2nd March 2018

Spatial Planning
Development Services
South Tyneside Council
Town Hall and Civic Offices
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Dear Sir/Madam

SOUTH TYNESIDE STRATEGIC LAND REVIEW

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 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.

It has been brought to our attention that the recent Strategic Land Review (SLR) and the current SHLAA is looking at potential sites for housing development and other development opportunities, particularly focussing on the development of brownfield sites.

It is imperative that the Council recognises it duty under the National Planning Policy Framework paragraph 143 to, amongst other matters, “....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 material.

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....”

Such facilities require 24/7 operations with activities often controlled by external influences, including tidal patterns. Proposals for the location of housing or other developments in close proximity often prejudices the ability of the operator to deliver its products and may have a significant economic impact on the legitimate use of sites.
It is therefore of significant concern that within the SLR, sites such as SA39 & SA40 are identified as being “potentially suitable for development”. These sites include and are adjacent to Cemex’s Jarrow Wharf facility. Inappropriate development on or in close proximity to this wharf be to the detriment of operations and will needlessly sterilise the site. South Tyneside has little to offer in terms of direct aggregate production and is therefore heavily reliant upon marine landings, recycled materials and imports. Further, inappropriate development on SA39 & SA40 would clearly contrary to national policy as defined in the NPPF.

There may well be other facilities within the borough which support minerals related activities and are also threatened by inappropriate development within the SLR, but unfortunately the SLR site assessment methodology does not provide suitable information on existing uses.

We, therefore seek Council’s assurance that site assessment methodology will be reviewed and identify existing land uses to ensure existing operations are not hindered and sites not sterilised by incompatible development on or adjacent to them.

I am attaching for your information MPA Guidance produced in November 2017 relating to the potential constraints to London Wharves, but is equally applicable to South Tyneside. It is the MPA’s aim to produce a similar document for wider national usage.

We would welcome the opportunity to discuss our concerns with the Council and look forward to hearing from you in due course.

Yours faithfully

[Signature]

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