

Matter 10: Policies for Minerals

Submission by JA Maxwell



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JA Maxwell

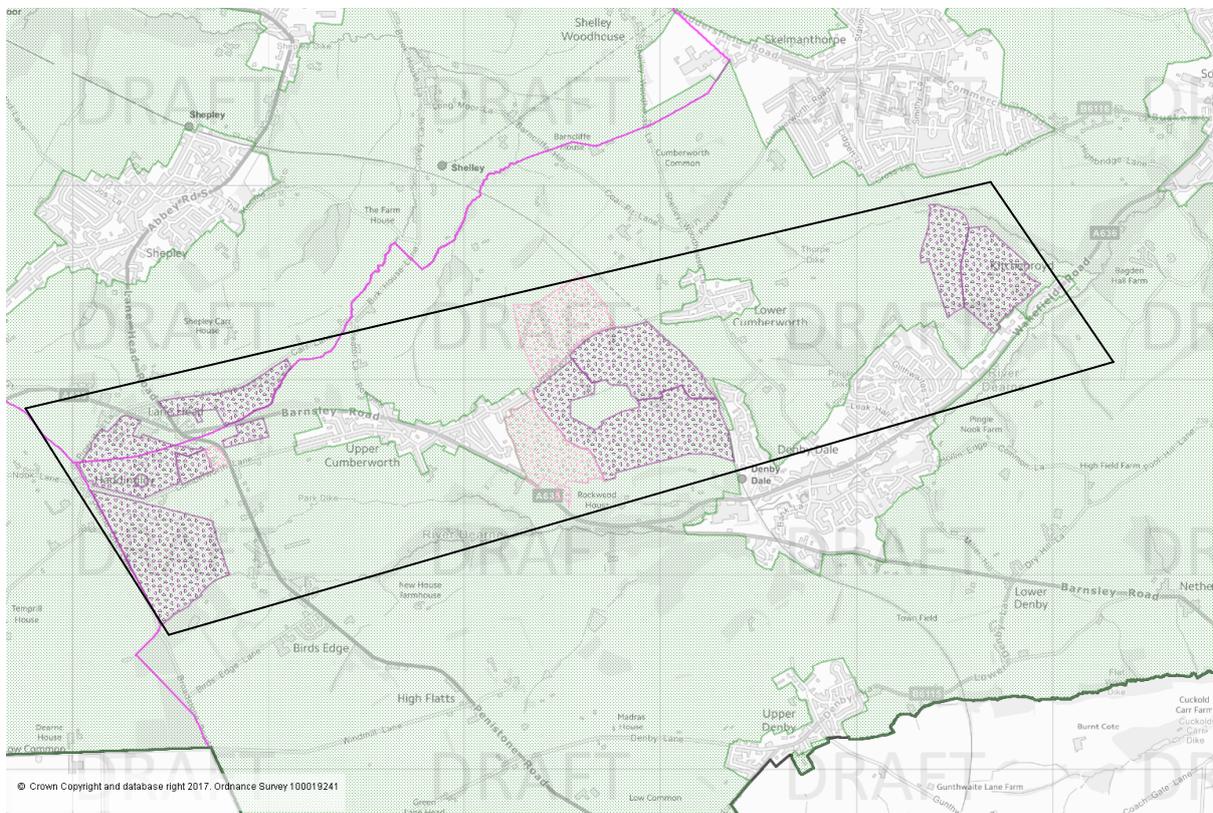
Matter 10: Policies for Minerals

Issue: Whether the minerals policies provide sufficient guidance to ensure the necessary minerals supply over the Plan period in accordance with the principles of sustainable development

1. I have previously commented upon this matter in 2015 and 2016 and I am sure that the inspector will have had sight of my submissions. I would like to add the following comments and will be happy to speak on Matter 10 at the public hearing.

Question c) PLP Green Belt

2. I am concerned at just how much of the greenbelt will be lost to minerals extraction. Taking just the 5 sq km of the Denby Dale area (please see map below) – there are currently 6 minerals sites comprising approximately 68 Ha. There are also proposals for another 6 sites (MES and MAS) in this small area removing an additional 79Ha of greenbelt. This would mean that in this 5 sq km of land around 1.5 sq km or 30% of the land mass would be given over to quarrying.
3. I do not think this is an appropriate use of the greenbelt and KMC should revisit the amount of quarrying it is proposing to carry out in greenbelt in this area.



Question f) Policy PLP 38

4. I am concerned that PLP38 does not reflect
5. Best Practice. It no longer includes any reference to stand off distances (250m from Clay and Shale and 500m from Sandstone) and includes a size threshold as an exemption criterion. Best practice from BGS states that “size thresholds as exemption criteria should be avoided in most cases, as the effects of sterilisation from a small development in an MSA can be significant.” The original MSA policy DLP39 in the 2015 report included the standoff distances and no size thresholds.
6. I have tried to find out why this policy has been altered. Looking at the feedback received in 2015 policy DLP 39 was supported by industry, minerals professional bodies and the public – so there was no need from feedback to change the policy. In their document “Publication Draft Local Plans; Summary of Main Changes (Nov 2016)” on Page 14 KMC detail why the changes have occurred - “Policy has been amended to include a site size threshold to clarify what is meant by infill. Policy reworded to exclude development within the curtilage of existing buildings. All minerals including those located in urban areas in mineral safeguarding areas. Amended supporting text to clarify the council will be involved in the delivery of policy aims.” No mention is made about why the specific threshold is set or why the application of buffer zones has been removed.
7. I also looked at document SD5 Annex7 Sustainability Appraisal. It detailed on page 92 the appraisal of PLP38 - “PLP38 outlines the criteria that needs to be demonstrated to allow surface development to be permitted in a mineral safeguarding area, *also outlining certain buffers for different mineral resources*. This ensures the efficient use of minerals as a resource, safeguarding them for future use. A significant positive effect is therefore likely on this SA objective.” So whoever wrote this and analysed the policy did so in the belief that the policy contained buffer zones and this is what created a significant positive effect.
8. As a member of the public I am confused as which policy is in place and why a perfectly good policy was altered.
9. One conclusion I have come to is that when the ME sites put forward in the 2015 plan were appraised against this Policy then many of them would not have been compliant with it.
10. From what I have read standoff distances have been seen as good practice for some time and authorities have been encouraged to adopt them by the BGS. Urban Vision – the consultants employed by KMC have also advised KMC of the need for specific buffer zones based on mineral type.

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11. According to BGS guidance issued in 2007 “A guide to mineral safeguarding in England October 2007”. Case study 3 looks at buffer zones (page 23). It is clear from some mineral planning decisions made since 2007 that KMC have not always followed this guidance.
12. As far as I can ascertain this guidance has been superseded by Mineral Safeguarding in England – good practice advice OR/11/046” – which is now the main source of advice. This report gives more examples of best practice. As I am sure that KMC wants to be the best council it can then it will obviously adopt recommendation from their own consultants (Urban Vision) and national bodies (BGS). I would therefore ask the Inspector to ask KMC to revisit this policy, adopt national best practice and re-instate Policy PLP39.
13. Further I would ask that KMC apply this best practice regarding buffer zones to their proposed mixture of ME sites and where necessary revisit their decisions.

Question g) PLP 38

14. I am concerned that KMC have not identified all the mineral resources that need to be safeguarded. I have previously expressed my concern that sources of minerals (sandstone) required for historic restoration have not been sufficiently safeguarded. The best source of mineral to repair a historic building is the original quarry that provided that mineral. An example of this relates to the nearby historic house of Chatsworth – where stone from the original remodel source quarry was used to repair the 300 year old historic building. See <http://www.menofthestones.org.uk/blog/post.php?s=2013-04-27-restoration-project-chatsworth-comes-clean>
15. KMC should do all it can to safeguard these “historic source” mineral sites.