Dear Sir/Madam,

THE SOUTH TYNESIDE LOCAL PLAN 2011-2031
PRE-PUBLICATION DRAFT (REGULATION 18) (AUGUST 2019)

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, QPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which had annual output valued at £151 billion in 2016. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting the MPA on the Pre-Publication Draft

Whilst we are largely supportive of the plan, we feel there are some areas where the plan would benefit from amendments.

Mineral considerations in the plan are addressed in one Policy IN11. This policy is a hybrid of a statement of approach by the Council (point 1.); Minerals and Minerals Infrastructure Safeguarding (Points 2-4) and Development Management considerations (Point 5). We feel it would be beneficial to separate these in to individual policies.

Taking these matters in order:-

Policy IN11 (Point 1)

Point 1 sets the context within which minerals provision in South Tyneside will be maintained, i.e. by working “with the wider north east authorities to ensure there are appropriate landbanks for the supply of minerals in the region. To achieve this, we have identified Minerals Safeguarding Areas, facilities that need to be safeguarded for the importation of minerals, and set out the criteria by which proposals for minerals extraction will be assessed”.

We recognise the good work done through the North East Aggregates Working Party (NEAWP) and the publication of the Joint Local Aggregates Assessment (LAA). The LAA2018 states “Tyne and Wear has sufficient permitted reserves of crushed rock and sand and gravel to meet the calculated demand from quarries in this sub-area. Notwithstanding this it is noted that sand and gravel production is limited to one quarry and crushed rock production is limited to two quarries. The permitted reserves of crushed rock at one of these quarries would be exhausted by the mid-2020s and the remaining quarry would not have sufficient productive capacity to meet the demand forecast. Local Plans and decisions on planning applications should therefore support additional areas for extraction where environmentally acceptable”.

Thank you for your time and consideration.

Yours sincerely,

[MPA Contact Information]
Paragraph 207 of the NPPF requires that “Mineral planning authorities should plan for a steady and adequate supply of minerals...”. Para 207 indicates how this should be achieved. Of note, is subsection g) “ensuring that large landbanks bound up in very few sites do not stifle competition...”.

We believe Point 1 of Policy IN11 should provide more strategic considerations and a spatial approach to indicate how the Authority will address the steady and adequate supply of minerals, a requisite of the NPPF. Whilst we support the MSAs, it is imperative that through working with the wider North East Authorities, the local plan should identify allocations (site specific, preferred areas or areas of search) and not simply safeguard minerals. Further, the joint LAA addresses aggregate minerals and it is understood that Marsden Quarry provides industrial minerals in the form of agricultural lime. It is not clear how continued support for this sector will be delivered.

At present, it is not evident how the longer-term provision of minerals will be maintained through the plan period and beyond and we feel the approach outlined in Policy IN11 is UNSOUND.

Policy IN11 (Point 2-4) Minerals Safeguarding Areas and Safeguarding Facilities

We support the approach the Council has proposed to MSAs, however, we feel that minerals & minerals infrastructure safeguarding should be addressed in a dedicated Policy.

Policy IN11 (Point 5) Proposal for Minerals Extraction

Firstly, we note that the subsections in Point 5 run from 5f) to 5q), rather than starting with 5a). We assume this is a formatting issue linked to subsection 3). Further, it is apparent that many of the matters included in subsections have been addressed in other policies in the plan. For example, issues of air quality, flood risk, biodiversity net gain, etc., are addressed in policies in Chapter 11 of the plan. We therefore question the need for repetition of these development control matters and their application to minerals development, when previous policies of the plan cover all developments.

Paragraph 12.61

This paragraph refers to the 2017 Joint LAA. It is not clear why the Council has not used the Joint LAA, published in December 2018. This utilises survey data (sales and permitted reserves) from 2017. It is anticipated a revised LAA covering 2018 sales and permitted reserves data will be published soon and as such this can be used to inform the developing plan.

We trust the above comments are helpful and would be happy to discuss any of the points raised with the Council.

Yours faithfully

Nick Horsley
Director of Planning

Email: nick.horsley@mineralproducts.org
Tel: 07568 427720