

# North Yorkshire Minerals & Waste Joint Local Plan

## Examination in Public – Hearings Statement by W Clifford Watts

### Matter 1 – Minerals (Overview)

**Issue: Whether the vision, objectives and strategic minerals policies seek to provide a sufficient supply of locally and nationally important minerals in an efficient and sustainable manner and whether the proposed allocations are the most appropriate**

#### *Overview*

- 1. Does the MWJP identify all the main challenges to providing minerals sustainably in the Plan area, and are these challenges properly reflected in the vision and objectives and incorporated in policy?*
- 2. How does the MWJP seek to achieve the efficient use of minerals resources?*
- 3. Bearing in mind that minerals can only be worked where they are found, does the MWJP seek to achieve the most appropriate spatial strategy for minerals development? How is this reflected in the Plan?*

#### **W Clifford Watts Statement**

1. By way of introduction, our comments on all the Inspector's questions summarises our representations to the plan, expanding on them as necessary to make a point in response to the questions. We also need to bear in mind that North Yorkshire is the largest county in England, and the Joint Local Plan area must be the largest in area by far. This calls for a special approach.
2. In addition, the principal change to the Plan requested is the allocation of Whitewall Quarry and recognition that the Jurassic limestone is a strategic issue for the eastern part of the plan area. As such, our representations are that the plan is unsound because it is not Positively Prepared, not Justified, not Effective and not Consistent with Government Policy. All our comments in this statement and others should therefore be construed to support these reasons and will not be repeated for each question. Where appropriate, we shall repeat the suggested changes to the plan.
3. In terms of **question 1**, the Councils have not addressed all the major challenges to the sustainable supply of minerals. In particular, and arising from our objections to the non-allocation of Whitewall Quarry we identified a lack of attention given to the eastern part of the plan area. The company's major interests lie in the eastern part of the plan area. We supply aggregates, ready mix concrete and precast concrete products, building stone

and recycled aggregates principally to the Scarborough, Ryedale and York districts plus the northern part of the East Riding and the North Yorks Moors and coastal towns from our base at Whitewall Quarry. In addition, the company's sand and gravel resources in the East Riding serve that locality plus Hull and the eastern part of the North Yorkshire plan area. We are a SME family owned company based in Bridlington but we have a strongly defined niche market across an area from the coast to York in the west and from Hull in the south to Whitby in the north. In addition, we have a thriving lime business which serves the agricultural community over a much wider area, especially to the west and north.

4. In terms of the geography of this area, it is isolated from the major transport corridors, with the only major route being the A64 from the west, which is the main link between York and Scarborough. North-south connections are much less developed, which contributes to its isolation and need for economic development. The area is strongly rural in character but contains the significantly large settlement of Scarborough with easy access to the major market of York. We estimate this part of our market area within the Local Plan area contains about 150,000 people or about one quarter of the population of North Yorkshire. However, if our total market area described above is looked at, the company has an opportunity to serve the construction needs of almost 900,000 people.
5. Within this eastern part of the plan area there is one significant sand and gravel quarry at Wykeham (which mainly serves the York market), and three active rock quarries, two of which are small scale and Whitewall Quarry. In fact, the Vale of Pickering and the limestone area above Malton are the only realistic sources of aggregates for this eastern part of the plan area; there are obvious constraints to developing the potential of the National Park, whilst the northern part of the East Riding is underlain by Chalk and has no aggregate resources, which is similarly the case with the City of York.
6. In terms of **question 2** a substantial proportion of the area's aggregate needs is already imported. Local stone is not strong enough to meet the highest specifications for road making and sub base material, but is more than adequate to provide for the bulk fill needs of the market and some lower spec concrete needs which form about 32%-40%

of the market for crushed rock in the region<sup>1</sup>. In addition, in the Scarborough and Ryedale districts, although there is only one sand and gravel producer with a dedicated readymix plant (which mainly serves the York market), there are four other readymix plants, which depend on imported mineral. In the case of W Clifford Watts alternative supplies must be hauled from up to 27 miles away. Rock for specialist end uses must be hauled as far away as 45 miles, which would grow significantly if local supplies are compromised. This does not in our view constitute the most efficient use of minerals, and more competition is needed for local firms to bring down mineral miles and localise aggregate supplies. This will require a more flexible approach to policy than is present in the Plan, perhaps by way of introducing a criteria-based addition to a policy which would allow sustainability benefits in reducing mineral miles to be argued. This would be in addition to any allocations considered necessary.

7. In terms of **Question 3** it should be clear that the company asserts that the Joint Authorities have not been successful in achieving a sustainable spatial strategy, mainly by not recognising the special needs of the eastern part of the plan area. The division of sand and gravel into two distribution areas, whilst commendable, looks to be oversimplistic. All the allocations for sand and gravel are in the western part of the plan area, as are the Areas of Search. Only one allocation for rock is made in the eastern part of the plan area, but this is not large and is not considered by the Joint Authorities to be of strategic significance.
8. We submit that in order for the plan to be sound in terms of national policy which requires provision of a steady and adequate supply of aggregates, and to fulfil other sustainability aims, it should not just focus on the quantum of provision, but further refine its distribution both in terms of area and control. For example, of the sand and gravel allocations about 60% are in the control of one company, which would seem to be contrary to national policy for mpas to not let large landbanks be bound up in a few sites (NPPF para 145 bullet point 7). The plan should recognise the special needs of more isolated areas and be more flexible in its approach to achieve sustainable outcomes.

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<sup>1</sup> Source: AM 2104 Table A3 Sales of crushed rock by product (end use) in 2014; Yorkshire & Humber column – Appendix WCW 1