

5th January 2017

Development Plans Manager,
South Lakeland House,
Lowther Street,
Kendal,
Cumbria
LA9 4DL

By email: developmentplans@southlakeland.gov.uk,

Mineral Products Association Ltd

Gillingham House
38 - 44 Gillingham Street
London SW1V 1HU
Tel +44 (0)20 7963 8000
Fax +44 (0)20 7963 8001
info@mineralproducts.org
www.mineralproducts.org

Dear Sir/Madam

ARNSIDE & SILVERDALE AREA OF OUTSTANDING NATURAL BEAUTY DRAFT DEVELOPMENT PLAN DOCUMENT

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 recent addition of British Precast and the British Association of Reinforcement (BAR), it has a growing membership of over 480 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 GB cement production, 90% of 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 has annual output valued at £144 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

We are largely supportive of the approach taken by the respective authorities in preparing the plan and have the following comments to make on the Draft Development Plan Document.

Paragraph 1.1.1 - We note that reference is made to Lancaster City Council and South Lakeland District Council being the Local Planning Authorities, responsible for preparing Local Plans and determining planning applications in their areas. We believe this paragraph or a supplementary paragraph should also make reference to Lancashire County Council and Cumbria County Council as mineral and waste planning authorities dealing with such matters in the area.

Section 1.3 is entitled "Other documents that guide development in the AONB". We believe that this section should also include the Minerals and Waste Local Plans for the respective counties of Lancashire and Cumbria.

Whilst we recognise that neither Lancaster City Council nor the South Lakeland District Council are the mineral planning authorities for the area, we believe the Development Plan Document should qualify the approach the planning authorities will take to dealing with any development proposals within Mineral Safeguarding Areas. With this in mind, we note that the plans accompanying the Draft Development Plan Document indicate the MSAs within Lancashire, but do not show those for Cumbria.

We appreciate that at the time of publication of the consultation document the Cumbria Minerals Plan was approaching its EiP, however as the EiP has now concluded and the Inspector's report expected in the near future, we believe the plan would benefit from the inclusion of the Cumbria MSAs.

We recognise that in Policy AS10 - Economic Development and Community Facilities, development proposals that bring economic and community benefits to the AONB, including economic diversification, will be supported in principle for the following purposes subject to meeting other policy requirements. This includes under bullet point 1 "*essential operations for agriculture, horticulture, allocated mineral extraction or waste management and essential infrastructure where there is a proven and justified need*". There is a footnote (10) accompanying this bullet point which states that "*There are currently no allocations for minerals or waste operations in the AONB and none are expected*". Whilst the first part of this footnote is factual, the second is speculative and should be deleted. The footnote should therefore read "*There are currently no allocations for minerals or waste operations in the AONB ~~and none are expected~~*". We believe that this is relevant to other policies in the plan.

We note in particular that **Policy AS08 - Historic Environment** states that "*In addition to the policy requirements for the historic environment as set out in the relevant District-wide Local Plans, all development in the AONB should take into account the unique heritage features and historic character of the area, including built, natural and cultural heritage features, and protect and enhance historic landscape character, locally important heritage assets and their settings, and the distinctiveness of settlements.....reflect local vernacular and the distinctive historic and settlement character through the design, style, scale, massing and materials used*".

Further, **Policy AS09 - Design** states that "*Within the built environment of the AONB, high standards of design and construction will be required to conserve or enhance the layout of the built environment, distinctive settlement character and historic, cultural and architectural features.*

In addition to the design requirements set out in the relevant District policies, development proposals should:

- (I) conserve and enhance the character of the local built environment including buildings, open spaces, trees, distinctive settlement character and other important features that contribute to visual, historical or architectural character; and*
- (II) reinforce the distinctive qualities of places through the consideration of uses, scale, height, solid form, massing, proportions, alignment, design detailing, lighting, materials, colours, and finishes; and*
- (III) respect the integrity of historic village layouts including boundary and street elements....."*

We believe that in order to achieve these requirements, it will be necessary to make use of locally sourced building materials, particularly dimension stone and other building stone products. This approach is not only sustainable in terms of minimising transportation of building materials, it is imperative in order to maintain the distinctive character of the communities and villages within the AONB.

Locally sourced building stones are not only important to retain the heritage and culture of designated historic buildings and conservation areas, but are key to maintaining local distinctiveness.

We would welcome the opportunity to discuss the above matters with you further and look forward to hearing from you in due course.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'N Horsley', is enclosed in a light grey rectangular box.

Mr Nick Horsley
Director of Planning, Industrial Minerals and MPA Wales