

Consultation on Draft Magnesial Limestone Paper.

Representation on behalf of the Mineral Products Association

Please find below comments on the above draft document. Please could you keep me informed of the progress of this document by email. Contact details are;

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General comments

- This report appears to be trying to redo the work of the BGS fact sheet, but falls short on many fronts. It would be worth the author of the report referring to the BGS studies highlighted below.
- There is no definition of the area of the study.
- There is no understanding of the geological extent of dolomite.
- There is poor use of wording (chemical vs industrial)
- There is a poor understanding of planning policy

Paragraph	Page	Comment
Executive Summary		
Para 1	4	A very limited view on the extent of industrial applications for Magnesial Limestone. No mention of the diversity of glass applications.
Para 3	4	What about the export market?
Para 4	4	A very limited view of the importance of individual sites. Also, what is the geographical and geological extent of the report.
Para 5	4	Landbanks for construction aggregates are based upon reserves generally within the boundary of a local planning authority. Industrial minerals are based upon stocks of permitted reserves "at individual sites".
Para 6	5	Care should be taken not to confuse aggregate landbanks with stocks of permitted reserves as required for industrial applications.
Introduction		
1.1	6	This would appear to be the Permian Magnesial Limestones. What about the geological and geographical extent of the Carboniferous and Cambrian Mag. Lsts. Which are also extracted in the UK. Maybe the scope of this report needs to be defined more clearly.
1.2	6	Significant shortfall in the scale of the products and uses of Mag. Lsts. What about glass products such as float glass, container glass, glass fibre, technical glass (lighting, monitors, etc.) Ceramic and laboratory glass. 10-15% of glass products comprise dolomite. Agricultural lime, etc.
1.4	6	This appears to be the Permian Mag. Lsts. from which Durham is a significant producer and is omitted from the list. The resource also runs through National Parks and if to be used for the purpose of Minerals Safeguarding, needs to be inclusive within these

		areas. The Mag. Lsts. from other geological horizons have a broader geographical extent from Wales to Gloucester, Shropshire to and Scotland, but have not been referred to.
1.5	6	The BGS Industrial Minerals Report (2004) and respective Factsheet (Dolomite 2006) are the best examples of documents which highlight the relevance and special considerations of industrial minerals in the planning process. These were sponsored by ODPM and were published specifically for the planning process.
1.6	6	The proposed intention of this resource assessment cannot be achieved as it does not define the study parameters, the extent of the industry, the scope of the products or the extent of the mineral resource
Geographical Context		
2.1	7	If the report seeks to identify solely the extent of the Permian resources it should say so. If it is looking at all Mag. Lsts. resources, it is simply wrong.
2.2	7	Again, this is incorrect for the reasons indicated above.
Fig. 1 & 2	7&8	Need to clarify that these are restricted to Permian resources.
2.3	8	Is this the scope of the report...to refer to the Mag. Lsts. industry in this area, or is the report looking at the UK industry?
2.4	8	Is this correct? There are other quarries producing Mag. Lsts. products throughout the areas and beyond.
Uses of Magnesian Limestone		
3.1	9	It is assumed that this breakdown of the aggregate construction market/products is correct, although I would seek reassurance as to the source of this breakdown.
3.2	9	The term “chemical” is in appropriate in the context of this paragraph. Surely this should be industrial application and or industrial mag. lst. production. There is also a significant shortfall in the scope of the mineral based products and downstream industries supplied. Also, there is no reference to milling and grinding within the scope of processing.
3.3	9	Again, a rather limited view of the range of products
Active Magnesian Limestone Quarries		
4.1	10	I have not checked the accuracy of this, but what about Omya, Sibelco, Lhoist, etc. However, again this section suffers from a lack of definition of the geological scope of the resource.
Fig 3-6	10-12	Permian Quarries only I assume. What about Thrislington? The Dolomite Quarry, is Warmsworth Quarry, operated by Sibelco (not UK). Again, what is Chemical Stone?
Reserves and Sales		
5.1	13	Again, do not refer to chemical stone. This is industrial dolomite
5.2	13	What is chemical grade aggregate? Is this limestone used for industrial purposes?
Security of		

Supply		
6.1	13	This is a rather naïve approach to classifying a site of regional/national strategic significance. Also, what does this term mean. It is not reflected in National Planning Policy (NPPF). Area these minerals of national importance. Also, there is no reference to the export of Dolomite. (See BGS factsheet). Clearly there have resources of international importance.
6.2	13	This is a rather naïve approach to qualifying the importance of a site. Simply because something produces “building stone” which I assume is dimension stone, does not mean that the site’s importance should be undermined. “Building stone” may travel significant distances and its importance is rarely confined to local markets.
6.3	13	One must be careful not to confuse aggregate landbanks which are based upon an authority based calculation, with stocks of permitted reserves for industrial minerals, which are site specific. Whilst the 4.8mt may add to the aggregate landbank for the local authority, it does not mean that the industrial landbank for specific products will be increased.
6.4	14	It is unclear what is meant by the term “reserves are much more distributed”. Also, the reference to the security of supply being “less vulnerable to the closure of any individual site” again demonstrates a lack of understanding of the unique chemistry and physical parameters of an industrial mineral used for not aggregate purposes, or indeed the physical characteristics used for dimension stone or specific aggregate grade purposes.
6.6	14	The references to “future demand for limestone aggregates” has limited bearing on changes in industrial demand. Care should be taken not to mix aggregates with industrial minerals.
Summary and Conclusions		
7.1	14	Again, please explain what is a “mineral resource of significant strategic economic importance”? Again, the lack of understanding of industrial applications is of serious concern.
7.2	14	Please define “Strategic Importance”.
7.3	15	Agreed, great caution should be applied to an overall Magnesian Limestone landbank as these decisions are more specific to individual sites when the mineral is being used for non-aggregate purposes, i.e. industrial applications and dimension stone.
7.5	15	Refer to industrial applications and not chemical applications.
7.6	15	I’m not sure it achieves this.

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