

Mr S Osborne-James
Senior Planning Officer
Nottinghamshire County Council
County Hall
West Bridgeford
Nottingham
NG2 7QP

Date: 28 September 2018
Our ref: 15038/JG/JSt/16544611v1
Your ref:

Dear Mr Osborne-James,

Nottinghamshire Minerals Local Plan Consultation August 2018

Lichfields act on behalf of Rotherham Sand and Gravel Company Limited (RSG) and write in response to the invitation to submit comments on the Publication Draft Nottinghamshire Minerals Local Plan (MLP). RSG's representation focuses on both the Scrooby Thompson Land (MP2m) and the Barnby Moor (Rotherham Sand and Gravel) prospect which was the subject of the 'Call for Sites' submission to Nottinghamshire County Council earlier in the year.

Introduction

RSG provided details of its Barnby Moor prospect within its 'Call for Sites' submission of 11 January 2018. This representation provides further justification in support of the inclusion of RSG's Barnby Moor (Torworth) landholding within the Submission draft of the Minerals Local Plan.

The representation also highlights RSG's need for a balance of supply between sharp sand and gravel resource for blending to produce a marketable minerals product necessary to maintain its market share. This representation therefore addresses some of the assumptions set out within the Publication Draft Minerals Local Plan and provides further context with respect to the Scrooby Thompson Land and how its Barnby Moor (Torworth) interest is a key component in meeting the company's future needs.

Site Name

To avoid any further confusion with the adjacent land promoted for inclusion in the Minerals Local Plan by Hanson, we propose that the RSG interest is hereafter referred to as 'Torworth'.

Ownership

RSG's Call for Sites submission of January 2018 was made in parallel with the acquisition of the land identified edged red on Figure 3 within the submission. The surface and underlying mineral of the interest is therefore owned freehold, we therefore confirm that that subject to the grant of planning permission, RSG has an unencumbered right to work mineral from land within its ownership.

In connection with the present consultation, it is understood that Hanson will write to Nottinghamshire County Council to confirm its interest in the adjoining land to the south.

RSG Operation

RSG is a long-established SME minerals business based in north Nottinghamshire, operating from its Scrooby Top Quarry located to the north of Ranskill. The company has been in existence since the 1930s with Scrooby Top now primarily operating as the hub to its satellite minerals extraction operations. Significant investment has been made in this site which now houses the company's centre of operations which includes fixed processing plant, bagging batch mix (concrete) operation and site infrastructure including new site access arrangements.

Sharp sand and gravel is imported to Scrooby Top from the company's satellite operations, where it is processed to provide for a range of products which serves an established customer base and wider market demand. Scrooby Top Quarry is the RSG's point of sale. Of significance to RSG is the availability of permitted reserve within its operational satellite sites and its ability to produce both sharp sand and gravel in parallel to enable (following processing) the production of a saleable product range which meets customer specification. By their very nature sand and gravel deposits can be variable in terms of the composition of the minerals in the ground, therefore to meet product specification there is invariably a need to blend sands and gravel to produce a marketable product. To maintain supply to the market, RSG therefore needs to be able to work both sand and gravel in parallel from its own deposits to be able to produce saleable products to supply the market.

Local Plan Site Allocation

RSG submitted the Scrooby North, Scrooby Thompson land and Torworth sites for inclusion within the Minerals Local Plan to ensure continuity of supply of both sand and gravel to its processing plant to provide for continuity of minerals product sales. More recent revaluation of the Scrooby Thompson land has shown it to contain much less gravel than originally reported, equating to some 50,000 to 60,000 tonnes of production which would be provide for up to 1.5 to 2 years supply at projected rates of working. This is principally within the east of the site, hatched black within the red line area as shown on Figure 4A. To complete the picture, the proposed Scrooby North allocation (MP2n) is primarily a sand resource and would provide the sand component for blending.

RSG has now purchased further land (freehold surface and minerals) to the immediate north of its Torworth landholding. This is now included on the attached plan Figure 3A which shows the enlarged 28.3 ha site edged red. RSG's Torworth (enlarged) prospect has a proven resource of 1.2 million tonnes of sand and gravel, with the gravel component evenly distributed throughout the deposit. Of this, 620,000 tonnes will be available for extraction during the plan period. Figure 3A identifies land with a black cross hatch which would be worked beyond the Plan period. With much less gravel being extractable from the Scrooby Thompson land, there is an even greater need for RSG to work Torworth, earlier in the plan period than had been previously proposed by the Call for Sites submission. An update to that Call for Sites submission is provided at Appendix 1 for ease of reference.

Delivery Schedule

The attached Table 1 sets out projected rate of extraction and phasing of delivery of its extant working site and those promoted for allocation in the emerging MLP, however it is RSG's experience that sales have been increasing, at least over the last two years, so there is the potential for new permitted reserves to be required by Rotherham Sand and Gravel sooner than projected.

Site Selection, Sustainability and Environment

The Nottinghamshire Minerals Local Plan Draft site selection methodology and assessment document of July 2018 highlights a staged approach to the choice of site taken forwards as allocations in the Publication Draft

Plan. The methodology and assessment document highlights the sustainability reporting for Barnby Moor (Rotherham Sand and Gravel) -16 and Barnby Moor (Hanson) -14. The overall score averages at -15 which is entirely consistent with Site Selection report of January 2016, where the site had been fully assessed and appraised with no issues highlighted.

Delivery Schedule

The Nottinghamshire Local Aggregates Assessment (LAA)¹ acknowledges that the working of sand and gravel from Finningley quarry, (which straddles the administrative boundary within Doncaster) caused the reported sales of sand and gravel to fall particularly in the years 2009 and 2013. The LAA also reports² that along with the fall in sales due to the recession, the number of permitted quarries coming online to replace worked out quarries has also fallen, affecting sales figures. The Draft Site Selection Methodology and Assessment (July 2018): Appendix 2, Delivery Schedules sets out projections for sites on a site by site basis. Extrapolating projected annual tonnage extracted across all sites highlights potential fluctuation in output that may be realised throughout the plan period. Flexibility should be introduced to the annual production projection by way of further allocation of sand and gravel resource to address invariable fluctuations in supply that may occur as has been highlighted by the LAA reporting.

All the new resource proposed by Rotherham Sand and Gravel will provide for continuity of working of reserves within the county area.

Summary

RSG is a long established independent minerals operator based at Scrooby Top in north Nottinghamshire from a location which serves the local market with a range of minerals products derived from locally won resource. To maintain supply of sharp sand and gravel, resource needs to be won from its sites in parallel, to ensure the desired balance of sand and gravel is available for blending to produce minerals products which meet market specification.

Scrooby Top Quarry is established as RSG's operational hub where over recent years significant investment has been made and the County Council has granted planning permission for new site infrastructure and the installation of new fixed processing capabilities to enable RSG to maintain its market share and continue to meet demand.

This representation highlights the need for both sand and gravel bearing sites operated by RSG to be operated in parallel to enable blending of resource to produce saleable products. The allocation of the Torworth prospect will provide for certainty in the supply of gravel (once the Scrooby Thompson Land is exhausted), to match the draft allocations made for sand bearing land at Scrooby North. The allocations proposed will maintain supply from within Nottinghamshire and not act as a replacement for exhausted workings principally operated outside of the county boundary.

We highlight the importance of making provision for flexibility in supply, in particular to account for fluctuations in supply over the plan period which will inevitably occur. The current projections for future demand are based upon a period of recession and emergence from it. RSG experience is that sales are increasing, and therefore to meet its own needs for sharp sand and gravel, the allocation of Torworth,

¹ Nottinghamshire Local Aggregates Assessment para 3.1

² Nottinghamshire Local Aggregates Assessment para 3.2

Scrooby North and the Scrooby Thompson land is essential to ensure continuity of supply over the plan period.

Conclusion

With respect to sharp sand and gravel, it is concluded there is a pressing need for the Torworth prospect to be included as an allocation within the MLP, together with the inclusion of Scrooby North and the Scrooby Thompson land. With the inclusion of all the sites promoted by Rotherham Sand and Gravel, the company will be able to operate with certainty over the plan period.

Should you have any questions, please do not hesitate to contact me.

Yours sincerely



Jonathan Standen
Planning Director

Copy RSG Ltd

**Nottinghamshire Minerals
Local Plan 2017/2018
Call for Sites**

Torworth

Rotherham Sand and Gravel Co. Ltd.

21 September 2018

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1.0 Introduction

Background

- 1.1 Following the Council decision to withdraw the Minerals Local Plan in May 2017, Nottinghamshire County Council is currently in the process of preparing a new Minerals Local Plan to replace the current plan which was published in 2005 and is now out of date. The new Minerals Local Plan will provide the planning policy context for minerals development in Nottinghamshire for the period to 2036. The area covered by this minerals plan is that for which Nottinghamshire County Council is the Mineral Planning Authority.
- 1.2 As part of the evidence gathering process, the Council is now inviting the minerals industry, landowners and other interested parties to submit site specific information for potential new quarries or extensions to existing quarries that they wish to be considered for allocation in the new Minerals Local Plan. The information submitted will be used to assess the proposals put forward, to ensure they are deliverable, realistic and achievable and will contribute to providing a steady and adequate supply of minerals are provided over the plan period.
- 1.3 Representations have previously made to the Nottinghamshire Minerals Local plan as part of the previous Call for Sites request resulting in the allocation of Barnby Moor (Reference MP2c). Having now obtained legal interest in the areas identified by this submission, Rotherham Sand and Gravel proposes the allocation of Torworth within the context of the Nottinghamshire Minerals Local Plan 2017/2018.
- 1.4 Following the completion of working at Scrooby Thompson Land (a site promoted for inclusion in the Nottinghamshire Minerals Local Plan by Rotherham Sand and Gravel Ltd (2017/2018)), the Barnby Moor site will be worked in tandem with the Scrooby North extension (a further site promoted for inclusion in the Nottinghamshire Minerals Local Plan (2017/2018)), to provide a blend of sand and gravels. The remainder of this submission document addresses the information requested in the Nottinghamshire Minerals Local Plan – Call for Sites 2017/2018 letter of 3 November 2017.

2.0 Call for Sites Information

Location

Question 1.1

2.1 The Torworth prospect is located at NGR SK6645685417 and at its closest point is situated some 500 metres to the north of the village of Barnby Moor and some 650 metres to the south of the village of Torworth in the north of Nottinghamshire. The site is neighboured by areas of agricultural land. To the west the site, the site is located adjacent to the A638.

2.2 The boundary of the proposed Torworth allocation prospect is shown on Figure 3A at Appendix 1. The prospect site is formed from three conjoined parcels of land has a total area of 28.3 hectares.

Question 1.2

2.3 It is proposed that only land within the northern part of the site with an area of 12.7 ha will be worked within the plan period, releasing some 620,000 tonnes of mineral. The remaining land hatched black some 15.6 ha on Figure 3A would be worked beyond the plan period. The site is however notable for its gravel resource. Working will take place at a rate of circa 40,000 tonnes per annum.

Question 1.3

2.4 It is proposed to take access from the site to the A638 from an existing access point located at SK6599885602 or further to the north, land fronting the A638. Thereafter mineral will be transported by road to Scrooby Top Quarry which is located 3.4km to the north, also accessed from the A638. The Scrooby Top Quarry access permitted in 1999 (reference 1/42/98/16) has been installed to a specification appropriate for the access and egress of heavy goods vehicles carrying minerals.

Question 1.4

2.5 All mineral will be processed at Scrooby Top Quarry where there is located existing processing plant. This plant has the capability to process approximately 350,000 tonnes of mineral per annum. All minerals extracted from Torworth allocation will be transported to Scrooby Top Quarry for processing and onward sale.

Question 1.5

2.6 It is likely that the Torworth site will be worked in two stages. Firstly, the northern parcel of land followed by that situated to the south. As described in 1.2 above

Question 1.6

2.7 The site boundary shown on an OS base is shown on Figure 3A.

Question 1.7

2.8 It is estimated that the development would be worked at a rate of circa 40,000 tonnes per year. This equates to 8 return movement per day or 2,000 return movements per year using heavy goods vehicles with a 20 tonnes payload.

Reserve Data

Question 2.1

2.9 The site has a recoverable reserve of 1.2 million tonnes of sand and gravel.

2.10 The geology of the site is interpreted from:-

- The British Geological Survey (BGS) 1:50,000 scale map, sheet 101- East Retford; and,
- An assessment of trial pit data within the proposal area;

2.11 The geology of the area comprises drift deposits of glacial sand and gravel overlying Triassic sandstone of the Sherwood Sandstone group. The Site is underlain entirely by the Chester Formation, the upper unit of the Sherwood Sandstone Group. It comprises a pinkish red or buff grey, medium to coarse grained, pebbly sand stone. Below the Sherwood Sandstone is the Roxby Formation, comprised of mudstone and siltstone.

2.12 The trial pit data is attached at Appendix 2.

Question 2.2

2.13 The estimated output from the site will be 40,000 tonnes of sand and gravel per annum.

Question 2.3

2.14 The estimated lifespan of the mineral working is approximately 33 years.

Question 2.4

2.15 The site will be worked in tandem with the Scrooby North extension, but will act as a replacement for Scrooby Thompson Land working area which as an 18 months projected lifespan. On this basis, subject to planning, it is programmed to extend working into the proposed Torworth site by **2021**. This is likely to follow on in sequence from the working of Barnby Moor, a site promoted by Hanson.

Role of Site / Markets

Question 3.1

2.16 Torworth will be a Greenfield working area.

Question 3.2

2.17 The site will supplement the extraction of minerals at other Rotherham Sand and Gravel operations located at Scrooby. The Torworth site will help Rotherham Sand and Gravel meet its future needs, particularly for gravel.

Question 3.3

2.18 Rotherham Sand and Gravel Co. Limited is an established supplier of graded sand and gravel products to the north Nottinghamshire and South Yorkshire market, using materials principally won from its working sites located between Scrooby and Ranskill. The Torworth site will provide continuity of production in the medium to long term of the plan period.

Question 3.4

- 2.19 The Torworth site is located some 3.4km to the south of the Scrooby Top Quarry operating centre. It is well placed to meet market needs for the products sold from Scrooby Top Quarry, the market for which is mature, having developed from the location of the mineral deposit and the particular market demand for the product.

Availability of Mineral

Question 4.1

- 2.20 Rotherham Sand and Gravel Ltd own the minerals deposit and have an existing permitted access or rights to access to the site from the public highway. Should a new access point be required then there are viable options for this to be created direct to the A638.

Landowner Consent

Question 5.1

- 2.21 Rotherham Sand and Gravel Ltd is the surface and mineral owners in unencumbered freehold and as such have the full legal rights to work the entirety of the mineral deposit indicated by the area shown on Figure 3A.

Question 5.2

- 2.22 Rotherham Sand and Gravel Ltd is both minerals operator and owner.

Question 5.3

- 2.23 Refer to Question 5.1

Agricultural Land Quality

Question 6.1

- 2.24 Land quality is Grade 3.

Sensitive Receptors

Question 7.1

- 2.25 The Torworth site is within 200 metres of a residential property called Woodlands, though the proposed allocation site is bordered by an established hedge line. Other residential and commercial properties are located in the vicinity, all accessed from the A638.

Reclamation

Question 8.1

- 2.26 The reclamation of the site in the future offers the opportunity for environmental benefit to be designed into the scheme. At this stage a scheme has not been designed, however it is anticipated that the reclamation of the site will provide a water based commercial and nature conservation after use, with field boundaries (hedgerows) either retained or newly created and also biodiversity habitat, including shallow waterbodies, ponds and scrapes; reedbeds; wet grassland; and blocks of scrub planting.

Question 8.2

2.27

The reclamation of the site does not depend on the importation of fill.

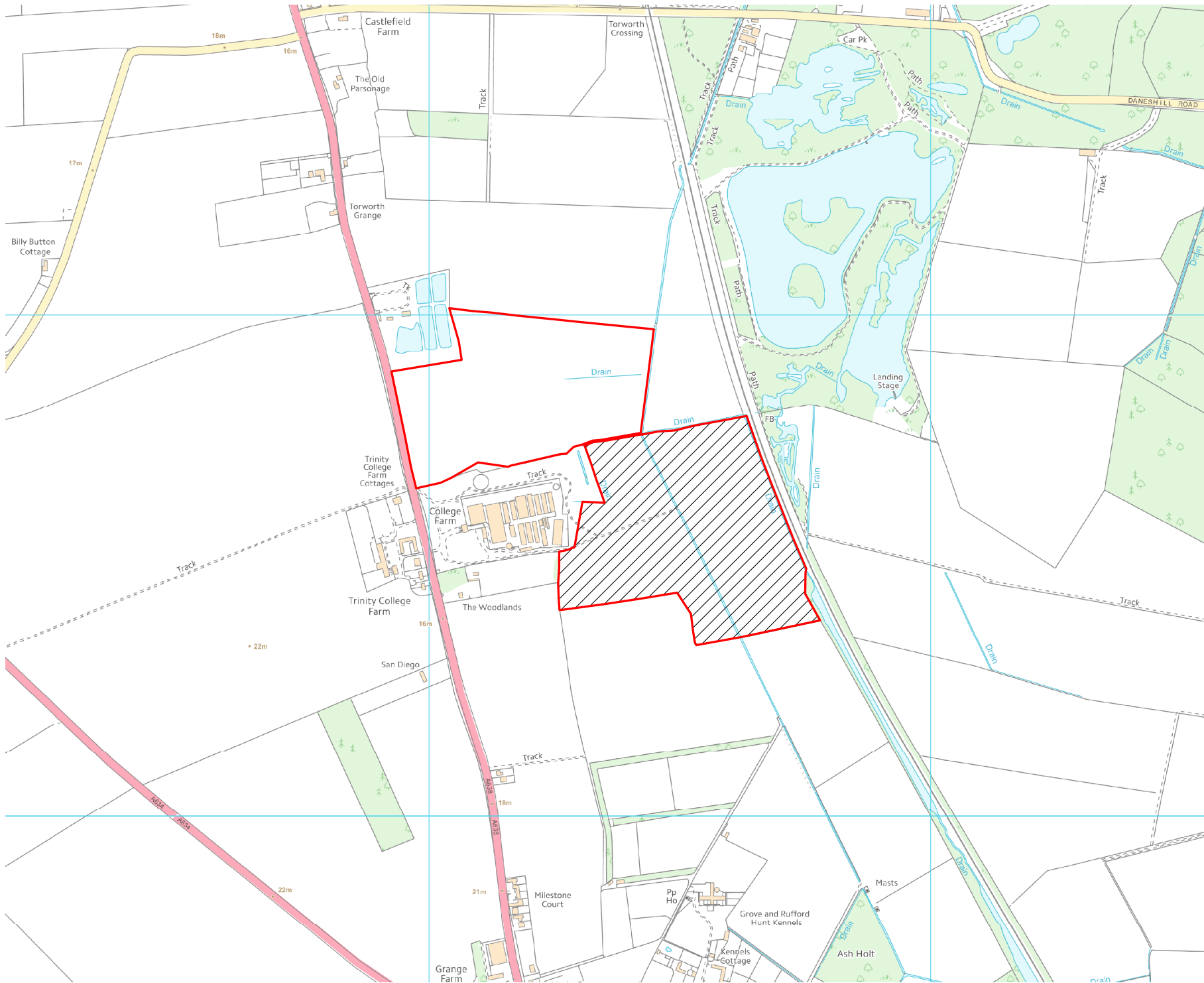
3.0

Conclusion

- 3.1 The Torworth allocation prospect (acknowledged by the now withdrawn submission Nottinghamshire Minerals Local Plan 2017) will make a valued contribution to the provision of sand and gravel reserve to the local market and necessary for Rotherham Sand Gravel's production of saleable product. The proposed allocation represents a major resource for the County and would be worked in the short to long term of the plan period and beyond. The Torworth allocation is not overlooked by residential properties and has a good access to the main A638 and from Scrooby Top Quarry has ready access to the local market and wider motorway network via the A1 M at Blyth.
- 3.2 Subject to the necessary permission, any working scheme with mitigation is not likely to result in an adverse effect upon sensitive receptors or the environment. Subsequent restoration will provide the opportunity to include ecological and further commercial benefits to the scheme.
- 3.3 Provision should therefore be made for the allocation of Torworth within the Nottinghamshire Minerals Local Plan 2017/2018.

Appendix 1

Site Location Plan Figure 3A



Key

- Torworth mineral to be worked within the plan period
- Torworth mineral to be worked beyond the plan period

0 100 200m

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Project	Nottinghamshire Minerals Local Plan 2018
Title	Figure 3a. Call for Sites Torworth
Client	Rotherham Sand and Gravel Co. Ltd
Date	28.09.2018
Scale	1:10,000 @ A4
Drawn by	MAR
Drg. No	GIS\CL\15038\01-07

GIS Reference: S:\CL15038 - Nottinghamshire Minerals Local Plan\CL15038 - Nottinghamshire Minerals Local Plan - Fig 3a - Torworth - 28.09.2018.mxd

Appendix 2

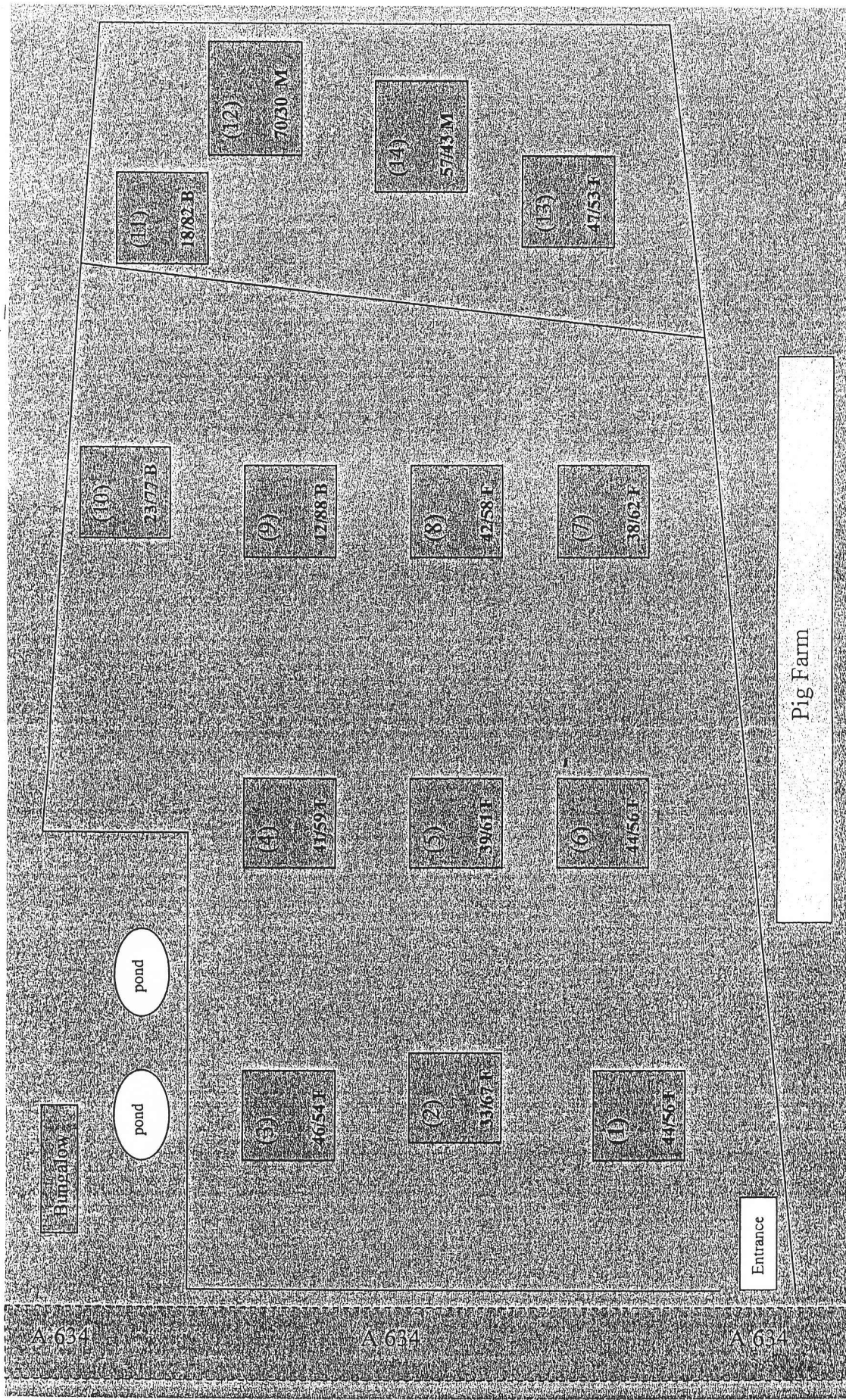
Trial Pit Data



Report Period : 09 February 2007 to 09 February 2007

Sand/Gravel As Dug Tonworth Grange		Date / Time	Site	O/burden depth	Deposit depth	80 mm	63 mm	40 mm	20 mm	14 mm	10 mm	6.3 mm	4 mm	2 mm	1 mm	0.5 mm	0.25 mm	0.125 mm	0.063 mm	Moisture	CAT
ID / Ref No	Lound																				
137292 Hole 1		09/02/07 08:30	Trial	1.5 M	4.5 M	100	100	100	79	72	65	58	54	51	49	44	15	7	5	9	A1
137300 Hole 2		09/02/07 09:00	Trial	1.5 M	4.5 M	100	100	100	90	83	76	69	65	61	59	52	15	5	4	10	A1
137301 Hole 3		09/02/07 09:30	Trial	1.5 M	4.5 M	100	100	100	85	73	65	57	52	48	46	42	18	6	4	8	A1
137302 Hole 4		09/02/07 10:00	Trial	1.5 M	4.5 M	100	90	90	82	75	69	61	57	54	52	46	18	8	5	11	A1
137304 Hole 5		09/02/07 10:30	Trial	1.5 M	4.5 M	100	100	97	90	81	72	64	59	55	53	48	24	7	5	10	A1
137305 Hole 6		09/02/07 11:00	Trial	0.5 M	5.5 M	100	100	93	83	74	68	59	54	50	48	44	25	11	7	8	A1
137308 Hole 7		09/02/07 11:30	Trial	0.5 M	5.5 M	100	100	100	83	76	70	64	60	57	55	51	25	8	5	10	A1
137310 Hole 8		09/02/07 12:30	Trial	0.5 M	5.5 M	100	85	82	72	69	64	59	57	55	54	51	25	8	4	10	A1
137311 Hole 9		09/02/07 13:00	Trial	1 M	5 M	100	100	97	95	92	90	88	87	86	86	84	48	18	9	16	A1
137314 Hole 10		09/02/07 13:30	Trial	1 M	5 M	100	100	96	90	85	81	78	76	74	73	71	45	17	10	13	A1
137316 Hole 11		09/02/07 14:00	Trial	2 M	4 M	100	100	100	95	90	88	83	80	78	77	73	33	10	5	18	A1
137321 Hole 12		09/02/07 14:30	Trial	2 M	Unknown	100	100	95	72	56	44	33	28	24	22	19	7	3	2	6	A1
137332 Hole 13		09/02/07 15:00	Trial	2.5 M	Unknown	100	100	89	79	69	63	55	50	47	45	41	19	7	4	10	A1
137333 Hole 14		09/02/07 15:30	Trial	2 M	Unknown	100	93	91	74	63	54	46	41	37	35	31	16	8	5	7	A1
				Mean:		100.0	97.7	95.0	83.5	75.6	69.2	62.4	58.5	55.5	53.8	49.9	23.7	8.8	5.3	10.4	
				Min:		100	85	82	72	56	44	33	28	24	22	19	7	3	2	6	
				Max:		100	100	100	95	92	90	88	87	86	86	84	48	18	10	18	
				SD:		0.0	4.9	5.5	7.8	10.0	12.2	14.2	15.3	16.1	16.5	16.8	11.6	4.2	2.2	3.5	

Torworth Grange Trial Holes 09/02/07



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 Key: example – (Gravel First) 60/40 M is 60% Gravel/40% Sand: likely to make M Grade sand
 (Gravel First) 30/70 F is 30% Gravel/60% Sand: likely to make F Grade sand
 B is majority Building sand

Bristol

0117 403 1980
bristol@lichfields.uk

Cardiff

029 2043 5880
cardiff@lichfields.uk

Edinburgh

0131 285 0670
edinburgh@lichfields.uk

Leeds

0113 397 1397
leeds@lichfields.uk

London

020 7837 4477
london@lichfields.uk

Manchester

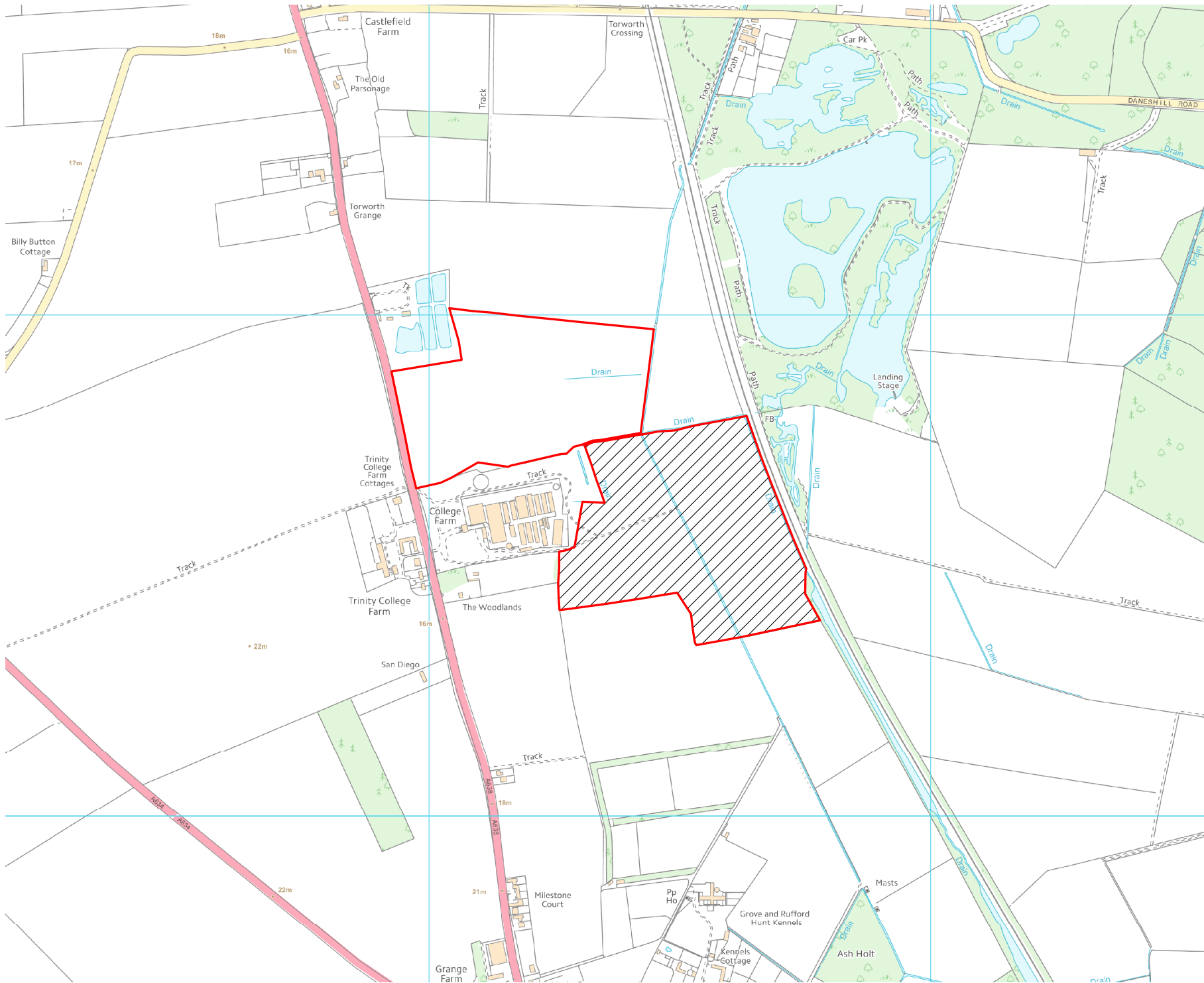
0161 837 6130
manchester@lichfields.uk

Newcastle

0191 261 5685
newcastle@lichfields.uk

Thames Valley

0118 334 1920
thamesvalley@lichfields.uk



Key

- Torworth mineral to be worked within the plan period
- Torworth mineral to be worked beyond the plan period

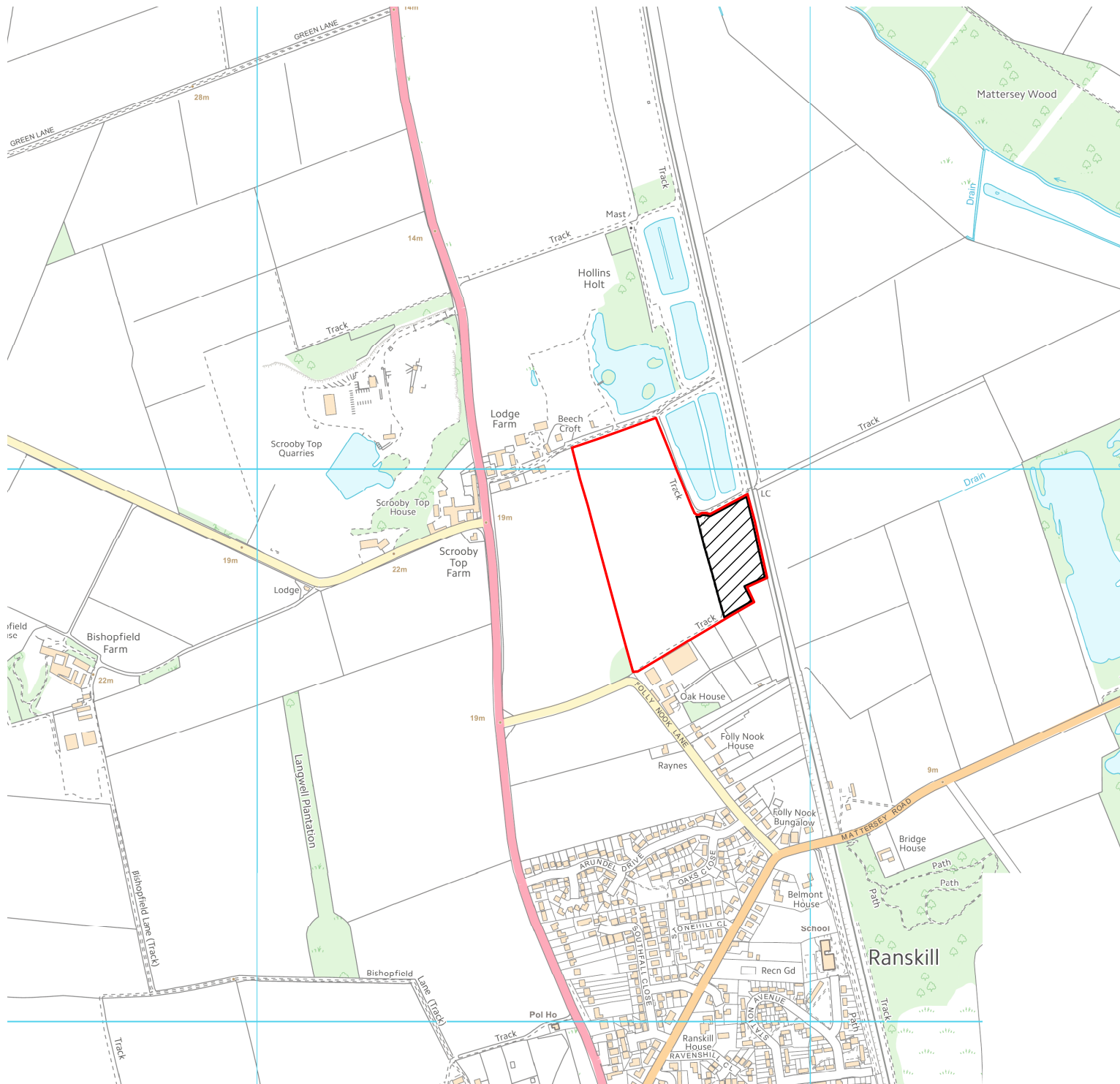
0 100 200m

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Drg. No	GIS\CL\15038\01-07

GIS Reference: S:\CL15038 - Nottinghamshire Minerals Local Plan\CL15038 - Nottinghamshire Minerals Local Plan - Fig 3a - Torworth - 28.09.2018.mxd



Key

- Scrooby Thompson Land
- Gravel



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Project	Nottinghamshire Minerals Local Plan 2017/2018
Title	Figure 4a. Call for Sites - Scrooby Thompson Land
Client	Rotherham Sand and Gravel Co. Ltd
Date	21.09.2018
Scale	1 : 10,000 @ A4
Drawn by	MAR
Drg. No	GIS\CL\15038\01-06

GIS Reference: S:\CL\15038 - Nottinghamshire Minerals Local Plan\CL15038 - Nottinghamshire Minerals Local Plan - Fig 4a - Scrooby Thompson Land - 21.09.2018.mxd

