddington be deleted. If the County Council is minded to retain the allocation, the following constraints should be imposed:

- a. Prior to the commencement of works on the site, modifications should be made to the A17/A46 and A17/A46/A1 junctions to increase their capacity and to make substantial improvements to their design. This should be complemented by the dualling of at least that section of the A17 eastwards from the Drove Lane junctions to the Stapleford Lane/C208 roundabout. The A46 dual carriage-way between Newark and Lincoln is commended for comparison. Movement to and from the Norton Disney sand and gravel quarry is at a generously constructed intersection (SK 4850 3598), whilst traffic from that at Swinderby joins the A46 at a roundabout.
- b. The eastern boundary of the allocation should be moved to the west to give greater protection to Stapleford Woods, and substantial landscaping provided to screen the workings from the woods and to provide some noise attenuation.
- c. Before any work is commenced on site, earth moulding and landscaping on a substantial scale be provided along the site frontages to the A17 and Drove Lane, to screen the development and to provide noise attenuation.
- d. The processing plant should be relocated to the north-west corner of the site to reduce noise and disturbance to the residents of Coddington. An on-site service road would be required to link the plant to the A17 which would be the only means of vehicular access to the site.
- e. An early environmental impact study should be undertaken to assess the potential effects of airborne dust on the residents and buildings of Coddington, and on traffic using the immediately adjacent A17.
- f. No vehicular access to the site be permitted from Drove Lane or Stapleford Lane.
- g. No working be permitted on-site during evenings and weekends, including all site access, HGV transport and machinery operations.

The permission would then require the restoration, after-use and after-care provisions referred to in Appendix 3.