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Dear Sir/Madam

**SUNDERLAND CITY COUNCIL: CORE STRATEGY AND DEVELOPMENT PLAN 2015-2033
- PUBLICATION DRAFT**

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 we would like to highlight that there are many policies we support. However, we have the following comments to make.

Page/Policy	Current Wording	MPA Comment	Required amendment
Page 23 Paras 2.76 & 2.77	Minerals	We note that paragraphs 2.76 and 2.77 provide a very brief “scene setting” context for minerals in Sunderland, appearing on page 23 of the Draft plan. However, the Minerals chapter itself and the accompanying policies commence from page 111, yet are not set in context. It would be beneficial to move paragraphs 2.76 and 2.77 to the Minerals Chapter to provide a proper context to minerals development within the area.	The minerals chapter should include an introduction to set the context of minerals policies in the plan.

Page/Policy	Current Wording	MPA Comment	Required amendment
Para 2.76	The paragraph indicates that only one quarry exists in Sunderland, Eppleton Quarry, which supplies sand and Magnesian Limestone, the latter for aggregate and industrial purposes.	No reference is made to appendix 3 which identifies 5 existing minerals infrastructure sites but does not expand on detail to name the sites or indicate their purpose.	Link the paragraph to Appendix 3 but provide more detail as to the purpose of the minerals infrastructure in Appendix 3 by naming the sites and providing details of the infrastructure.
Para 2.76	Para 2.77 makes reference to The Local Aggregates Assessment.	The LAA refers to marine aggregate and crushed rock imports. If para 2.76 is setting the scene, marine imports should be referred too.	Refer to marine and crushed rock imports in the paragraph/minerals chapter.
Para 2,77	This paragraph states “Sunderland is reliant on imports of minerals”“The LAA has identified that the Tyne and Wear authorities jointly do not provide sufficient minerals to meet their needs.....”	In light of this clear statement of need, we question why Policy SP11 states “Development for mineral extraction must demonstrate.....need for the resources to be extracted”	Policy SP11 needs to be reviewed. Clearly there is a need established in the LAA and in Para 2.77.
Para 3.3	Strategic Priorities	It is unclear why, under the row headed minerals, the relevant policies identified are all waste policies, with no minerals policies included in any of the key rows. This suggests a lack of understanding of what minerals, minerals products and extraction sites deliver, in terms of, homes, economic growth, built environment, transport, natural environment, infrastructure, etc.	This table needs to be reviewed fully with appropriate policies identified in the final column.

Policy SP1	This policy identifies what will be needed to deliver sustainable economic growth in terms of housing, infrastructure, retail development, etc.	We are disappointed that no resource assessment has been made to consider how, from a mineral products perspective, the spatial strategy will be delivered. Further, there is no assessment of the economic contribution made by the minerals sector to the area.	For a sound evidence base, the local plan needs to take these matters in to consideration. An estimated 5.36mt of aggregates is needed to meet the new housing requirements and associated infrastructure based on the predicted number of new dwellings alone. New housing represents only 25% of overall aggregate sales. It is therefore not clear how the council intend to meet aggregate demand over the plan period.
Figures 19 & 20	The same plan is used for both North of Unsworth Hall and Fatfield	We are not sure if this is correct.	Review plans
Policy HS1	Quality of life and amenity - This policy indicates that development must demonstrate that it does not result in unacceptable adverse impacts arising from the following sources.	We are unclear how this policy relates to a formal scoping for EIA development and with Policy SP11 of the draft plan which appears to suggest that the scope and requirements for considering minerals applications differs from other forms of development.	This matter needs to be given further consideration and clarification to avoid unnecessary duplication. The plan would benefit from clear indication of development management policies.
Policy HS2	Noise-sensitive development.	We suggest this policy should consider “agent of change” referred to in Paragraph 182 of the NPPF(2018.). Proposals in the plan should not impact unreasonably on existing uses and developments.	This matter should be considered in the plan.

Section 7.	Economic Growth	It is unclear why no consideration is given to the economic growth of the minerals sector or its downstream value.	This matter should be considered in the plan to provide a sound evidence base.
Policy BH7 & BH8	Historic Environment and Heritage Assets	These policies identify the requirements for conserving and enhancing the historic environment and in particular building structure, yet there is no indication of how the plan will meet the demand for the extraction of building stone for the repair of heritage assets or other such conservation uses	The plan needs to consider this issue.
Policy NE6	Green Belt	It would be helpful if the Green Belt Policy and text reflect the wording of the NPPF and include details of developments which need not be inappropriate on Green Belt, if only by reference to NPPF2018.	The plan needs to address this issue
Chapter 12	Sustainable Transport	The plan identifies a number of strategic transport proposals. No indication is given in the plan of the likely resource requirements to deliver this infrastructure. In the absence of a proper assessment of the mineral needs in the plan, the evidence base should include a resource assessment of the development needs and aspirations of the plan.	The plan needs to address this issue.
Chapter 13	Minerals	Many of the above points identify the shortcomings in the draft plan with regard to planning for minerals. With the exception of Minerals Safeguarding, the policies and associated text fall short of the requirements of the NPPF2018 and the previous NPPF. Paragraphs 204 -208 of the NPPF2018 identify the requirements of planning policy and development management	In order to meet the soundness test, the plan needs to properly address the requirements of NPPF Policies 204-208

		which the Local Planning Authority should address. At present the plan is unsound.	
Policy SP11	Mineral Extraction	This policy is weak and repetitive. Firstly, the LAA and Paragraph 2.77 already state there is a need for minerals and Policy HS1 identifies the matters to be considered for proposed development	This policy would appear unnecessary
Policy M3	Land instability and minerals legacy	Located in the minerals chapter of the plan, this policy implies it is only minerals developments which need to consider the matters identified. In reality all new developments should consider the matters identified and as such this policy could be dovetailed with Policy HS1	Delete the Policy and dovetail its requirement in Policy HS1
Appendix 3	Mineral Safeguarding	The plan is vague and would benefit from identifying the existing mineral infrastructure sites.	Amend the plan accordingly.
Appendix 5	Restoration Plan	Although entitled Restoration Plan, the scope of the information requested goes beyond the information which is necessary for restoration.	Amend the list accordingly.

Mineral Specific Matters (Chapter 13)

As mentioned in the above table, the plan does not accord with the policy requirements of the NPPF, neither former or recently published. As we move forward NPPF2018 should be the main planning policy framework within which the local plan should accord and as such the following references relate to the latest NPPF iteration.

Paragraph 204 indicates that Planning Policies should provide for the extraction of mineral resources of local and national importance. Paragraphs 2.76 and 2.77 indicate that at present, the reserves worked in the area include Permian sands for aggregates and Magnesian limestone for both aggregate and industrial purposes. There are no policies ensuring the plan maintains a steady and adequate supply of these minerals throughout the plan period and no consideration of landbank requirements. Policy SP11 states that it is the requirement of a Development (not Developer) to demonstrate need. Both the LAA and Paragraphs 2.76 and 2.77 state a need for minerals within the area, however the plan does not indicate how the policies will address this identified need. Para 204 also identifies the need to safeguard mineral resources and the criteria against which any proposals within safeguarding areas will be considered. Policy SP11 is very selective over which elements of NPPF2018 paragraph 204 it seeks to embrace.

Paragraph 205 of NPPF2018 states that great weight should be given to the benefits of minerals extraction, a matter which appears to have been overlooked in Section 13 of the plan. As mentioned above, there are criteria in Policy HS1 which in part duplicate the matters referred to on SP11. SP11 therefore appears to be more of a Development management policy than a Strategic Policy. A Strategic Policy should identify the mineral needs for the area over the plan period and indicate how this will be delivered.

The Minerals Chapter would benefit from a thorough review to set out how the plan will ensure a steady and adequate supply of the individual mineral types necessary to deliver the aspirations, be it aggregates, industrial minerals or building and roofing stone. Further, there is no consideration of the marine dredging and rock import matters using coastal facilities. Whilst inevitably, the area will rely on imports by sea or by road from adjacent or more distant authorities, there is no evidence of a duty to cooperate to consider the mineral needs for the area. The plan makes no assessment of the resources necessary to deliver its aspirations and does not indicate the provisions for the plan as required by paragraph 207 of the NPPF2018. The Local Planning Authority should also ensure that large landbanks bound up in few sites do not stifle competition

Conclusions and suggested amendments

Whilst we are largely supportive of the plan we believe there are significant shortcomings in recognising the value of minerals and mineral products in delivering the aspirations of the plan. It is not appropriate for the plan to simply defer to the LAA and yet ignore the need for a steady and adequate supply

There are critical matters which need to be addressed to ensure the plan accords with the NPPF and is sound. In order to address these points, we suggest that the plan's minerals policy chapter has individual policies which address the key minerals types (aggregates, building stone and industrial minerals). The chapter should also highlight the value of the sector to the sustainability of the Sunderland from retaining its character to supporting the economy. The plan should have one set of development management criteria against which development proposals are considered and which accord with other proposals in the plan;

We would welcome the opportunity to meet with officers in advance of further iterations of the Local Plan.

Yours faithfully



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