

**Derbyshire and Derby Minerals Local Plan; Revised Site Assessment Methodology, Hard Rock Quarries December 2016.**

Representation on behalf of the **Mineral Products Association.**

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We refer to criteria references 23, 24, and 25 which deal with ecology. The comments in the considerations column for each of the aforementioned criteria refers to the *impacts on internationally, national and locally designated sites* without making any differentiations as to the designations relative importance.

The second part of paragraph 113 of the NPPF states;

*Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and contribution that they make to wider ecological networks.*

We believe that the distinction identified in the NPPF should be made in the consideration column of the site assessment methodology.

**Derbyshire and Derby Minerals Local Plan; Towards a strategy for Building Stone November 2016.**

**Emerging approach for building stone:**

It is important that a strong criteria based policy is put in place for future building stone development within the future mineral plan regardless of whether the mineral planning authority (mpa) decide to allocate a specific site or not.

The Mineral Products Association believes that at paragraph 6.1 the mpa has misinterpreted the NPPF. Any policies in respect of building stone should encourage building stone quarries, and plan positively for these and reflect the economic, social and environmental importance of supply of building stone. The NPPF (paragraph 144) refers to 'demand

*for small scale extraction of building stone* in terms of determining applications, rather than setting policy, as implied by the text at paragraph 6.1 of the *Towards a strategy for Building Stone* document. In doing so the NPPF requires that the '*small scale nature and impact*' of such quarries is taken into account. '*Small-scale*' is not defined, and so should reflect local circumstances, including the market for the material which may be wider than 'local' and should not be restricted to a planning authority area which would make no sense in terms of commercial or planning considerations. Indeed, many small sites simply will not be commercially viable if they are only able to supply the 'local' market that exists within the planning authority area, which is likely to be too small, and too infrequent. The demands for such products are just as likely to arise outside the planning authority area as within it.

Taking the above into account we believe that a strategic policy is required for dimension stone.

It is important that you do not limit dimension stone extraction to local markets or the heritage sector. You should note that building stone is not only reserved for 'historic' purposes (repairs and Conservation Areas) and operators should be free to develop new-build markets like any other entrepreneur. That being so, repairs may be a very small part of production. So we should be pleased to see recognition that higher production will not be resisted if it contributes to economic development. However, it is important that the authority does not artificially seek to impose restrictions but allows any expansion of the operation (subject to environmental safeguards) without decreeing maximum production levels or prohibitions on aggregates production or limits to reserves, for example. All of these restrictions are commonly met by our members in their businesses on the mistaken assumption by local government that building stone operations must be small and confined in order to be acceptable. We look forward to a flexible approach being adopted in the emerging mineral plan.

In particular, an emphasis of policy on local markets or small scale working is likely to discourage applications. Our members report problems because they are being limited to 'local markets' which reflects the historic circumstances of the industry and the emphasis on heritage end uses. A 'local market' means restricted outlets, low volumes and low

turnover/operating profit. This scenario does not allow the operator to invest in the technology and training which is increasingly being required of him. This is a serious threat to continuity of security of supply. Conversely, serving wider markets makes it easier to guarantee that stone will also be available to serve the local market. Emphasising local markets and small scale operations like this is merely descriptive of the traditional character of the industry. We should prefer policy to omit implications that dimension stone production needs to be controlled or curtailed, which we believe is against the spirit and purpose of NPPF.

Mark North

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