

**Examination of the Nottinghamshire Minerals Local Plan**

**Matter 2 – Vision, strategic objectives and strategic policies**

**ISSUE : Whether the vision, strategic objectives and strategic policies provide an appropriate basis for sustainable minerals development**

**Policy SP1: Minerals Provision**

**8. Please explain how the Plan's policies prioritise the extension of existing sites in preference to new sites**

1. The main thrust of argument from CEMEX challenging the soundness of the plan is made under Matter 3 with regard to Policy MP1: Aggregate Provision. However, the Development Plan clearly needs to be looked as a whole and the fundamentals of minerals provision for the plan period are laid out here under Strategic Policy SP1: Minerals Provision. As the Inspector will have noted Officers have sought to prioritise extensions to existing quarries through the provision of caveat (b) within this policy and the identification of such extension sites within Policy MP2: Sand and Gravel part (b) with only one new sand and gravel site reference (c) MP2p being identified as being needed for the plan period.
2. It is assumed therefore that the purpose of the Inspector's question is framed around seeking an explanation on the logic that has been applied by officers in arriving at their prioritisation for extensions over preference for new sites.
3. It is noted within the supporting text to Policy SP1 at paragraphs 3.7 and 3.8 that officers recognise that:
  - Nottinghamshire is rich in minerals
  - There needs to be a steady supply to meet future demand

- Minerals can only be worked where they are found
4. CEMEX absolutely agree with the above sentiments and fully support the provision within SP1(a) that the strategy should identify suitable land for mineral extraction to maintain a steady and adequate supply of minerals. Indeed, this is consistent with the provisions of the National Planning Policy Framework (NPPF) paragraph 207.
  5. However, the following sentence it is also noted within paragraph 3.8:

*'Within Nottinghamshire the priority is therefore to extend existing sites, in preference to developing new sites, and encourage the use of secondary and recycled aggregates where possible'.*

The inclusion of the word 'therefore' within the text suggests that there has been a thought process, but this is not set out within the policy or the supporting text. Indeed, there is no National policy basis for the County Council to adopt this approach and no logical explanation with the supporting text as to how and why officers have arrived at the judgement that extensions and recyclables are able to meet a steady supply to meet future demand. It follows therefore that CEMEX disagree with the premise then adopted by officers within the policy at (b) that the plan will:

*'Give priority to the extension of existing sites, where economically, socially and environmentally acceptable,'*

6. CEMEX understand why officers might want to encourage extensions to existing quarries as it is sustainable and logical to maximise extraction in one location

before moving to another, although it should be noted that extensions largely maintain existing supply rather than increase it because they do not automatically lead to increases in productive capacity at sites. However, such an approach to extensions should not conversely lead to restrictions on supply that the very policy is seeking to ensure through part (a). It should also not be the case that extensions are prioritised over potential new sites in the evaluation process of site selection as some of these might offer better opportunities to ensure continuity of supply for the plan period rather than extensions.

7. Therefore, for reasons set out here and as further elaborated under the statement provided under Matter 3 the CEMEX case is that the County Council's strategic approach to minerals provisions is unjustified and unsound. As a consequence it has not approached site selection in a manner consistent with national policy and by focusing on just extensions and only one new site it is also seriously under providing mineral supply in the county and therefore its ability to meet future needs during the plan period contradicting caveat (a) of the SP1.

**Mark Kelly**

**CEMEX UK OPERATIONS LTD**

**10<sup>th</sup> April 2020**