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Planning Policy
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Dear Sir/Madam

NORTHUMBERLAND LOCAL PLAN - PUBLICATION DRAFT 2019

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, it is disappointing that despite significant and detailed comments, the Council has chosen to disregard or ignore many of the comments made previously. We believe this is a missed opportunity to alleviate many repetitions and duplications in the plan, allowing the publication of a more concise and readable document. Unfortunately, we have had to reiterate these comments in the table below, in the hope that due regard will be given to the representations.

We would welcome the opportunity to discuss the representations with officers to give a better understanding of the comments made.

Yours faithfully



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Director of Planning

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Page/Policy	Current Wording	MPA Comment	Amendment required	New Para/ Policy	Changes made	MPA position/comment
Para 1.20	Duty to cooperate	We support the Council's approach to working with neighbouring authorities. We feel that for minerals this should be broadened. Minerals matters go beyond the authorities identified. Further, the Northumberland, Yorkshire Dales and North Yorkshire National Parks are close and this may create long term supply issues.	The Council should ensure a broader working on minerals matters.	Para 1.20	Reference made to the Duty to Cooperate Statement	The reference to the statement is noted and we have no further comments to add on this matter
Para 2.16	Economy and employment	We are pleased the Council recognises the importance of the supply chain	Noted	Para 2.16		No additional comment
Figure 2.1	Delivery areas	The plan is fairly poor quality	Improve graphics.	Fig 2.1	Changes made	The quality of the graphics has markedly improved.
Para 2.37	South East Northumberland Delivery Area	We note the reference to the positive contribution made to ecology and recreation by the former mining industry and to the economy by the current industry.	We support this recognition but feel that the plan may undervalue the contribution made by the industry.	Para 2.46	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Para 3.5	Economy and Jobs The economic benefits of	We welcome this recognition and suggest the downstream benefits of mineral extraction should not be underestimated, including supply and service industries, business	We support this recognition and suggest when a review of the strategy takes place downstream benefits of the sector should be recognised.	Para 3.5	No changes made	Our initial comments do not appear to have been addressed and remain valid.

	minerals extraction	rates, GVA, etc. We refer the Council to the UK Minerals Strategy.				
Para 3.6	Homes The Local Plan makes provision for at least 17,700 new homes	This figure is noted which may have consequences over the planned supply of minerals and mineral products.	Noted			No Comment
Para 3.9	Environment	It is disappointing that the benefits of quarry restoration in delivering biodiversity net gain have not been referenced. The historic environment is routinely dependent upon the provision of compatible building stone, etc to ensure the character of an area is maintained. In addition, water and sewage infrastructure and purification requirements are upon a steady and adequate supply of mineral products.	Council to note and amend text where necessary to recognise this.	Para 3.9	Some changes made	We note minor changes have been made, but these do not address our initial comments which remain valid. Further the amendments to the 5 th bullet point have done nothing but create further confusion. We would question the inclusion of the term “including significant views”. What does this mean? The original subsection should be reinstated.
Para 3.11	Connections	The infrastructure identified is not deliverable without a steady and adequate supply of minerals and mineral products. The Council should consider the need for resource assessments and supply audits to ensure major infrastructure projects can be delivered in an efficient, effective and timely manner.	Council to note and amend text where necessary	Para 3.11	No changes made	Our initial comments do not appear to have been addressed and remain valid.

Para 3.14	Climate Change	Renewable energy sources, improved efficiency of building products, etc., are reliant upon a steady and adequate supply of minerals and mineral products	Council to note and amend text where necessary	Para 3.14	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Para 3.15	Resources Northumberland is rich in energy resources”.	We would suggest amending the first sentence to read “Northumberland is rich in energy <u>and other natural</u> resources”.	Amend as suggested	Para 3.15	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Page 49	Delivering the preferred growth strategy	It is disappointing the preferred growth strategy makes no reference to the sustainable benefits of the minerals industry. We refer the Council to the UK Minerals Strategy and the value of the industry to the local and national economy.	Council to note and amend text where necessary.	Growth strategy	Changes made	We note major changes have been made, but these do not address our initial comments which remain valid. This is a missed opportunity to highlight the value of a sustainable minerals industry.
Policy STP1	Spatial Strategy	We note the point f. refers to development in open countryside and we assume that “other land-based industries” includes minerals extraction. However, this assumption is not qualified by the text. We believe the spatial strategy policy and the supporting text should clearly identify that the winning and working of minerals is a largely rural based activity which can only take place where the minerals are found. Other associated activities, including RMC and asphalt plants can be located in	Council to make reference to Mineral Extraction, mineral processing facilities and the agent of change principle within the Spatial Strategy and supporting text.	Policy STP1	Changes made	We note the change in paragraph numbers but the changes do not address our initial comments which remain valid.

		urban areas in industrial locations where the agent of change principle is relevant.				
Policy STP 9	Development in Green Belt	We support the simple approach adopted to development in Green Belt.	We support the Council's position.			No Comment
Policies ECN 12 & ECN 13	Employment opportunities in rural area	The respective policies do not recognise the skilled employment associated with minerals development in rural areas	Council to note and amend text where necessary.	Policies ECN 12 & ECN 13	No changes made	Our initial comments do not appear to have been addressed and remain valid.
				Para 5.65	Changes made	We support inclusion of the reference to supply chain, but are disappointed that this appears to have a limited understanding, i.e. farm produce. It should be expanded to recognise the wider rural economy, including the minerals industry.
Policy ECN 14	Rural Diversification	This policy should recognise minerals safeguarding areas (MSAs) and the limitations and exclusions associated with these.	Council to note and amend text where necessary.	ECN 14	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Policy HOU 8	Housing Development	This policy should recognise (MSAs) and the limitations and exclusions associated with these.	Council to note and amend text where necessary.	HOU 8	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Policy ENV 3	Landscape	We are largely supportive of the policy. In subsection e), the word "only" is superfluous and its inclusion adds nothing to the policy.	Delete the word only.	ENV 3	No changes made	Our initial comments do not appear to have been addressed and remain valid.

		Exclusion of the word “only” works well in Policy REN 1 without changing the meaning of the policy.				
Policy Env 9	Conservation Areas	We support the principle of respecting the architectural and historic character through appropriate design but feel this policy should link to Policy Min 9 which relates to the supply of local building and roofing stone.	Council to make the link between Env 9 and Min 9.	ENV 9	Changes made	We note minor changes have been made, but these do not address our initial comments which remain valid.
Policy Pol 4	Soil and Agricultural land quality. Subsection 2 - Development of “best and most versatile” agricultural land will only be supported.....”	We are largely supportive of the policy. In subsection 2, the word “only” is superfluous and its inclusion adds nothing to the policy. Exclusion of the word “only” works well in Policy REN 1 without changing the meaning of the policy	Delete the word “only”.	POL 3	Changes made	Our initial comments do not appear to have been addressed and remain valid.

Mineral Specific Matters

Page/Policy	Current Wording	MPA Comment	Amendments Required	New Para/ Policy	Changes made	MPA position/comment
Policy Min 1	Environmental Criteria	Whilst the Policy could be more succinct, the general criteria identified are supported.	Council to look to see if the policy could be more succinct	MIN 1	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Policy Min 2	Benefits of Minerals Proposal	The Policy is largely supported	Noted			Noted
Policy Min 3	Site Restoration, aftercare and afteruse.	Whilst this policy is generally supported, the following amendments are necessary. Under subsection 2, after the words "...sites should:", insert the words "where appropriate". A number of the points a)-h) would be mutually exclusive for example "improved public access" (point b.) may conflict with biodiversity net gain (point a.) or similarly with Protection of soil resource (point c.). The "where appropriate" can then be deleted from Point b.	Amend to read Proposals for the restoration, aftercare and after-use of mineral extraction and landfill sites should, where appropriate . Delete the "where appropriate" from point b)	MIN 3	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Policy Min 3	Site Restoration,	The 5-year aftercare (not maintenance) referred to in Point g., is the maximum period in legislation which	Subsection g to be reworded "Make provision for the aftercare and maintenance of the restored site for a period of not less than	MIN 3	Changes made	We support the changes made.

	aftercare and afteruse.	may be imposed by planning condition. Subsection g. needs rewording to accord with legislation.	up to five years to ensure the land is capable of sustaining the approved after use or after uses. The aftercare period should may be extended by legal agreement beyond the normal five years aftercare period where it is required.....”			
Policy Min 4	<p>Safeguarding of Mineral Resources</p> <p>Subsection 3b) states “The Mineral can be extracted without unacceptable adverse effects on residential amenity and the natural and historic environment prior to the non-mineral development, recognising that prior extraction has different characteristics to longer-term mineral extraction</p>	<p>Whilst we largely support the principles behind the safeguarding policy, we have concerns over Subsection 3b). We believe this is a prior extraction element of the policy, but believe it unnecessarily repeats environmental criteria already addressed in Policy Min 1. The subsection should be reworded to reflect prior extraction.</p>	<p>Reword Subsection 3b) to read “The Minerals can be extracted prior to the development proceeding, without adversely affecting the viability of the development”</p>	MIN 4	Changes made	We support the changes made.

Policy Min 5	Safeguarding Mineral Infrastructure	Whilst we are supportive of the approach to safeguard mineral related infrastructure, under the NPPF2018, it is important to apply the “agent of change” principle to ensure new development in the location of an existing facility does not needlessly sterilise the facility. The Council should add a third subsection to address this.	Council to note and amend text to include an additional subsection relating to the “agent of change”.	MIN 5	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Table 11.2 and supporting paragraphs 11.21-11.27	Quarries in Northumberland	As mentioned above, it would be beneficial if Table 11.2 could be more informative. Information on end dates as indicated in the LAA would help inform the reader with supporting narrative, particularly noting the number of sites scheduled to close within the plan period.	Provide further information to help the reader.	Table 13.2 and supporting paragraphs	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Table 11.2	Quarries in Northumberland	The LAA refers to Harden Quarry which does not appear in Table 11.2	Council to clarify the position on Harden Quarry	Table 13.2	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Table 11.2	Quarries in Northumberland	Sand and Gravel reserves are indicated as 6.1MT. Table 11.3 indicates 6.0MT.	Council to clarify the position.	Table 13.2	Changes made	Amendment noted.

				Table 13.4	Changes made	There would appear to be an error as the figures conflict with Table 13.2
Policy Min 6	Aggregate Minerals	The may be benefits in separating out individual matters in to separate policies, covering individual topics such as Sand and Gravel, Crushed Rock, Borrow Pits. If the Council are not minded to follow this approach in general, it is suggested that Borrow Pits are separated out.	Council to consider separating out individual matters.	MIN 6	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Policy Min 6	Aggregate Minerals Subsection 1) "Provision towards a steady and adequate supply of aggregates"	The NPPF requires that Mineral Planning Authorities should "plan for" and not provide "towards". The policy should be reworded to accord with the NPPF.	Reword subsection 1 "Provision towards for a steady and....."	MIN 6	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Policy Min 6	Aggregate Minerals	Subsections 2b&c, 3b&c, 4c&d, and 5d&e unnecessarily repeat the environmental criteria already addressed in Policy Min 1 and the working criteria required by Min 3. There is no need to repeat this requirement in Policy Min 6 and the respective	Delete subsections 2b&c, 3b&c, 4c&d, and 5d&e.	MIN 6	Changes made	Amendment noted.

		subsections should therefore be deleted.				
				MIN 7 & MIN 8	New policies inserted.	These appear to be principally Development Management policies and not Strategic Policies. They are extremely prescriptive in their criteria which is largely repetitive of the requirements of Policy MIN1. Whilst, the principle of the site-specific references is supported, the policies could be much shorter.
Policy Min 8	Clays Subsection 1a. states "It would enable a 25-year stock of reserves to be maintained"	The NPPF requires "at least" 25 years of "permitted" reserves. "	Amend text to accord with the NPPF. The subsection should be reworded to state "It would enable an at least 25-year stock of permitted reserves to be maintained"	MIN 10	Changes made	Amendment noted.
Policy Min 8	Clays Subsection 3a&b	Subsections 3a&b. repeat the environmental criteria already addressed in Policy Min 1 and the working criteria required by Min 3. There is no need to repeat this requirement in Policy Min 8 and the respective subsections should therefore be deleted. It is appreciated that this would make Subsection 3 very short and as	Delete subsections 3a&b and refer to Policies Min 1 and Min 3. "proposals for the stockpiling of clay extracted as an ancillary mineral will be permitted where it accords with Policies Min 1 and Min 3.	MIN 10	No changes made	Our initial comments do not appear to have been addressed and remain valid.

		such it could refer specifically to Policies Min 1 & Min 3				
Para 11.37	<p>Natural Building and Roofing Stone</p> <p>This paragraph references the important contribution sandstone quarried in Northumberland makes to defining the character and appearance of the County's towns villages, castles, etc.</p>	<p>This paragraph of the Local Plan somewhat undervalues the much broader contribution made by Northumberland's building stone quarries to the built environment and heritage past and present. This influence is not confined to the County as suggested, but extends northwards to the Scottish Central belt and much further afield. The building materials are geologically critical to continue to maintain this heritage and a great deal of the "New Builds" being built to ensure the character of these areas is enhance and maintained.</p>	<p>The Council should give greater recognition to the importance of the dimension stone quarries in the County and the highly skilled employment associated with the industry. This is truly a legacy for the Council to be proud of.</p>	Para 13.38	Changes made	Amendment noted.
				Para 13.39	We note the reference to the "environmental safeguards set out in Policy MIN"	Amendment noted. We feel the wording here could be used to reduce the amount of repetition included in many of the minerals policies, simply by cross-references to Policy MIN 1.

Policy Min 9	Natural Building and Roofing Stone Subsections b&c	Subsections a&b. repeat the environmental criteria already addressed in Policy Min 1 and the working criteria required by Min 3. There is no need to repeat this requirement in Policy Min 8 and the respective subsections should therefore be deleted.	Delete subsections a&b	MIN 11	No changes made	Our initial comments do not appear to have been addressed and remain valid.
Glossary	Mineral Resource and Mineral reserve	There are varying definitions associated with mineral resources and mineral reserves. However, in the land use planning context the clear distinction should be that a mineral reserve benefits from planning permission, allowing it to be worked. A link is provided to the BGS website definition ¹ which may help the council inform a clearer definition	Make the clear definition between mineral resource and mineral reserve with the latter having the benefit of planning permission.	Glossary	No changes made	Our initial comments do not appear to have been addressed and remain valid.

Additional comments

Page/Policy	Current Wording	MPA Comment	Amendments required	New Para/ Policy	Changes made	MPA position/comment
Ren 1 & Ren 2	Certain subsections begin with the	The words “through the development management	Delete text accordingly	REN 1 & REN 2	Changes made	Amendment noted.

¹ <https://www.bgs.ac.uk/mineralsuk/mineralsYou/resourcesReserves.html>

	words “through the development management process”	process” are unnecessary and can be deleted				
Policy Inf 1	Delivering Infrastructure Projects	Major infrastructure projects may create unprecedented demands on raw materials supply and impact upon supply chains. Subsection 1 should require the submission of a resource assessment to ensure developments can proceed in an effective, efficient and timely manner	Include the requirement for developers of major infrastructure projects to include resource assessments and give consideration to supply chains.	INF 1	No changes made	Our initial comments do not appear to have been addressed and remain valid. This is a missed opportunity for the Council.