




About you

- First name: Matthew
- Surname: Cuthbert
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- I am completing this form as: A business
- If other, please specify:
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- Job title: Assistant Estates Surveyor
- Organisation: Aggregate Industries UK Limited
- On behalf of:
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- Email address: 
- Did you submit comments on the Regulation 18 (First Draft) Local Plan?: Yes
- Local Plan Consultee List: I would like to be added to the Local Plan consultee list

Share your comments

- Does your comment relate to a paragraph, policy or policies map?: Paragraph
- Please tell us which paragraph/policy your comment relates to: Chapter 1 - Strategy (Page 13)
- Do you consider the Local Plan to be legally compliant?: Yes
- Do you consider the Local Plan to be sound?: No

- Do you consider the Local Plan to be compliant with the duty to co-operate? Yes

- Please tell us why you have answered yes and/or no to the questions above:

OBJECTION - Chapter 1 – Vision and Spatial Strategy, first paragraph on Page 13 states “Major Development will not take place in the National Park other than in exceptional circumstances”. The wording should reflect Paragraph 172 of the National Planning Policy Framework 2019 (NPPF19) which uses the word ‘should’, as in “Planning permission should be refused for major development other than in exceptional circumstances. This is so the Local Plan is consistent with the NPPF19 as per Paragraph 35 Point (d). This was previously highlighted during the First Draft consultation and remains within the Final Draft.

- What modifications do you consider necessary to make the Local Plan legally compliant and/or sound?:

It is suggested that the wording of the first paragraph is amended to read “Major development should not take place in the National Park other than in exceptional circumstances”.

- Do you wish to participate in hearing session(s)?:

No, I do not wish to participate in hearing session(s)

- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:

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Share your comments

- Does your comment relate to a paragraph, policy or policies map?:

Paragraph
- Please tell us which paragraph/policy your comment relates to:

Chapter 6 - Minerals, Waste and Energy - Page 123
- Do you consider the Local Plan to be legally compliant?:

Yes
- Do you consider the Local Plan to be sound?:

No
- Do you consider the Local Plan to be compliant with the duty to co-operate?:

Yes
- Please tell us why you have answered yes and/or no to the questions above:

OBJECTION - Chapter 6 – Minerals, Waste and Energy, Page 123 second paragraph which states “Minerals Development should: ● maximise the use of recycled materials and secondary aggregates, in preference to primary minerals extraction. Recycled and secondary aggregates are unsuitable for some construction applications as a substitute for primary aggregates. The wording of this bullet point should be revised to reflect the advice in the NPPF 2019 at Paragraph 204 (b) . This is so the Local Plan is consistent with the NPPF19 as per Paragraph 35 Point (d). This was previously highlighted during the First Draft consultation and remains within the Final Draft.
- What modifications do you consider necessary to make the Local Plan legally compliant and/or sound?:

It is suggested that the wording of the paragraph is amended by including the words “as far as practicable”.
- Do you wish to participate in hearing session(s)?:

No, I do not wish to participate in hearing session(s)
- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:

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Share your comments

- Does your comment relate to a paragraph, policy or policies map?: Policy
- Please tell us which paragraph/policy your comment relates to: Chapter 6 - Minerals, Waste and Energy - Policy 6.1 (1) New or Extended Mineral Operations
- Do you consider the Local Plan to be legally compliant?: Yes
- Do you consider the Local Plan to be sound?: No
- Do you consider the Local Plan to be compliant with the duty to co-operate?: Yes
- Please tell us why you have answered yes and/or no to the questions above: OBJECTION - Chapter 6 – Minerals, Waste and Energy, Policy 6.1 (1) New or Extended Mineral Operations. The Policy as drafted appears to apply the ‘exceptional circumstances’ test in Paragraph 172 of the National Planning Policy Framework 2019. However the wording of this policy is not consistent with the NPPF19 and should be amended so the Local Plan is consistent with the NPPF19 as per Paragraph 35 Point (d). This was previously highlighted during the First Draft consultation and remains within the Final Draft.
It is suggested that to be consistent with the NPPF19 the wording should be amended to include: "1. Major Minerals Development a) ‘including the impact of permitting or refusing it on the local economy’ b) ‘and the relative costs of these’ c) ‘including how these could be moderated and’" In addition, the word ‘will’ needs to be replaced with ‘should’ to be consistent with national policy/NPPF 2019.
- What modifications do you consider necessary to make the Local Plan legally compliant and/or sound?:
- Do you wish to participate in hearing session(s)?: No, I do not wish to participate in hearing session(s)
- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:

Share your comments

- Does your comment relate to a paragraph, policy or policies map?: Policy
- Please tell us which paragraph/policy your comment relates to: Chapter 6 - Minerals, Waste and Energy - Policy 6.1 (1)
- Do you consider the Local Plan to be legally compliant?: Yes
- Do you consider the Local Plan to be sound?: No
- Do you consider the Local Plan to be compliant with the duty to co-operate?: Yes
- Please tell us why you have answered yes and/or no to the questions above:

OBJECTION - Chapter 6 – Minerals, Waste and Energy, Policy 6.1. The wording for this policy has been changed from 'Major' to 'Large Scale'. The term 'Major' is used within the National Planning Policy Framework 2019 (NPPF19) during Paragraphs 172 and 173 (Including Footnote 55) when referring to development in the National Parks and not 'Large Scale'. This wording should be amended so that the Local Plan can be consistent with the NPPF19 as per Paragraph 35 Point (d).
- What modifications do you consider necessary to make the Local Plan legally compliant and/or sound?: It is suggested that to be consistent with the NPPF19 the wording should be amended from 'Large Scale' to 'Major'.
- Do you wish to participate in hearing session(s)?: No, I do not wish to participate in hearing session(s)
- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:
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Share your comments

- Does your comment relate to a paragraph, policy or policies map?: Paragraph
- Please tell us which paragraph/policy your comment relates to: Chapter 6 - Minerals, Waste and Energy - Paragraph 6.1.4
- Do you consider the Local Plan to be legally compliant?: Yes
- Do you consider the Local Plan to be sound?: No
- Do you consider the Local Plan to be compliant with the duty to co-operate?: Yes
- Please tell us why you have answered yes and/or no to the questions above:

OBJECTION - Chapter 6 – Minerals, Waste and Energy, Paragraph 6.1.4. The wording for this paragraph has been changed from 'Major' to 'Large Scale'. The term 'Major' is used within the National Planning Policy Framework 2019 (NPPF19) during Paragraphs 172 and 173 (Including Footnote 55) when referring to development in the National Parks and not 'Large Scale'. This wording should be amended so that the Local Plan can be consistent with the NPPF19 as per Paragraph 35 Point (d).
- What modifications do you consider necessary to make the Local Plan legally compliant and/or sound?: It is suggested that to be consistent with the NPPF19 the wording should be amended from 'Large Scale' to 'Major'.
- Do you wish to participate in hearing session(s)?: No, I do not wish to participate in hearing session(s)
- If you answered yes to the hearing session(s), please tell us why you consider this to be necessary:
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