

My Ref: TAR-050-M/JC/JJ/002

Your Ref:

Date: 4<sup>th</sup> May 2018

Miss K Trueman  
Programme Officer Solutions Ltd  
32 Devonshire Place  
Prenton  
Wirral  
CH43 1TU

[Sent via Email to Kerry.Trueman@peakdistrict.gov.uk](mailto:Kerry.Trueman@peakdistrict.gov.uk)

Dear Miss Trueman,

## **PEAK DISTRICT DEVELOPMENT MANAGEMENT POLICIES DOCUMENT**

### **STATEMENT ON BEHALF OF TARMAC LTD**

We are writing in response to the Matters and Issues raised by the Inspector as part of the Independent Examination of the Peak District National Park Development Management Policies. We are writing on behalf of our client Tarmac Trading Ltd and Tarmac Cement and Lime Ltd (Tarmac) who carry out mineral extraction at Ballidon and Tunstead/Old Moor Quarries.

Ballidon is a limestone aggregate quarry and supplier of lime powders. Tunstead/Old Moor includes an operational cement plant and the site supplies high purity industrial limestone for use within the chemical and other industries as well as a range of products including limestone aggregate for the construction market, and on-site manufactured lime products. Tunstead is of national importance in mineral supply terms.

Please find below our comments further to those submitted at the Publication version consultation of the Development Management Policies (dated 27<sup>th</sup> January 2017).

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### **Matter 3 – Overview of Soundness**

#### **Issue 2: Are the individual policies clear, justified and consistent with national policy and will they be effective?**

*Point 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?*

Policies DMC1 and DMMW1 of the Development Management Policies document are considered unsound in their current form as they do not reflect the NPPF - specifically paragraph 116 which seeks to control major development in National Parks. The NPPF states that major development should be refused, 'except in exceptional circumstances and where it can be demonstrated they are in the public interest'. Applications should include an assessment of, 'need for the development including any national considerations and the impact of permitting it or refusing it upon the local economy, cost and scope for developing elsewhere or meeting the need for it in some other way and any detrimental effect on the environment, landscape and recreational opportunities and the extent to which they could be moderated' (our emphasis).

Development, including extensions at major mineral sites are likely to be classed as major forms of development and the policies as worded would restrict potential mineral development. Paragraph 144 of the NPPF seeks, 'as far as is practical', to provide for the maintenance of landbanks of non-energy minerals from outside National Parks. Whilst it is the intention to limit mineral extraction within the Peak Park, the NPPF is not categorical that all extraction is unacceptable and consideration needs to be given to the significance/importance of the resource. Appropriate weight should be attributed to the economic and sustainability benefits of development at or extending an existing operation where significant investment, infrastructure and markets already exist. In particular, the need for development should be given appropriate weight in cases where there are clear economic benefits and continuation in supply of mineral resources are of national importance.

The policies should be worded to identify that there are exceptions to the test for major development in the National Park that reflect the tests of paragraph 116 of the NPPF.