

Statement on behalf of the Mineral Products Association (MPA)(Additional Comments).

Independent Examination of Peak District National Park Development Management Policies; Examination in Public.

Matter 3 – Overview of Soundness

2. Paragraph 116 of the Framework resists major developments in National Parks except in exceptional circumstances and where it can be demonstrated they are in the public interest. Would policies DMC1 and DMMW1 be consistent with the Framework and the Core Strategy policies GSP1 and DS1 in as far they would restrict major development? Should any modifications to those policies be considered?

The following comments are in addition and in support of the previous statement made on behalf of the MPA in respect of Matter 3 (Question 2) of the Inspectors Matters and Issues.

In the original statement the MPA commented as follows;

Of equal concern is the supporting text for DMMW1 at paragraph 11.1, notwithstanding the proposed modification (M11.1; page 60) of the DMP document which as modified states;

*The Core Strategy Policies MIN1 to MIN4 set out the overall strategic context for minerals development in the National Park. The NPPF requires that when determining planning applications, local planning authorities should, as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks. **The general direction of core strategy policy is therefore to continue to enable progressive reduction in mineral working in the National Park.***

This text is unsound because it is not **Consistent with National Policy** – the plan does not enable the delivery of sustainable development in accordance with the policies in the Framework.

The effective conclusion in the last sentence, which states, *'The general direction of core strategy policy is therefore to continue to enable progressive reduction in mineral working in the National Park'*, constitutes a policy of *managed retreat* for minerals from the National Park which is far in excess of the requirement of National Planning Policy and is unsound. As previously stated the *'as far as practical'* clause is important as it reflects the fact that minerals can only be worked where they occur, and it may not be practical or viable to provide for or extract material from outside of National Parks and ensures in the interests of sustainable development that finite workable mineral resources are not sterilised.

In support of the concerns expressed by the MPA on this topic we refer to the recent *West Sussex Joint Mineral Local Plan (Schedule of Proposed Modifications January 2018)* and specifically MMI and MM2 on page 3&4 on the document which are reproduced below.

Schedule of Modification: x GENECON x Schedule of Modification: x

www2.westsussex.gov.uk/mlp/md002.pdf

Ref. No.	Old ref. No.	Part of Plan (Para / Policy / Table / Fig)	Proposed Modification	Reason for Modification
Executive Summary				
MM1		1st paragraph under heading "Chapter 2: Vision and Strategic Objectives"	The Authorities want economic minerals in West Sussex, which mainly comprise Aggregates, Silica Sand, Clay, Chalk, Stone and Hydrocarbons, to be produced and managed in a sustainable way. To that end, minerals resources will be safeguarded and exploited in a manner which only sees minerals development a move away from activity within the South Downs National Park (SDNP) take place in exceptional circumstances and in the public interest . The activity of minerals importation to wharves and railheads in West Sussex will be safeguarded from other non-minerals development. The replacement of primary minerals with secondary and recycled materials will be promoted. Provision of minerals will take place in ways that protect public amenity and the special character and environment of the County.	To ensure the Plan is consistent with national policy concerning development within National Parks
MM2		4th paragraph under heading "Chapter 6: Strategic Minerals"	With regard to the production of minerals from within the South Downs National Park, the strategy is to allow existing sites to be worked and not to plan for any specific additional capacity. This situation will be monitored in case exceptional circumstances were shown to exist in future which would merit the future provision of	To ensure the Plan is justified and consistent with national policy

West Sussex Joint Minerals Local Plan Schedule of Proposed Modifications
Page 3 of 44

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www2.westsussex.gov.uk/mlp/md002.pdf MD/002

		Supply"	additional supplies sourced from within the SDNP.	
MM3		Text under heading "Chapter 7: Strategic Minerals Site Allocations"	Chapter 7: Strategic Minerals Site Allocations The only allocations for an additional minerals sites is are as follows: <ul style="list-style-type: none"> • An extension to West Hoathly claypit (clay). • Ham Farm, Steyning (soft sand) The broad locations of the allocated sites is are shown on the Key Diagram and the boundary identified on Policies inset Maps. 'Development principles' for the sites have been identified, which are that is, specific issues that will need to be addressed at the planning application stage, as and when proposals come forward for the allocated site.	To ensure the Plan is justified and consistent with national policy
Chapter 1: Introduction to Minerals Planning				
MM4		Para 1.3.1	Amend last sentence: It also allocates a strategic minerals sites for clay and soft sand and includes a monitoring and implementation framework.	To reflect the deletion of Ham Farm (Policy M11)
Chapter 2: Vision and Strategic Objectives				

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The above modifications were made at the direction of the Inspector (Jonathan Manning) as the original proposal by West Sussex was to have in effect a managed retreat of mineral working from the National Park which was considered unsound and not consistent with National Policy concerning development in National Parks. We believe a similar circumstance exist with the policy proposal put forward by the Peak District National Park. A link to the full West Sussex Modification schedule is below.

<http://www2.westsussex.gov.uk/mlp/md002.pdf>

M E NORTH

01/15/2018