

## **APPENDIX 1**

### *Major issues facing the Peak District*

3.18 In a nationally protected landscape of great beauty and where the principal driver in the economy is tourism, the proper control of approved mineral sites is vitally important. The main difficulty which the Authority faces in this respect is the existence of a series of sites which predate planning control or where planning permissions were granted as long ago as the 1950s, all with inadequate and usually imprecise controls. These sites are being progressively, but not always sufficiently improved through the mineral review procedure, consolidation/exchange applications and through negotiations with operators. However, the review process has been held up for a decade at those numerous sites where legal deficiencies in the operation of Environmental Impact Assessment have in effect allowed mineral companies to continue operating to inordinately weak conditions imposed over half a century ago. Changes to the law have reinvigorated the review process recently, creating opportunities for the Authority once again to resume the upgrading of practices at old-established sites.

3.19 So far as proposals for new and extended workings are concerned, proven need for raw materials for the regional and national economies must be matched with exercising the most rigorous operational standards. Policies precluding new permissions for working construction aggregates other than in exceptional circumstances have been widely understood for some years, and there have been no major proposals for extensions since those at Topley Pike and Eldon Hill were rejected on appeal in the 1980s. Nonetheless, modest extensions have been negotiated at a range of sites as the price to be paid for securing the revocation of otherwise lawful operations in still more damaging locations, and for securing valuable improvements to site operations which would have attracted compensation if the Authority had attempted to impose them unilaterally. A few more packages of improvements remain to be negotiated, but the bulk of the schemes which merit negotiation as 'exceptional circumstances' has now passed. There is now real potential to implement a gradual reduction in mineral activity over the years, as the Authority has long sought, in line with the sympathetic new policy in the Regional Plan. This will be achieved as existing sites are worked out or become time-expired.

3.20 There remain three major conflicts of interest for the Authority to address (principally through its emerging Local Development Framework but with the assistance of management actions). These concern fluorspar, building stone and cement-making

- The Peak District is one of the country's last-remaining major sources of fluorspar with the only processing plant supplying acid-grade fluorspar for the manufacture of hydrofluoric acid to British industry. The more easily available fluorspar deposits have been worked out and higher-grade deposits are increasingly hard to find. However, this is a predicament not unique to the UK, and there may well be pressure for operations to continue in the National Park. Unless these can be by underground working, the medium term prospect is for bigger opencast fluorspar operations searching for large quantities of lower grade material in increasingly sensitive locations. The Authority will be called upon to make difficult judgements about the implementation of Policy 37 of RSS8 both in preparing its LDF and in decisions on individual proposals.

- The Peak District is a major supplier of building stone, with the large majority of its output sold for use outside the National Park's boundaries. Nonetheless, without mineral operations sufficiently large to be economically attractive, the supply of local stone to sustain the vernacular built environment of the Park would be at risk. There is already a serious shortage of stone slates for roofing (measured not least by thefts of slate from buildings in use). However, sources of such slates within the Park may well be very difficult to find without conflict with other environmental interests. Resolving this either inside or outside the National Park will require a level of partnership and co-operation amongst various interests which has not been achieved in the past, and for which the Authority is likely to be the lead agency.

• Materials for cement-making can be obtained from outside National Parks. A new proposal for cement making inside the Park would be most unlikely to meet the MPS1 tests. The closure of various cement plants around the country over recent years illustrates not only the concentration of activity into a smaller number of larger operations (of which Hope is one), but also the potential for choices to be made to concentrate activity outside rather than inside National Parks. In the longer term, therefore, there may be a case for seeking the closure of Hope cement works and the replacement of its output by supplies elsewhere. This is a complex decision which needs to take into account national need for cement, social and economic issues connected with the value of the Hope cement works to the region's (possibly national) economy, weighed against planning policies, which are based on national park purposes and the social and economic duty. Unlike established practice in respect of aggregates, there is no exit strategy at present for cement-making in and close to the Peak District. Rather, activity at Hope has been reinforced by consolidations and upgrading of activities in 1990 and 2004, with the result that the cement plant has sufficient reserves of limestone to last to 2042 well beyond the emerging LDF period. It would be expected, in line with the industry's general approach to such matters, that future applications to extend the reserves would fall well in advance of that deadline. However, if an exit strategy were to be considered, in line with RSS Policy 37 to reduce output of land-won minerals in the Peak District, then consideration should be given now rather than postponed as to how this might be achieved while supporting the industry and its employees throughout the period while existing permissions last. With the level of employment associated with the plant it is appropriate to plan many years ahead if there is to be a transition to alternative arrangements. This may entail alternative cement-making outside the Park or, more fundamentally, a review of the role of cement-making as one of the most power-consuming and carbon-emitting industries in the country today.

#### **Action Point 14**

#### **Encourage the reduction of green house gasses and evaluate the long term alternatives to cement-making at Hope**

##### Background to the issue

The only cement works in the National Park is at Hope, but in addition limestone from Old Moor is used in the Tunstead cement works immediately outside the Park, and Cauldon in Staffordshire is a third cement works based on the Pennine carboniferous limestone, just outside the Park. Hope is probably the principal cement works at which Lafarge has consolidated its operations. The site has limestone reserves sufficient to last for about 30 years. There is, however, a potential shortage of clay/shale to support Hope in the foreseeable future, and pulverised fuel ash (pfa) is proposed to be railed-in from Drax power station to supplement the shortfall.

Cement-making is a long term business with a very long term investment. This partly reflects the long pay-back period for the enormous initial capital investment. Once established, there is every incentive for companies to sustain output if feasible, upgrading kilns and other plant when the opportunity arises. The operation of cement plants cannot be gradually run down: they operate 24 hours per day for very long periods, and their unit of operation is the kiln, of which Hope has two. With infrastructure costs to support, the expectation would be that sites would either operate at full capacity (allowing for individual kiln maintenance, upgrading and replacement), or not at all. The prospect is that Lafarge will seek to ensure continued operations at Hope for generations to come.

There is a need to consider whether cement makes and the associated quarrying of limestone and shale/clay, within the National Park, is strictly necessary in terms of the policies set out in MPS1 and PPS7, which seek to discourage major development of this nature in national parks. Furthermore, the recent East Midlands Regional Plan (policy 37) establishes that output of land won minerals should be reduced in the Peak District. In this context, it should be noted that many

other cement works outside National Parks have closed over the years. Lafarge has been given permission for a new cement plant at Snodland in Kent, but this has not yet been built. It is, therefore, probable the market could not be served by sites other than Hope, located outside National Parks.

The decision on the future of Hope cement works is based around a consideration of the national or regional need for cement, impact on the local, regional or (possibly) national economy, the economic analysis of the substantial infrastructure established at Hope against the need to pursue national park purposes and the planning policies referred to above.

Despite the secure position of the cement works until 2042, the NPA needs to begin the process of interaction with a number of agencies and the local community to determine the strategic direction for the cement works. These agencies include the company, EMDA, CLG, Natural England. This should be decided through the LDF process, ultimately, but this Action Plan needs to anticipate the work that needs to be carried out to inform the strategic direction to deal with interim development proposals, until 2042, and the situation after that date.

In the interim it has to be acknowledged that the cement operations are a major source of greenhouse gas emissions Authority's Climate Change Action Plan, has a specific policy to seek to reduce the considerable harmful emissions from the cement works In the interim efforts can be made to encourage the company to reduce harmful emissions in connection with discussions about the future planning position..

#### Reference in the National Park Management Plan 2006-2011 and Performance and Business Plan

The NPMP establishes that "by 2011 the impact of mineral working on the special qualities of the National Park and on communities has been reduced because:

- there are fewer quarries
- those quarries that remain are worked to the highest modern environmental standards with established operating end-dates and restoration schemes
- there is an agreed definition of 'national need' for mineral working."

The Authority's corporate outcome B in the Performance and Business Plan states that the adverse impact of mineral working on the special qualities of the National park and its communities is minimised by the following key corporate actions :

B2 Ensuring that those quarries that remain are worked to the highest environmental standards  
B3 Managing the Reduction of Quarrying in the National Park

#### Other NPA Policies

Climate Change Action Plan Theme 9: Greening the Economy & Communities

Links to **Action 9.3** Encourage major emitters of GHG's (e.g. the cement, minerals and aggregates industry) to reduce their GHG emissions.

#### Action to date

The pressure has been on the NPA to support imports of pfa to supplement shale supplies to feed the cement works.

## Proposal

The NPA will establish in practice, a strategy of:

- 1) accepting the existing operations until they expire, in order to provide stability and welcome their economic benefit; while
- 2) pressing the companies and appropriate agencies to engage in discussion regarding the development of strategic policies relating to the longer term future of the cement works.
- 3) encouraging the development of measures to make the operations more sustainable particularly measures to reduce greenhouse gas emissions

### Implications for timing, staff and cost

This is not an immediate priority due to the timescales and it will take time to fully resolve through the LDF process. However engagement with the company needs to commence and then be followed by seeking responses from the agencies referred to above. There would be the costs of research by hired consultants and a small call on NPA staff time.

**TARGET:** Engage with the company to seek to achieve the themed objectives in the Climate Change Action Plan.

Commence discussions regarding the future of the works with the company and relevant agencies and report findings to members in April 2011

This relates to the corporate indicator B3.2 Change in the number and area of (1) dormant and (2) active quarries