

Newcastle-under-Lyme Local Plan Examination

Further Work - Item Minerals Safeguarding Assessment

- 1. The Inspector's post hearing advice ("EX/INS/06") asked the Council, in paragraphs 8 10, to seek the advice of Staffordshire County Council as to the nature of minerals resource that might be impacted upon by proposed allocations in the Local Plan.
- 2. It is noted that Staffordshire County Council have not objected to the approach that the Local Plan has taken to Minerals, more generally, and a joint note has been prepared by both Staffordshire County Council and Newcastle-under-Lyme Borough Council to emphasise that existing Policy 3 of the Minerals Local Plan would be a relevant consideration of schemes in the Borough as they come forward [EX/NBC/31].
- 3. Following the Inspector's examination post hearing advice, the Council has screened the remaining allocations in the Local Plan to determine those allocations impacted by Minerals Safeguarding Areas ("MSA"). This approach has excluded commitments as a decision notice has been issued and the need for a minerals safeguarding assessment has been established through the consideration of the relevant planning application.
- 4. The proposed remaining site allocations impacted by Minerals Safeguarding Areas have been provided to the Minerals team at Staffordshire County Council and the following comments can be made: -

Site Ref	Site Name	Use	Comment
AB2	Land at J.16	Employment	MSA for superficial sand and gravel and bedrock sand and gravel. A mineral resource assessment, prepared by Wardell Armstrong, has been provided in support of the planning application on the site which is appended to this note (appendix 1). The note confirms that minerals safeguarding is not a constraint for Site AB2 for the purposes of the Local Plan.
AB15	Land North of Vernon Avenue	Residential	Minerals safeguarded area for superficial sand and gravel. It is considered that this site is constrained by existing residential development. No mineral safeguarding statement required.

Site	Site Name	Use	Comment
Ref			
BW1	Chatterley Valley, Lowlands Road	Employment	Minerals safeguarded area for brick clay. It is noted that there has previously been consideration of safeguarding clay resources on an adjoining site which resulted in no objections from Staffordshire County Council. This site is only partially affected by clay resource and constrained by existing development to southeast. No mineral safeguarding statement required.
CT20	Rowhurst Close, Chesterton	Employment	Minerals safeguarded area for a mix of superficial sand and gravel and brick clay on parts of the site. This is allocated land within an area of former clay workings. Referring to Staffordshire County Council's 'Standing Advice: Mineral and Waste Safeguarding' there is no requirement to submit a mineral safeguarding statement.
KL15	Land south of A525 Keele	Residential and Employment	Minerals safeguarded area for brick clay. The site is partially within a minerals safeguarding area and is constrained by residential development to the east. If clay is present, prior extraction of mineral is unlikely to be feasible due to the nature of extraction. Note that clay is within Upper Division of Etruria Marls and likely to contain calcareous nodules which could affect suitability for clay product manufacture.
G&T 11	Land at Hardings Road	Residential	Minerals safeguarded area for superficial sand and gravel. Within the development boundary for Kidsgrove and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
KS18	Land North of Lower Milehouse Lane	Residential	Minerals safeguarded area for superficial sand and gravel. Within the settlement boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
KS19	Land at Knutton Lane	Residential	Minerals safeguarded area for superficial sand and gravel. Within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).

Site	Site Name	Use	Comment
Ref			
SP2	Cheddar Drive	Residential	Minerals safeguarded area for superficial sand and gravel. Within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
SP11(2)	Lyme Park	Residential	Partially within Minerals Safeguarded Area for sand and gravel. Unlikely to be worked as independent quarry but policy 3 from the Minerals Local Plan is likely to be a consideration. Therefore, proposals should assess opportunities to recover mineral(s) as part of development works to reuse within construction. A new policy criterion is suggested as follows: - "any sand and gravel minerals extracted from the site should be used within the construction of the proposed development"
SP11(3)	Lyme Park	Residential	Minerals safeguarded area for superficial sand and gravel - Unlikely to be worked as independent quarry but policy 3 of the Minerals Local Plan would be a consideration. There may be an opportunity to recover minerals as part of development works to reuse within construction. As above, a new policy criterion is proposed to be added as follows: - "any sand and gravel minerals extracted from the site should be used within the construction of the proposed development" Minerals safeguarding area for brick clay – Constrained by proximity to housing.
SP11(4)	Lyme Park	Residential	Minerals safeguarded area for brick clay - note that clay is within Upper Division of Etruria Marls and likely to contain calcareous nodules which could affect suitability for clay product manufacture. This resource is south of the Holly wood Fault and are classified differently to the clays north of the fault which were recovered within Walleys Quarry. Proximity to housing would affect western part of the allocation.

Site Ref	Site Name	Use	Comment
SP23	Land at Cemetery Road	Residential	Minerals safeguarded area for brick clay on the site. It is noted that clay is within Upper Division of Etruria Marls and likely to contain calcareous nodules which could affect suitability for clay product manufacture. This resource is south of the Hollywood Fault and are classified differently to the clays north of the fault which were recovered within Walleys Quarry.
BL18	Clough Hall Playing Fields, Talke	Residential	Minerals safeguarded area for superficial sand and gravel on the site. The site is unlikely to be worked as independent quarry due to proximity to sensitive property and existing use of site but Minerals Local Plan policy 3, would be a consideration if there was an opportunity to recover mineral as part of development works to reuse within construction. A new policy criterion is proposed to be added as follows: - "any sand and gravel minerals extracted from the site should be used within the construction of the proposed development"
BL32	Land at Congleton Road	Residential	Minerals safeguarded area for superficial sand and gravel on the site. The site is within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
TK6	Site at Coalpitt Hill	Residential	Minerals safeguarded area for superficial sand and gravel. The site is within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
TB6	Former Pool Dam Pub Site	Residential	Minerals safeguarded area for superficial sand and gravel. The site is within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).

Site Ref	Site Name	Use	Comment
TB19	Land South of Newcastle Golf Club	Residential	Minerals safeguarded area for brick clay on the site. The site is mainly not affected by the Minerals safeguarding area. Note that clay is within Upper Division of Etruria Marls and likely to contain calcareous nodules which can affect the suitability of the clay.
TB23	Land West of Galingale View	Residential	Minerals safeguarded area for superficial sand and gravel. The site is constrained by residential development. Presence of brick clay on the site. This site was allocated for clay extraction in a former Mineral Local Plan as an extension to Walleys Quarry. Given that Walleys Quarry is now being backfilled with waste to restore quarry workings, there is no likelihood of clay being extracted under this land.
TC19	Hassell Street	Residential	Minerals safeguarded area for brick clay. The site is within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
TC20	King Street	Residential	Minerals safeguarded area for brick clay. The site is within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
TC40	Car Park, Blackfriars Road	Residential	Minerals safeguarded area for superficial sand and gravel. The site is within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).
TC52	Goose Street Car Park	Residential	Minerals Safeguarded Area for superficial sand and gravel on the site. The site is within the development boundary and therefore exempt from policy 3 of the Minerals Local Plan (mineral safeguarding requirements).

Appendix 1: Minerals Resource Assessment Prepared for Land South East of M6, Junction 16





Land South East of M6 Junction 16

MINERAL RESOURCE ASSESSMENT APRIL 2025

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INDURENT MANAGEMENT LTD

LAND SOUTH EAST OF M6 JUNCTION 16

MINERAL RESOURCE ASSESSMENT

MARCH 2025



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DATE ISSUED: March 2025

JOB NUMBER: ST21667

REPORT NUMBER: 0001

VERSION: V2.0

STATUS: Final

INDURENT MANAGEMENT LTD

LAND SOUTH EAST OF M6 JUNCTION 16

MINERAL RESOURCE ASSESSMENT

MARCH 2025

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INDURENT MANAGEMENT LTD LAND SOUTH EAST OF M6 JUNCTION 16 MINERAL RESOURCE ASSESSMENT



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EXECUTIVE SUMMARY

This report has been prepared in accordance with instructions from Indurent Management Ltd to prepare a mineral resource assessment for a planning application on Land South East of M6, Junction 16, Audley, Staffordshire. The site has been reviewed in relation to the adopted mineral safeguarding policy of Staffordshire County Council.

The site is located approximately 11 km northwest of Stoke-on-Trent. Published geological maps for the area indicate that the site is covered by till, alluvium and two glaciofluvial sand and gravel deposits. The proposed development site lies partially within a Mineral Safeguarding Area for both superficial sand and gravel and bedrock sand and gravel.

The solid geology underlying the site consists of four geological formations, namely the Sidmouth Mudstone Formation, the Bollin Mudstone Member, the Helsby Sandstone Formation and the Chester Formation. It is the Helsby Sandstone formation and the Chester formation which have been safeguarded for bedrock sand and gravel.

There is a glaciofluvial sand and gravel deposit located to the south of the proposed development site and this is the superficial sand and gravel which has been safeguarded by Staffordshire County Council. The two smaller glaciofluvial deposits within the proposed development boundary itself have not been safeguarded and has been historically worked in the past. Consequently, the proposed development will not permanently sterilise any mineral, as there is no safeguarded superficial sand and gravel present on the proposed development site.

An area of safeguarded bedrock sand and gravel extends to approximately 13 ha in the south eastern part of the site and is considered to be too small to be considered as an economically viable mineral resource. It is not practicable to extract such a small quantity of bedrock sand and gravel, due to the associated costs with stripping soils and overburden (glacial till) that overly the bedrock sand and gravel. The permanent sterilisation of this safeguarded mineral would have no significant impact on the sand and gravel landbank. The site therefore meets the requirements of the Mineral Safeguarding Policy 3, so the proposed development would be acceptable in a Mineral Safeguarding Area.



1 INTRODUCTION

- 1.1 This report has been prepared in accordance with instructions from Indurent Management Ltd to prepare a mineral resource assessment for a planning application on Land South East of M6, Junction 16, Audley, Staffordshire. The site is located approximately 11 km northwest of Stoke-On-Trent.
- 1.2 The site boundary is shown edged red on the plan attached at **Appendix 1**, with the planning application covering approximately 78 hectares. The site is bounded by the A500 to the north, agricultural land to the east, the B5500 to the south and the M6 to the west.
- 1.3 The proposed development site is located partially within a Mineral Safeguarding Area (MSA) for superficial sand and gravel, and bedrock sand and gravel as set out in the Minerals Local Plan (LDP) for Staffordshire (2015 2030), adopted February 2017. The site also falls within a resource area for deep coal (>1200m) deposits. Therefore, any application for non-mineral development must include a mineral resource assessment to determine whether the proposed development would be compatible with the relevant mineral safeguarding policies.

2 GEOLOGY

2.1 Geologically, a distinction is made between "superficial deposits" and "solid geology".

Superficial deposits are generally unconsolidated deposits (such as sand and gravel) which are found at, or close to, the surface. The solid bedrock beneath the superficial deposits is called the "solid geology".

Superficial Geology

2.2 The British Geological Survey (BGS) online map indicates that the site is underlain by three superficial deposits, namely till, alluvium and glaciofluvial sand and gravel. The superficial geology is shown on the attached drawing ST21167-001. It is the glaciofluvial sand and gravel which has the potential to be safeguarded. However, Staffordshire County Council (SCC) has created their superficial sand and gravel MSA by applying a 250m buffer zone around the larger glaciofluvial sand and gravel deposit, which is located to the south of the proposed development site, likely covering the sand and gravel which surrounds Nantwich Road. The MSA therefore extends partially within the proposed site boundary but does not cover any sand and gravel which is within the site boundary.



2.3 There are two small deposits of sand and gravel located in the centre of the site, both of which are under 2.5 ha in size, and are not safeguarded by SCC.

Bedrock Geology

- 2.4 The BGS online mapping indicates that there are four geological formations beneath the site, namely the Sidmouth Mudstone Formation, the Bollin Mudstone Member, the Helsby Sandstone Formation and the Chester Formation. Two geological fault lines cross the site area, and no surface coal seams were observed. The bedrock geology is shown on the attached drawing ST21167-002.
- 2.5 The Sidmouth Mudstone Formation, and the Bollin Mudstone Member cover most of the site and are shaded red and pink on drawing ST21167-002. Both formations comprise mudstone and are not safeguarded mineral resources. The Helsby Sandstone Formation and the Chester Formation cover a small proportion of the site, approximately 13 ha and are shaded yellow and orange on drawing ST21167-002. Both formations comprise sandstone and are therefore safeguarded for their potential to contain a commercially viable quantity of bedrock sand and gravel.

3 MINERAL PLANNING POLICY

3.1 The Minerals Local Plan (MLP) for Staffordshire covers the period 2015 to 2030. The MLP outlines the spatial strategy, vision, objectives and policies for guiding minerals development in the County.

Policy 3 – Safeguarding Minerals

- 3.2 "Policy 3: Safeguarding Minerals of Local and National Importance and Important Infrastructure", is attached at **Appendix 2.** Paragraph 3.3 states that within a Mineral Safeguarding Area (MSA), where important mineral resources do exist, non-mineral development should not be permitted unless it has been demonstrated that:
 - a) the non–mineral development is temporary and does not permanently sterilise the mineral; or
 - b) the material planning benefits of the non-mineral development would outweigh the material planning benefits of the underlying or adjacent mineral; or,
 - c) it is not practicable or environmentally acceptable in the foreseeable future to extract the mineral.



Compliance with adopted safeguarding policy

Superficial sand and gravel

- 3.3 The proposed development site lies partially within a MSA for superficial sand and gravel. However, the MSA created by Staffordshire County Council takes into account the large area of sand and gravel which is located to the south, outside of the site boundary. It is clear that whilst the MSA extends partially within the proposed site boundary it does not contain any sand and gravel.
- 3.4 There are two small deposits of sand and gravel located in the centre of the site, both of which are under 2.5 ha in size, and are not safeguarded by SCC. The sand and gravel present in the centre of the site has also previously been worked as indicated by the historical mapping shown on drawing ST21167-004.
- 3.5 Consequently, the proposed development will not permanently sterilise any mineral, as there is no safeguarded superficial sand and gravel present on the proposed development site.

Bedrock sand and gravel

- 3.6 The proposed development site is in a MSA for bedrock sand and gravel and it is present within the southern part of the site. The Chester and Helsby formations, which are safeguarded for their potential to contain a commercial quantity of sand and gravel, cover approximately 13 ha of the site. It would not be practicable for the prior extraction of such a small quantity of bedrock sand and gravel, due to the associated costs of removing the soils and overburden (glacial till) that overly the bedrock sand and gravel. Furthermore, extraction would lower the elevation of this part of the site creating a depression which would need to be infilled with inert material in order to re-establish existing ground contours.
- 3.7 It is likely that the sandstone to the south of the proposed development site, has previously been worked. It appears that sandstone of the Chester Formation was historically extracted from Stonefield Quarry, which was located approximately 400m south of the site boundary. This area is shown by the absence of superficial deposits on drawing ST21167-001 and by the location of The Quarry on the attached drawing ST21167-004. The sandstone appears to have been worked from the 1800s to 1945. The land has since been restored to agricultural and residential land uses.
- 3.8 In addition to the constraints surrounding the extraction of bedrock sand and gravel, SCC has not indicated any intention of extracting bedrock sand and gravel in the vicinity of the proposed development. The Staffordshire Local Aggregate Assessment



(LAA) dated 2024, shows that the bedrock sand and gravel quarries of Pottal Pool and Moneymore will continue to be major suppliers of aggregate until 2034 and 2042. The current landbank for sand and gravel is 12.9 years as of 2024, and this more than the requirement of 7 years. It is clear that there is little to no demand for the bedrock sand and gravel and it is highly unlikely that it would ever be worked due to the constraints surrounding its extraction.

Deep coal resources

- 3.9 The site falls within a deep coal resource area (>1200m below the surface). SCC has included the deep coal resource area on their online mapping, but do not safeguard deep coal resources.
- 3.10 Surface coal was last extracted in Staffordshire in 2001, and since then the UK has transitioned away from using coal as a source of fuel, due to climate change implications. There are also no coal seams outcropping or at shall depth underlying the site. Therefore the proposed development will not result in any significant sterilisation of coal resources, due to the depth of the resources underneath the site.

4 CONCLUSION

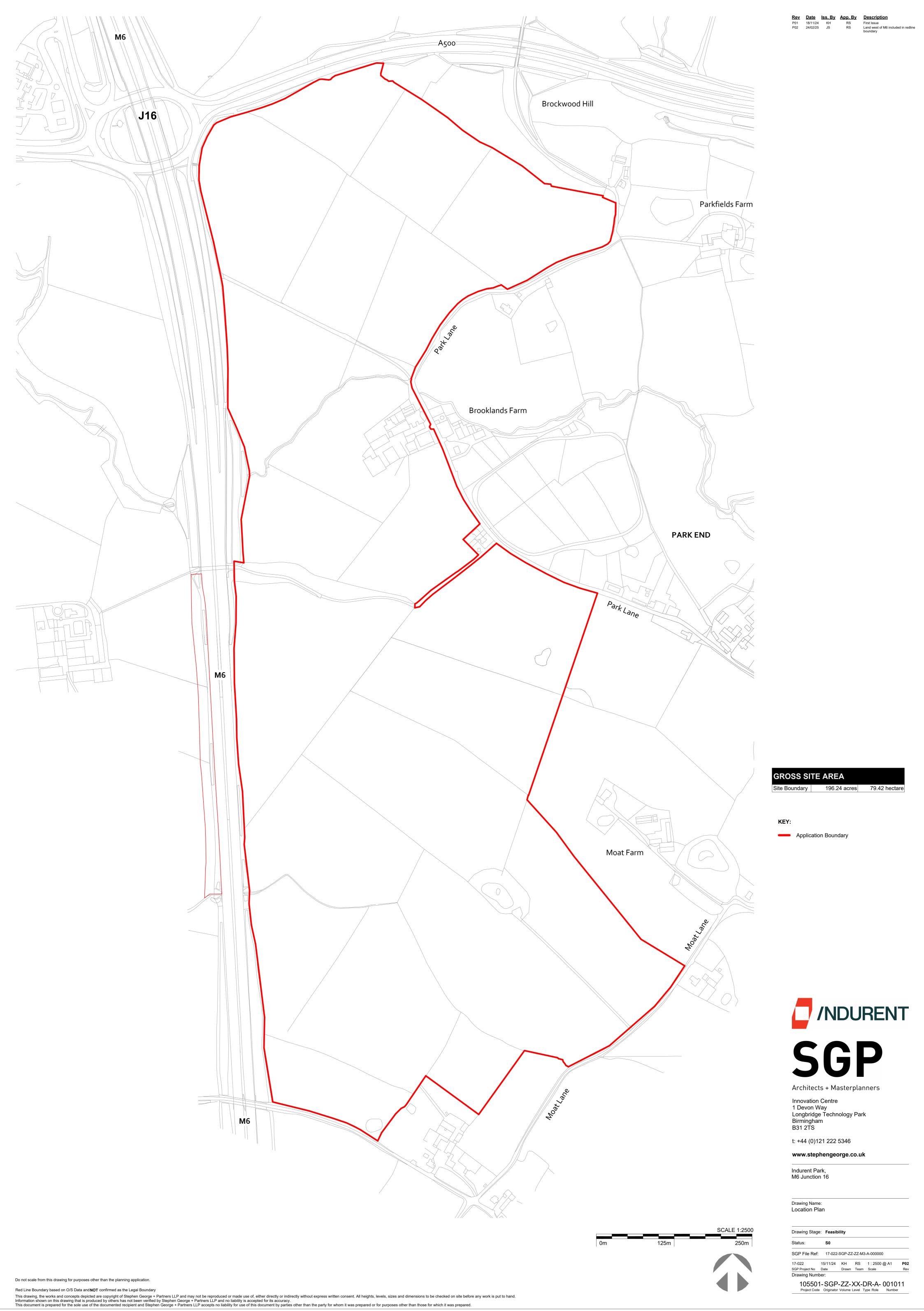
- 4.1 The proposed development site is located within a mineral safeguarding area for superficial sand and gravel and bedrock sand and gravel. However, it is clear that there is little to no superficial sand and gravel present on the proposed development site. The MSA covers sand and gravel which is outside of the proposed development area. The two small deposits of superficial sand and gravel within the site boundary have not been safeguarded due to their small size, but in any event these have previously been worked. Consequently, the proposed development will not permanently sterilise any safeguarded superficial sand and gravel mineral.
- 4.2 An area of safeguarded bedrock sand and gravel lies within the south east of the site extending to approximately 13 ha, which is considered to be too small to comprise to a standalone hard rock quarry. It is also considered not economically viable to prior extract such a small quantity of bedrock sand and gravel, due to the associated costs with stripping the soils and overburden (glacial till) that overly the bedrock sand and gravel. The loss of this mineral would have no impact on the sand and gravel landbank. The site therefore meets the requirements of the Mineral Safeguarding Policy 3, i.e. the proposed development would be acceptable in a Mineral Safeguarding Area.



APPENDICES



Appendix 1: Site Location





Appendix 2: Staffordshire Minerals Local Plan – Policy 3

Policy 3: Safeguarding Minerals of Local and National Importance and Important Infrastructure

Safeguarding mineral resources

- 3.1 The following mineral resources, within the Mineral Safeguarding Areas shown on the Policies and Proposals Map, will be safeguarded against needless sterilisation by non-mineral development:
 - a) Sand and gravel
 - b) Limestone
 - c) Cement shale
 - d) Etruria Formation clays
 - e) Anhydrite and gypsum
 - f) Hollington Formation building stones
 - g) Silica sand associated with the Rough Rock Formation
 - h) Shallow coal with associated fireclays
- 3.2 Within a Mineral Safeguarding Area, non-mineral development except for those types of development set out in appendix 6, should not be permitted until the prospective developer has produced evidence prior to determination of the planning application to demonstrate:
 - a) the existence, the quantity, the quality and the value of the underlying or adjacent mineral resource; and
 - b) that proposals for non-mineral development in the vicinity of permitted mineral sites or mineral site allocations would not unduly restrict the mineral operations.
- 3.3 Within a Mineral Safeguarding Area, where important mineral resources do exist, except for those types of development set out in appendix 6, non-mineral development should not be permitted unless it has been demonstrated that:
 - a) the non-mineral development is temporary and does not permanently sterilise the mineral; or,
 - b) the material planning benefits of the non-mineral development would outweigh the material planning benefits of the underlying or adjacent mineral; or,
 - c) it is not practicable or environmentally acceptable in the foreseeable future to extract the mineral.

Policy 3: Safeguarding Minerals of Local and National Importance and Important Infrastructure (continued)

3.4 Within a Mineral Safeguarding Area, where important minerals do exist and the above criteria have not been met, the non-mineral development except for those types of development set out in appendix 6, should not be permitted unless the development includes provision for the extraction of the mineral prior to the development being implemented.

Safeguarding important mineral infrastructure sites

- 3.5 Where there are mineral infrastructure sites used for mineral processing, handling, and transportation, except for those types of development set out in appendix 6, non-mineral development should not be permitted unless it has been demonstrated that:
 - a) the non-mineral development would not unduly restrict the use of the mineral infrastructure site; or
 - b) the material planning benefits of the non-mineral development would outweigh the material planning benefits of the mineral infrastructure site; or,
 - c) the mineral infrastructure can be relocated; or
 - d) alternative capacity can be provided elsewhere.

Reasons for the Policy

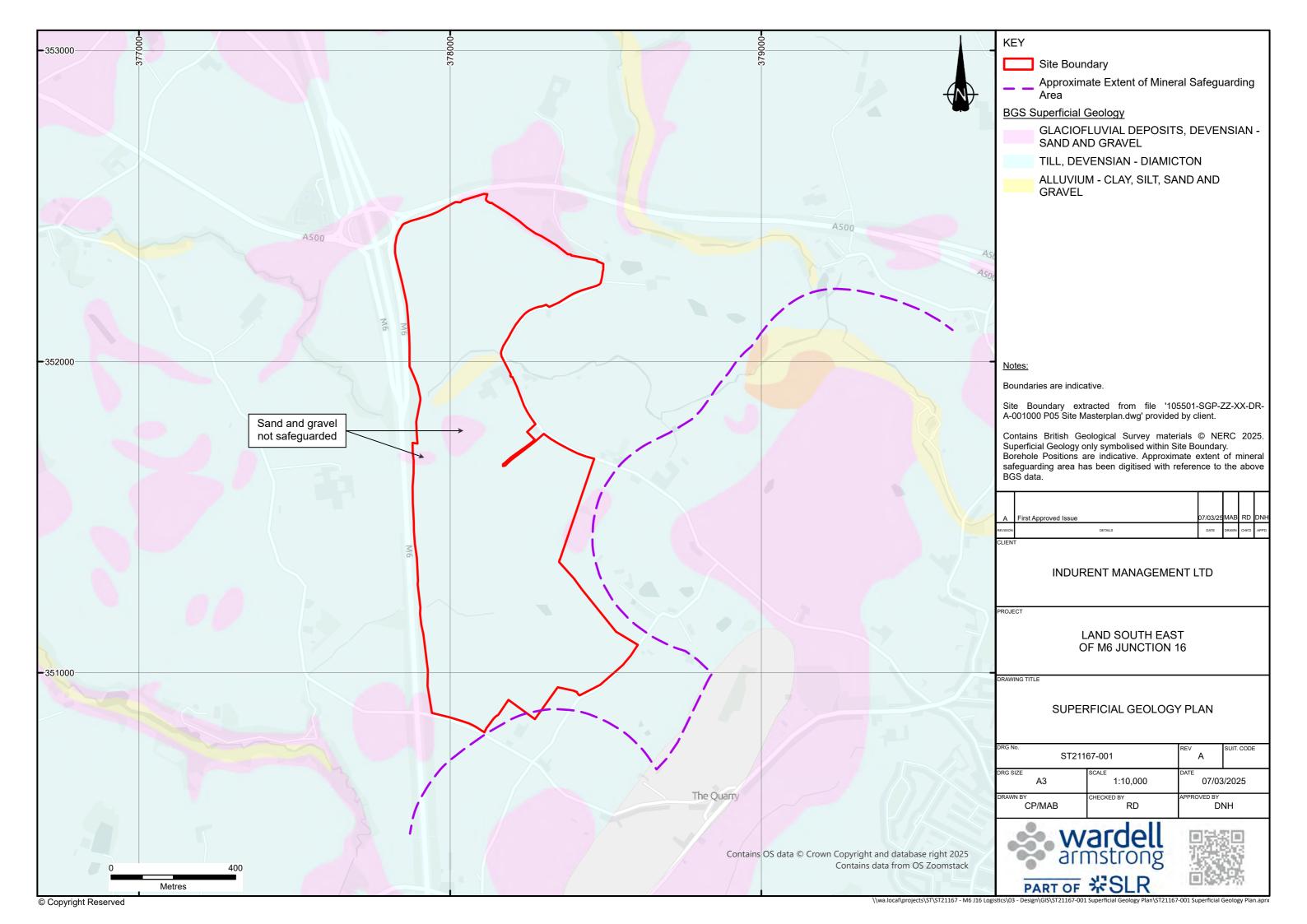
- 7.21 National policy requires that mineral safeguarding areas are designated which "cover known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development" and also requires local planning authorities to safeguard mineral infrastructure used for processing, handling and transporting minerals. In accordance with our Vision and Strategic Objective 1, Policy 3 aims to achieve an acceptable balance between non-mineral development and safeguarding Staffordshire's important minerals and mineral infrastructure sites.
- 7.22 Policy 3 aims to safeguard a range of mineral resources that are considered to be of economic importance within the foreseeable future but not limited to the timeframe of the Plan and takes into account a review of mineral resources in

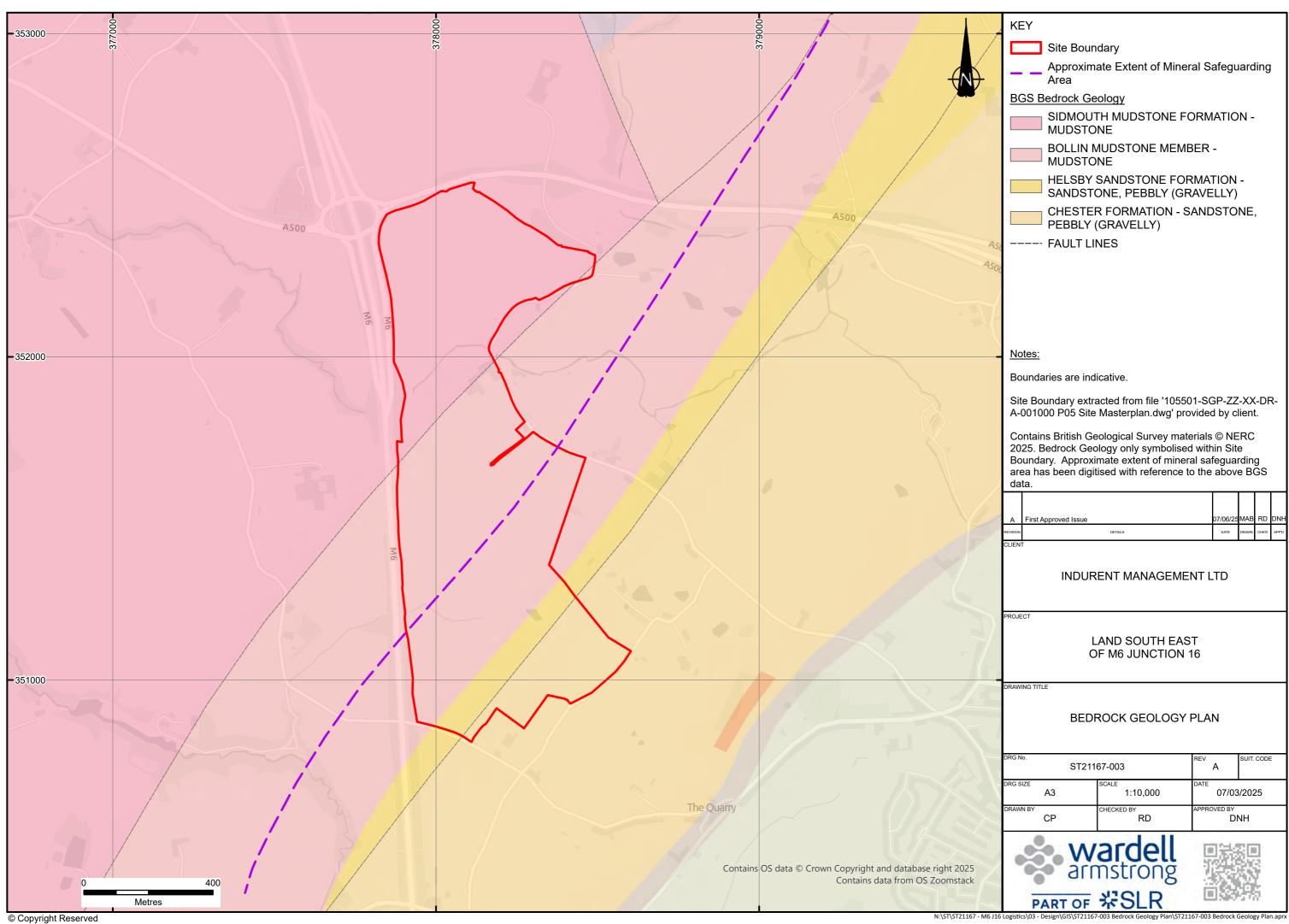
Refer to Annex 2: glossary of the NPPF

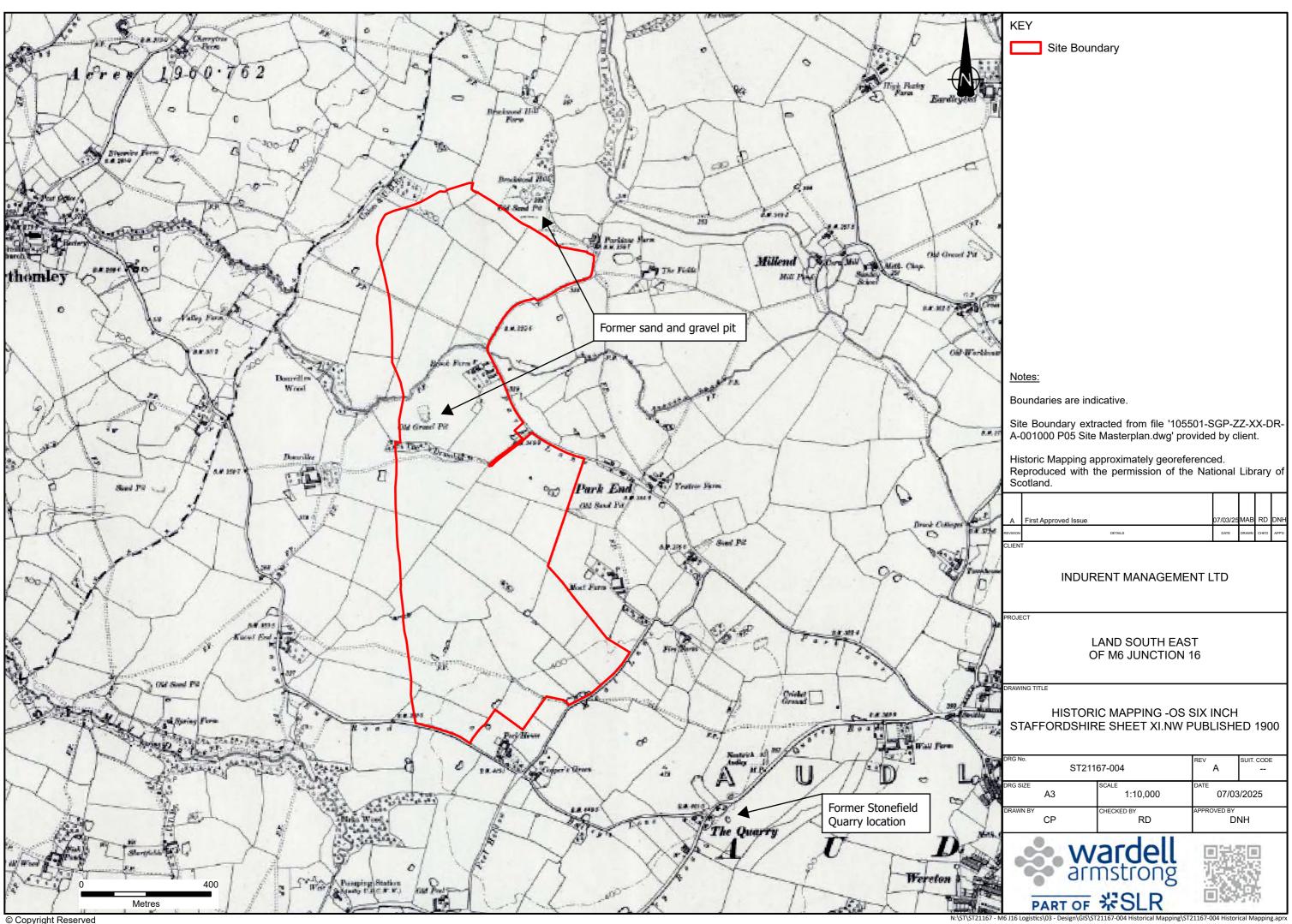
⁵⁷ Refer to bullet point 4 of paragraph <u>143</u> of the NPPF.



DRAWINGS







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