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Dear Sir/Madam

**SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES
MAKING SPACES FOR GROWING PLACES (MSGP): LOCAL PLAN DOCUMENT FOR
GATESHEAD SUBMISSION DRAFT PLAN (OCTOBER 2018)**

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 500 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.

With reference to the current consultation on the MSGP we have the following comments to make. It is unclear if we have missed a consultation exercise, but have made comments upon the current consultation. We note the current consultation is guided by the adopted Core Strategy (CS) together with National Policy (NPPF) and Guidance (PPG), and informed by the Local Aggregate Assessment (LAA) produced by the joint authorities.

Our focus is primarily on the minerals policies but refers to other policies in the proposed MSGP and the CS where relevant.

MSGP and link to CS

Policy CS20(1) of the CS states that the whole of the plan area will be identified as a Minerals Safeguarding Area (MSA). This is not evident from the Policies Map (printed or interactive which would appear only to safeguard Brick Clay under policy MSGP 52. The LAA and BGS resources maps recognise and identify respectively, areas of known resources. Indeed, the LAA states clearly that the majority of the Fluvial and Glacial sand and gravel resources in the region lie within Gateshead. These should be properly safeguarded on the Policies Maps. The absence of any reference to this and failure to identify MSAs in the proposed MSGP will make the document unsound.

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Policy CS20(2) of the CS also states that Areas of Search (AoS) will be defined in subsequent Local Development Documents. One would question why the AoS have not been identified in the Site Allocations document. The PPG is clear, Mineral Planning Authorities should plan for the steady and adequate supply of minerals in one or more of the following ways; 1) Designating Specific Sites; 2) Designating Preferred Areas; and, 3) Designating Areas of Search. The omission of this policy requirement would make the MSGP unsound.

Policy CS20(5) of the CS seeks to ensure all minerals of economic importance being safeguarded. As stated above, the MSGP does not appear to achieve this or indeed safeguard minerals infrastructure. Again, this is contrary to the NPPF and therefore the approach to the MSGP would appear to be unsound.

MSGP Specific wording

Page/ Policy	Current Wording	MPA Comment	Amendments required/comments
MSGP46	Environmental Impacts - Minerals and Waste.	The NPPF requires plans to be prepared positively and contain policies which are clearly written. Policy MSGP46 does not meet these requirements. Whilst the NPPF and the CS specify the need for a steady and adequate supply of minerals and the landbank requirements of at least 7 years for sand and gravel and at least 10 years for crushed rock, together with other requirements for non-aggregate minerals, the MSGP does not indicate how it proposes to meet these through appropriate site allocations	Reword the policy and amend taking on board the comments in this response. It is not clear from the Council's web site if there has been a "call for sites" for sites with the potential for minerals extraction.
MSGP46 1.	Environmental Impacts - Minerals and Waste. "1. The environmental impact of any proposal for mineral extraction or waste management facility will be assessed individually and cumulatively, taking into account the availability of appropriate protective or mitigation measures with regards to its effect on: a).....g)"	It is not clear why Policies MSGP20 though to MSGP38 identify a full suite of Development Management criteria against which developments will be considered, yet subsection 1a) to g) identifies the suite of criteria against which mineral and waste developments will be considered. This suite of criteria largely mirrors the DM Policies unnecessarily and can therefore be deleted.	Amend the policy to read: 1. The environmental impact of any proposal for mineral extraction or waste management facility will be assessed individually and cumulatively, taking into account the availability of appropriate protective or mitigation measures. with regards to its effect on: a).....g)
MSGP46 2.	"2. Unless there are overriding material considerations no zone	We are not able to undersand what this policy is seeking to achieve.	Reword the policy or delete.

	of influence of a mineral extraction or waste management facility should suffer a continuous series of schemes on separate sites (i.e. within a minimum period of five years)		
8.1	The first sentence states “Mineral extraction and landfill operations.....will usually disturb the amenity of an area through factors such as noise, dust and visual intrusion.”	These matters are reflected in the general development management policies and do not need to be repeated in policy MSGP46. However, the policy fails to recognise anything positive about minerals extraction and should be reworded.	Reword the paragraph “Mineral extraction and landfill operations..... will usually disturb <u>may affect</u> the amenity of an area through factors such as noise, dust and visual intrusion. <u>These effects may be mitigated using recognised mitigation measures</u> ”
8.1	The third sentence states “The zone of influence of a site is that area which would experience impacts from any mineral or waste activity of the site.”	Again, this sentence is extremely poorly worded and fails to recognise the positive influence of mineral extraction and waste management. It fails to address the principles of sustainability including the economic and social parameters, choosing only to focus on any perceived negative environmental effects	This paragraph needs to be revisited in a balanced and informed approach, or should be deleted. Clearly such a tainted opinion and understanding of minerals and waste developments would suggest an ill-considered and unsound plan. In effect, the zone of influence of minerals and waste development in Gateshead could include the whole of the borough where waste collections are made and any developments using locally sourced minerals.
8.1	The remainder of the paragraph	The remainder of the paragraph seeks only to identify negative elements of developments.	The paragraph should be re-worded to give a balanced consideration or deleted completely.
8.2	References to “zones of influence” and “breathing space”	These concepts are non-sensical and are concepts which are not recognised in the sphere of minerals planning.	The paragraph should be deleted or reworded in recognised planning parlance with full justification.
8.3	Again, reference is made to “breathing space”	Yet again, this paragraph does not make sense, is unclear and has a serious negative intonation. It’s negativity does not accord	The paragraph fails to identify any justification for the approach being cited and should be deleted

		with the NPPF requirements to plan positively	
MSGP47 and 8.4	The policy is titled “Minerals and Waste development: Noise”. The third sentence of paragraph 8.4 which refers to short term activities.	At last a policy which recognises proper controls in current planning guidance. The parameters in the third sentence of paragraph 8.4 which may involve temporary exceptions to standards noise conditions, such as soil stripping and the construction of noise attenuation bunds, should be included in the policy and not buried in text	Amend the policy to include temporary noise criteria.
MSGP52	Brick Clay	We support the safeguarding of Brick Clay, but would question the overall approach to minerals and minerals infrastructure safeguarding which is far from clear and therefore unsound	Provide clarification and a consistent approach to MSA of all economic minerals and minerals infrastructure within the borough.
MSGP53	Dormant Sites	It is unclear why this requires a separate policy. This information is contained in the LAA and does not justify a separate policy. It does not contribute to the plan and should be deleted.	Delete the policy.
MSGP54	Unacceptable areas for mineral working	This policy identifies areas in the plan where mineral extraction will not be permitted. However, there is no clear text or evidence base which clarifies why these areas are unacceptable. The MSGP should focus on identifying areas where minerals can be worked rather than focussing on areas which cannot. Any proposals within the areas identified under Policy MSGP54 would likely to be accompanied by an EIA. It would be the EIA process which should determine the acceptability of mineral working.	Delete this policy.

Additional comments

The NPPF requires plans to be prepared positively and make provision for a steady and adequate supply of minerals making a contribution to the local, regional and where appropriate national supply of minerals. The policy aspirations for economic growth, housing delivery and regeneration cannot be delivered without this.

It is not clear what pre-consultation has been undertaken as part of the plan process and there is no formal clear statement indicated of the “Duty to Co-operate”. The recommendations in the LAA would also appear to have been overlooked.

Further, many of the design and heritage elements of the plan cannot be delivered without the need for provision of dimension stone upon which the MSGP is currently silent. We would seek clarity on the Council’s proposed approach to the provision of dimension stone for buildings and to retain local vernacular.

Conclusions

We have highlighted a number of concerns with the proposed plan, as detailed above, and have sought to highlight where we believe the MSGP does not accord with national policies. We have suggested appropriate amendments in order to address the key issues and would like to participate in any examination.

We would welcome the opportunity to meet with officers in advance of further iterations of the Local Plan and trust the above comments are given due consideration.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', is placed over a light blue rectangular background.

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Director of Planning

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