**M15. Minerals**

*Mineral safeguarding areas*

SQ15.4. Turley point out that the mineral safeguarding area includes much of the airport policy area, including the operational area (terminal, hangars and part of the runway), and claim that the requirements of policy 62 part B are incompatible with the operational activities of the airport. I note that paragraph 14.55 in the Plan states that mineral safeguarding areas are identified under developed/sterilised areas to allow for prior extraction consideration should this be appropriate as part of a redevelopment/regeneration scheme; that development proposals allocated in the Plan are deemed to be of greater economic importance and have been allocated over the mineral safeguarding area; and that proposals for temporary, permitted or minor development are not required to consider the impact of mineral sterilisation. There then follows a list of “safeguarding exemption criteria” which comprises various types of, mainly minor, development but also includes “applications for development on land already allocated in the adopted local plan”. Is it sufficiently clear how policy 62 part B is intended to be applied to (a) proposals in accordance with policies relating to sites allocated in the Plan and (b) proposals for other development within the airport policy area?

1. The Mineral Safeguarding Area (MSA) designation is not incompatible with the day-to-day operational activities of the airport. The designation makes the operator aware of their obligations in line with NPPF paragraphs 203 and 204c. The response to matter 15.4 identifies the need and justification for MSAs. Figure 1, below show the extent of the safeguarding area in the vicinity of the airport (buff coloured hatching) and Figure 2, shows the 421Ha airport operational area (black dots) and surrounding development proposed through the Local Plan. Source: [Doncaster Local Plan 2015-2035 – Policies Map (Regulation 19 Publication Version)](Doncaster Local Plan 2015-2035 – Policies Map (Regulation 19 Publication Version))

**Figure 1**
2. The two images above show that a significant part of the airport operational area is situated on a sand and gravel resource to be safeguarded during and beyond the plan period. The British Geological Survey (BGS), Minerals Products Association and British Aggregates Association all acknowledge that the mineral resource under the airport is more than likely to be best remaining source of sharp sand and gravel in the borough. The safeguarding areas were produced using the BGS Mineral Resources data licenced to the Authority under Digital Data Licence 2008/113 (IPR Ref: 1604-40DY).

Is it sufficiently clear how policy 62 part B is intended to be applied to (a) proposals in accordance with policies relating to sites allocated in the Plan and (b) proposals for other development within the airport policy area?

3. Policy 62 part B is a criteria based policy designed to ensure compliance with the NPPF 204c. The aggregate minerals safeguarded during and beyond the plan are of local and national importance. The town centre, surrounding towns, villages and airport are not new proposals in the Local Plan but have developed over time on areas we now know to contain a resources that should be considered within the plan period in line with national policy and planning practice guidance.

4. To address the requirements of policy 62 part B, non-mineral related development proposals not identified in the local plan within mineral safeguarding areas should provide evidence in the form of a geological report and/or survey identifying the extent and quality of the mineral resource and consider realistic opportunities for extraction prior to development. Considerations 1 to 4 in 62 part B should form part of the survey report. This

---

1 Paragraph: 004 Reference ID: 27-004-20140306
will allow the planning authority to judge appropriately if the development is acceptable in terms of NPPF204c.

5. Proposals allocated within the Local Plan will not be required to go through this procedure. It is considered the new proposals in the Local Plan are important to the immediate economic viability and deliverability of the Local Plan and as such given a higher immediate importance than the mineral to be safeguarded.

6. The sharp sand and gravel on which the airport sits is becoming an increasingly rare commodity and this needs to be identified in the Local Plan. The juxtaposition in terms of national policy is the immediate viability of the airport and the importance of a sharp sand and gravel reserve, which is becoming increasingly rare locally, regionally and nationally.

7. Not acknowledging the safeguarding area at the airport would be contrary to national policy. Limiting growth at the airport is also contrary to national policy. To accommodate the airport viability and retain the safeguarding designation, the Council could propose a modification to Local Plan policy 62 part B and add an exemption in to the airport operational area for aviation related development during the life of the Local Plan. Any future non-airport related proposals should however, still be required to consider the mineral in the ground. Proposed amendment (in bold underline text) to Policy 62 part B sub part 5...

B) Proposals for non-mineral development within Mineral Safeguarding Areas (see Table 15), and the 250m buffer zone, will be supported where it can be demonstrated that:

1. consideration has been given to the long term economic value of the mineral
2. non-mineral development can take place without preventing the economically viable mineral resource from being extracted in the future;
3. the proposal can feasibly incorporate the prior extraction of any minerals of economic value in an environmentally acceptable way;
4. the need for the development outweighs the need to safeguard the area for future minerals extraction;
5. the development is permitted, minor or temporary in nature, or for aviation related development within the airport operational area during the life of the local plan.

8. An addition to the last sentence of Local Plan paragraph 14.55 would also be required in relation to the safeguarding exemption criteria ... 'Proposals for temporary, permitted or minor development (see below) and aviation related development within the airport operational area are not required to consider the impact of mineral sterilisation.

9. The suggested changes will also support the policy 7: Doncaster Sheffield Airport policy direction and proposed changes to the policy.