

Local Development Framework for Bradford

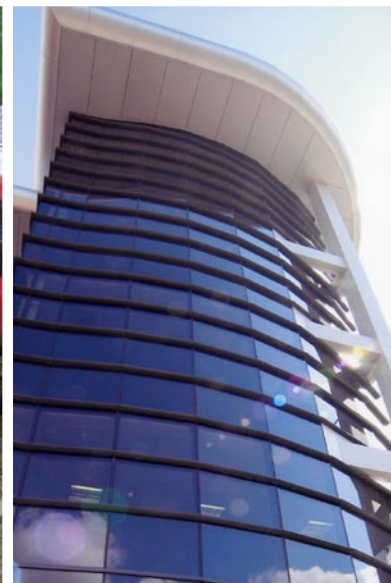
Core Strategy

Further Issues and Options

Summary of Written Representations and Consultation Event Log

Topic Paper 7: Environment (Minerals) Update

March 2009



City of Bradford MDC

www.bradford.gov.uk

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1.0 CONSULTATION OVERVIEW

BACKGROUND

- 1.1 The Core Strategy is the document that will show broad areas for growth and restraint, and will set out the role that different areas of the District will have in 2026. . There are three stages in the production of the Core Strategy, the first being the pre-production stage that is termed 'issues and options' stage; the next is the preferred option stage and lastly examination stage prior to adoption of the document. It will become the statutory development plan for the district once adopted
- 1.2 In line with the requirements of the new Planning system, Bradford Council has undertaken public consultation on the issues and options for the Bradford in January 2007. The Council undertook further consultation at this stage following the publication of revised housing figures in the Regional Spatial Strategy (the regional development plan published by the Yorkshire and Humber Assembly) in October 2007. In addition to this, further consultation was also undertaken on the Waste Management and minerals elements of the Core Strategy. This consultation report outlines the consultation and responses received to the minerals consultation.

FURTHER ISSUES AND OPTIONS CONSULTATION:

TOPIC PAPER 7: ENVIRONMENT (MINERALS) UPDATE

- 1.3 Following consideration of comments received to the initial Topic Paper 7: Environment in 2007, and to take account of changes to the national and regional policies, the Council felt it necessary to revise the documents relating to the environment to include further information surrounding the issue of minerals. This enabled stakeholders to assist in choosing options regarding minerals and to make further comments, prior to the preparation of the Preferred Options document.
- 1.4 Consultation on the Further Issues and Options documents for Topic Paper 7: Environment (Minerals) update took place between 6th November until 12th December 2008. In total the Council received 2 written representations to this consultation document. This was deemed to be a disappointing response.
- 1.5 Following the above consultation, the Minerals and Waste Team took the step to arrange a minerals stakeholder meeting, targeting the statutory bodies as well as minerals industry, such as site operators, minerals agents and stone merchants with an interest in the area. This meeting was held on 4th February 2009. A total of 15 people attended this event.

OBJECTIVES OF THE CONSULTATION

- 1.6 This consultation with minerals stakeholder had two broad objectives:
- Raise awareness of the Local Development Framework and the Core Strategy for Bradford.
 - To specifically engage with key minerals industry stakeholders in exploring the key issues and options within the District.

PARTICIPANTS

- 1.7 The Council targeted invites to site operators, mineral agents and stone merchants with an interest in the area. Section 2.0 sets out those who were invited to the events and a sample invite letter.

MINERALS STAKEHOLDER MEETING PROGRAMME

- 1.8 The event took the form of a 2-hour session, which started with a general introduction and scene setting presentation setting out minerals planning issues within the District and potential planning policy options. The attendees were then divided into three break-out groups whereby policy options were discussed and comments made were recorded.

DOCUMENTATION

- 1.9 The consultation focused on the following Further Issues and Options document:
- Topic Paper 7 Environment (Minerals) Update
- 1.10 The minerals stakeholder meeting (4th February 2009) included a PowerPoint presentation which set out a more detailed analysis and set of policy options the key minerals relevant to the District. This can be found in section 8 of this report.

BREAK OUT GROUPS

- 1.11 The break out groups were designed to allow people to express their opinions on the issues and options for minerals within the District until 2026.

2.0 LIST OF ORGANISATIONS AND GROUPS

2.1 The following people were specifically contacted as part of the further consultation on Topic Paper 7: Environment (Minerals) Update paper and the Waste Management and Sustainability Appraisal documents. Please note that the majority of these contacts will be duplicated from the previous consultation lists.

- A & S
- Aggregate Industries UK
- Airedale Partnership
- Allan Bailey
- ASHLAR stone products
- Associated Waste Management Limited
- Autospares Bingley Limited
- Bank Top Quarry
- Bedminster International (UK) Limited
- Berry And Marshall (Bolton Woods) Limited
- Biffa Waste Services Ltd
- Bioganix Ltd
- Birks Royd Stone
- Bradford Chamber of Commerce & Industry
- Bradford Hospitals NHS Trust
- Bradford Organic Composting Scheme
- Bradford Waste Traders
- Bradley Natural Stone Products
- CBCMDC – Department of Regeneration (Dockfield Road)
- CBMDC - Environment & Neighbourhoods
- CBMDC - Waste Project
- CEMEX UK Operations
- Charles Raistrick
- Colas Ltd
- Combined Masonry Supplies
- Covanta Energy Limited
- CPRE Bradford District
- Cullingworth Parish Council
- Darrington Quarries Ltd
- Denholme Residents Action Group
- Denholme Town Council
- Dennis Gillson and Son
- Dennis Gillson And Son (Haworth) Limited
- Dial A Skip Service Limited
- Dolmens
- ENER-G plc
- English Heritage
- Ennstone Johnstone
- Environment Agency
- Erlings Works
- Fairport Engineering Ltd
- Farrar Natural Stone
- George M Watson (Construction) Limited
- Gill Demolitions
- GW Butler Limited
- Hanson Aggregates
- Hard York Quarries Ltd
- Harry Sanders Ltd
- Highways Agency, Yorkshire & Humber
- John Hornby And Sons Limited
- Keighley Town Council
- Lafarge Aggregates & Concrete UK
- Leeds Environmental Organisation Limited
- Leeds Friends of the Earth
- M & G Stone Ltd
- Midgeham Cliff End Quarry Ltd

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- Miles J Delaney
- Mineral Resources (Yorkshire) Limited
- Mr Bryan Scott
- Myers Group
- Natural England
- Northern Stone & Paving Co
- Omega Proteins Ltd
- Orchid-environmental
- P Casey (Enviro) Limited
- P Waddington And Sons Ltd
- Parkinson Spencer Refractories Ltd
- Quarry Products Association
- Russell Stone Merchants
- S M Building Products
- Shanks
- Shipley Stone Sales
- Sibelco UK
- SITA UK Limited
- Skipton Properties
- Sterecycle
- Stone Federation Great Britain
- Tarmac Northern Limited
- TEG Environmental Ltd.
- The Bingley Stone Company (Yorkshire) Ltd
- The British Aggregates Association
- Thomas Crompton Developments Ltd
- University Of Bradford - Estates And Facilities
- Veolia Environmental Services Plc
- VISTA ENVIRONMENTAL LIMITED
- W E Leach
- Waste Recycling Group Limited
- West Riding Crushing Services
- West Riding Waste Disposal Limited
- WRG
- Yorkshire Aggregates Ltd
- Yorkshire and Humber Assembly
- Yorkshire Poultry Products
- Yorkshire Water Services Ltd
- Yorwaste Ltd

3.0 CONSULTATION LETTER

City of Bradford Metropolitan District Council

www.bradford.gov.uk

Department of Regeneration

**Local Development Framework
8th Floor Jacobs Well
Bradford
BD1 5RW**

Tel: (01274) 434950

Fax: (01274) 433767

Minicom: (01274) 392613

E-Mail: Andrew.marshall@bradford.gov.uk

My Ref:

06 November 2008

Dear Sir or Madam

Bradford District Local Development Framework – Core Strategy Issues and Options Further Consultation

- **Waste Management Further Issues and Options**
- **Initial Sustainability Appraisal of Waste Management Further Issues and Options**
- **Core Strategy: Topic Paper No 7 Environment (Minerals) Update**

You may remember that the Council undertook extensive public consultation on the Core Strategy Issues and Options for the Bradford Local Development Framework between February and July 2007.

Following consideration of comments received, and to take account of changes to the National and Regional policies, it was felt necessary to revise the above documents and provide more information to assist the stakeholders in choosing options and making further comments, prior to the preparation of Preferred Options.

I now write to inform you that the Council is currently consulting on the Waste Management Further Issues and Options, the Initial Sustainability Appraisal of Waste Management Further Issues and Options and Core Strategy: Topic Paper No 7 Environment (Minerals) Update reports. All these documents can be downloaded from the Council's website via the Local Development Framework pages found at www.bradford.gov.uk/ldf. Hard reference copies are also available in the Council's planning offices at: Jacob's Well, Bradford, and the Town Halls at Ilkley, Keighley and Shipley; or in the main libraries at Shipley, Bingley, Keighley and Bradford Central Library. In addition, hard copies will be made available on request from the LDF Group.

The Council welcomes your views and comments and will take these into account when producing the Preferred Options for the Core Strategy. Please send your comments to the following FREEPOST address:

**Bradford Local Development Framework
FREEPOST NEA 11445
PO Box 1068
BRADFORD
BD1 1BR**

Alternatively, comments should be marked Core Strategy Consultation and emailed to ldf.consultation@bradford.gov.uk or faxed to (01274) 433767.

Comments should be received by **12 December 2008**.

Please note that representations cannot be treated as confidential and a schedule of all representations received will be published.

Should you require clarification on any of the above or further information please contact Ali Abed on the above number or Carole Howarth on (01274) 433770. Alternatively, you can email ldf.consultation@bradford.gov.uk with your enquiry.

Yours faithfully,



Andrew Marshall
Strategy Manager

Encs

4.0 LIST OF THOSE WHO SUBMITTED A WRITTEN REPRESENTATION

List of consultees that submitted general comments on Topic Paper 7: Environment (Minerals) Update paper as part of the Further Issues & Options consultation for the Core Strategy.

1. English Heritage (Rep No.3)
2. Government Office for the Yorkshire and Humber (Rep No.5)
3. Highways Agency (Rep No.8)
4. Berry & Marshall (Rep No.14)

5.0 SCHEDULE OF WRITTEN REPRESENTATIONS

GENERAL COMMENTS		
Rep ID	Name / Organisation	Summary of Representation to Topic Paper 7: Environment (Minerals) Update
8.	Highways Agency	The only actions are to reserve the Agency's position in relation to developing policy, options and site selection and to indicate the need to minimise or avoid additional HGV traffic on the SRN. Also need to ask to be kept informed if any quantification of volumes produced and transported outside the District becomes available.

Question 1: How should the LDF contribute to meeting the region's need for aggregates including crushed rock and sand and gravel?		
Rep ID	Name / Organisation	Summary of Representation to Topic Paper 7: Environment (Minerals) Update
3	English Heritage	In view of the significant permitted reserves of crushed rock and aggregate within the sub-Region, we would favour a strategy based upon restricting further extraction of crushed rock aggregates, maximising the use of secondary materials where appropriate, and of safeguarding such resources from sterilisation by other forms of development.
		In terms of sand and gravel extraction, given the uncertainty regarding the viability of known reserves within Bradford, it would seem logical to explore further the potential of these resources within the District.
		Whilst some aggregate production is currently taking place as a secondary activity from quarries mainly producing sandstone in block form (and, indeed, it is recognised that such aggregate production can assist the economic viability of a quarry), it is important that such aggregate production does not compromise the ability of those quarries to provide building or roofing stone or result in better quality stone being utilized for production of aggregates. This is particularly so given that where there are already significant aggregate reserves within this part of the sub-Region.

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Question 2: How Should the LDF deal with the supply of building stone and flagstone?		
Rep ID	Name / Organisation	Summary of Representation to Topic Paper 7: Environment (Minerals) Update
3	English Heritage	Further to our comments to the initial consultation on the Core Strategy, we are pleased to note that the LDF is now examining the strategy for safeguarding and maintaining the supply of building stone.
		In view of the lack of evidence about the extent of the potential sources of building and roofing stone within the Bradford, as a starting point, it is essential that an assessment is undertaken of the extent and location of such materials within the District. To this end, English Heritage would be willing to liaise with the Council (perhaps as part of a wider assessment of the resource within West Yorkshire as a whole) about how it can assist in the delivery of such an assessment.
		In line with the advice in MPS1 Annex 3, the LDF should set out a strategy to safeguard sources of building and roofing stone against sterilisation from other forms of development.
5	Government Office for Yorkshire & Humber	1. Para 2.4: MPAs should also “facilitate sites and operations” (RSS policy ENV4). In the Core Strategy, Bradford will need to identify the broad locations of sites (we note the call for sites at para 5.0). You should also be aware of the judgement in <i>Associated British Ports v Hampshire County Council & Others</i> (4 July 2008), as mentioned above. The High Court held that certain policies in the Hampshire County Council Waste and Minerals Core Strategy were unsound in that they had not identified the broad locations of sites (albeit not details of specific sites).
		2. Paras 2.13 and 3.2: these say that there are likely to be constraints on the exploitation of sand and gravel resources in West Yorkshire, and that West Yorkshire currently makes a minimal contribution to sand and gravel supply within the region. A brief explanation is needed for clarity in future documents.
		3. Para 3.3 Option 5: “Ensuring that sand and gravel and crushed rock aggregate resources are safeguarded against sterilisation by other forms of development” – this is a requirement, therefore not really an option.
		4. Examples of Minerals Policy Issues to be covered in a Core Strategy

Written Representation submitted following Minerals Stakeholder meeting		
Rep ID	Name / Organisation	Summary of Representation to Topic Paper 7: Environment (Minerals) Update
4	Berry and Marshall (Bolton Wood) Limited	<p><u>Safeguarding:</u></p> <ol style="list-style-type: none"> 1. Any quality building stone 2. Building stone output requires allowance for aggregate production to maintain viable business. 3. Local historic evidence. 4. More complex planning issues are involved. 5. Possibly 6. No minimum size. Size is relevant to scale and quality of operation. <hr/> <p><u>Supply:</u></p> <ol style="list-style-type: none"> 1. Relative to volume of building and civil engineering work taking place. 2. Number of alternatives is relative to potential output of allocations. Product needs might be sourced from builders, builders merchants, civil engineers but considerable trade does come from private people for stone industry produce. 3. Business should be allowed to market as best it can, be it local or national. 4. Specialised area but needs consideration. 5. Yes 6. Site requirement are best coming from the stone industry. 7. Has many planning considerations. 8. Yes if situations at existing sites are satisfactory. 9. Quite possibly – can be unknown until tried or viable evidence of survey. 10. Yes.

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RESPONSE TO CALL FOR SITES (MINERALS)			
Rep No.	Consultee	Site	Location
4	Berry and Marshall (Bolton Wood) Limited	Land adjacent to Bolton Woods Quarry	Bolton Hall Road, Bradford
		Land adjacent to Deep Lane Quarry	Clayton, Bradford
		Land adjacent to Fagley Quarry	Eccleshill, Bradford

6.0 CONSULTATION EVENT INVITE LETTER

City of Bradford Metropolitan District Council

www.bradford.gov.uk

Department of Regeneration

[Address]

Planning Service

Minerals and Waste Team
3rd Floor Jacobs Well
Bradford
BD1 5RW

Tel: (01274) 434605

Fax: (01274) 722840

Minicom: (01274) 392613

E-Mail: Michael.eaglestone@bradford.gov.uk

12 January 2009

Dear Sir/ Madam

MINERALS PLANNING FOR THE BRADFORD DISTRICT

As you may be aware, the Planning Service is currently preparing a new set of plans for the district called the *Local Development Framework*. One of the first documents to be produced as part of this new planning framework is the *Core Strategy*, which will include broad policies relating to the supply of minerals and safeguarding of mineral resources over the next 20 years. Following on from this document we hope to make specific allocations for sites and/or areas for future minerals extraction on detailed proposals maps.

The minerals industry has an important role to play in the process of drawing up these policies and plans. You can influence the content of the new planning documents by putting forward new or extended sites to be considered for future minerals extraction and by advising the planning authority on the realities facing the minerals industry and the specific issues which you feel should be addressed in minerals planning policies.

Without the input of industry it is possible that potential future new or extended minerals extraction sites could be missed, making it harder to gain planning permission for these sites in the future. You would also miss an opportunity to influence planning policies for the future and shape a new development framework which is sensitive to the issues facing quarry operators and the stone industry.

The Council recently sent out a consultation document setting out issues and options for minerals planning in Bradford (enclosed). Unfortunately no responses to this consultation were received from the minerals industry.

In order to engage with the minerals industry we propose to hold a meeting with quarry operators within the Bradford District. During this meeting we can explain the process for producing the Local development Framework and broadly outline the issues and options for minerals planning within Bradford. Through group discussion sessions you will then have an opportunity to express your opinions on the policy options and put forward views on how planning policies should respond to the issues facing the minerals industry. Following the meeting a further 2 week period will be allowed for you to submit written comments and put forward sites or areas for future minerals extraction.

I am looking to arrange a morning meeting beginning at 10:00 on Wednesday 4 February 2009 at Jacobs Well in Bradford City Centre. Please respond to this letter by confirming whether you will be able to attend this meeting.

If you have any questions regarding this letter please contact Michael Eaglestone on 01274 434605 or michael.eagestone@bradford.gov.uk.

Yours sincerely

Michael Eaglestone
Minerals and Waste Planning Officer

City of Bradford Metropolitan District Council

www.bradford.gov.uk

Department of Regeneration

[Address]

Planning Service

Minerals and Waste Team
3rd Floor Jacobs Well
Bradford
BD1 5RW

Tel: (01274) 434605

Fax: (01274) 722840

Minicom: (01274) 392613

E-Mail: Michael.eaglestone@bradford.gov.uk

29 January 2009

Dear Sir/ Madam

MINERALS STAKEHOLDER MEETING

Further to my recent letter inviting you to attend a Minerals Industry Stakeholder Meeting, I am writing to you to confirm details of the event and notify you of a change of venue. The meeting will be in the form of an initial presentation followed by group discussions and will allow you opportunity to put forward your views on the issues affecting the minerals industry and how new minerals planning policies should respond to these issues.

Venue: The Design Exchange (Lockwood Room), 34 Peckover Street, Bradford, BD1 5BD

Date and time: Wednesday 4 February 2009 10:00 - 12:30

Notes: There is no parking on site, please report to reception and they will direct you to the correct room, tea and coffee will be provided.

If you have any questions regarding this letter please contact Michael Eaglestone on 01274 434605 or michael.eagestone@bradford.gov.uk .

Yours sincerely

Michael Eaglestone

7.0 LIST OF PEOPLE INVITED TO MINERALS STAKEHOLDER MEETING

7.1 The following list of organisations were invited to attend the Minerals Stakeholder Meeting on the 4th February 2009:

ORGANISATION	SECTOR
Bardill Barnard	Planning Agent
The Land & Development Practice	Planning Agent
Silkstone Environmental Ltd	Planning Agent
Fennell Green & Bates	Planning Agent
The Mineral Planning Group	Planning Agent
Dolmens	Stone Merchant
Russell Stone Merchants	Stone Merchant
S M Building Products	Stone Merchant
Shiplely Stone Sales	Stone Merchant
Clayax Yorkstone Ltd	Stone Merchant
M & G Stone Ltd	Stone Merchant
Myers Group	Stone Merchant
Dennis Gillson and Son	Quarry Operator
Hard York Quarries Ltd	Quarry Operator
Midgeham Cliff End Quarry Ltd	Quarry Operator
Birks Royd Stone	Quarry Operator
M & M Stone	Quarry Operator
Ashlar Stone Products	Quarry Operator
Farrar Natural Stone	Quarry Operator
Parkinson Spencer Refractories Ltd	Quarry Operator
P Casey (Enviro) Limited	Quarry Operator

8.0 DELEGATE LIST

8.1 The table below lists the individuals representing various organisations that attended the Minerals Stakeholder Meeting on the 4th February 2009.

NAME	ORGANISATION	SECTOR	GROUP
Carole Haworth	CBMDC – Minerals and Waste Team	Facilitator	A
Samantha Fernie	CBMDC – Minerals and Waste Team	Facilitator	B
Michael Eaglestone	CBMDC – Minerals and Waste Team	Facilitator	C
John Carlon	Fennel, Green and Bates	Minerals Agent	A
Mark Barrett	Silkstone Environmental	Minerals Agent	A
Dolmens Representative	Dolmens Ltd	Stone Merchant	A
Serg Dulay	Dennis Gillson & Son Ltd	Minerals Operator	A
Shaun Berry	Johnsons Wellfield Quarries	Minerals Operator	A
Martin Millmore	Minerals Planning Group	Minerals Agent	B
Andrew Hollingworth	Fennel, Green and Bates	Minerals Agent	B
Gary Hodgkinson	M & G Stone	Stone Merchant	B
Roger Sadler	Midgeham Cliff End Quarry Ltd	Minerals Operator	B
Cedric Gillson	Dennis Gillson & Son Ltd	Minerals Operator	B
James Bailey	Hainworth Shaw Quarry	Minerals Operator	C
Jessica Morgan	Minerals Planning Group	Minerals Agent	C
Mary Spiesberger	Minerals Planning Agent	Minerals Agent	C
Edward Marshall	Berry and Marchall (Bolton Wood) Limited	Minerals Operator	C
Tony Barry	P Casey (Enviro) Limited	Minerals Operator	C

9.0 POWERPOINT PRESENTATION

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BRADFORD LOCAL DEVELOPMENT FRAMEWORK

CORE STRATEGY – ISSUES & OPTIONS

Minerals Stakeholder Event
Wednesday 4th February 2009

Design Exchange, Bradford City Centre

Department of Regeneration

City of Bradford Metropolitan District Council
www.bradford.gov.uk

Welcome & Event Outline

Carole Howarth
(Senior Planning Officer)
Minerals and Waste Planning Team

City of Bradford Metropolitan District Council
www.bradford.gov.uk

Event Outline

- 10.00 Welcome and Event Outline
- 10.05 What is a Core Strategy?
- 10.10 Issues and Options for Minerals Planning in Bradford
- 10.30 Introduction to Discussion Groups
- 10.35 Refreshments break.
- 10.50 Discussion Group Session
- 12.00 Summary and where next
- 12.15 Finish

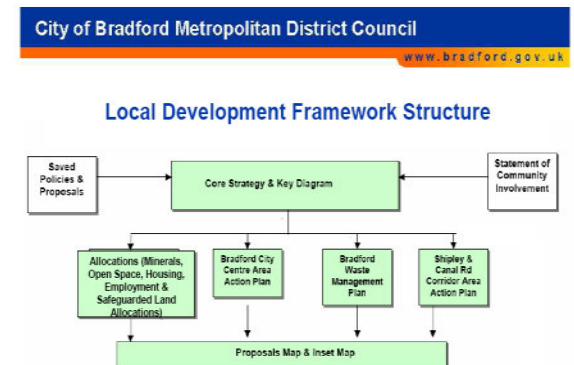
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Scope and Purpose

- Objective: Engage key minerals industry stakeholders in the policy development process.
- What we will do: Briefly explain the LDF process, set out the potential options for future minerals planning policies, listen to and record your comments.
- What you can do: Put forward your views on the issues facing the minerals industry within Bradford and the planning policy options which would best respond to these issues.
- What we are not here to do: Air grievances, discuss individual planning applications or development control decisions/ process.

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What is the Core Strategy?



Core Strategy

- First DPD sets out the 'big picture' through a spatial picture & Vision
- Other LDF documents deliver detailed approach in line with Vision, Strategy and Core Policies.
- Not site specific but needs to guide broad locations of development, change and restraint etc
- Written statement with spatial policies supported by a key diagram

Issues for the Minerals Industry and Options for future Minerals Planning Policies and Land Allocations.

Minerals Elements of Core Strategy

- Identify key minerals for Bradford
- Describe significant issues related to the supply and use of those minerals
- Set out the approach to safeguarding minerals and broadly show the location of Minerals Safeguarding Areas
- Set out the approach to be taken to secure adequate and steady supplies of minerals needed by society and the economy within the limits set by the environment. (landbanks)
- Indicate how the location of future minerals extraction will be guided through subsequent Development Plan Documents (site allocations/ preferred areas/ areas of search).

Issues

- **Building Stone:**
 - Scarcity of certain types of natural stone products (threat to quality of built heritage, sustainability of importing stone)
 - Sterilisation of resources by other forms of development and ecological designations
- **Crushed Rock Aggregate:**
 - Excessive West Yorkshire landbank (36.8 years)
 - Production of aggregate at building stone quarries (sustainability, scale of impacts)
- **Sand and Gravel:**
 - Only 2 sites with permitted reserves in West Yorkshire
 - Potential increase in West Yorkshire apportionment
 - Resources within Bradford relatively constrained

Issues

- **Coal**
 - No active deep or shallow coal mines
 - Potential shallow coal resources within south-eastern quarter of district.
 - Energy White Paper 2007
- **Fireclay**
 - No active workings
 - Questionable viability of future workings primarily for fireclay.

Options – Building Stone

- **Supply:**
 - Make no allocations for new or extended building stone quarries and instead consider need for new workings on a case by case basis based on the evidence put forward in planning applications.
 - Consider any sites for new or extended building stone quarries put forward by stakeholders and make allocations accordingly.
 - Maintain the preference for the extension (or reopening) of existing quarries rather than opening new workings.
 - Proactively search for sites to allocate for building stone extraction within the plan period (constraints, dormant and disused workings, diversity of supply, lack of quantitative evidence).
- **Safeguarding**
 - Ensure that all sandstone resources identified by BGS are safeguarded.
 - Apply constraints to safeguarding (urban areas, ecological designations)
 - Only safeguard proven resources adjacent to existing or historic workings.
 - Do not safeguard sandstone resources given their relative abundance.

Options – Aggregates

- **Supply:**
 - Make no allocations for new or extended workings for primary aggregate quarries based on the excessive sub-regional landbank.
 - Allow limited aggregate production at building stone quarries based on economic and operational requirements at individual sites.
 - Maximise aggregate production at building stone quarries (resource utilisation, scale of impacts, restoration)
 - Prohibit aggregate production from any new building stone reserves permitted within the plan period (landbank)
- **Safeguarding**
 - Safeguard sandstone resources for both viable aggregate and building stone resources.
 - Specify that only viable building stone resources should be safeguarded but not aggregate.
 - Do not safeguard sandstone resources given their relative abundance.

Options – Sand and Gravel

- **Supply:**
 - Consider any sites for new sand and gravel extraction put forward by stakeholders and make allocations accordingly.
 - Proactively search for sites to allocate for sand and gravel extraction within the plan period (constraints, commercial concerns about viability).
 - Given the uncertain viability of sand and gravel resources within Bradford make no allocations at the current time but annually monitor and review the situation.
- **Safeguarding**
 - Ensure that all sand and gravel resources identified by BGS are safeguarded.
 - Apply constraints to safeguarding (urban areas, ecological designations)
 - Do not safeguard sand and gravel resources within the district.

Options – Coal and Fireclay

- **Supply:**
 - Consider any sites for coal/ fireclay extraction put forward by stakeholders and make allocations accordingly.
 - Maintain the presumption against coal extraction but annually monitor and review the situation to respond to any changes in national planning guidance or renewed interest in commercial coal/ fireclay extraction within the district.
- **Safeguarding**
 - Ensure that all shallow coal and fireclay resources identified by BGS are safeguarded.
 - Apply constraints to safeguarding (urban areas, ecological designations)
 - Do not safeguard shallow coal/ fireclay resources given the relative abundance and uncertain commercial viability of the resource

Introduction to Discussion Groups

Where Next?

What we will do:

- Record and consider consultation feedback
- Consider consultation comments, any other relevant evidence and sustainability appraisal, and produce a preferred options document setting out what policies we think the new LDF Core Strategy should contain.
- Following a further consultation period and review of the preferred options document put forward a submission draft Core Strategy document for public examination by the Planning Inspectorate.

What you can do:

- Use the further 2 week consultation period to submit any written comments/ evidence or put forward sites/ areas you consider appropriate for future minerals extraction.
- Read the preferred options consultation document to be published in spring/ summer and make any additional comments/ suggestions during the consultation period.
- Submit comments on the submission draft Core Strategy and attend/ speak at the public examination.

Web Information

- **Council general planning:**
http://www.bradford.gov.uk/the_environment/planning_service/
- **Bradford Local Development Framework:**
http://www.bradford.gov.uk/the_environment/planning_service/local_development_framework/
- **Department of Communities & Local Government:**
<http://www.communities.gov.uk/>
- **Planning Advisory Service:**
<http://www.pas.gov.uk/>

Contact Information

- **Local Development Framework Group**
 - local.development.framework@bradford.gov.uk
 - ldf.consultation@bradford.gov.uk
 - 01274 434050
- **Minerals and Waste Planning Team**
 - Minerals.Planning@Bradford.gov.uk
 - 01274 434370 (via contact centre)

Questions?

Discussion Group List

Group A	Group B	Group C
Facilitator: Carole Howarth	Facilitator: Samantha Fernie	Facilitator: Michael Eaglestone
John Carlon	Martin Millmore	Chris Ballam
Mark Barrett	Andrew Hollingworth	Jessica Morgan
Dolmens Representative	Gary Hodgkinson	Melvyn Poole
Serg Dulay	Midgeham Representative	Edward Marshall
Shaun Berry	Cedric Gillson	Tony Barry

10.0 FACILITATOR NOTES

SUMMARY OF COMMENTS MADE DURING GROUP DISCUSSIONS:

Topic/ Issue	Group A Comments	Group B Comments	Group C Comments
SAFEGUARDING (GENERAL)	<ul style="list-style-type: none"> • Safeguarding should ensure that housing does not impact on future opportunities for mineral extraction. • Dormant Quarries should be safeguarded. 	<ul style="list-style-type: none"> • Safeguarding all minerals would be a huge task; there is therefore a need to prioritise on the basis of unsatisfied demand, particularly for dimension stone. • Safeguarding should be linked to other policies i.e. housing to ensure prior extraction has been considered. 	<ul style="list-style-type: none"> • Housing developments should not threaten mineral extraction. • Priority should be given to safeguarding potential building stone reserves over other forms of development of the land. • Safeguarding the entire sandstone resource area identified by BGS would be of limited use, as it is unlikely that unproven resources will be worked in the future. Instead policy should focus on safeguarding resources adjacent to existing quarries especially where other development is encroaching. • Building stone quarrying generally takes place over a long period of time. Prior extraction is more suitable to other minerals, such as

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Topic/ Issue	Group A Comments	Group B Comments	Group C Comments
			opencast coal workings which can be worked over a shorter period.
WHAT MINERALS SHOULD BE SAFEGUARDED?	<ul style="list-style-type: none"> • Dimension/ Building Stone, Block Stone and Flag Stone resources should be safeguarded. • Sand and gravel should be safeguarded to ensure that resources are not sterilised. • Geologically, fire clays sites in Bradford are world class and should be safeguarded. • There are firms still making products using fireclay, so fireclay sites should be safeguarded. • Coal has to be worked in order to get to the fireclay. • Surface coal mining reserves and clay reserves could become very important resources in the future and we should safeguard such sites across the district. 	<ul style="list-style-type: none"> • Society has a significant need for minerals, all should be safeguarded. • Coal and fireclay are very important in terms of future reserves. Thus should also be safeguarded. • There is a duty to consider aggregates for safeguarding. 	<ul style="list-style-type: none"> • It would not be appropriate or practicable to exclude aggregate resources from MSAs. It is extremely difficult to accurately predict the quality of a sandstone resource before it is worked; therefore it would be difficult to determine whether a sandstone resource under a proposed development site was suitable for building stone or just aggregate without actually working the mineral.

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<p>SHOULD MSAS INCLUDE URBAN AREAS?</p>	<ul style="list-style-type: none"> • Housing developments should not threaten mineral extraction. We should quarry the site before it is redeveloped for housing. • Some sites which are being redeveloped for housing are good quality mineral sources. • Developers should be urged to extract minerals from the site before they are redeveloped. • We must have a criteria based policy approach to ensure we do not lose opportunities for minerals extraction to housing developments. 	<ul style="list-style-type: none"> • Urban areas should only be included in MSAs if the resource is of a very high calibre, otherwise this could be too restrictive. • Coal is a different issue, as open cast coal can be extracted quickly before development takes place. 	<ul style="list-style-type: none"> • New development, particularly housing, should not be allowed close to the existing quarries in built-up/urban areas.
<p>SHOULD A BUFFER BE APPLIED TO MSAS, IF SO WHAT SIZE?</p>	<ul style="list-style-type: none"> • A 200m MSA buffer zone may be appropriate. • Buffer zones should also be flexible subject to topography, local climate, etc • Buffer zones are dependent upon the operation and the location. 	<ul style="list-style-type: none"> • Buffer sizes can range from 50m to 500m. There is no perfect answer. • It depends on the type of production for individual sites, machinery used and traffic levels. 100m to 250m could be reasonable. It would depend on whether just dimension stone was being produced or aggregates as well. 	<ul style="list-style-type: none"> • Given the differences in scale and operational practices between quarries, it is difficult to generalise an MSA buffer size which would be appropriate to all. Urban quarries tend to operate with practically no buffer from surrounding housing. • The relatively low impact working

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		<ul style="list-style-type: none"> • Too narrow a buffer can require mitigation measures that reduce viability. • It was recognised that the public are looking for wide buffers. The quantities of dust produced can be limited by weather and location of quarries. The government has produced studies which have recommendations of up to 1k. 	<p>practices used at building stone quarries can allow working in close proximity to residential areas however this is reliant on operators successfully mitigating impacts.</p> <ul style="list-style-type: none"> • 250 - 400m was mentioned as a buffer size which has been used in the past.
MINERALS SUPPLY ISSUES	<ul style="list-style-type: none"> • Lack of variety/ diversity in available building stone supply is a concern. • Riven flagstone (Elland Flag) is in very short supply and should be a priority in searching for sites for future extraction and safeguarding. • Sawn flags are easier to source. • A number of quarries within the district producing flagstone have closed. • There are small areas of sand 	<ul style="list-style-type: none"> • There is a drastic shortage of building stone, especially that of certain calibres. • The shortage of blockstone is restricting work that can be done. Only stone of a limited calibre is currently available. • Reserves of high quality stone have decreased in the area, new allocations are required. • Greater consideration should be given to local minerals supply issues and local demand e.g. Where will stone come from for regeneration? From what distance should stone be imported? Is 	<ul style="list-style-type: none"> • High quality sandstone resources suitable for block stone and flag production are limited not abundant and therefore their value should be recognised in new planning documents and land allocations. • The reserves of good quality stone have diminished greatly in Yorkshire/Bradford. So new allocations for sandstone building stone quarries are essential. • Quarrying for building stone is a 'hit and miss' activity where the quality

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	<p>and gravel reserves in West Yorkshire. There is conflict with built up urban areas. Geologically, sand and gravel resources may not be located in the district.</p> <ul style="list-style-type: none"> • It is worth searching for sand and gravel, but there are unlikely to be large sites. The eastern periphery of West Yorkshire has the sand and gravel reserves. • The geology of Bradford District means that we do have sites for coal and fire clay. • There should not be a presumption against open cast mining per se. We must recognise that fireclay requires open cast coal mining. • There are problems with stone slate supply due to a lack of skills. • Production of stone slate from resources within the district 	<p>stone from abroad of sufficient quality?</p> <ul style="list-style-type: none"> • There is limited knowledge of good quality local stone. There are questions about sustainability and quality of supply from abroad. • A lack of supply can make blockstone so expensive that developers are reluctant to use it. • Quarrying is not always accurate; the quality of stone cannot always be predicted. Supply also depends on the faces being worked and the agreed phasing of extraction. • Supplies from quarries can be managed according to the level of economic activity and demand. 	<p>of reserves can not always be accurately predicted.</p>

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	<p>should be viable. We have stone slate quarries towards Thornton for example, but the skills are no longer available to work the material.</p> <ul style="list-style-type: none"> • Skills are being lost in the local area due to a lack of flagstone quarry reserves. 		
<p>MINERAL DEMAND/ NEED ISSUES</p>	<ul style="list-style-type: none"> • Block stone and flag stone is important for historical buildings and structures in the district and beyond. • The Dimension Stone produced in the district is sought after and is unique to the district/sub region. • Flagstone producers are very busy and cannot satisfy demand. • Dimension Stone and Flags are exported outside the district/ region. Local products are also supplied for local use; walling stone for example is used locally. 	<ul style="list-style-type: none"> • Bradford needs to be recognised as an area built in block stone and sandstone. There is therefore a need for local stone to maintain the local identity of Bradford and to avoid having to transport stone significant distances. • Block and flag stone are important for the historical built environment for the district and beyond. • Stone from Bradford is exported to other areas of the country; London was highlighted as an area that has used a lot of stone from this area. Thus demand for the stone is not limited to the area it has been worked. 	<ul style="list-style-type: none"> • The majority of Building stone and flag produced in Bradford is exported to other regions, London and, to a lesser extent, overseas markets. York Stone is a widely marketable product and sales are not limited to areas where buildings have traditionally been built from this material. • The 'built heritage' market was stated to represent a relatively small proportion of sales with new build projects being far more significant. • Stone slate is expensive to produce and demand is not consistent.

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	<ul style="list-style-type: none"> • Building stone supply is a national and international issue. There is demand nationally and internationally. York Stone come from Bradford, Leeds, Calderdale and Kirklees. We must cater for the strong demand. • Dimension stone is important for local industry/economy, local jobs, trades, skills. 	<ul style="list-style-type: none"> • Priority should be given to the supply of minerals for regional and local markets. • The need for stone for historic buildings is an element of local demand. Stone for historic buildings needs to be matched. Imported stone should only be used as a last resort. • The demand for stone to support historic buildings would be insufficient to support supply alone without a demand from new build. • Bradford should seek to keep up demand by having a policy for funding public art projects which use local stone. • Demand has only fallen in the short term due to the recession. • Dimension Stone and flag are important for local industry, heritage and skills. 	<p>Demand for this material is heavily related to built heritage conservation policies adopted by Councils.</p>

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<p>HOW SHOULD THE LOCATION OF NEW MINERALS DEVELOPMENT BE GUIDED THROUGH THE LDF?</p>	<ul style="list-style-type: none"> • Minerals extraction can only take place where suitable resources occur; therefore mineral planning authorities should not seek to influence the location of new minerals development. • We would support a combination of approaches with both broad areas of search and site specific safeguarded land. • Areas of search should be allocated for Coal and Fireclay, sandstone and Elland Flag resources. • The information in relation to other minerals is very market sensitive, so it may not be desirable to highlight individual sites for search. • There should not be a general presumption in favour of extending existing sites, as the opening of new or re-opening of 	<ul style="list-style-type: none"> • Areas of search are relatively easy to produce by sieve analysis, but there needs to be a recognition that these would not necessarily lead to planning permission being granted. • A combination of areas of search, preferred areas and site allocations was considered to be the best option. • The preference for extensions to existing sites could form an element in future policy, but new sites should still be considered on their merits. 	<ul style="list-style-type: none"> • Potential new sites as well as existing areas need to be looked at; however new minerals extraction of unproven resources is unlikely due to the expense and practicalities of exploratory work and therefore allocation of greenfield sites would be of limited practical benefit unless resources had been proven. • Areas adjacent to existing operational minerals extraction sites are the most likely locations for new minerals development.

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	<p>dormant/ disused sites might be preferable in certain cases.</p> <ul style="list-style-type: none"> • We should keep all options open. • Options for the re-opening of dormant and disused quarries should be explored before looking at Greenfield sites. 		
<p>SHOULD ANY CONSTRAINTS BE APPLIED TO EXCLUDE AREAS FROM BEING ALLOCATED FOR FUTURE MINERALS EXTRACTION?</p>	<ul style="list-style-type: none"> • Minerals extraction inevitably has an impact on ecological designations (bats, wetlands etc) • European Designations and SSSIs do impose constraints on minerals extraction. 	<ul style="list-style-type: none"> • Minerals can only be extracted where these occur. • It may be possible to work around sensitive geological areas. A high percentage of SSSIs are former quarries. • Ancient monuments can be a constraint. • Consideration could be given to the weighting of constraints, although this was considered to be too complicated to be the best solution. 	

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<p>IS THE RE-OPENING OF DORMANT OR DISUSED SITES LIKELY TO BE COMMERCIALY VIABLE?</p>	<ul style="list-style-type: none"> • We have a lot of dormant quarries that could be opened again. • Some quarries are dormant and disused due to the nature of technology at that time. New technology/machinery could make dormant quarries and disused quarries viable again. 	<ul style="list-style-type: none"> • Much depends on the individual quarry, on whether it has restoration conditions and on whether it is greenfield or brownfield. 	<ul style="list-style-type: none"> • Dormant and disused quarries could potentially be re-opened; however the sites should be investigated thoroughly, as there may well be reasons why the site is no longer worked and would not be viable for future working. • Historic working methods were very labour intensive and digging was a slow process. Modern quarrying techniques may allow the exploitation of resources that were not viable to access in the past. • There was not thought to be a significant number of disused quarries within Bradford that would be suitable for re-opening.

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<p>AGGREGATE PRODUCTION AT BUILDING STONE QUARRIES</p>	<ul style="list-style-type: none"> • Quarries should recover aggregates and make use of all possible resources in the interest of the environment and efficiency. • Aggregates are a by-product from the quarrying of building stone. • Stopping aggregate production at building stone quarries would sterilise mineral resources. • Dimension Stone and aggregates quarrying in Bradford are intertwined. • Planning Authorities should focus on maintaining supplies of locally sourced aggregates/stone. This is a sustainable solution, better for the environment (proximity principle). • In the interest of sustainability, we should utilise every type of stone/mineral in the district, use local aggregates and support local industries. 	<ul style="list-style-type: none"> • There is an argument that the aggregate produced at a building stone quarries could be classed as secondary aggregate. • The landbank is within the control of a few operators. The landbank is an artificial concept. There is a need to consider real demand and supply issues. There is potential for assessing individual quarry production in relation to supply. • Quarries should not be classified as producing one material or another. They are producing a combination of building materials. • In some cases it would not be practical to operate a quarry without some aggregate production without it becoming waste bound. • Government policy is for there to be at least 10 years supply of aggregates. • The suitability of recycled aggregate has not been proven and it is mainly 	<ul style="list-style-type: none"> • There is an argument that the aggregate produced at a building stone quarries could be classed as secondary aggregate. • Prohibiting aggregate production at building stone quarries would make most quarries impractical to operate. The consequence of not being able to sell aggregate would be for quarries to become waste-bound and unworkable or to have to store large obtrusive mounds of overburden/ mineral waste on adjoining land. • Aggregate produced at building stone quarries is generally sold at low cost and is sometimes practically given away is it can not compete with the high quality limestone aggregates produced in other areas. • No building stone quarry operator would crush any stone reserves

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	<ul style="list-style-type: none"> Production of aggregates does lead to challenges in terms of restoration of workings. 	<p>used as fill material.</p>	<p>which are capable of producing building stone; as the value of building stone is much greater than aggregate.</p> <ul style="list-style-type: none"> The aggregates levy ensures that secondary aggregates have a competitive advantage over primary aggregates. Sandstone aggregates and recycled aggregates rarely supply the same markets. Recycled aggregates were said to be mainly only suitable as fill material.
<p>SOURCES OF EVIDENCE TO INFORM MINERAL ALLOCATIONS/ POLICIES</p>	<ul style="list-style-type: none"> Bradford has good BGS information. BGS electronic maps and historical OS maps are a good basis to start from. The minerals industry should assist the local planning authority by sharing knowledge of the industry and the data (site investigations). The industry should look to supply better site investigation 	<ul style="list-style-type: none"> The basic geological maps are a starting point, but can give a false picture in local terms. Borehole data from operators would be useful to improve this. There is a lack of information about coal in the area. Need could be based on demand for stone for buildings. There should be support for the use of local stone. 	<ul style="list-style-type: none"> The British Geological Survey may be able to provide information on where past exploratory surveys and the areas where resources have been proven. The Planning Authority should place significant importance on quarry operators' knowledge of the mineral reserves present within particular quarries and their understanding of

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	<p>information (get our facts and figures right) so that we can have an informed discussion.</p> <ul style="list-style-type: none"> • The Coal Authority could provide information on evidence in relation to Coal and Fire Clay. • We support the findings of the Symonds Report and the BGS Minerals Factsheets. • There should be West Yorkshire supply and demand study, as part of the evidence for the core strategy, which should focus on block stone quarrying. • Coring is a good starting point in terms of determining the viability of mineral resources. • The only way to determine viability is to dig and trial. 	<ul style="list-style-type: none"> • Useful assessments of supply depend on an understanding of the extraction process and viability. • There was uncertainty whether data was available to identify preferred areas. Again the need for borehole data was noted to help identify accurate areas. 	<p>which areas are likely to be suitable for future extraction.</p> <ul style="list-style-type: none"> • Exposures from existing workings and the experiences of individual quarry operators are generally the best sources of information on the potential viability of new resources.

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<p>PUBLIC PERCEPTION OF THE MINERALS INDUSTRY</p>		<ul style="list-style-type: none"> • It was recognised that the public's lack of knowledge of minerals workings is an issue for the industry and better PR and educational visits can be worth considering. • There is a poor public perception of large operators. 	<ul style="list-style-type: none"> • The benefits of quarrying rarely come to the fore during contentious planning applications whilst local community objections may be given significant weight. Wider publicity of the benefits of quarrying would greatly benefit the industry. • The importance of the building stone industry to Bradford should be highlighted in the Core Strategy. The building stone industry provides employment, keeps traditional crafts and skills alive and provides high quality building materials for use all over the UK.
<p>GENERAL COMMENTS</p>	<ul style="list-style-type: none"> • We would like to see a flexible approach to small scale quarrying as it's a 'craft business' as it is skills based. • An annual get together between the Local Planning Authority and the local Minerals industry should be held to understand 		<ul style="list-style-type: none"> • The circumstances of each building stone quarry are very different and having set of generic policies may not be helpful. Instead the operational needs of each site should be considered and policies should have sufficient flexibility to allow for the unpredictability of

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	<p>developments in the industry and also changes to planning (Exchange information). This could form part of monitoring and managing mineral planning policies and proposals.</p>		<p>resources and markets for finished products.</p> <ul style="list-style-type: none"> Minerals planners should work more closely with the Minerals Industry, who have greatest knowledge of mineral resources and reserves. The planning authority should meet with quarry operators for in-depth discussions on how each quarry should develop in the future and what land allocations should be made to facilitate this.

11.0 SUMMARY OF KEY ISSUES FROM STAKEHOLDER MEETING

The notes below provide a summary of the key points raised during the stakeholder meeting.

SAFEGUARDING

- Safeguarding is particularly appropriate for proven resources adjacent to existing workings and for particularly scarce resources such as those capable of producing dimension stone.
- Some sites which are being redeveloped for housing are good quality mineral sources.
- Surface coal mining and fireclay resources could become very important in the future and we should safeguard such sites across the district, geologically, fireclay sites in Bradford are world class.
- Except for coal, urban areas should only be included in MSAs if the resource is of a very high calibre, otherwise this could be too restrictive.
- MSA buffer sizes can range from 50m to 500m. Given the differences in scale and practices between quarries, it is difficult to set an MSA buffer size which would be appropriate to all. Urban quarries tend to operate with practically no buffer from surrounding housing.

SUPPLY AND DEMAND

- The importance of the building stone industry to Bradford should be highlighted. The building stone industry provides employment, keeps traditional crafts and skills alive and provides high quality building materials for use all over the UK.
- A large proportion of building stone and flag produced in Bradford is exported to other regions, London and overseas markets. York Stone is a widely marketable product and sales are not limited to areas where buildings have traditionally been built from this material.
- There is a drastic shortage of building stone, especially that of certain calibres. Reduction in variety/ diversity of supply is also concerning.
- The Dimension Stone produced in the district is sought after and is unique to the district/sub region.
- Reserves of high quality stone have decreased in the area; riven flagstone (Elland Flag) is in particularly short supply.
- A lack of supply can make blockstone so expensive that developers are reluctant to use it.

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- There are problems with stone slate supply due to the expense of producing it and a lack of skills.
- There is a need for local stone to maintain the local identity of Bradford and to avoid having to transport stone significant distances.
- Block and flag stone are important for the historical built environment for the district and beyond.
- There are concerns about the sustainability of importing stone and the quality of stone supplied from abroad.
- There should not be a presumption against open cast mining; we must recognise that fireclay requires open cast coal mining.
- The aggregates landbank is within the control of a few operators. The landbank is an artificial concept. There is a need to consider real demand and supply issues.
- Prohibiting aggregate production at building stone quarries would make most quarries impractical to operate.
- No building stone quarry operator would crush any stone reserves which are capable of producing building stone; as the value of building stone is much greater than aggregate.

LOCATION OF NEW MINERALS DEVELOPMENT

- Minerals extraction can only take place where suitable resources occur; therefore mineral planning authorities should not seek to influence the location of new minerals development.
- Areas adjacent to existing operational minerals extraction sites are the most likely locations for new minerals development.
- The opening of new or re-opening of dormant/ disused sites might be preferable to the extension of existing quarries in certain cases.
- Options for the re-opening of dormant and disused quarries should be explored before looking at greenfield sites.
- New technology/machinery could make dormant quarries and disused quarries viable again.
- Exposures from existing workings and the experiences of individual quarry operators are generally the best sources of information on the potential viability of new resources.

GENERAL

- Minerals planners should work more closely with the Minerals Industry. Policies should have sufficient flexibility to allow for the variability of quarry characteristics and the unpredictability of resources and markets for finished products.

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