

Statement on behalf of the Mineral Products Association(MPA)

N Yorkshire Joint Mineral & Waste Local Plan; Examination in Public

Building Stone

47. In order to demonstrate that there is, as far as practicable, a sufficient supply of building stone (NPPF paragraph 142), should the Plan contain more information on the scale and type of main building stone produced in the Plan area and, as far as possible, an indication of reserves and how long it is estimated they might last?

Yes, this would be ideal and due to limited number of operations this should not be too onerous assuming information not already held by the planning authority. Without this information then the requirements of paragraph 142 of NPPF are not being met in respect of building/dimension stone and the plan could be considered unsound.

48. Is the allocation of only one site (Land at Brows Quarry – MJP63), together with existing operating sites, enough to demonstrate that there are reasonable prospects of supplying sufficient building stone of the main types required throughout the Plan period?

No. The Plan does not propose to make an allocation for Whitewall Quarry which is a major supplier of building stone from the Jurassic Limestone. Its loss would be a blow to provision as this is the only current supplier of this material.

49. In the event of identifying any shortfall during the Plan period, and in the absence of other suitable sites coming forward for allocation, could preferred areas or areas of search be designated for any of the main building stone types and if so, would this be appropriate.

The resource is broadly known as the planning authority have identified building stone resources for safeguarding on the Policies Map. However, the economics of building stone production depend on known sources which must either be extensions to existing supplies or the re-activation of relict sites. The rationale for this statement is that it is very expensive and uncertain to prospect for the highly variable presence of building stone because of its tight specifications of colour, hardness, porosity, durability, workability, etc. which mean that almost all sources of stone have been known about for centuries. Customers must also be certain of supplies for repairs over the lifetime of buildings and are therefore wary of new suppliers without assurances of security of supply. This favours the identification of dependable existing suppliers or known relict sources above more speculative methods of searching for new sources.

Further detail is available and the necessary information on differing rock type distribution is readily available of the British Geological Survey (BGS) website through their on-line minerals information GIS tool (see link below),

<https://www2.bgs.ac.uk/mineralsuk/maps/maps.html>

In addition, the BGS website host the Strategic Stone Study. Historic England commissioned the BGS to expand its database of UK quarries, mines and mineral workings to accommodate a database called England's Building Stone Pits (EBSPits). The data is freely available on a Geographical Information System accessed through the British Geological Survey's web site. In addition, the data for each county can be freely downloaded as a series of Excel spread sheets. Written accounts of the building stones of each county are contained within a series of atlases (see link below)

Strategic Stone Study (SSS) | Minerals UK

50. In order to support the various stages of winning, working and processing of building stone, should Policy M15 (Continuity of supply of building stone) cover the stone products/processing industry?

Yes, this would be a logical and welcome extension to the terms of Policy M15 and would be in line with the requirements of Paragraph 28 of NPPF re the support of rural enterprises through the local plan process.

51. In accordance with NPPF paragraph 28, which encourages local plans to support rural enterprises, should there be specific policy support for sustainable stone processing at appropriate locations (e.g. quarries)?

Yes. In addition to NPPF paragraph 28 and, in respect of such operations that exist in or near the National Park/AONB we refer to the *English National Parks and the Broads: UK Government Vision and Circular 2010*. This aims to capture the statutory purposes and duty of the Authorities in a modern vision (paragraph 11). The Circular has specific guidance on minerals and states that the Parks are a vital source of minerals that society and the economy need, recognising that quarrying provides employment. It advises that the need for minerals, the impacts of extraction on people and the environment should be managed in an integrated way (paragraph 141).

The Circular also states that the Parks' socio-economic duty has been given added weight by the Taylor report and the Rural Advocate's report on the potential of rural England. It continues: -

*"Both reports point to the need to accommodate growth, development and investment in all rural areas at an appropriate scale and form. This should **not be interpreted as meaning that development cannot be accommodated**; (emphasis added) rather, it means that additional and concerted efforts are required to ensure communities, planners and business have clear consistent advice regarding the acceptable forms development might*

take, so that the Park communities are places where people can live and work by maintaining sustainable livelihoods." (Paragraph 70)

52. Policy M15, paragraph 2 seems to allow for a greater, more general scope of production if the building stone is for outside the area i.e. for "important requirements ... outside the area"; whereas for inside the area it needs to make a more specific contribution to "the quality of the built and/or historic environment". Is this intended? Is this too restrictive? (My emphasis)

We believe that this is too restrictive. The effect of the proposed wording is to limit building and roof stone proposals beyond the requirements of National Policy and is wrong and hence the plan is unsound. The policy should be more encouraging of building stone quarries, and plan positively for these and reflect the economic, social and environmental importance of supply of building stone. The NPPF (para 144) refers to '*demand for small scale extraction of building stone*' in terms of determining applications, rather than setting policy. And it importantly qualifies the policy by doing so in the context of sites '*at or close to relic quarries*'. This is only applicable to a small proportion of building stone demand, much of which is national or international in scope and also used for new build applications, not just for the historic repairs market. In doing so it 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*' as described above and should not be restricted to a planning authority area which would make no sense in terms of commercial or planning considerations. Indeed, many building stone operations 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 National Park as within it.

It should also be remembered that the majority of building stone in the UK is quarried in medium sized sites which also produce aggregates, either as the main product or as a by-product of a building stone business model.

We also believe paragraph 28 of NPPF is relevant where local plans should support rural enterprise.

Ultimately the National Park is protected by paragraph 116 of the NPPF and restrictions over and above National Policy should not be applied to building and roofing stone or any other mineral.

53. Is there sufficient support in the Plan for other stone uses including internal decoration and other stone products? How does the Plan support other potential stone markets that might develop over the Plan period?

Support for potential new stone markets would be achieved by having preferred areas.

Also, an acceptance that that para 116 (*the major development test*) of NPPF is in place and should be relied on to test proposal coming forward for new mineral development in designated landscapes. Furthermore, a recognition that para 114 of NPPF is not to be interpreted by planning authorities that building stone must be '*small-scale*' (see Q52 response). There is no logic to this thinking. Why should a particular sector of an industry be limited to only *small-scale* operations? Building stone companies have just as much right to be entrepreneurial and look to expand their markets. All this would benefit the rural economy in line with NPPF para 28.

END

1432 words including questions.