North York Moors National Parks Authority (Local Plan, First Steps, September 2016).

Representation on behalf of the Mineral Products Association.

Please find below representations on the above on behalf of Mineral Products Association.

I would like to be kept informed on the progress on the Local Plan, and when you publish further documents for comment. Please contact me by email.

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Main Issues:

- **M2 Policies and programmes;** it is noted that no mention is given to minerals within the documents provided. It is important that the Local Plan has clear and focused policies in relation to the development of minerals, and in particular, aggregates, industrial minerals and dimension stone that reflect the importance placed on them by NPPF, the need to safeguard them, along with associated infrastructure, and their importance to society.

  NPPF [para.142] states ‘Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply to provide the infrastructure, buildings, energy and goods that the country need. However, since minerals are a finite natural resource and can only be worked where they are found, it is important to make best use them to secure their long term-term conservation.’

  In support of the above statement NPPF [para.143] require that:

  *In preparing Local Plans, local planning authorities should:*

  *define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas;*

  *safeguard:*

  - existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials; and
  - existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.
and;

set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place.

Appropriate safeguarding policies relating to minerals and associated infrastructure need to be included within the Local Plan.

**The English National Parks and the Broads: UK Government Vision and Circular 2010** is one of several documents listed by the council in the supporting documents provided as being most influential when drafting the new Local Plan. This document states that its aim is to capture the statutory purposes and duty of the Authorities in a modern vision [para.11]. The Circular has specific guidance on minerals and states that the Parks are a vital source of minerals that society and the economy needs, recognising that quarrying provides employment. It advises that the need for minerals, the impacts of extraction on people and the environment should be managed in an integrated way [para.141].

The Circular also states that the Parks’ socio-economic duty has been given added weight by two further documents namely the Taylor report and the Rural Advocate’s report on the potential of rural England. It continues:-

*Both reports point to the need to accommodate growth, development and investment in all rural areas at an appropriate scale and form. This should not be interpreted as meaning that development cannot be accommodated; rather, it means that additional and concerted efforts are required to ensure communities, planners and business have clear consistent advice regarding the acceptable forms development might take, so that the Park communities are places where people can live and work by maintaining sustainable livelihoods."*[para.70]

Policies need to reflect these sentiments in respect of the role minerals play in providing employment, and the help they give in the National Park meeting its socio-economic duty. The importance of giving equal weight to the economic pillar of sustainable development is discussed later in this representation.

Most mineral applications are likely to come under the major development test as set out at para.116 of NPPF. In recognition of this it is important that development policies in the Local Plan do not exceed the requirements of NPPF in this regard.

- **M3 Vision and Objectives**; it is welcomed that it is stated in the supporting documentation that the ‘National Park has an economic and social value for everyone….but is a working area, which among other things contributes to people’s incomes’.

In recognition of this point, and that it is the stated ambition of the plan to have a sustainable development message within its vision and objectives, it is important to recognise that sustainably has 3 pillars i.e. social, environment and economic. In
developing the visions and principles and subsequent policies it is important that equal weight is given to the economic aspects of sustainability compared to the social and environmental.

Mark E North.

15 November 2016