

24<sup>th</sup> September 2018



Forward Policy  
Northumberland National Park Authority  
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Dear Sir/Madam

### **NORTHUMBERLAND NATIONAL PARK AUTHORITY - LOCAL PLAN 2017-37 CORE STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES PREFERRED OPTIONS CONSULTATION**

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](http://www.mineralproducts.org).

With reference to the current consultation we would like to highlight that there are many policies we support in the consultation draft. We have the following comments to make for areas where we feel improvements may be made.

Page/Policy	Current Wording	MPA Comment	Amendments required/comments
Para 4.19	The use of local stone.	We support the use of local stone and vernacular to help maintain local characteristics.	Support this approach
Para 4.22	Policy 2 provides a single list of detailed criteria against which all new developments will be considered.	We are pleased the Council has taken the approach which avoids repetition throughout the plan. However, please see comments below on "Quarrying", which are clearly contrary to this paragraph and Policy 2.	Support this approach, but with the reservations highlighted below.

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Page/Policy	Current Wording	MPA Comment	Amendment required/comment
Policy 30	<p>Quarrying</p> <p>The development of new quarries into undisturbed land will not be permitted other than in the exceptional circumstances set out in Policy 3 (Major Development)</p>	<p>We object to the wording of the policy as it does not plan positively. Whilst we recognise the special characteristics of the National Park, the wording as proposed represents a “managed retreat” of quarrying from the national park on anything other than disturbed land for which there is no definition. Whilst such an approach could be considered as part of a criteria-based policy, there is no recognition that minerals, can only be worked where they are found. National policy in the NPPF seeks to provide for the maintenance of landbanks from outside, amongst other areas “National Parks” <u>“as far as is practical”</u> our underlining. The plan is assuming that supply will continue from elsewhere without proper consideration.</p> <p>There is one operational aggregate quarry in the National Park, Harden Quarry. Planning permission for extraction at the site expires during the plan period and the policy as worded provides limited scope for further development. The materials from the quarry clearly make an important contribution to the area, yet there are no considerations as to how this material will be replaced to ensure a steady and adequate supply. The joint LAA recognises the special nature of the “red whin” which is limited to Harden Quarry and is not extracted anywhere else in the area. It is important to help maintain local vernacular and characteristics of the area. Further, the LAA also recognises that the aggregate landbank should not be bound up in few sites which would stifle competition.</p>	<p>Strongly object. The policy and preamble are not supported by the evidence base making the policy unsound. The policy gives no indication of how the council will maintain a steady and adequate supply of minerals</p> <p>The evidence base does not support the plan’s approach.</p>

		<p>Whilst paragraph 4.19 referred to above supports the use of local stone, the policy background cited in Policy 30 fails to detail how this can be achieved.</p> <p>Further despite Policy 2, this policy, under subsection b) repeats many of the criteria indicated within Policy 2. Paragraph 4.22 states the desire to avoid repetition. Subsection b) is unnecessary.</p> <p>Subsection iv) states an absolute, to give up permitted reserves due to the word “must”. Whilst this could be a consideration it cannot and should not be regarded as a must, unless the Authority agrees to the payment of compensation for the value of important reserves.</p> <p>Further the final sentence of subsection v) is wholly unreasonable and contrary to national policy to expect the quarry developer to deliver the finance for the proposed afteruse. This would appear to be an in-perpetuity requirement. Planning law facilitates the provision of “aftercare” for an agreed period of time post site restoration</p>	<p>The plan does not consider how it will meet the demand for building stone.</p> <p>Refer to Policy 2 for criteria against which applications will be considered.</p> <p>Delete this subsection.</p> <p>Delete this subsection.</p>
Policy 31	Mineral Safeguarding Areas	National Policy requires that planning policies within local plans safeguard mineral resources by defining mineral safeguarding area <u>and</u> existing, planned and potential sites for minerals infrastructure. The policies should also encourage prior extraction where practical and environmentally feasible.	Reword the policy to accord with National Policy.
Para 4.331	This paragraph refers to Policy 31 (Crushed Rock Quarry)	It is not clear what this refers too.	Clarify the paragraph.

Para 4.333 to 4.335	These paragraphs refer to mineral extraction but follow the waste section in the plan.	The format is confusing.	Restructure accordingly
Para 4.333	The paragraph refers to sustainability issues for mineral extraction	The paragraph refers to the sustainability impacts of the wholly restrictive approach towards minerals extraction which grossly under-estimates the negative effects of the plan's policies. The sustainability appraisal suggests a "limited" negative effect on the economic viability on communities and businesses. The Economic Futures and Employment Demand Study indicates that Mining and Minerals account for no jobs in 2017. This is clearly not correct and should have been challenged by the Council. This study goes to the heart of the local plan and an incorrect evidence base clearly question the soundness of the plan.	The evidence base is clearly incorrect making the plan unsound.
Para 4.334	This paragraph refers to the areas built heritage	At last, the plan makes a positive reference to the need for mineral extraction recognising the need for local stone. However, the policies in the plan fail to indicate how this will be delivered.	Include policies on the provision of building stone.
Para 4.3335	Local employment	Whilst this paragraph begrudgingly recognises mineral extraction as a "potential" source for local employment, this conflicts with the findings of the economic and employment study.	The evidence base is clearly incorrect making the plan unsound.
Glossary	Major Development	This section refers to Policy GP2 Major Development. Policy 3 of the local plan refers to "Major Development"	Amend accordingly
	Policy 30 refers to disturbed and undisturbed land	There is no definition of disturbed or undisturbed land	Provide a definition.

### Conclusions and suggested amendments

We have serious concerns that the plan has a flawed evidence base making the consultation document and the policies contained therein unsound. The plan requires a fundamental review of its approach to mineral extraction.

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

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', is written over a light blue horizontal line.

Nick Horsley

Director of Planning

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