

15 April 2020

Mr Nick Palmer BA(Hons) BPI MRTPI
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Our Ref: 404.00925.00002

Dear Mr Palmer

**NOTTINGHAMSHIRE MINERALS LOCAL PLAN
STEETLEY DOLOMITE - RESPONSE TO MATTER 3**

The following statement sets out Steetley's response to the above Matter with regard to industrial dolomite provision.

Introduction

Steetley Dolomite Limited (Steetley) is a UK operating division of Lhoist Group, a global producer of high quality specialist lime and dolime products headquartered in Belgium and employing over 6,400 employees worldwide at over 100 locations. Lhoist has two active operations in the UK, at Whitwell, near Worksop and Hindlow, near Buxton. Steetley operates the Whitwell Works which produces dolime using dolomitic limestone as the raw material. Dolime is an important raw material in the steel, refractory and glass industries.

Whitwell Works is adjacent to Whitwell Quarry, which is operated by Tarmac who currently supply industrial grade dolomite to the Works under a supply agreement. The Works employs approximately 60 people directly, with additional contract labour and supply chain activity. In 2019 the Works generated a turnover over of approximately £32 million, adding considerable value to the local and national economy. Further value is provided to the economy through the supply of dolime from the Works to downstream industries such as steel-making that make a larger contribution to wealth creation and employment.

Over 60% of output is exported around the world, contributing to the UK's balance of payments.

Requirement for new reserves

Whitwell Works has an annual demand of approximately 1 million tonnes of dolomite. Reserves of industrial grade dolomitic limestone at Whitwell Quarry are expected to become exhausted in the next few years (currently estimated at around 2025). Whilst the Quarry is expected to continue producing aggregates, Steetley must look elsewhere for supplies of industrial grade dolomite for the Works. Steetley is working with SLR Consulting Limited (SLR) to establish a new supply of high quality industrial grade dolomitic limestone to maintain production at the Works for the foreseeable future. This has taken the form of a site search programme of development based on geological, environmental and logistical criteria.

As part of its development programme for replacement of dolomitic limestone reserves, Steeley has recently undertaken a drilling programme on a number of sites to sample and test mineral quality. The Works has very specific chemical criteria and this is likely to limit the choice of locations that would be suitable for development of new reserves to supply the Works. Steeley, through Lhoist's laboratory support in Belgium, is currently taking the core samples through a rigorous testing programme. It is expected that the company will be in a position to confirm which site or sites meet the specification for the Works by late 2020 / early 2021.

The site search has focused on the dolomitic (Permian) limestone outcrop within a reasonable transport distance of the Works. Due to the location of the Works close to several local authority boundaries, this includes sites in Derbyshire, Nottinghamshire, Rotherham and Doncaster. Steeley has undertaken preliminary consultation with all four mineral planning authorities as part of its development programme. The intention is to submit a planning application in due course for a preferred site

MLP Matter 3 – Minerals Provision Policies

Your Matters, Issues and Questions document sets out the following Issue and Question in relation to minerals provision policies:

Issue: Whether the minerals provision policies are positively prepared in terms of making adequate provision for minerals, whether they are consistent with national policy, justified and otherwise sound.

Policy MP9: Industrial Dolomite Provision Question 39: Should Policy MP9 require consideration of environmental, transport and other factors?

Steeley response to Issue (adequate provision)

Steeley is satisfied that the MLP provides adequate support for industrial dolomite extraction as set out in Policy MP9: "Proposals for industrial dolomite extraction will be supported where a need can be demonstrated".

MP9 is consistent with national policy as set out in NPPF, which states that Minerals Planning Authorities should plan for a steady and adequate supply of industrial minerals. The economic importance of industrial dolomite is highlighted in the Mineral Planning Factsheet prepared by the British Geological Survey and the Office of Deputy Prime Minister in 2006¹ as part of series on economically important minerals intended to inform the land-use planning process.

The Mineral Planning Factsheet correctly identifies that Permian limestone which runs in a narrow north-south outcrop from Newcastle to Nottingham is the main source of dolomite in the UK, but that "the sequence is highly variable, both regionally and locally, in its geology and chemical and physical properties, and thus its suitability for particular applications".

Steeley's view is that the Minerals Planning Factsheet, although in some ways dated, especially with regards to production, fully expresses both the importance of the mineral to the economy and the

¹ British Geological Survey and the Office of Deputy Prime Minister, 2006 *Mineral Planning Factsheet: Dolomite*

restricted nature of the geological outcrop. The variability of the Permian outcrop is also crucial to decision making, and it is this variability that led Steetley to undertake an extensive programme of exploratory drilling during 2019 and 2020 in order to ascertain mineral quality and suitability for use in industrial minerals applications.

Consequently, Steetley considers that the requirement for 'adequate provision' is best carried out by means of a criteria based policy due to uncertainty regarding the location of suitable quality industrial dolomite. It would be inappropriate for the MLP to define specific site allocations for dolomite in the absence of data on suitability. The drilling programme undertaken by Steetley has included three potential sites within north Nottinghamshire. Once the laboratory testing is completed, Steetley will then have sufficient data to take forward a preferred site based on both technical and environmental considerations.

Policy MP9 refers to demonstrating the need for the mineral. Steetley is confident that it will be able to provide evidence of need for the mineral at the appropriate time. In recent years the Works has experienced increased demand for its dolomite products both nationally within the UK and globally. Steetley is content that Policy MP9 requires need to be demonstrated to be weighed in the planning balance.

Steetley response to Question 39 (consideration of other factors)

It is Steetley's understanding that the MLP should be read as a whole. Therefore, although Policy MP9 does not in itself set out the criteria against which proposals for new development would be assessed, the development management policies of the plan (DM1 to DM12, and DM16) would apply to any planning application that is brought forward for dolomite extraction.

Steetley understands that there is particular sensitivity with regard to the historic environment in the area around Holbeck, which coincidentally is the closest area in Nottinghamshire to Whitwell Works. This is due to the presence of Creswell Crags, which is a Scheduled Ancient Monument, a Site of Special Scientific Interest and forms part of the Registered Park and Garden of Welbeck Abbey. Steetley is aware of the sensitivity of this feature and fully understands that the policy support provided by MP9 would be weighed in the planning balance with other national and local policy should it be decided to bring forward a planning application for dolomite extraction in this area.

Yours sincerely

SLR Consulting Limited



Anne Dugdale

Principal Planner

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