OPPOSITION TO A QUARRY AT CODDINGTON

This document and the accompanying petition have been prepared for submission to Nottinghamshire County Council by the following residents of Coddington on behalf of CAGE (Coddington Against Gravel Extraction):

Robert Campbell

David Armstrong

Jackie Armstrong

Michael Bassey

Leon LeBlanc

Nerissa McDonald

Alan Marsden

Adrian Parrett

Donna Payne

and other residents who have worked with them in preparing this submission, in setting up our website with its e-petition, and in the painstaking work of collecting signatures.

13 September 2014

OPPOSITION TO A QUARRY AT CODDINGTON

Coddington Parish Council called a public meeting on 24 June to alert parishioners to the proposal for a sand and gravel quarry on the outskirts of the village. 120 people crammed into the Village Hall to voice what was universal opposition to the proposal. An Action Group was set up.

Subsequently 109 residents wrote to the Planning Group expressing concern: their objections are listed on the Council's website and appended (Annex III).

The Action Group formed six groups of residents inquiring into different aspects of the impact of a quarry on the locality. Their reports have been collated (with numbering for the convenience of discussion) and form the substance of this document.

The Action Group also formulated a petition as follows:

> ***Petition to Nottinghamshire County Council***
> We, the undersigned, are strongly opposed to the proposed quarry at Coddington. We are extremely concerned:
> - by the additional and unacceptable demands it will place on the already inadequate road infrastructure, leading to increased traffic congestion on the minor roads as well as on the A17, A46 and A1;
> - by the risk to health associated with poor air quality, noise and light pollution as a result of the quarry's close proximity; and
> - at the catastrophic environmental threat posed to Stapleford Wood and the associated negative impact on the local water table.
>
> Coddington Site MP2o is wholly unsuitable and we insist that it be removed from the Council's Mineral Local Plan.

By 8 September 2255 signatures had been obtained from Coddington (prime concerns the hazards of proximity to the quarry) and Newark and surrounding areas (prime concerns the increase in traffic congestion): of these 750 signatures from Coddington represent 75% of the adult population. The collected signatures on this petition are submitted with this document (Annex I).

In addition an e-petition was put on the special website created by the Action Group (calling itself CAGE – Coddington against Gravel Extraction). This had 271 signatures by 8 September: perhaps 30 overlapping with paper petition. Comments made on this petition are also submitted herewith (Annex II).

We trust that the County Council will recognise that there is justified opposition to a gravel quarry at Coddington. We believe that no community should be subjected to these hazards. Quarries should be opened at a reasonable distance from habitation.

The proposed quarry site is within 2 km of all of Coddington village which is in a Conservation Area and includes Coddington primary school (400 children). It is about 4 km from the centre of our market town of Newark-on-Trent.

In the light of the following arguments Coddington Action Group requests that the proposal to include Coddington MP2o site in the Nottinghamshire Minerals Plan be removed.

CAGE 13 September 2014

CONTENTS

Appendices:

1. DELIVERABILITY OF CODDINGTON QUARRY SITE

1.1 There are significant challenges to the deliverability of the proposed Coddington Quarry site, both from the ownership structure of the parcels of land making up the site and from several strategically important infrastructures crossing the site.

1.2 Ownership structure

1.2.1 The ownership structure of the parcels of land at the site have been examined via the records at the Land Registry, making use of the INSPIRE spatial dataset combined with title documents and plans and show that:

1.2.2 The quarry site consists of 10 parcels of land owned by three families and one local charity, with varying rights within individual parcels based on the history of ownership.

1.2.3 The parcels sometimes have partial or full access to mineral and mining rights to a varying depth, but there can also be competing claims for these rights within the same title document:

- Some parcels have competing claims for the mineral rights from between one and three other parties.
- There are also restrictive covenants in place on some parcels that may prevent quarrying operations, including transport over the parcel, taking place at all.
- Some parcels of land have other restrictions in place that could either prevent quarrying or restrict the scope of work to allow continued rights of way or access for maintenance.

1.2.4 These factors will make it difficult to develop the site, and make it unlikely that the developer has the required agreements in place with all of the different parties involved across the 300 acre site.

1.3 Infrastructure

1.3.1 There are several important pieces of nationally or regionally strategic infrastructure crossing the site in roughly a North-South direction which will restrict development of the site by the requirement to retain clearance zones around them both for safety and to allow continuous access for maintenance and repair work on them.

1.3.2 The Government Pipeline and Storage System has a 6 to 8 inch bore pipeline from Rawcliffe in the East Riding to Sandy in Bedfordshire, which crosses the site. This is of national strategic importance as it is used to carry aviation fuel (at a high pressure of 50 bar) from Immingham to the airports at Heathrow and Gatwick. The pipeline is currently under the ownership of the Ministry of Defence, with covenants in place on relevant title documents to ensure suitable access is available at all times.

1.3.3 The National Grid has two nationally and regionally important assets crossing the site:

- A 400,000 volt transmission line running from the power stations at Cottam and West Burton down to supply points in the South of England; and,
- A high pressure natural gas pipeline which is part of the national gas distribution network across the country, connecting consumers to offshore and imported gas supplies.

1.3.4 Both of these assets will require clearance zones and access for maintenance and repairs, and would not be economic to relocate due to the very significant engineering and business disruption costs involved.

1.3.5 Also, Western Power Distribution own a local electricity high voltage distribution line running across the site, which would be a significant safety hazard for any large mobile plant moving underneath, and could also cause a difficulty for the distribution business if damage to the asset resulted in customers being disconnected from their electricity supply.

1.3.6 In addition to these north-south infrastructures there is also a requirement to protect the important Moor Brats Drain water course which runs across the site, causing additional challenges to the deliverability of the quarry site.

1.4 Deliverability?

1.4.1 The deliverability of the Coddington quarry site is questionable, both in terms of reaching the required agreements with landowners and minerals rights holders, and from the constraints imposed by the significant infrastructure and waterway crossing the site.

2. TRAFFIC PROBLEMS

2.1 Traffic congestion

2.1.1 One of Coddington's strong objections to the proposed Local Mineral Plan MP2o is the inadequate infrastructure of the road network in and around Newark-on-Trent. It will cause long delays, resulting in people avoiding the town, which could have an adverse impact on trade and businesses.

2.1.2 To the north east of Newark is the notoriously heavily congested A1/A46/A17 triangle, a current Pinch Point. The Newark relief road is the only single carriageway of the A46 trunk road, it has 3 key roundabouts, the only roundabouts between Lincoln and Leicester M1 and as reported there is no obvious solution to duelling this road, it will be near impossible due to geographical constraints, (railway lines, river Trent and flood plains).

2.1.3 Newark's relief road has to accommodate traffic from the A1, A17, A616, A617, A1133 and B6326 with a level crossing at the Castle Train Station, Nottingham to Lincoln train main line all adding to poor journey times.

2.1.4 The 2013 Traffic Count, average daily volume shows, B6166 to A17 (Bridge over A1, 0.4km) has 48,277 vehicles daily, of which 4,415 are HGV's, this is a higher volume than the A1 Trunk road.

2.1.5 The A1/A17/A46 junctions have seen an increase in traffic volume of 37% after completion of the duelling of the A46 Newark to Lincoln while other areas of Newark's road network have also seen increases of: A1 north of the A46 10%, A1 south of the A46 17%, B6166 through Newark 8%, C208 Beacon Hill Road to Coddington 22% and with the completion of the A46 duelling, Farndon to Widmerpool, similar figures are expected, thus putting greater pressure on Newark and its single carriage relief road.

2.1.6 Manual traffic counts have been carried out by the Coddington Action Group on the A17, 8th August 2014, 16.40 – 17.40 hrs, 1563 vehicles, 11th August 2014 13.00 – 14.00 hrs, 1110 vehicles of which 208 were HGV's.

2.2 Accidents

2.2.1 County Road Safety manager, Mrs Pam Shaw's report states that almost a fifth of all road casualties in Nottinghamshire occur in the Newark and Sherwood area and most of the fatalities are on the districts 'A' roads. The A1/A46/A17 junction is ranked in the top 10% nationally for casualties.

2.2.2 Along the proposed lorry route (A17) the junction with Drove Lane near Coddington has had a cluster of accidents with 5 fatalities involving HGV's 19th December 2008, 23 December 2008,

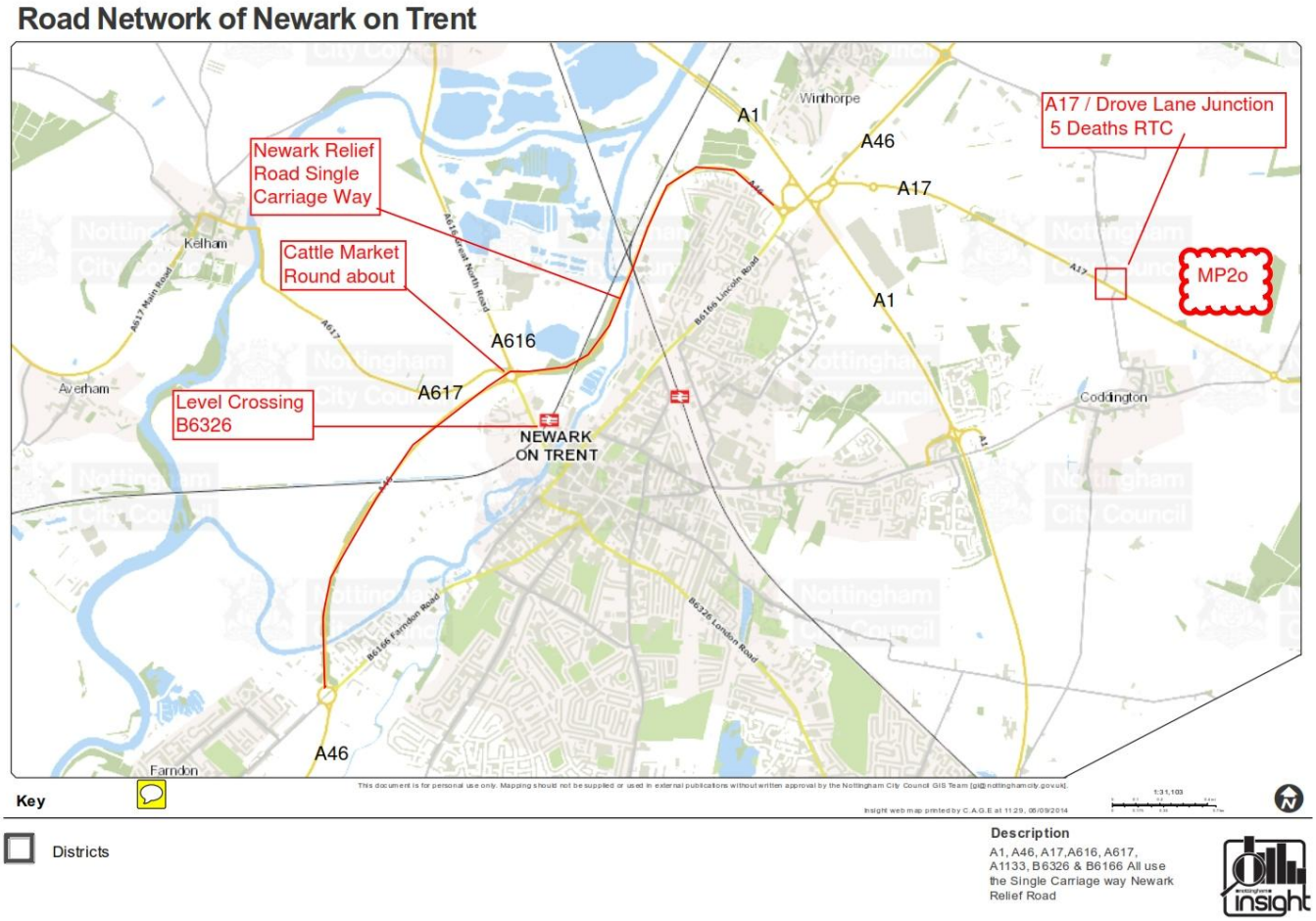
28th March 2011, 3rd January 2013. It is a staggered crossroad with no physical protection for vehicles or cyclists turning or crossing the junction, it is also unlit.

2.2.3 In 2000 there was an accident involving 2 young boys with cycles and a HGV, the boys were trying to cross the junction into Drove Lane, one was fatally injured.

2.2.4 During events at the Newark Showground this junction is deemed so hazardous that a Traffic Management Company has to be employed to control the junction with traffic lights and traffic is diverted between the 2 roundabouts, Stapleford Lane and Currys/Knowhow roundabout.

2.3 Alternative forms of transport

2.3.1 Government policy states that movements of aggregate materials should be, where possible, moved by rail and waterways to reduce carbon emissions, reduce road noise, airborne vibrations and effects on road verge habitats. It is deemed to be the most cost effective and environment way to transport aggregates over large distances.



2.4 Visitors to Newark

2.4.1 The National Civil War Centre – Newark Museum hopes to attract 57,000 visitors per year, also a Heritage Trail with mobile technologies moving between Queens Sconce, The Castle, Southwell, and Thurgarton, will both add to the volume of traffic on the already congested roads.

2.4.2 When collecting signatures for our petition in Newark on two Saturday market days we were frequently told by visitors from Lincoln, Bingham, Grantham and nearby villages, that it is a nightmare driving into the town on shopping expeditions.

2.4.3 The A46 and A17 roads also have to accommodate extra holiday traffic in the summer and lorries and tractors en route to the sugar beet factory (B6326) in the winter months, and as reported these roads are at capacity now; any further large commercial business such as a quarry with the proposed 180+ vehicle movements per day would further exacerbate the problem.

2.4.4 Newark-on-Trent is a strategic point, it has the only river crossing between Nottingham and Dunham-on-Trent in Lincolnshire, traffic travelling north/south (A1), east/west (A46) and the A17 all culminate at Newark to cross the River Trent. Newark-on-Trent is rightly known as the 'Key to the North'.

3. ENVIRONMENTAL ISSUES

3.1 Impact on the built environment

- The site is within an area noted by English Heritage to have a high potential for non-designated archaeology; a Neolithic jadeite axe was found in a nearby field in 1955, and a Bronze-Age burial pot from the area is in Newark Museum.
- The site is known to be within the area in which there was a Civil War skirmish and the venue of a historic annual horse race 1619 -1877.
- Nottinghamshire County Council (NCC) admits that the historic continuity of the Sandlands is underestimated and underappreciated.
- The site is only 400 metres from Coddington Conservation Area, which recognises that all the Parish Lands have a value and clear organic unity vested in their shared history. Extracting gravel here would damage the heritage associations, landscape setting and tranquillity of the Conservation Area.
- The site would cause unacceptable noise and visual intrusion to many nearby properties.

3.2 Impact on the landscape

- Almost the entire landscape area classified by NCC as 'Notts East Sandlands' is 'minerals safeguarded' and under threat of destruction from sand and gravel extraction.
- The site is within the 'Winthorpe Farms' sub-area of the East Nottinghamshire Sandlands where the NCC Landscape Policy is "Conserve and Create".
- Coddington is a Mature Landscape Area (MLA) with important and varied tree cover including Mature Parkland facing the site. Landscape elements, including open rural approaches, are central to its Conservation Area.
- The site is predominantly Grade 2 and 3a agricultural land (best and most versatile land) and should be restored as such.
- There are no industrial sites in the parish - this industrial development would cause much more than a "moderate effect on the landscape' conceded by NCC.

3.3. Impact on the natural environment

- The site is populated by birds that are categorised as 'Rare and declining, farmland and woodland birds', including several on the red list.
- The site contains a Biological Site of Importance for Nature Conservation (SINC) known as Moor Brats Drain - categorised by NCC as 'A drain of interest for Water Beetles'.
- The site adjoins Stapleford Woods, which is a habitat for many moisture-loving plants on the NCC "Rare Plants Register, 2013". Effects on the water table are of grave concern to trees, flora and the woodland ecology.
- The site adjoins Moor Brats Woodland (predates 1835) and is close to an area of Ancient Woodland within Stapleford Woods and several areas of Deciduous Woodland (Priority BAP).
- The site is not far from other SINCs;

- Langford Moor, an area that has ‘Valuable plant and animal communities along rides and in drainage ditches throughout this coniferous forestry plantation’
- 2/810 – Newark Golf Course ‘A good mixed habitat association of acidic grassland, heath and deciduous woodland’
- Coddington Plantation unmanaged, mainly deciduous woodland of high botanical value”.

- The northern end of the site has a high risk of flooding (from river water, Flood Zone 3)
- The soils have high leaching potential and groundwater quality may be at risk.
- The site is less than 3km from the Winthorpe Conservation Area which incorporates more mature parkland and streams (linked via watercourses that cross the MP2o site and flow beneath former Winthorpe Air Base).

3.4 Impact on local air quality

- The increase in traffic due to the proposed development, particularly HGVs, will have a negative impact on the air quality in and around Coddington.
- The Habitat Regulations Assessment indicates that the export routes from the site are likely to pass within 200m of several protected sensitive Natura 2000 sites.
- Increases in HGV Traffic have been underestimated in the MLP Draft Transport Assessment by using data for 28 tonne rather than 20 tonne loads. At normal production levels, there would be significant additional traffic amounting to 180-200 HGV journeys per day
- Pollution at local 'pinch points' such as the roundabouts along the A46/A1/A17 Newark bypass and the Newark area stretch of the A1 is of concern with elevated NOx levels calculated by DEFRA as 30-40 µg m^{-3} as NO_2, (2012) and a reading of 37 µg m^{-3} as NO_2 at the intersection of the A1/A46.
- Elevated PM_{10} levels of 17-20 µg m^{-3} track the A17, a wide corridor along the A1 and cover the triangle bounded by A1, A46 (to North Hykeham) and A17.
- Elevated $PM_{2.5}$ levels of 12.5-15 µg m^{-3} track the A1 at Newark, extending over Winthorpe and the western half of Coddington.

REFERENCES.

1. Nottinghamshire County Council Landscape Condition and Sensitivity Report, 05 October 2009. http://cms.nottinghamshire.gov.uk/lcaeastnottssandlands.pdf
2. Newark and Sherwood Landscape Character Assessment (The East Nottinghamshire Sandlands Chapter and Farmland Chapter 5).
3. “Impacts of nearby development on the ecology of ancient woodland” Corney, P.M.1, Smithers, R.J. 2, Kirby, J.S. 1, Peterken, G.F. 3, Le Duc, M.G. 4 & Marrs, R.H. 4
4. NCC Rare Plants Register, 2013.
5. DEFRA Magic maps, Bird Conservation Targeting Project BCTP 2006-11
6. Newark on Trent – The Civil War Siegeworks RCHM 1964.
7. http://uk-air.defra.gov.uk/data/gis-mapping

4. NOISE NUISANCE & VISUAL INTRUSION

4.1 NOISE

4.1.1 Although parts of the village of Coddington already experience some noise from the A1 cutting, the majority of the village enjoys rural tranquillity with high levels of birdsong in village gardens. Owing to the topology, Newark Showground’s large event tannoy system is occasionally audible to all areas of the village except perhaps Balderton Lane. This indicates the susceptibility of the village to noise – the quarry site will be much closer than the showground, the noise levels much higher, more continuous and experienced over a duration of 10 hours a day, up to 6 days a week and for 20 years. It will be virtually impossible to suppress the noise from the quarry and it is unlikely that banks and vegetation of any type will mitigate the problem sufficiently.

4.1.2 British Standard 4142: 1997 revised 2014, states that should the existing background noise be exceeded by 10dB it is an 'unacceptable' noise level and complaints are likely, should the rating be 5dB above the background noise it is still of a 'marginal significance' and complaints are possible. (ISVR Consulting. Southdowns Consultants).

4.1.3 It is a known fact that quarry noise is one of the major complaints in all nuisance cases against existing quarries. Investigations for health & safety reasons concluded that plant work (e.g. gravel) was the second noisiest industry for workers to be involved in. Sources of noise include: grading plants, crushers, conveying equipment, loading shovels and trucks, earth moving equipment and water pumps (very often running 24/7), 'reversing' and 'start up' alarms (from vehicles, moving and static plant), aggregate noise when loading into empty truck bodies from hoppers and mobile loading plant.

4.1.4 Hanson has provided no information about the likelihood of other allied industries operating from the site (ie concrete batching, tarmac processing and also a bagging plant for out sales to builder's merchants etc) which would add to noise and traffic levels.

4.2 VISUAL INTRUSION

4.2.1 The processing plant will include towers, tall sloping conveyors and tall heaps. The site area will be encased in high metal fences whilst the Site Development Brief will specify banks and hedge screening. Both processing plant and screening arrangements will intrude upon and alter our landscape.

4.2.2 Views of the site would potentially affect a significant number of Coddington residents and visitors (especially when deciduous trees are leafless) and impact the setting of the Conservation Area.

5. HEALTH

5.1 A considerable number of houses fall within a kilometre radius of the proposed quarry and we feel the quarry will have a significant impact on the health and wellbeing of the people living in the village.

5.2 Reports and personal statements from other communities living near quarry sites state that gravel pits do have a negative effect on the quality of life and health for local people. Mining operations will create heavy traffic with large trucks and queuing traffic adding to the pollution. Heavy trucks will cause hazardous traffic conditions. Mining will produce large volumes of dust. Plant working will create vibrations and noise that will be heard within the village.

5.3 In addition to the above effects, we are aware that quarries become toxic dumps and waste fill sites when mining ceases. This will lead to additional issues for the health of the village in years to come. Recently we heard about the issues with unauthorised tipping at the Collingham Quarry site.

5.4 Reports we have read clearly state that contaminants that are released into the air and waste water from the excavation process will impact on the quality of local air and water supply.

5.4.1 Dust is known to have a substantial impact on air quality. Dust is not always an obvious hazard as particles can be invisible. Research highlights that the body is harmed in different ways by dust being absorbed through skin or eye contact, through ingestion as well as by inhalation; some of this is dependent on the individual physical and chemical properties of the dust (HSE 1997).

5.4.2 Exposure to dust from sand and gravel quarries is amongst some of the most harmful contaminants as it contains silica which is known to be carcinogenic. There is significant evidence

of the impact of quarry dust on people working at quarries, carrying out activities to extract and prepare minerals for sale. Dust is one of the largest occupational hazards and is one of the largest occupational killers.

5.4.3 Exposure to dust is known to create and worsen existing respiratory problems and we feel it is unreasonable that we are exposed to this risk. Some of the community's most vulnerable residents live nearest to the proposed quarry site.

5.4.4 We undoubtedly feel the risk that our health will be greatly impacted:

- by the pollution which will affect our breathing,
- by the noise which will disturb our sleep; and
- by the vibrations which will impact on our tranquillity;
- and all of these making it difficult for us to live the life we have become accustomed to.

5.5 As a community we object strongly to the proposed quarry and we feel that the increased pollution from it will negatively impact on the quality of air and that this will have an unacceptable effect on our health and quality of our life. We consider that the Council has a strong responsibility to ensure that our health and wellbeing is not negatively impacted by future developments.

6. COMMERCIAL IMPACT

6.1 Nottinghamshire's Local Economic Assessment

6.1.1 In a recent report – "Nottinghamshire's Local Economic Assessment", the County Council categorised Newark as a "large secondary centre" with a diverse economic base, ensuring a continued provision of employment sites. With a strong "service sector", the area provides significant housing and employment through the infrastructure planned as part of the "Growth Point Plan".

6.2 Potential losses

6.2.1 It is almost impossible to quantify the potential losses, in economic terms that could follow the development of both Coddington and Averham, as sand and gravel quarries.

6.2.2 There are a large number of self employed and small businesses in Newark and area who employ 8 or less people. (Noteable exceptions are Currys Know How, NSK Bearings, Laurens Pattiseries, Vodafone, Fullflow etc.)

6.2.3 Small companies may find it easier to adapt, or move base of operations, in order to cope with pressures of access, but bigger companies may find it much more difficult to adapt and may well consider moving with an impact on employment, revenue in business rates for the council and consequent losses in services.

6.3 Roads and Routes

6.3.1 The current road system is overloaded (see Road Report above), and most local residents will recall the weekly, if not daily, problems faced accessing the town at peak hours, or when there is an accident /roadwork's, especially on the A1/A46 backing traffic up through the centre of Newark.

6.3.2 Any increases in traffic mean additional risks of accidents, and, with the "Growth Point Plan" adding a potential 7,000 new homes the residential traffic alone will cause increases in traffic load across the entire local road network.

6.3.3 Add to that the much increased movements, from both sites, affecting major routes, and the risks of accident, additional wear and tear on roads, and the carrying of airborne/traffic borne pollutants into residential areas will not be acceptable.

6.4 Businesses

6.4.1 On the Newark and Sherwood web site the Economic development team says: "Newark and Sherwood sits at the heart of England, between the A1 and the M1, on the East Coast Mainline and we are aware of making the most of this when it comes to attracting businesses into the area. We are aware of the positive developments such as the dualling of the A46 and ***also of the areas where development is still needed such as additional roads/junctions and pinch points on our networks."***

6.4.2 It seems safe to assume that business types needing excellent access will find it difficult if road conditions worsen without significant investment in the roads infrastructure. Other larger employers might also become frustrated if, as a consequence of traffic hold up's, there is more difficulty for staff getting to and fro their place of work. This may cause employers to re-locate AWAY from Newark with loss of employment, business rates and empty commercial premises.

6.5 Tourism

6.5.1 On tourism the Economic Development Team says; "We have much to celebrate and be proud of in our district. Some examples include Southwell, which is steeped in history including the Minster; Sherwood Forest; Rufford Country Park; Vicar Water; Newark Castle and our developing National Civil War Centre - Newark Museum. We have festivals such as the Southwell Folk Festival, the Newark Festival and many themed weekends such as the Jazz Weekend. Our strategy has recently been reviewed and we will be working with our local businesses in order to develop our offer so that more people not only visit our District but stay overnight with us."

6.5.2 With such attractions we would feel Newark has a great future in tourism terms, The National Civil War Centre and Newark Museum is set to attract up to 60,000 new visitors per year, and the development of tourist apps and further investigation of Newark's Tunnel System could mean more employment and economic benefit for the whole area.

6.5.3 In a presentation earlier this year to the District Council, Jennifer Spencer, Chief Executive of Experience Nottinghamshire, said "tourism was worth around £215m p.a. to our area, representing some 3.6m day and 311,000 overnight visitors in 2013". Overnight visitors spend, on average, £100 more than day visitors, but £215m represented less than 25% of the value of tourism outside of Nottingham City. Maureen Dobson, local County Councillor, claimed that not enough Hotel Business came to the area, and they needed to know why.

6.5.4 Unfortunately, if traffic access to Newark gets more and more difficult due to traffic congestion caused by quarrying, our existing tourist business will be threatened. The much anticipated increase in tourism may well not be realised resulting in any economic advantages from these new initiatives being lost.

7. CONCLUSION

In the light of these arguments, which are strongly supported by the number of signatures on our petition (Annex I), by the postal objections listed on the County Council's website (Annex III), and by the e-petition comments on the CAGE website (Annex II), **we request that the proposed quarry site at Coddington (MP2o) be removed from the County's Minerals Local Plan**.