APPENDIX 5 – Representations – Support

Detailed Summary Responses

Ineos Fluor – Glebe Mines is the only UK source of fluorspar, a key raw material for manufacturing fluorochemicals, used in many vital consumer goods such as asthma inhalers, refrigerators, telephone components. There is not enough commercially available fluorspar wordwide to replace this raw material source. Planning permission is needed to enable continued operation of Glebe Mines and a large proportion of Ineos plants in Runcorn. Without planning permission,110-150 direct and indirect jobs are expected to be lost as a result of Glebe Mines closure and 1300-1400 from downstream plants in Ineos Fluor & Chlorvinyls. The loss of revenue to the UK economy will amount to £280 million annually. Glebe Mines is a very responsible company: it only removes limestone directly associated with the fluorspar and has an excellent record of site remediation. Remediation in the seventh year will enhance biodiversity though the provision of ponds, bat caves, & retained cliff faces for nesting birds. The extension of Tearsall will provide enough ore for Glebe to meet Ineos' requirements while helping to fund investment in a greater proportion of underground mining in the future. This will reduce reliance on open pit mining resulting in a reduction in lorry loads as less associated limestone would be mined. Believes that national importance of fluorspar and exceptional circumstances have been demonstrated. A successful application is absolutely essential for the ongoing survival of Glebe Mines and a significant number of Ineos production plants in Runcorn. 150 jobs are dependent on this application. The prolonged determination of the application is having a serious impact on the performance of Glebe and the downstream chain due to the dwindling nature of currently accessible fluorspar reserves. The application satisfies the exceptional circumstance criteria in MPS1: The mineral is essential for ongoing operation of the fluorochemical industy and the chemical industry is of national strategic importance. Fluorspar in the UK can only be extracted economically in the Peak District. If unsuccessful there will be very significant job losses across Derbyshire and in particular the North West and will jeopardize Glebe's contribution to the local economy of £3 million & associated operations at Runcorn with an annual turnover of £280 million. Cannot obtain by importing into the UK the quantities of fluorspar that we need and at a price which makes fluorochemical manufacture economic. Glebe are proud of record of restoration and believe it to be best in the class. Following restoration, the Tearsall site will be much improved compared to its current condition. The landscape has been shaped by and given a lot of its unique characteristics by mining operations. Glebe has been part of the Park for over 50 years. Balance the human consequences with the environmental considerations, which are well catered for.

Chemical Industries Association – stresses the interdependent nature of chemical manufacture in the UK; the changed economic outlook affecting alternative sources of fluorspar internationally; the importance to the economy of NW England of the continuation of fluorspar mining in the area. Fluorspar is the main raw material in making HF which is used in a wide variety of other chemical manufacturing processes. The future of a significant part of the UK chemicals industry is reliant on Ineos Fluor which depends on the extraction of fluorspar at Tearsall. It is not feasible to import the mineral to produce fluorochemical compounds in Runcorn. International alternative sources of imported fluorspar have been adversely affected recently and CIA is aware from independent reports that China has a policy of restricting access in favour of its own rapidly developing chemicals sector. Without Tearsall, Glebe Mines, Ineos Fluor's downstream fluorochemicals and a significant part of ineos ChlorVinyls upstream supply business will become uneconomic by the end of 2008. Tearsall is the only viable provider in the UK of short to medium-term relief for fluorspar demand. A loss of 1500 jobs in Runcorn and Derbyshire and £280 million in income estimated. Individuals place enormous value on the current and potential recreational importance & benefit of the PDNP but the recovery of minerals is a long established feature of the area & Glebe Mines is one such active site. Ineos have undertaken to restore the site to a high standard. Strongly supports. Stresses concern over job losses that would result which would be damaging to both the local & regional economy at a time of uneconomic uncertainty. Numerous delays have put pressure on Glebe's dwindling reserves of fluorspar – important given the inability to import from China.

Halton Borough Council – the economic implications for the Borough & Liverpool City Region are a material consideration to which significant weight should be given. The economic base in Halton is changing but the chemical industry remains crucial providing considerable numbers of direct & indirect jobs. Halton is ranked at the 30th most deprived borough in the country & unemployment remains above both regional & national average. The Ineos & other companies on the Runcorn site are linked and frequently inter-dependent. Overall there are approx 3000 jobs associated with the Ineos Runcorn complex. About 240 are related to Ineos Fluor. If Ineos loses its supply of fluorspar, about 1500 jobs would be lost. This would be devastating to the Halton & surrounding area. As the world's chemical industry develops, the need to maintain an averall competitive edge becomes paramount & marginal cost increases may jeopardise long term sustainability. The NP has a difficult task balancing the economic & environmental considerations. The environmental improvements effected by Ineos in Runcorn is a material issue. The overall impact of the Ineos operation is steadily improving and is a positive factor. Refers to MPS1 & Fluorspar Factsheet. The current application is consistent with the requirements imposed in respect of mineral development in a National Park. Refers to consistency with the PDNPA's corporate outcomes, actions & priorities. The supply of fluorspar from the PDNP is critical to the future of the chemical industry in Halton which supplies industrial users throughout the country. There is a very strong case that the economic benefit for Halton, for the NW & nationally, are of sufficient weight to justify the grant of permission. All reasonable efforts should be made to protect & enhance the character of the area by careful planning & design. It is also relevant to recognise Ineos' commitment & willingness to work with the local community.

Mining Association of the UK – the association represents the non-energy industrial mineral mining operators. There is not an abundance of industrial minerals in the UK and members have to extract minerals where they occur. Fluorspar is only found around Stoney Middleton & Weardale. The size of the veins made Weardale unviable and extraction ceased years ago. The Glebe operation is the only viable source of fluorspar in the UK. PPS 12 states minerals 'should take account of the need to contribute appropriately to national, regional & local requirements at acceptable, social, environmental & economic costs'. The extraction of fluorspar is the start of a production process that spreads to other regions of the UK. When considering the environmental impact need to take into account the socio-economic effect refusal will have on other regions. There would be a loss of 60+ direct jobs & 50+ indirect jobs locally and the loss of over 1000 jobs regionally with the closure of Ineos Fluor & part of Ineos Chlor. The importation of fluorochemicals at premium prices could also impact on further downstream processes. The BGS report 'The need for indigenous fluorspar production in England' concluded that UK extracted fluorspar is a critical raw material for the domestic chemicals industry; flurochemicals are essential components in many everyday products; insufficient fluorspar is available in the market to satisfy Ineos Fluor's requirements; downstream customers such as nuclear and petroleum are key UK strategic industries. The application is only for 600,000 tonnes over 6 years which is relatively small compared with an aggregates operation.

The Barytes Association – writing in support of their member's proposal. The Association represents the interests of 16 producers and processors of barytes worldwide who account for 2.5 million tonnes or 30% of world mined output. Barytes like fluorspar is particularly vulnerable to the high volume of overall worldwide output from China accounting for 50%. The increasing unavailability of Chinese fluorspar and the impact on the domestic consumer industries for a stable supply is concerning to our members. This has already occurred with other minerals and is an underlying threat to the barytes supply The UK is already a net importer of barytes so the local added-value barytes filler consumer industry in Derbyshire is potentially vulnerable as is the domestic oil business. The EU are currently looking at greater security for raw material supply and safeguarding of resource and encouragement for a greater reliance on domestic production. This would also give confidence for long-term investment in Europefor both the supply and consumer industries and employment. It would also reduce dependence on imports particularly where disruptions have already occurred as with fluorspar and potentially barytes. An EU

communication is expected Autumn 2008 and hopefully a directive on raw material supply soon after. Barytes and fluorspar are in the top 20 most strategically endangered materials in the UK supply chain for ensuring manufacture of added-value products for the national need. We understand that the situation at Glebe is now critical with regard to surface ore sourcing and the continued viability of the operation depends on securing this permission. Without this permission there is a knock-on effect on downstream and associated operations of the parent group with potential consequences to 1500 jobs in Debyshire & Runcorn. A parallel situation developed in France following the closure of their domestic fluorspar industry in 2006. Within a year the downstream hydrofluoric acid plant closed and much of their fluorochemical business.

Mersey Partnership – the Partnership is the inward investment agency & tourist board for Liverpool City region & leads city region-wide collaboration on economic development. Member representation is currently 500. Provision of fluorspar is critical to the long-term sustainability of Ineos Fluor which employs 500 people & Ineos Chlorvinyls which is the last remaining chlorine producing plant in the UK. Both companies are vital to the manufacturing base of the Liverpool City Region & are key drivers for the North West economy through the 13,000 direct & indirect jobs they support in the region with a total of 133,000 jobs being potentially affected on a UK-wide basis. The impact on the companies cost base if fluorspar had to be imported from abroad would place a significant proportion of these jobs across the supply chain in serious jeopardy. Ineos Fluor is the UK's sole producer of HF which is an essential raw material for a number of other critical industries across the North of England including nuclear power, chemical manufacturing & oil refining. Failure to approve would likely close Glebe & Ineos Fluor's Runcorn operations resulting in these strategically important industries for the UK becoming dependent on imported HF and the inherent physical & economic risks that this brings. Fully supports.

Individual Comments

- Glebe Mines is the only UK source of fluorspar and not enough is available globally to sustain manufacturing plants in the UK;
- Jobs at Glebe Mines (60 skilled, 100 indirect) are full-time non-seasonal professional roles providing diversity of employment in contrast to local industries of agriculture and tourism which are largely unskilled and part-time;
- If Glebe is forced to close, the loss of jobs will have a significant impact on the local area;
- Knock-on effect to Glebe's parent company, Ineos Fluor, which is dependent on Glebe for its fluorspar used to manufacture a range of essential everyday products;
- If Glebe is forced to shut down, downstream manufacturing at Ineos will become uneconomic with total job losses of 1500;
- Only extracts host limestone directly associated with the fluorspar;
- Greatly improving the site after only 6 years mining
- Not commercially viable to source fluorspar from elsewhere;
- Any limestone extracted will be backfilled into the site;
- Glebe has a good environmental track record and commitment to land remediation; plans involve extensive work to remedy any impact on the local environment; restoration will enhance local biodiversity; company will reinstate footpaths and bridleways giving better public access; overall there will be a significant positive impact on the appearance of the area;
- Lorry movements will be restricted to the normal working day; Tearsall will replace extraction at Winster Moor and materials will be transported on established routes
- Ineos operations in Cheshire are a vital cornerstone of the UK economy and support over 130,000 direct & indirect jobs across the country;
- Glebe currently directly employs 64/60 people and is indirectly responsible for the employment of a further 50-90/50-70 people locally;
- Glebe injects about £3 million into the local economy; Glebe & directly associated downstream manufacturing in INEOS generates a gross sales value for the UK economy of £280/£230 million;

- Extension at Tearsall wll provide enough ore for Glebe to meet its requirements while helping to fund investment in a greater prortion of underground mining in the future; reducing reliance on open-pit mining, resulting in significant reduction in lorry loads as less associated limestone would be extracted;
- If overseas fluorspar was available in the quantities required the carbon footprint would be substantially worse than locally mined fluorspar and have an adverse impact on climate change;
- Can only extract fluorspar where it exists and it is only a temporary use of land;
- Too much is made of lorry movements and quarrying disturbance and not enough to create a living working environment for local inhabitants instead of a postcard park for tourists;
- The argument that we could import spar from China no longer applies and there is a national need for fluorspar; chemical and fluorspar industry interdependency shown in France whereby chemical industry ceased within 6 months of the fluorspar industry closing down;
- Quarrying is one of the traditional industries that has evolved the landscape; there has been mining and quarrying on this unspoilt hillside for the past 500 years and nature soon restores this temporary use of the land;
- Support local industry as tourism does not provide an income for all;
- Mineral working is part and parcel of Derbyshire & if run properly & responsibly will have a positive effect on local shops and industry;
- Safety, housekeeping and the environment are a high profile element of working practices at Ineos Fluor;
- This application can satisfy the provision of jobs and essential materials and be sensitive to the environment to minimise the effect of opencast workings and make good the disruption to the land.
- The only economical source of fluorspar is from Derbyshire. Fluorspar imported from abroad will cost 50% more than spar mined in Derbyshire.
- The proposed opencast mine is a relatively small extension as such the visual impact will not be significant to local residents;
- Noise & traffic will not be significantly different from present levels as the location rather than the volume of mining is being changed;
- Failure of the application would devastate communities and local economies would suffer;
- Concerns over mining are often based on emotion rather than objective analysis;
- Investment by Ineos in Cheshire has given a brighter future to employees, contractors, regional economy and community; to remain sustainable and competitive the site at Runcorn needs a supply of raw material;
- Few alternative employment opportunities for the local population in the North West;
- Climate change issues should prevail over the local issues involving the temporary use of a small piece of land;
- Associated transport costs and rising prices through escalating demand in developing counties combine to make the cost of imported fluorspar unfeasible; fluorspar is the only source of fluoride for the manufacture of hydrogen fluoride which is a strategic chemical in the glass, electronics, petroleum, nuclear fuels, pharmaceutical, chemical and polymer industries; woud be beholden to other nations for supplies which may cease in times of crisis; inability to manufacture hydrogen fluoride in the UK would compromise our nuclear industry and ultimately our strategic deterrent;
- Cavendish Mill came on stream in 1965 but remains a significant capital investment; if the plant were to be closed unlikely that there would be sufficient economic justification for investing in a new plant as adequate reserves could not be proved in advance due to the small size of deposits to justify the high capital investment; fluorspar resources should not be conserved for some undefined future strategic demand;
- In today's global business climate sourcing fluorspar externally is not a viable option; the partnership between Glebe & Ineos would provide business stability and job security;

- Company has integrity and long-term commitment and has successfully remediated the Deep Rake working;
- Long-term strategy for Glebe is to shift the bulk of fluorspar extraction from open pit to underground operations; Ineos raw material needs will be met by Tearsall and the business put on a sound footing which will help fund a return to underground operation;
- Industry & care for the environment need not be diametrically opposed and can work in harmony when the participants act responsibly;
- The local case is primarily economic; the national case also has a strong economic element and factors of national interest and broader environmental impact;
- The Runcorn site is a highly integrated chemical complex; chlorine is used to make derivatives for a wide range of applications and Ineos Fluor convert these into other more valuable products using fluorspar; without fluorspar the economic operation of much of the Runcorn site would be challenging;
- No crushing on site and most of the work would be below ground level;
- Glebe Mines generate approximately 70% of Cavendish Engineering Services' business which employs 14; without Glebe there would be a loss of income, premises and jobs;
- Without local industry businesses such as tourism & leisure may suffer;
- With the right environmental controls & standards, fluorspar mining can be allowed to enable economic sustainability alongside long-term environmental protection; restored sites by Glebe show little or no sign of historic activity;
- The continued decline of British industry will leave our economy in such ill health wil be unable to maintain, protect and financially support national treasures such as the Peak District National Park; the National Park Authority should define the standards required for the continuation of British Industry rather than prevention of industrial activity;
- Ineos manufactures 75% of the world's needs of medical propellants & a loss of fluorspar supply would lead to shortages of these essential medical products with lives being at stake;
- It would be an error to judge the application against past performance by Glebe;
- Loss of UK manufacturing will not alter consumer demand and production will move from the UK where health, safety and environmental standards & efficiencies are likely to be lower;
- Employment will be threatened by closure of Glebe so will not be able to visit the National Parks to enjoy their peace, tranquillity & natural beauty;
- Loss of operations at Runcorn may put an end to UK PTFE manufacture at Hillhouse resulting in unemployment;
- UK needs manufacturing as a key element of its economy & fluorspar supports a large element of the UK economy;
- Current ore reserves cannot support the continuing operation a Glebe Mines;
- Tearsall will provide enough crude ore for Glebe Mines to meet its requirements while helping to fund investment at Milldam Mine. Both Tearsall and the development of Milldam Mine are needed to support local employment;
- UK has been a net importer since the early 1990's however worldmarkets have changed and the China domestic market is limiting its export;
- Tearsall is the only source of acid grade fluorspar in the UK & the only option available to maintain an indigenous supply of a strategically important mineral to the UK chemical industry;
- Refusal of the planning application would result in closure of Ineos' HF, HCFC-22 and HFC-125 plants & the closure of 50% of Ineos ChlorVinyls chlorine cell room capacity & a major impact on the UK's only sulphuric acid plant;
- Construction impactswill be short-term and temporary in nature;
- The impact of the extraction will be limited to 6 years with progressive restoration; full restoration will ensure that there is not a fundamental change in the nature or character of the National Park or wider surrounding areas;
- Restoration measures give a high degree of reassurance that there will not be a long term adverse visual impact;

- Glebe Mines provide the premises for Derbyshire Dales Engineering who will be forced to close in the event of pemission not being granted;
- Demand for hydrogen fluoride unlikely to decline;
- Chemical plants to replace Ineos Fluor are likely to have worse environmental performance and a poorer safety record;
- Other sources of fluorspar are of inferior quality resulting in more emissions & plant problems;
- Mines and quarries have played a part in forming the character of the Park and provided employment;
- The lead mining industry has left us with a legacy that remains today which attracts visitors and provides employment;
- Fluorspar has played a major part in the industrial upbringing of the Park and our nation; there is a very limited supply in this country especially at the higher grade; this grade is only found and processed in Derbyshire;
- Ore reserves are at a critically low level and without permission, Glebe Mines will close and 110-150 direct and indirect jobs in Derbyshire will be lost;
- The French fluorochemical industry closed following the cessation of French domestic fluorspar production in 2006 due to the high cost and scarcity of imported fluorspar; french are now reliant on external supplies of these strategic materials in a worsening world supply situation compounded by the high costs of energy and transportation; the supply of domestic fluorspar from Glebe's operations in Derbyshire being close to Ineos production operations is a significant strategic advantage for the UK;
- Glebe is focused on the safe production of fluorspar to meet the needs of the UK chemical industry whilst maintaining the highest environmental standards to minimise damage and nuisance; road traffic impacts will be kept to a minimum by not processing and selling limestone from the site nor importing waste; voluntary restoration bonds are offered to guarantee site remediation;
- A significant amount of work has been undertaken to assess the associated environmental impacts and significant remediation has been proposed to improve the site over its current condition; the proposals provide added biodiversity, access and potentially increased geodiversity;
- The development will provide circa 25% of Cavendish Mill's requirements during its life and help to fund investment in underground mining operations resulting in a net reduction in lorry movements as underground mine ore is better and Cavendish Mill would use less but maintain current producton levels of acid grade fluorspar;
- The public engagement exercise by the company allowed misconceptions to be addressed and provided useful feedback to be incorporated into the operating methods;
- When environmental impacts can be mitigated it is in the public interest to meet the need to supply fluorspar from our own deposits; there are no viable alternatives either to extraction from the National Park or to supply the chemical industry from abroad;
- The need for fluorspar has been demonstrated and there are no alternatives to this application; the need for the mineral should not outweigh all other factors; in this case the environmental impacts can be adequately mitigated and there wil be an overall improvement in the area;
- Less of fluorspar as a raw material is now available from previous overseas suppliers and the UK supply must be safeguarded and maintained at viable levels;
- The vein minerals industry is a long established part of the local industrial landscape and should be encouraged to continue under modern planning constraints and conditions;
- Fluorspar is an important mineral that has become very scarce and in the UK can only be found within the boundaries of the National Park; the global supply situation has changed dramatically over the past 10 years – in the late 90's Chinese material was readily available, exports are now limited due to internal demand and reducing resources – making fluorspar very difficult to source; Ineos purchased Glebe Mines because of the worldwide shortage and strategic importance of it to Ineos;

- Fluorspar is essential to the manufacture of key consumer goods: asthma inhalers, refrigerators, mobile phone components, non-stick frying pans; fluorspar is a key raw material for hydrofluoric acid; fluorspar from Glebe Mines supports virtually all UK manufactured fluorine compounds and the majority of Ineos Fluor's hydrofluoric acid goes into downstream fluorochemicals production; most is HCFC-22 a feedstock to produce polytetrafluoroethylene (PTFE) used in advanced engineering materials;
- Key HCFC-22 consumers include the British and European manufacturers of advanced polymers; HF is also used in petroleum alkylation, etching agents and UF6 production; other key customers include nuclear industries and other critical industries for the UK's fuel, power independence and economic well being;
- It is essential that fluorspar is locally sourced and the resources now available to Glebe Mines means that Tearsall is the only viable provider of short to medium term relief for fluorspar demand;
- Glebe is a significant contributor to the local economy; the activities that Glebe undertakes in the local area have been estimated at around £3 million; Glebe's operations provide an element of diversity to the local economy, otherwise dependent on tourism and agriculture;
- There is a need for fluorspar in the UK to support the UK fluorochemicals industry; sufficient alternative supplies are not available to maintain the economic viability of the UK fluorochemicals industry;
- The Authorities and Glebe need to work together to ensure that the details of the plans are fulfilled and that there is the best possible environmental outcome;
- Towns and villages within the Park are dying and young people are beng displaced because they cannot find employment within the area to support them and their families;
- The scale of the development is tiny when compared to sites such as Lafarge which had a successful planning application; Glebe Mines seem willing to work with the Authority and surrounding communities;
- Importing fluorspar would increase production costs and increase the overall energy use of the overall process;
- In the event of closure of Glebe, the likelihood of finding alternative employment for everyone is small due to the state of the economy;
- The preservation of jobs outweighs that of the short-term appearance of the countryside;
- Derbyshire is the only area in the UK with sufficient extractable reserves and Glebe Mines the only home based processor & supplier to the industry; China uses the majority of their fluorspar internally & other countries mineral is of a poor standard or contaminated;
- Employees of PROjEn engaged in projects at Glebe Mines and chemical manufacturing plants at Ineos will lose their positions if Glebe Mines closes;
- Should not become over reliant on imported material and if we have the raw material on our doorstep we should make full use of it;
- The industry should not have to import material as this would have the effect of forcing up the cost of a large number of chemically based products which would have an adverse effect on our economy;
- We should be supporting this native commodity and be proud that Derbyshire is able to supply the chemical industry with a native product;
- This area has always been associated with mineral extraction therefore the transportation of the mineral should not create any additional demands on the local road network;
- Glebe Mines is a key supplier of raw material to Viaton Industries employing over 40 people; closure could result in job losses & cause customer supply problems.