

My Ref: JC/SJW Bassetlaw 002
Your Ref: CS Publication Draft
Date: 16th December 2010

Planning Policy Team
Bassetlaw District Council
Queens Buildings
Potter Street
Worksop
Nottinghamshire
S80 2AH

Dear Sir/Madam,

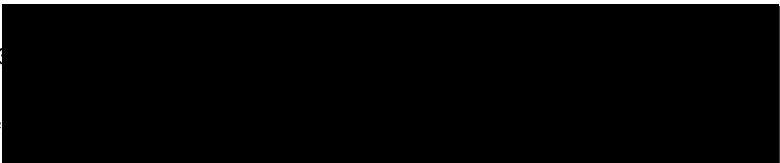
BASSETLAW DISTRICT COUNCIL LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY PUBLICATION DRAFT CONSULTATION – DECEMBER 2010

REPRESENTATIONS ON BEHALF OF LAFARGE AGGREGATES LTD

Thank you for allowing us to comment on the above consultation document. We are making representations on behalf of our client Lafarge Aggregates Ltd (LAL) who have sand and gravel mineral interests within the plan area. These interests include Finningley Quarry and a site with permission for sand and gravel extraction at Sturton le Steeple. The site at Sturton le Steeple forms part of a Mineral Local Plan allocation and LAL are actively promoting the remainder of the allocation as a suitable site for further mineral extraction through the Nottinghamshire Minerals Development Framework.

We have made representations earlier this year to the Preferred Options Draft and we wish to re-emphasise a number of the points made.

We would recommend that Strategic Objective 8 (SO8) is expanded to include protection of the natural environment through the safeguarding of natural resources, including mineral resources. This would be in line with paragraph 13 of MPS1 which states that Local Development Documents should identify Mineral Safeguarding Areas (MSA's) to ensure that proven resources are not needlessly sterilised. Alternatively the location of known mineral reserve could be illustrated on the Key Diagram as a MSA. SO8 also seeks to ensure the conservation and enhancement of green infrastructure and this would emphasise the valuable role the

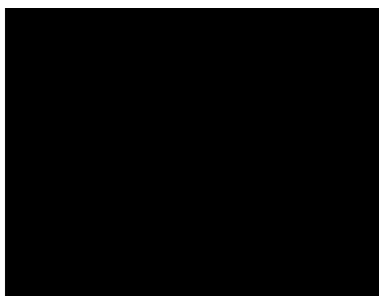


minerals industry has in contributing to these objectives through mineral site restoration.

With regards to policies relating to development in rural areas (DM1-3), it is assumed that minerals development would need to be judged against the criteria of this policy given that the majority of mineral reserves are located within the countryside. We note that development is not considered acceptable if it creates or exacerbates environmental/highway safety problems. We would suggest further clarification/qualification within the policy which would allow for consideration to the degree of any potential impact. By their nature, minerals development for example, have the potential to cause/create environmental impact. However, they are, in land use terms, only temporary operations. In addition, potential for adverse impact can often satisfactorily be mitigated to acceptable levels and is more than compensated for through habitat and biodiversity improvements as a result of restoration. The inclusion of 'to an unacceptable level' will allow a judgement to be made on the degree of impact taking into account potential mitigation measures/controls proposed.

With regards to Policy DM8 (the historic environment) there is clearly a distinction, in terms of importance (as Policy DM8 (A) provides), between that of a Scheduled Monument and a building/area of local interest. The preferred approach therefore by encompassing all the defined "heritage assets" in the sentence 'there will be a presumption against development... that will be detrimental to the significance of a heritage asset' is too broad and could be made clearer. In the case of the latter, there should not be a presumption against development. Minerals development, for example, could affect an area of archaeological interest but in the majority of circumstances any potential impact can satisfactorily be addressed through the use of appropriate mitigation.

I trust that these comments are helpful. I would be grateful if you could continue to update us on the progress of the Core Strategy.



Cc. David Atkinson Lafarge Aggregates Ltd