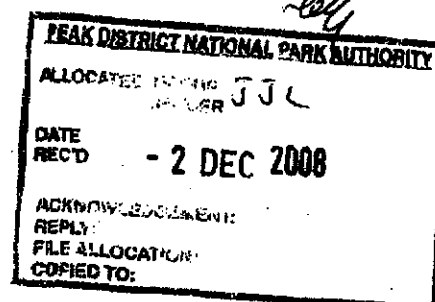


BERRRef
YourRef

Mr John Lomas
Director of Planning
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
DE45 1AE



1 December 2008.

Dear Mr Lomas,

INEOS FLUOR AND GLEBE MINES

I am writing on behalf of the Economic and Business Minister, Ian Pearson, following recent correspondence from Derek Twigg MP about the planning application made by Glebe Mines Ltd to extend their open cast mining operations at their Tearsall site.

At present Government is implementing a number of measures to help support business through the current economic situation, with the aim of ensuring that the UK maintains a strong and competitive position in global markets in going forward. The Government is committed to encouraging the creation and retention of highly skilled, high value-added jobs, especially in manufacturing.

In this context, I am aware that the Tearsall application is still under consideration. The capability to produce fluorochemicals competitively in the UK, which is of importance to other parts of the UK economy, with the ability to secure a competitive and reliable source of fluorspar is viewed as a significant element of this.

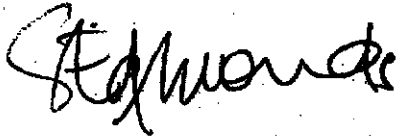
As highlighted in my earlier letter in June '08, in which BERR made representations concerning socio-economic factors that we considered should be taken into account when deciding this application. An indigenous supply of fluorspar for the UK Chemicals Industry is vital to maintain its competitiveness in a sector that is highly exposed to international trade. The potential negative effect on the supply of key chemicals that are used for water purification, healthcare products, electronic products and in the nuclear industry could have an adverse impact on the competitiveness of the UK.

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Continuation 2

I recognise that you are considering a number of issues in relation to this application, including BERR's earlier representation. Please do not hesitate to contact me if you wish to discuss further.

A handwritten signature in black ink, appearing to read 'S Edmonds', written in a cursive style.

Simon Edmonds
Director, Business Relations 1

Simon Edmonds
Director, Business Relations 1
Bay UG 102
1 Victoria Street
London SW1H 0ET

Mr John Lomas
Director of Planning
Peak District National Park Authority,
Aldern House,
Baslow Road,
Bakewell,
DE45 1AE

ALLOCATION NUMBER	109801
APPROVER	JJK DGB
DATE RECEIVED	20 JUN 2008
ACKNOWLEDGEMENT RECEIVED	
FILE ALL INFORMATION COVERED TO	JJK

18 June 2008

Dear *John*

I am aware from this Department's business relationship with the Ineos Group, a key contributor to the UK economy, that you are in the process of considering a planning application from the Company concerning the Glebe Mines site at Tearsall. I am writing on behalf of the Secretary of State for Business, Enterprise and Regulatory Reform to make representations concerning economic considerations that we consider should be taken into account by you when deciding this application

As part of your consideration of this application, you will no doubt be taking into account the value to the local economy and that in the North West of retaining highly skilled jobs at Glebe Mines and the Ineos sites in Runcorn. An indigenous supply of fluorspar for the UK Chemicals Industry is vital to maintain its competitiveness in a sector that is highly exposed to international trade. The potential negative effect on the supply of key chemicals that are used for water purification, healthcare products, electronic products and in the nuclear industry could have an adverse impact on the competitiveness of the UK.

The Government is committed to encouraging the creation and retention of highly skilled, high value-added jobs, especially in manufacturing, such as those in question at Ineos Fluor, Ineos Chlor and Glebe Mines.

The Ineos Group has told us that should the development of the Tearsall site not go ahead, there would be a significant consequence for around 1500 jobs in both the East Midlands

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Continuation 2

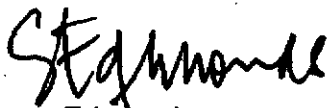
(100) and North West (1400). We believe that such an impact would be detrimental to the economy in these regions, not only in terms of loss of jobs, but also in terms of attracting further investment in those regions and the UK more generally.

I do, of course, appreciate that in relation to planning applications, such as this one, there will be other issues which need to be considered. However, in addition to these, and the potential impact on the regional economies in the East Midlands and North West, I am sure you will wish to take into account the broader national context I have described.

Should you have any questions about this letter and content, please contact in the first instance Chris Barrell, tel 0207 215 1107, email chris.barrell@berr.qsi.gov.uk. Please do not hesitate to contact me should you have any questions or require further advice.

I am copying this letter to Ineos Fluor, Government Office East Midlands, Government Office North West, North West Development Agency and East Midlands Development Agency.

Yours sincerely



Simon Edmonds
Director
Business Relations



Northwest

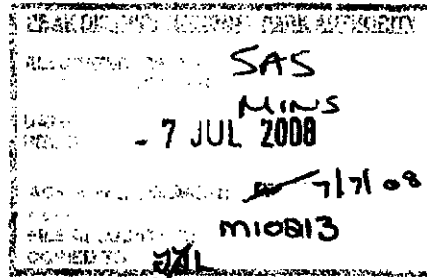
REGIONAL DEVELOPMENT AGENCY

MH/amc/0401-01

4 July 2008

Mark Hughes
Executive Director
Enterprise & Innovation

Sue Smith
Development Control/Planning
Peak District National Park Authority
Aldem House
Baslow Road
Bakewell
Derbyshire
DE45 1AE



Dear Ms Smith

**Proposal: Proposed extraction of fluorspar ore and associated vein mineral by open pit methods from an extension to the workings at Tearsall.
Planning Application Number: Application NP/DDD/0208/0104**

As detailed in our previous correspondence, the above planning application is essential to the future of Ineos Fluor which has a significant role in the future of the North West chemicals sector and supply chain. Glebe Mines Ltd is the only producer of a marketable fluorspar in the UK (ref. 2). Without a domestic source of fluorspar, it is likely that Ineos Fluor would have to terminate hydrofluoric acid (HF) production in the UK. This has a knock-on effect on the complex chemicals supply chain, both downstream UK consumers of HF, some of whom are strategically important and also upstream chlorine production at Ineos's Runcorn Site. We would like to provide further information in four key areas:-

- Fluorspar availability;
- Impact of Ineos Fluor HF plant closure on upstream production facilities in the chlorine supply chain;
- Impact of losing fluorspar supply on the downstream hydrofluoric acid (HF) supply chain and subsequent knock-on consequences to HF consumers in the chemicals, oil and nuclear sectors; and
- Local employment and community impacts.

1. FLUORSPAR AVAILABILITY

There are now great concerns over security of fluorspar supply and prices worldwide, particularly in Europe, due to rising demand in China (the major producer following closure of mines in Italy and France during 2006). Chinese exports are now subject to growing restrictions in order to promote production of added-value products (HF and fluorochemicals) there - reported exports have decreased from 1.37MT in 1999 to 0.56MT in 2006 and these are likely to reduce further in the future because of a continued tightening of export quotas and the introduction of a 15% export tax on

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acid spar (high quality fluorspar). Data published by Industrial Minerals Magazine (ref 4) shows Chinese acid spar prices have risen by 157% in 5 years.

2. UPSTREAM IMPACT ON CHLORINE SUPPLY AND STRATEGIC IMPORTANCE OF UK CHLORINE PRODUCTION CAPABILITY

As highlighted in our previous letter, Ineos Fluor has a direct impact on the Ineos Chlor's chlorine production capability through the supply chain (see appendix 1).

A strong and world-scale chlorine manufacturing capability is strategically important to any developed economy. Chlorine products feed a significant proportion of the chemical industry including disinfectants, water treatment, paint pigments, silicon chips, detergents, lubricants, herbicides, insecticides, PVC, solvents, silicon rubbers and PTFE. An enormous range of products and 2,000,000 jobs in Europe depend directly on chlorine chemistry (ref. 1). The strategic importance of UK chlorine production was recognised by the UK Government in 2001, when it supported the construction of the new £330m membrane cellroom at Runcorn with £32m in grant funding.

Runcorn, the UK's only chlorine plant, is the second largest chlorine plant in Europe. The UK already has significantly less chlorine manufacturing capability than our Western European neighbours – Runcorn's capacity is 767 kte / yr compared to 18 sites, 4880 kte / yr in Germany and 10 sites, 1735 kte / yr in France (ref. 3, 2006 data). We understand that closure of the HF plant would almost certainly lead to closure of the two mercury cellrooms at Runcorn, reducing the UK's capacity further to 450 kte / yr. This strategically important national asset would be at significant risk if loss of fluorspar production at Tearsall led to closure of the Runcorn HF plant and consequent closures of chlorine using plants.

3. DOWNSTREAM IMPACT ON HF CONSUMERS AND THEIR STRATEGIC IMPORTANCE

Closure of Arkema's HF plant in France in 2006 means there is now no spare HF capacity in Europe and therefore satisfying the demand for >30kte/yr of HF in the UK would become extremely difficult if the Runcorn HF plant were to close.

4.1 Downstream Impact on HF Consumers

There are three main consumers of HF in the UK who would be exposed to higher prices and reduced security of supply if the Runcorn HF plant were to close.

51% of HF manufactured by Ineos Fluor is used to manufacture the chemical intermediate HCFC-22 at Runcorn. We understand that loss of HF supply would lead to closure of this plant. HCFC-22 is used as a critical feed material for the Asahi Glass Chemicals PTFE plant at Hillhouse Site near Blackpool. Whilst we cannot speak for Asahi, we believe that non-supply from a domestic HCFC-22 producer would be of great concern to them.

19% of HF manufactured at Runcorn is used to manufacture HFC-125, a blended refrigerant component, for use in refrigeration and air-conditioning systems. Again, we understand that loss of this supply would lead to closure of this plant at Runcorn.

The remaining 29% of HF manufactured by Ineos Fluor is directly sold within the UK to the chemicals industry (e.g. Victrex plc) and industries critical to UK Fuel and Nuclear power independence. Paragraph 4.2 considers the impact on these industries in more detail.

Two key organisations who have recently invested into the UK are dependent on the supply of HF currently supplied by Ineos Fluor. Victrex plc opened a new £32 million VICTREX® PEEK™ polymer plant to significantly increase production in October 2007 and AGC chemicals opened the first £15million EFTE plant outside of Japan in 2007. AGC are now looking to open a third plant with Hillhouse being on the preferred option list.

4.2 Strategic Importance of Domestic HF Supply to Fuel and Nuclear Sectors

HF is a key raw material for uranium enrichment / nuclear fuel manufacture and oil refining. Closure of the Runcorn HF plant would cause these industries to source from abroad in a very tight market and would therefore potentially increase risk to fuel and energy supplies.

The May 2007 Government White Paper on Energy identifies one of the four policy goals as being 'to maintain the reliability of energy supplies'. Minimising reliance on foreign HF supplies would be central in ensuring the security of both fuel and electricity supplies.

Approximately 20% of the UK's electricity generation is from nuclear power. This reduces national carbon emissions by 7-14% (ref 5). Nuclear fuel for seven Advanced Gas Cooled Reactors (AGRs) and the UK's single Pressurised Water Reactor (PWR) at Sizewell is made at Springfields, near Preston by a process that utilises HF from Ineos Fluor. These reactors account for 9.6GW of generating capacity or 87% of the total UK nuclear generation and are scheduled to run until 2014-2035. The AGR design is unique to the UK and fuel is only made at Springfields. It is estimated that Ineos Fluor provides 2/3 of the HF used at Springfields with the remainder sourced from Europe.

With plans in place for new UK nuclear power stations, a reliable source of high quality domestic HF is a key factor in ensuring that fuel for the new stations is manufactured in the UK (HF is required for all fuel types). Replacing the existing nuclear capacity in the UK would require fuel costing £165M - £220M/yr. Fabrication of fuel for existing reactors has essentially been a monopoly for the Springfields site due to the relatively high technical barriers and the small market size (UK only). Construction of new reactors of generic design means that fuel fabrication for the bulk of nuclear capacity is now open to full competition. Thus Urenco (Capenhurst) Ltd and Springfields Fuels Ltd will need to be competitive in a global market to survive or, potentially, expand in the UK.

HF is a key raw material in oil refining for petroleum alkylation. There are ten refineries in the UK, six of which use HF from Runcorn. These refineries process 64,000 barrels of oil a day producing a range of products (diesel, kerosene, petrol, heavy fuel oil and heating oils). The impact of one of the refineries being unable to produce has been clearly demonstrated in Grangemouth recently.

5. LOCAL EMPLOYMENT AND COMMUNITY IMPACTS

We are aware of the need to compromise between the extension of fluorspar extraction activity and the wider environmental purposes of the Peak Park designation. However, in our view the strategic nature of the Park's fluorspar reserves and its wider economic importance to the UK chemicals sector requires a positive approach. We understand that the Peak Park fluorspar extraction operations directly employ over 70 people with the vast majority from a local catchment area, and Glebe Mines' operations contribute close to £3m to the local economy per annum. As detailed above, the unique nature of these reserves means this activity and employment cannot be undertaken or relocated elsewhere. The employment covers a range of specialist, technical and other skills and our concern is that many of the staff with higher value jobs would be likely to need to relocate from the local area were their jobs to be lost. Looking beyond the wider economic impacts of the operation, our concern is that local facilities and services in the Peak Park and neighbouring communities may suffer if these jobs were lost. We understand that local schools have already seen alarmingly low enrolments, and the loss of these jobs could further exacerbate concerns about the sustainability of other local services.

The high environmental quality of the Peak District National Park is a national and regional asset, and we are keen that this be protected and further enhanced. We understand that the applicant has a good track record of remediation and restoration of previous sites in the Park, including the reinstatement of public rights of way, and that the current application includes proposals for full restoration. We also understand there are proposals to help reinstate or provide new habitats for selected species which would contribute towards local biodiversity targets. We are also aware of the recent and ongoing local consultation and discussion with key groups being undertaken by the Applicant. In these terms, we hope that the Peak Park Authority can take some comfort and reassurance that while the proposals would result in disruption locally in the relative short-term, in the longer-term there is potential to secure environmental improvements and benefits.

6. CONCLUSION

As expressed above and in previous correspondence, the current planning application is crucially important in securing the future of Ineos Fluor. Closure of Ineos Fluor's Runcorn plants would have significant knock-on effects on strategically important up- and downstream industries.

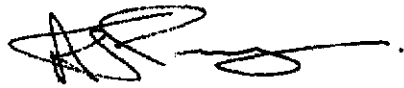
The NWDA and EMDA are aware of the difficulties associated with deciding this application and therefore have provided our perspective on the significant importance of a local, indigenous supply of fluorspar.

We hope that information provided within and letters sent from our colleagues will help to secure a positive outcome of this application.

Yours sincerely



Mark Hughes
Director, Enterprise and Skills, NWDA



Anthony Payne
Land & Development Director, EMDA

cc Chris Barrell, Deputy Director, Chemicals Unit, BERR
Steve Harley, Head of Spatial Development, EMDA

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<http://www.eurochlor.org/upload/documents/document268.pdf>
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Appendix 1 – FURTHER DETAIL ON THE SOCIO-ECONOMIC IMPACT IN THE NW

Impact	Probability	No. of Jobs	Financial Impact
Closure of Ineos Fluor operation at Runcorn (HF, HCFC-22, HCFC 125 and other plants)	High probability – alternative fluorospar sources are poor quality and / or economically unviable	235 direct 235 indirect	Revenue £275M/yr GVA Direct=£41.9 million indirect=£38million (est.)
Closure of Ineos Chlor's chloromethanes (CMs) plant, per/tri plant, Anhydrous Caustic Soda (ACS) plant and two chlorine cellrooms	High probability – the HCFC-22 plant is a significant consumer of chloroform, manufactured on the CMs plant. Without this outlet for chloroform, the CMs plant will close. This will remove a significant chlorine consumer and cause the shutdown of the two remaining mercury cell rooms and the per/tri plant. This reduces caustic soda production and would lead to closure of the ACS plant.	460 direct 460 indirect	
Commercial risk to Victrex Hillhouse plant	Removal of domestic HF supply leaves Victrex exposed to significant price increases on a key raw material and concerns over security of supply.	467	GVA £26million (est.)
Commercial risk to AGC Chemicals site at Hillhouse	Removal of domestic HF supply leaves AFG exposed to significant price increases on a key raw material and concerns over security of supply.	148	GVA £8million (est.)
Impact on wider NW chemicals 'cluster'	The NW chemicals cluster consists of 22% of the UK's total with a turnover of £9.4Bn, a £2.4Bn GVA impact and £58n of exports. Ineos's NW operations are a major contributor		

Impact	Probability	No. of Jobs	Financial Impact
	<p>to the critical mass of skills, materials flows, and service providers that support the industry. A significant reduction in the scale of the Runcom operation would inevitably have a knock-on effect on the rest of the NW chemical industry.</p>		
<p>Commercial risk to the Uranium Enrichment site owned by Urenco (Capenhurst) Limited.</p>	<p>Removal of domestic HF supply would result in Capenhurst, as a key facility in the UK Nuclear industry, being exposed to potential significant price increases on a key raw material required by the nuclear industry and potential concerns over security of supply.</p>	<p>500 employed by Urenco Capenhurst Limited</p>	
<p>Commercial risk to Westinghouse nuclear fuel manufacturing plant at Springfield near Preston. Springfield site owned by the NDA and operated currently under an M&O contract with Springfield Fuels Ltd (Westinghouse).</p>	<p>Removal of domestic HF supply leaves Springfields exposed to significant price increases on a key raw material and concerns over security of supply.</p>	<p>1400 employed by Springfield Fuels Ltd.</p>	<p>Revenue £260M</p>



PEAK DISTRICT NATIONAL PARK AUTHORITY
ALLOCATED GROUP OFFICER SAS
DATE REC'D 26 MAR 2008
ACKNOWLEDGEMENT: [initials]
REPLY: [initials]
FILE ALLOCATION: [initials]
COPIED TO: [initials]



Steven Broomhead
Chief Executive

Sue Smith
Development Control/Planning
Peak District National Park Authority
Aldern House
Baslow Road
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DE45 1AE

SB/MH/CD
25 March 2008

Dear Ms Smith

**Proposal: Proposed extraction of fluorspar ore and associated vein mineral by open pit methods from an extension to the workings at Tearsall.
Planning Application Number: Application NP/DDD/0208/0104**

We are writing to you to clarify our position on the above planning application and the significant importance of this application on our region.

We fully appreciate the environmental stance behind this issue, but are deeply concerned about the economic impact of this decision.

The information provided within this letter is as a result of direct communications with BERR, Ineos Fluor, East Midlands Development Agency, Chemicals Northwest (Regional chemicals sector support organisation), an independent study provided by Roskill Consulting Group Ltd and our internal resource.

The chemical sector contributes £10 billion to the NW economy and is the largest exporter within the region.

Background

Glebe Mines Ltd was purchased by INEOS Fluor in November 2007 and is its sole domestic source of Fluorspar, the base raw material for its Runcorn-based fluorchemicals business. INEOS Fluor is the UK's largest fluorchemicals producer and the sole domestic manufacturer of hydrofluoric acid (HF) and has had a close relationship with Glebe Mines for over 50 years. Both companies are successful in their own right, whilst being strategically linked and making a significant contribution to the UK.

- In 2004, the value of Glebe's fluorspar operation was estimated at £2.3m- £2.8m.
- Glebe Mines' operation currently supports 65 jobs directly and a further 50 to 90 jobs indirectly.
- INEOS Fluor employs 250 people in the UK generating a turnover in excess of £105m pa. The company has invested over £44m over the past 5 yrs.

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- INEOS Fluor provides INEOS ChlorVinyls (1600 people) and INEOS Enterprises (500 people) with over £18m/yr of sales, and is their largest customer. A total turnover of £285m is underpinned by Glebe Mine operations.

- Asthma inhalers, unleaded petrol, computers, refrigeration and air-conditioning systems, mobile phones and anaesthetics are just some of the products dependent on hydrofluoric acid (HF), which is produced from fluorspar.

- The UK has an annual requirement of acidspar (defined as fluorspar containing greater than 97% calcium fluoride content) of around 65ktpy; 50ktpy of which is consumed in the manufacture of HF by INEOS Fluor in Runcorn.

- In 2006, Glebe Mines produced around 55kt of acidspar from its operations in Derbyshire. Additional demand was satisfied by imports, predominately from Minersa in Spain

The importance of a strategic supply of fluorspar is clearly illustrated by the example Arkema in France, which was forced to close its fluorochemicals production following the closure of its long-term fluorspar supply from France and Italy.

Ineos will provide, on request, supportive evidence to show that importing is not an economic solution for the survival of their organisation.

Affect on Customers and Suppliers

The majority of HF produced by INEOS Fluor in the UK is destined for downstream fluorochemicals production, the most significant of which is HCFC-22, a feedstock in the production of PTFE. Key customers for HCFC-22 include Asahi-Glass (UK) and Dyneon (Germany). HF is also used in a diverse range of applications such as petroleum alkylation, PEEK (advanced polymer) production, etching agents and uranium hexafluoride (UF₆) production. Key UK customers include Shell, Texaco, BNFL and Victrex.

The loss of the sole UK HF supplier would be likely to result in a significant cost increase for the direct HF consumers and added fragility in the HF supply chain. UK HF consumers are individually relatively small consumers and without the tension of UK HF production, European HF producers are likely to seek commercial advantage. Of particular note are the petroleum alkylators and UF₆ producer that in INEOS Fluor's view are critical industries to UK fuel and power independence.

Direct Affect on Ineos ChlorVinyls and Ineos Enterprises

An unsuccessful planning application is likely to result in closure of Glebe Mines and most of INEOS Fluor's Runcorn plants including HF, HFC-125 and HCFC-22. Closure of the HCFC-22 plant at Runcorn could conceivably have profound effects on the whole of INEOS' Runcorn operation. In addition to the lost revenue and jobs within the INEOS Fluor business there is a significant risk of a resulting 'domino effect', should the Runcorn Chloromethanes plant also close. Over half of the chloroform output from this plant is consumed in the HCFC-22 plant and current market conditions indicate that selling this volume profitably elsewhere could be very difficult. Should this be the case, closure of the plant and the cell rooms providing its chlorine feedstock would occur. The consequential effect would be the closure of the remaining mercury cell rooms, the Per/Tri plant and the anhydrous caustic soda plant.

The projected lost revenue to INEOS Chlor/Enterprise is estimated at £170million p.a. (mainly exports) along with about 460 INEOS jobs, which constitute about 30% of the employees at the Runcorn site.

The projected lost revenue to INEOS Fluor is estimated at £105M and around 250 direct jobs.

A roughly equivalent number of support jobs (contractors, suppliers, hauliers etc) could also be lost. No estimate of the US/Asian/European job losses resulting from cessation of export sales is included.

Without an adequate supply of HF, INEOS Fluor would be forced to move their operations out of the UK to other producing sites. The entire associated R&D department would also have to move. The closure of this business would be of even greater significance in social and economic terms than both the loss of domestic fluorspar and HF production.

A domestic source of fluorspar is therefore considered of strategic importance to the UK and the Northwest Region.

Conclusion

Without successful planning approval, Glebe Mines and the dependent manufacturing chain through to INEOS Chlor/Vinyl's cellrooms will become uneconomic by the end of 2008. This has the potential for a loss of a turnover of £280m per annum and 1500 jobs throughout the supply chain.

The NWDA support this application and would be grateful if you would inform us of the final decision.

Yours sincerely



Steven Broomhead
Chief Executive

cc Derek Twigg MP
Bryan Gray
Jeff Moore
Tony MCDermott

Sue Smith
Development Control/Planning
Peak District National Park Authority
Aldern House
Baslow Road
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Derbyshire
DE45 1AE

Ref. NP/DDD/0208/0104

4th April 2008

PEAK DISTRICT NATIONAL PARK AUTHORITY	
ALLOTTED GROUP OFFICER	SAS MWS
DATE REC'D	- 7 APR 2008
ACKNOWLEDGEMENT:	
REPLY:	
NO. OF ALLOCATION:	10213
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Dear Ms Smith

Proposal: Proposed extraction of fluorspar ore and associated vein mineral by open pit methods from an extension to the workings at Tearsall.
Planning Application Number: Application NP/DDD/0208/0104

Thank you for your letter dated 27th February requesting the comments of *emda* on the above planning application. You will have received a copy of the Notification Criteria which *emda* sent to all local authorities in February 2007. The above application falls under Criterion:

1. d) Employment, commercial (or any mixed use scheme) on sites of 5 ha. or more where the floorspace is unknown;

Local Planning Authorities are also encouraged to consult *emda* on a non-statutory basis where they receive planning applications of economic significance which they think the RDA may have an interest in, and our criteria explicitly refers to development proposals in rural areas which do not fit the other criteria where the impacts are sub-regionally significant.

Significant development of the type proposed is considered to be within the provisions of Article 10(1)(zc)(ii) of the Town and Country Planning (General Development Procedure) (England) (Amendment) Order 2003.

Discussions with the applicant and with the Department for Business, Enterprise and Regulatory Reform (BERR) have provided *emda* with a useful overview of the background and context to this application. We are aware of the clear scope for tensions between the extension of fluorspar extraction activity and the wider environmental purposes of the Peak Park designation. However, in our view the strategic nature of the Park's fluorspar reserves and its wider economic importance to the UK chemicals sector requires a positive approach.

We understand that the Peak Park fluorspar extraction operations directly employ over 100 people in a range of specialist, technical and other roles, with the vast majority from a local catchment area, and Glebe Mines' operations contribute between £2.3m and £2.8m to the local economy per annum. The unique nature of these reserves means this activity and employment can not be undertaken or relocated elsewhere.

Following discussions with the North-West Regional Development Agency (NWDA), it seems clear that in addition to supporting local employment and economic activity, the fluorspar produced in the Peak Park is essential to the wider UK chemicals industry. The processing of fluorspar supports hundreds of jobs in the North-West region, including many high-value and high-skilled jobs in highly competitive global markets. Should the Peak Park source not be available in the future, NWDA inform us it would lead to the direct loss of 1500 jobs and an annual turnover of around £300million in the wider supply chain focused on the north-west region. Therefore, while we understand the need for balance between economic and environmental considerations, we are keen to see the planning process provide some certainty to allow continued local and inter-regional economic activity and employment. Given the requirement for the National Park Authority to take the social and economic needs and context into account in discharging its responsibilities, we are hopeful that a positive outcome and balance can be achieved.

The East Midlands Regional Economic Strategy (RES) *A Flourishing Region* recognises the importance of achieving economic growth, but not growth at any cost. Stimulating economic growth and renewal in rural areas is one of the regional challenges facing the region over the medium to longer term identified in the RES. The RES strategic priority of Environmental Protection emphasises the importance of delivering sustainable economic development: enabling economic activity and growth while minimising negative impacts and finding mechanisms to compensate or mitigate against damage. The development principles (Annex B of the RES) also include a requirement for development to help support and promote diversification of rural areas.

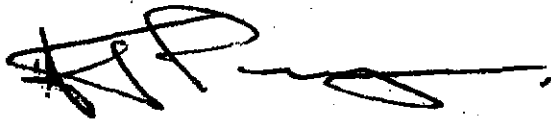
In considering the wider impacts of this application, in addition to the national and international competitiveness, the relatively local supply chain should be considered a strength. We understand that the nature of the international fluorspar market makes importing fluorspar both very difficult and unsustainable in economic terms. The extraction of the fluorspar from the Peak Park for use in the north-west region reduces the need for the material to be imported from abroad, and therefore reduces the carbon footprint of the supply chain.

The high environmental quality of the Peak District National Park is a national and regional asset, and we are keen that this be protected and further enhanced. We understand that the applicant has a good track record of remediation and restoration of previous sites in the Park, including the reinstatement of public rights of way, and that the current application includes proposals for full restoration. We also understand there are proposals to help reinstate or provide new habitats for selected species which would contribute towards local Biodiversity targets.

Therefore, *emda* supports this application and recommends approval. If this application is approved, *emda* would urge the Local Planning Authority to secure full commitment to appropriate levels of restoration and associated biodiversity improvements via planning conditions and section 106 obligations as appropriate. In determining the application, we would also encourage the Peak Park Authority to consult with DEFRA and BERR, and make use of the advice and knowledge of the British Geological Survey.

I would be grateful if you would inform *emda* of the final decision on this application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AP', with a long horizontal stroke extending to the right.

Anthony Payne
Director of Land and Development
East Midlands Development Agency
0115 988 8380
anthonypayne@emd.org.uk

DEREK TWIGG M.P.



HOUSE OF COMMONS

LONDON SW1A 0AA

Ref: DT/SH/21

3 October 2008

Jim Dixon
Chief Executive
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
Derbyshire DE45 1AE

PEAK DISTRICT NATIONAL PARK AUTHORITY	
ALLOCATED TO: GROUP OFFICER	
DATE REC'D	- 7 OCT 2008
ACKNOWLEDGEMENT:	
REPLY:	
FILE ALLOCATION:	
COPIES TO:	

Dear Mr Dixon

Planning Application for Fluorspar Extraction at Tearsall, Peak District National Park

Thank you for your letter dated 16 September regarding the above.

I am a little confused about the last paragraph of your letter in which it states "that it would be helpful if the Government on a whole and especially CLG were to make a clear statement on the national need for fluorspar".

I attach a copy of a letter sent to Mr John Lomas, your Director of Planning on behalf of The Secretary of State for DBERR. DBERR is taking the lead on this matter.

The letter clearly states "An indigenous supply of fluorspar for the UK Chemicals Industry is vital to maintain its competitiveness in a sector that is highly exposed to international trade." The letter then refers to the negative impact on the competitiveness of the UK

I therefore do not feel the Government could have been any clearer about the national need for fluorspar.

I hope this is helpful.

*has Jimmy
Derek Twigg*

Derek Twigg

THE CONSTITUENCY OF HALTON
WIDNES RUNCORN (WEST) HALE

Constituency Office: Tel: 0151 424 7030 Fax: 0151 495 3800

Mr John Lomas
Director of Planning
Peak District National Park Authority,
Aldern House,
Baslow Road,
Bakewell,
DE45 1AE

I am aware from this Department's business relationship with the Ineos Group, as key contributor to the UK economy that you are in the process of considering a planning application from the Company concerning the Glebe Mines site at Tearsall. I am writing on behalf of the Secretary of State for Business, Enterprise and Regulatory Reform to make representations concerning economic considerations that we consider should be taken into account by you when deciding this application

As part of your consideration of this application, you will no doubt be taking into account the value to the local economy and that in the North West of retaining highly skilled jobs at Glebe Mines and the Ineos sites in Runcom. An indigenous supply of fluorspar for the UK Chemicals Industry is vital to maintain its competitiveness in a sector that is highly exposed to international trade. The potential negative effect on the supply of key chemicals that are used for water purification, healthcare products, electronic products and in the nuclear industry could have an adverse impact on the competitiveness of the UK.

The Government is committed to encouraging the creation and retention of highly skilled, high value-added jobs, especially in manufacturing, such as those in question at Ineos Fluor, Ineos Chlor and Glebe Mines.

The Ineos Group has told us that should the development of the Tearsall site not go ahead, there would be a significant consequence for around 1500 jobs in both the East Midlands (100) and North West (1400). We believe that such an impact would be detrimental to the economy in EM and the NW region, not only in terms of loss of jobs, but also in terms of attracting further investment in those regions and the UK more generally.

I do, of course, appreciate that in relation to planning applications, such as this one, there will be other issues which need to be considered. However, in addition to these, and the potential impact on the regional economies in the East Midlands and North West, I am sure you will wish to take into account the broader national context I have described.

Please do not hesitate to contact me should you have any questions or require further advice.

I am copying this letter to Ineos Fluor, Government Office East Midlands, Government Office North West, North West Development Agency and East Midlands Development Agency.

Should you have any questions about this letter and content, please contact in the first instance Chris Barrell, tel 0207 215 1107, email chris.barrell@berr.gsi.gov.uk.

Simon Edmonds

DEREK TWIGG M.P.

Copy to Dave Banks / Bob Bryson / Peter Crimble / John Lomas



I need to respond *ear* later than Fri this week, so I need

HOUSE OF COMMONS

Ref: DT/MT/21

LONDON SW1A 0AA

advise as per my phone
at Tues. 12.30

26 September 2008

Jim Nixon
Chief Executive
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
Derbyshire DE45 1AE

PEAK DISTRICT NATIONAL PARK AUTHORITY	
ALLOCATED TO GROUP	SBD/CE
DATE REC'D	29 SEP 2008
ACKNOWLEDGEMENT:	
REPLY:	
FILE ALLOCATION:	M10213
ISSUED TO:	

Handwritten mark resembling a smiley face and the text "/A65022"

Dear Mr Nixon

Planning Application for Fluorspar Extraction at Tearsall, Peak District National Park

Thank you for your letter dated 16 September regarding the above.

I am a little confused about the last paragraph of your letter in which it states "that it would be helpful if the Government on a whole and especially CLG were to make a clear statement on the national need for fluorspar".

I attach a copy of a letter sent to Mr John Lomas, your Director of Planning on behalf of The Secretary of State for DBERR. DBERR is taking the lead on this matter.

The letter clearly states "An indigenous supply of fluorspar for the UK Chemicals Industry is vital to maintain its competitiveness in a sector that is highly exposed to international trade." The letter then refers to the negative impact on the competitiveness of the UK

I therefore do not feel the Government could have been any clearer about the natural need for fluorspar.

I hope this is helpful.

Yours sincerely
Derek Twigg

Derek Twigg

THE CONSTITUENCY OF HALTON
WIDNES RUNCORN (WEST) HALE

Constituency Office: Tel: 0151 424 7030 Fax: 0151 495 3800

DEREK TWIGG M.P.



HOUSE OF COMMONS
LONDON SW1A 0AA

① Response as over

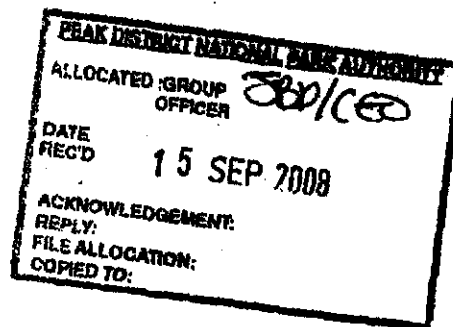
② Pass to ~~John Latham~~ then to David Burt via Bob Bryan

SS - for incorporation into
Cite. report LTB 17/9

Ref: DT/MT/21

9 September 2008

Mr Jim Dixon, Chief Executive
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
Derbyshire, DE45 1AE



Jim M Dixon

Planning Application for Fluorspar Extraction at Tearsall, Peak District National Park

Ineos Fluor whose business is in my constituency have contacted me about the planning application by Glebe Mines Ltd. to extract fluorspar by extending the existing Tearsall workings at Bonsall Moor, Matlock. I am aware that Ineos Fluor acquired the Glebe Mines Ltd. Business at the end of November 2007.

The application to extract fluorspar at Tearsall has been submitted because this is the only source acid grade fluorspar in the UK. This is the only option available to maintain an indigenous supply of a strategically important mineral to the UK Chemical Industry. Importation of fluorspar from abroad is not a viable proposition.

Fluorspar is a key raw material and is crucial for the manufacture of many household objects and appliances from asthma inhalers, refrigerators, mobile phone components, computer components and non-stick frying pans. It is the key raw material for hydrofluoric acid which in turn is the key component in fluorchemical manufacturing.

Ineos Fluor have estimated that the refusal of the planning application would result in the closure of their HF, HCFC-22 and HFC-125 Plants. This in turn would result in the closure of 50% of Ineos Chlor Vinyls chlorine ~~oil~~ room capacity. It would have a major impact on the only sulphuric acid plant at Ineos Enterprises.

THE CONSTITUENCY OF HALTON
WIDNES RUNCORN (WEST) HALE

Constituency Office: Tel: 0151 424 7030 Fax: 0151 495 3800

In total 1,500 jobs would be lost in Runcorn and Derbyshire. This would represent the loss of around £280 million to the UK economy.

This would represent a significant blow to the manufacturing sector of our economy and would impact regionally and nationally.

The impact of the actual extraction will be limited to a six year maximum, with progressive restoration taking place. At the end of the extraction Glebe Mines Ltd. Are committed to full restoration to ensure the impact of the extraction would not result in a fundamental change in the nature and character of the national park or wider surrounding areas.

I understand the concerns about any development of the Peak District National Park and the wish to preserve this are of outstanding natural beauty. Having studied the case presented by Ineos Fluor for their Tearsall Planning Application, I accept this is in the national interest for it to go ahead. The impact of a refusal of the planning application on the economy of my constituency, the area of Halton, the North West and nationally would be devastating. It would be a very serious blow to what is left of the manufacturing base in the UK.

I would be grateful if you would please ensure that the points raised in this letter are taken fully into account when the Tearsall Planning Application comes forward for consideration.

yan tin

Derek Twigg

Derek Twigg

MIKE HALL MP
WEAVER VALE



HOUSE OF COMMONS
LONDON SW1A 0AA

PEAK DISTRICT NATIONAL PARK AUTHORITY	
ALLOCATED GROUP	JRD CEO
DATE DEC'D	- 9 JUN 2008 JRS
ACKNOWLEDGEMENT	JH 12/6/08
REPLY	
FILE ALLOCATION	
COPIED TO:	10213

Mr Jim Dixon - Chief Executive
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
Derbyshire
DE45 1AE

06/06/2008

Our Ref: **INEO01002/01081047MF**
(Please quote in all correspondence)

Dear Mr Dixon,

Planning Application for Fluorspar Extraction at Tearsall, Peak District National Park

I have been contacted by representatives of Ineos Fluor about the planning application by Glebe Mines Ltd. to extract fluorspar by extending the existing Tearsall workings at Bonsall Moor, Matlock. I am aware that Ineos Fluor acquired the Glebe Mines Ltd. business at the end of November 2007.

The application to extract fluorspar at Tearsall has been submitted because this is the only source of acid grade fluorspar in the UK. This is the only option available to maintain an indigenous supply of a strategically important mineral to the UK Chemical Industry. Importation of fluorspar from abroad is not a viable proposition.

Fluorspar is a key raw material and is crucial for the manufacture of many household objects and appliances from asthma inhalers, refrigerators, mobile phone components, computer components and non-stick cookware. It is the key raw material for hydrofluoric acid which in turn is the key component in fluorochemicals manufacturing.

Ineos Fluor has estimated that the refusal of the planning application would result in the closure of their HF, HCFC-22 and HFC-125 Plants. This in turn would result in the closure of 50% of Ineos ChlorVinyls chlorine cell room capacity. It would have a major impact on the UK's only sulphuric acid plant at Ineos Enterprises.

In total 1,500 jobs would be lost in Runcorn and Derbyshire. This would represent the loss of around £280 million to the UK economy.

SERVING THE CONSTITUENTS OF WEAVER VALE
Constituency Office: Office 4, Castle Park, Frodsham, Cheshire, WA6 6SB
Tel: 01928 735000 E-mail: hallm@parliament.uk
www.epolitix.com/Mike-Hall



This would also represent a massive blow to the manufacturing sector of our economy and would impact regionally and nationally.

I am aware of the concern that the extraction operation, if approved, would have a detrimental impact on the visual amenity of the Peak District. The construction impacts of the proposed development will be short term and temporary in nature. ✓

The impact of the actual extraction will be limited to a maximum of six years with progressive restoration taking place. At the end of the extraction Glebe Mines Ltd. is committed to full restoration to ensure the impact of the extraction would not result in a fundamental change in the nature and character of the national park or wider surrounding areas. ✓

I understand the concerns about any development of the Peak District National Park and the wish to preserve this area of outstanding natural beauty. Having studied the case presented by Ineos Fluor for their Tearsall Planning Application, I accept this is in the national interest for it to go ahead. The impact of a refusal of the planning application on the economy of my constituency, the area of Halton, the North West and nationally would be devastating. It would be a very serious blow to what is left of the manufacturing base in the UK.

The restoration measures which are an integral part of the planning application give a high degree of reassurance that the extraction of fluorspar at Tearsall will not have a long term adverse impact on the visual amenity and the outstanding area of natural beauty in the Peak District. ✓

Can you please ensure that the points raised in this letter are taken fully into account when the Tearsall Planning Application comes forward for consideration?

Yours sincerely,

Mike Hall MP

PEAK DISTRICT NATIONAL PARK AUTHORITY	
PLANNING DEPARTMENT	
DATE	- 9 JUN 2008
RECD	
APPROVED BY:	
BY:	
FOR ALLOCATION:	
COPIES TO:	



GEORGE OSBORNE MP
SHADOW CHANCELLOR OF THE EXCHEQUER

① Copy to Sue Smith + Nav
② Return original to me

House of Commons, London SW1A 0AA
Telephone: 020 7219 8214 Facsimile: 020 7219 6322

PEAK DISTRICT NATIONAL PARK AUTHORITY	
ALLOCATED: GROUP	SAS
DATE RECD	15 MAY 2008
ACKNOWLEDGEMENT:	
REPLY:	M10213
FILE ALLOCATION:	
REF TO:	

Mr Narendra Bajaria
Chair
Peak District National Park Authority
Aldern House, Baslow Road
Bakewell
Derbyshire DE45 1AE

12 May 2008

N. Bajaria

My constituent Mr A J Sayle of 20 Tudor Close, Rudheath, Northwich, has written to me regarding the application to extend the fluorspar mine at Tearswell. I enclose a copy of his letter and would be grateful if you could take his views into consideration.

By order
George Osborne

George Osborne MP

Working for the constituents of Tatton
Constituency Office:

Telephone: 01565 873037 Facsimile: 01565 873039 Website: www.georgeosborne.co.uk

G.Osborne MP
House of Commons
London

SW1 0AA

29 April 2008.

Dear Sir,

I write to yourself to request your pro-active support regarding the Application by Glebe Mines Ltd to extract fluorspar and associated vein minerals by open pit methods from an extension of the workings at Tearsall, Bonsall Moor, Derbyshire

The full details are enclosed by a copy of my letter (attached) to the Peak District National Park Authority.

Although the application is within the Peak District Park , a source of sustainable UK fluorspar is of vital importance as a strategic raw material for our country and my job and family income for my place of work (Ineos Fluor Ltd at Runcorn)

I do hope that after due consideration that you will be able to actively support this application.

Yours sincerely

A.J. Sayle

A.J.Sayle

A.J.Sayle
20 Tudor Close
Rudheath
Northwich
Cheshire
CW9 7UJ
Tel 01606-45503

Ms Sue Smith
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell, Derbyshire
DE45 1AE

A.J.Sayle
20 Tudor Close
Rudheath
Northwich
Cheshire
CW9 7UJ
Tel 01606-45503

29 April 2008.

Dear Ms Smith,

RE. "Application to extract fluorspar and associated vein minerals by open pit methods from an extension of the workings at Tearsall, Bonsall Moor, Derbyshire."

As you are aware, an application has been submitted to extend the fluorspar mine at Tearsall, Derbyshire. I am writing in order to submit my support for the application, and to give my views on why it would be beneficial and appropriate to approve the application.

Glebe Mines Ltd provide direct and indirect employment for 110-150 people locally. Without planning permission, Glebe Mines Ltd will close and these jobs will be lost.

Additionally, the fluorspar produced by Glebe Mines Ltd is the key raw material for fluorochemicals which are essential for the manufacture of many vital consumer goods such as asthma inhalers, refrigerators, telephone components etc. If Glebe Mines Ltd is shut down, downstream manufacturing plants in INEOS will also be forced to close with a total loss of 1500 jobs and a loss to the UK economy of £280m.

It is essential that Glebe Mines Ltd remains in operation as it is the only UK source of fluorspar and there is not enough fluorspar available globally to sustain downstream manufacturing plants in the UK. As a employee of Ineos Fluor my job and family income depends upon a sustainable source of UK fluorspar..

I am fully aware of the concerns that mining can raise in some people's minds but I would point out that Glebe Mines Ltd and Ineos Fluor Ltd are very responsible companies, in particular :

- 1) Glebe Mines are only interested in the extraction of fluorspar and will only remove limestone which is directly associated with the fluorspar.
- 2) Glebe Mines has an excellent track record of site remediation. Tearsall will be mined for 6 years and then remediation will take place over the 7th year. Remediation work will enhance biodiversity through the provision of ponds for Great Crested Newts, bat caves and the retention of cliff faces for bird nesting.
- 3) In addition, the extension of Tearsall will provide enough ore for Glebe Mines Ltd to meet INEOS's requirements, while helping to fund investment in a greater proportion of underground mining operations in the future. This will reduce reliance on open pit mining, resulting in a reduction in lorry loads on the Peak Park roads as less associated limestone would be mined.
- 4) Wider environmental considerations should also be taken into consideration. If overseas fluorspar was available in the quantities required the carbon footprint would be substantially worse than locally mined fluorspar, which in turn would have an adverse impact on climate change.



Northwest
REGIONAL DEVELOPMENT AGENCY

PEAK DISTRICT NATIONAL PARK AUTHORITY	
ALLOCATED GROUP OFFICER	MIA SAS
DATE REC'D	- 3 DEC 2008 5/12/08
ACKNOWLEDGEMENT	(UK)
REPLY:	
FILE ALLOCATION:	10213
NUMBER TO:	

Mark Hughes
Executive Director
Enterprise & Innovation

Sue Smith
Development Control/Planning
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
Derbyshire
DE45 1AE

01st December 2008

Dear Ms Smith

Proposal: Proposed extraction of fluorspar ore and associated vein mineral by open pit methods from an extension to the workings at Tearsall.

Planning Application Number: Application NP/DDD/0208/0104

The NWDA has highlighted in previous correspondence that the above planning application is essential to the future of Ineos Fluor which has a significant role in the future of the North West economy, chemicals sector and supply chain.

We are aware that the committee meeting to review this application has been deferred to December 12th 2008. We would therefore like to present the current economic situation facing the UK and the Northwest region as a further concern which reinforces the importance of this application to the NW economy.

Current state of the UK economy

The UK is now officially in recession having undergone three consecutive quarters without economic growth – projections going forward now suggest that recession conditions will continue into 2009 and possibly 2010. Company insolvencies were 26% higher in Q3 2008 compared to the previous year. Unemployment reached 5.8% in the three months to September 2008, equivalent to 1.83m people out of work in the UK. Forecasters are estimating that unemployment will increase to over two million, with some suggesting over three million as economic conditions worsen.

Current Situation of the Northwest Economy

Unemployment figures released on November 11th showed an increase - 230,000 people are now unemployed in the Northwest region. This was the largest rise of any UK region with the regional unemployment rate rising to 6.8% (notably above the average England rate). There have already been a considerable number of job loss announcements in the area local to Ineos

Northwest Regional Development Agency
Renaissance House,
PO Box 37, Centre Park,
Warrington, WA1 1XB

Telephone: +44 (0)1925 400402
Fax: +44 (0)1925 400402
E-mail: mark.hughes@nwda.co.uk
www.nwda.co.uk

INVESTING IN
englandsnorthwest

considerable number of job loss announcements in the area local to Ineos Fluor with house builder David McLean going into liquidation and shedding close to 500 staff, Runcorn-based Howden Kitchens announcing 70 job losses and closure of the Bayer Crop Site in Widnes with the loss of 100 staff. Firms within the chemical industry are also beginning to suffer with Chemix, a Stockport-based business closing with the loss of 60 jobs.

The economic situation will prove challenging for the UK and Northwest for some time. As mentioned in previous correspondence, Ineos Fluor is a significant contributor to the economy of the Northwest and failure to approve this application puts a large number of jobs at risk throughout the NW chemicals sector. We ask that you take the current economic situation into account when considering this application.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'MH' followed by a long horizontal stroke.

Mark Hughes

Executive Director

DEREK TWIGG M.P.



HOUSE OF COMMONS
LONDON SW1A 0AA

Ref: DT/MT/1676/40

5 January 2009

Mr John Lomas
Director of Planning
Peak District National Park Authority
Aldern House
Baslow Road
Bakewell
DE45 1AE

copy

PEAK DISTRICT NATIONAL PARK AUTHORITY	
ALLOCATED : GROUP OFFICER	<i>JTL</i>
DATE REC'D	06 JAN 2009
ACKNOWLEDGEMENT:	
REPLY:	
FILE ALLOCATION:	
COPIED TO:	

Re: Glebe Mines Ltd - Tearsall Site

I enclose a copy of a letter I have received from Ian Pearson MP, Economic and Business Minister at the Department for Business Enterprise & Regulatory Reform which says there is a National Need, which I hope you find useful.

Derek Twigg

THE CONSTITUENCY OF HALTON
WIDNES RUNCORN (WEST) HALE

Constituency Office: Tel: 0151 424 7030 Fax: 0151 495 3800

Our Ref: JPW/JC/B1084-005
Your Ref: M10213
Date: 10 December 2008

Sixth Floor, Silkhouse Court,
Tithebarn Street, Liverpool L2 2LZ
Tel: 0151 227 1301
Fax: 0151 227 1300
E-mail: post@bremners.com
MDX 14119 Liverpool

Mrs B. H. Primhak
PDNPA
Aldern House
Baslow Street
BAKEWELL
DE45 1AE

Dear Mrs Primhak

Re: Glebe Mines – Tearsall Extension; Longstone Edge, Great Longstone, Derbyshire

On behalf of our client Bleaklow Industries Limited (BIL) we have been passed a copy of the Officers' Report to the Planning Committee Agenda item no. 6 for the Planning Committee Meeting on 12 December 2008. That Report was published only 6 December. We cannot, and do not attempt to address all the matters raised in that Report in the very short time available, but we do wish to draw attention to one important issue.

BIL is concerned to note the proposals for the possible completion of a deed of planning obligation affecting land within its ownership. BIL has not been consulted with regard to the matter either by the Applicant or by the Authority.

We respectfully refer the Committee to the Judgment of Mr. Justice Sullivan dated 29 November 2006 and the comments therein regarding the use of the Section 106 procedure to attempt to forestall or pre-empt the rights of parties affected by, but not party to, any such procedure.

It follows from that Judgment that any subsequent attempt to impinge upon the 1952 Permission area by the use of the same means would be inherently flawed, and susceptible of challenge, particularly having regard to the outstanding matters which are the subject of the hearing before the Court of Appeal in February 2009.

Please confirm the Committee Members will be duly advised of this letter and the Judgment mentioned, a copy of which is enclosed for the assistance of members, so that they can be fully and properly appraised of all relevant considerations, before making any decision upon the Tearsall Application.

Yours faithfully

