

Independent Examination of the Hull Local Plan

Inspector's Matters, Issues and Questions for Examination

Issue 13.4: Minerals

The Council's Local Development Scheme dated December 2016 [LOC003] states that a Joint Minerals Plan will be produced by the City Council and the East Riding of Yorkshire Council in 2017/2018. Having regard to this, is it essential for the Local Plan to include any policies relating to minerals in order to be consistent with national policy and effective?

Specific safeguarding of existing, planned and potential storage, handling (concrete batching and coated stone sites, recycling) and transport sites (wharves and rail heads) for minerals is essential within the Hull LP. This will ensure, as set out in the Planning Practice Guidance (PPG), that sites for these purposes are available should they be needed; and prevent sensitive or inappropriate development that would conflict with the use of the sites identified for these purposes.

The NPPF is explicit on the subject of safeguarding mineral infrastructure and states at paragraph 143 (4th bullet point);

143. In preparing Local Plans (emphasis added), *local planning authorities should:*

- *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.*

It is clear from this policy that it is for the Local Plan to address the matter of safeguarding of mineral infrastructure and not specifically the Mineral Plan.

Furthermore the Planning Practice Guidance (Minerals) at paragraph: 006 Reference ID: 27-006-20140306 states;

Why should planning authorities safeguard existing, planned and potential storage, handling and transport sites?

Planning authorities should safeguard existing, planned and potential storage, handling and transport sites to:

- ensure that sites for these purposes are available should they be needed; and*
- prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.*

In areas where there are county and district authorities, responsibility for safeguarding facilities and sites for the storage, handling and transport of minerals in local plans will rest largely with the district planning authority. Exceptions will be where such facilities and sites are located at quarries or aggregate wharves or rail terminals.

As Hull City is a unitary authority it is clear from the above guidance in the PPG that the responsibility falls upon it to address all the matters of safeguarding on mineral infrastructure as set out in the NPPF and PPG.

The whole point of safeguarding is to ensure that essential infrastructure is protected from inappropriate development not only on the site itself but in its proximity. This is a strategic issue and as the purpose of the Hull City Council Local Plan is to identify future development sites for housing, employment and infrastructure the issue of safeguarding has to be considered and dealt with in parallel with these issues. This will prevent essential mineral infrastructure being irreversibly sterilised.

In addition Hull City Council is identifying development opportunities in the Local Plan all of which will need building materials. It would be unfortunate that essential mineral infrastructure is not identified and safeguarded which would make the mineral supply to future developments less sustainable.

The Crown Estate in its most recent Marine Aggregate; Capability and Portfolio 2016 document (see link below)

<https://www.thecrownestate.co.uk/media/1023079/marine-aggregates-capability-and-portfolio-2016.pdf>

identifies that the offshore Humber area has 59.14 million tonnes of licensed marine aggregate which on a 10 year average has seen a 2.31million tonnes of annual extraction giving a current regional marine aggregate reserve of 25.66 years. Currently the marine aggregate

landings into the Humber River have been relatively small but with land won reserves diminishing the future potential for marine aggregates being supplied into Hull are obvious. It is vital therefore that the Hull City Plan should identify and safeguard through appropriate policies marine aggregate wharfage and other mineral infrastructure.

Apart from the sustainability advantages it is important that the Plan allows flexibility and options for alternative mineral supply options in case of difficulties in supplying traditional land won minerals during and post the Plan period.

The Hull Local Plan currently fails to address the issue of safeguarding as required by NPPF and is therefore unsound.

M E North

(On behalf of the Mineral Products Association)

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