

# English Stone Forum

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**Mr B Miller**  
**Minerals and Waste Policy Team**  
**C4, Environment Directorate**  
**County Hall**  
**Taunton**  
**Somerset TA1 4DY**

**24<sup>th</sup> September 2010**

**Dear Mr Miller**

## **SOMERSET BUILDING STONES PAPER – ISSUES CONSULTATION FOR THE MINERALS CORE STRATEGY**

### **1. The English Stone Forum**

The English Stone Forum was set up to promote dialogue between key interested organisations to debate and disseminate information on issues concerning the supplies of appropriate building and roofing stone, and roofing slate that are essential for repair and conservation of existing buildings and in new building that provides a sense of place by using traditional materials. The aims and membership of the Forum are at Appendix A to this response. I am responding in my capacity of current chairman of the Forum. **Views expressed in this response are those of the Forum. These are not necessarily views of those organisations that representatives attending the English Stone Forum Committee are drawn from.**

### **2. Responses to consultation questions:**

The English Stone Forum welcomes this consultation and hopes that other Minerals Planning Authorities with significant building and roofing stone resources will follow Somerset's lead in considering these matters.

#### **Q1 Should there be a mechanism to help match policies and decision relating to the provision of local building stone with policies relating to the demand for local building stone?**

Yes – consideration should be given to the demand for stone for repair and maintenance, new building in traditional styles and other new building. However some caution should be exercised about the term “local”. This often tends to ignore the sometimes wider national interest in the supply of particular stones. Should the policy also reflect, therefore, on the demand for some Somerset stones outside the county e.g. there are no other sources of Ham Stone (ubiquitous throughout south-west England, Doulling Stone (widely used in Bristol (Avon) and Somerset is currently the principal supplier of Blue Lias limestones (Lower Jurassic) to the rest of the UK.

#### **Q2 Is the importance and use of local building stone as part of Somerset's built heritage and local character recognised and promoted enough?**

It is hoped that adequate promotion is being undertaken. Although, on the whole, people recognise that stone contributes to the historic heritage and character of the area, the complexity of that contribution is often not understood. Individual stone types are not easily recognised, even by many

conservation professionals including architects, conservation officers and planners. Planning officers frequently apply conditions to LBC or Conservation Area consent to the effect that 'natural stone' should be used, without stating which natural stone. Sometimes this is qualified by the phrase 'to match existing' but this is also open to interpretation. In another case, the correct type of stone was specified in planning conditions at a time when there was no source of that stone so, when work started on site, planners allowed an alternative type of stone that did not match that already used exclusively in the village. More knowledge about availability of stone types is needed to appropriate decisions can be made at the planning stage. Instances also occur where, for example, a new quarry in particular stone may be refused on the grounds that alternative supplies of material from another geological formation are already permitted, even though the two differed in properties and appearance. Listed descriptions may not help either because stone types are so often wrongly identified. Therefore a great deal more needs to be done to clarify and promote the contribution that stone makes to built heritage and local character.

**Q3 How much local building stone are you or your organisation likely to need over the next 15 years. Is this mainly for restoration, conservation, ornamental, decorative or new build works?**

Not a matter for the relevant to the ESF. However consideration should also reflect national interests (see comment on Question 1, above)

**Q4 Is the need for building stone for conservation/restoration work similar to that for new buildings or is the importance/demand of one greater than the other?**

Adequate supplies of appropriate stone are essential in repair and maintenance of historic buildings and structures but are also important for new building using traditional local materials. However it should not be overlooked that the continuing economic viability of many quarries depends, in part, on sales for other new building. Therefore all need to be taken into account.

**Q5 How can the MPA facilitate the recycling of local building stone for use by the industry?**

The MPA might consider keeping a register of reputable companies undertaking the recycling of stone but considerable caution is needed because of the danger that some demolition might be undertaken in order to secure supplies of valuable stone. There are increasing examples of remote farm buildings, stone slate roofs, field boundary walls being removed by unscrupulous individuals for sale on the 'stone black market' because the value of the material has increased dramatically.

**Q6 Where the use of natural stone is impractical does reconstituted or cast stone offer an alternative material for heritage and aesthetic purposes? Should the MCS provide guidance on the use of such reconstituted stone?**

While reconstituted or cast stone may not be inappropriate in some new buildings, depending on location, it should not be used for repair and maintenance of stone structures because of very different technical (especially weathering and porosity characteristics) properties and aesthetic appearance. A clear definition of reconstituted and cast stone is also needed.

**Q7 Should imported stone be used in preference to local Somerset or UK sourced stone where suitable stone is available and economically viable to use?**

Suitable matching stone to that in existing structures (i.e. stone from the original source) should be used in preference, wherever practicable, because of compatible properties and appearances. It is important to secure adequate sources of supply. While imported stone may be appropriate for some types of new development, and it may in some cases be cheaper, it is important to recognise that it should come from ethically and sustainably managed quarries and that long distances of transport add significantly to levels of carbon emissions. Whereas imported stone may superficially appear to be similar to that originally sourced domestically, detailed specification, weathering characteristics and performance over time, may not be appropriate to UK conditions. Reliance on ever greater volumes of imports may in itself inhibit the viability of local sources, either extant or proposed.

It is important not only to consider the track record of an imported stone in its own country but also its likely durability in the sometimes more extreme climate of the UK. The use of a limestone or sandstone in the equable climates of central and southern Europe, for instance, does not guarantee it will be as durable through a UK winter.

**Q8 Should there be a hierarchy or order of preference for the sourcing and use of building stone? For example, reclamation of used local stone, then use of fresh quarried local stone, then use of UK sourced stone, then use of imported stone then use of reconstituted stone.**

The ESF supports this proposal but with the reservation that, while the reclamation of used local stone is strongly desirable, that should not create a perverse incentive that some demolition, or thefts, might be undertaken in order to secure supplies of valuable stone. Therefore a preferable hierarchy might be:

1. local stone of the same type
2. local stone of an appropriate different type (e.g. for new building in a conservation area) or regional or UK stone of the same type (e.g. for repair of an existing historic building)
3. if none of these are available, then reclaimed material or imported stone of a similar type might be used if the aesthetic and technical properties are suitable

**Q9 Are there any benefits or preferences in maintaining on-site stone dressing and cutting facilities (e.g. at the quarry source) or should these be operated off site?**

There may be benefits of locating stone dressing and cutting facilities at the quarry in order to minimise the need to transport material and, therefore, carbon emissions. But it must be recognised that some major long term repair initiatives (e.g. work on cathedrals) may require such facilities at the building or in related urban locations rather than at the quarry. In the case of clusters of small quarries the best economic model may be a central processing plant serving all of them. However the ESF is also aware of an instance elsewhere in England of a stone operator investing in its own cutting equipment and then declining to supply uncut stone to a specialist cathedral workshop. It is important that supplies of stone should be appropriate to the situation.

**Q10 Should there be a hierarchy or order of preference relating to the quarrying of fresh building stone where geological resources are available? For example, the lateral extension or deepening of existing quarries the re-opening of former quarries or the opening of new quarries.**

It makes sense in economic and sustainability terms to make full use of existing quarries and to extend these where geological conditions and environmental considerations are suitable. However it should be recognised that it is sometimes necessary to re-open old quarries or to open new sites where particular types of stone are required or to allow competition within the industry.

**Q11 Are there any benefits in the reopening of former quarries instead of creating new quarries?**

This depends on environmental circumstances and the types of stone that are needed. In some cases, the nature and quality of resources at former quarries can be established from performance in existing structures more readily than at potential new sites. As it is, very few 'new' indigenous stones ever reach the UK market.

**Q12 Should preference be given to the use of more smaller quarries as a source of local building stone or fewer larger quarries supplying the county's needs where possible?**

While, in economic terms, fewer large quarries would make sense, the key issue is securing supplies of suitable stone whether from small or larger quarries. In practice, sites of a variety of sizes are likely to be required.

**Q13 Under what circumstance if any should the opening of quarries for small scale extraction of local specialist building stone types be considered?**

This should be considered for securing supplies of particular types and qualities of stone depending on demand. This may be for strictly local use but it should not be overlooked that Somerset stone has been used over a much wider area than the County so the full demand, not just local demand, should be kept in mind.

**Q14 What potential impacts of quarrying are particularly relevant or concerning for Somerset and are there other issues not mentioned?**

The potential impacts of operations are fairly stated in the consultation document. While all sites should be designed and managed to minimise adverse environmental and other impacts it should be recognised that small sites may have fewer impacts than large ones. Policies and planning conditions should be proportionate to the potential impacts of the proposed operations.

**Q15 How important is the carbon footprint of quarrying, working, and transporting local building stone. How can it be mitigated.**

The carbon footprint of the industry is minimised if supplies are secured primarily from well managed local sources using energy efficient plant and equipment and short transport pathways. Indigenous natural stone is inherently “greener” than any type of imported stone, re-constituted stone and many other types of building materials because of relatively lower carbon emissions and embodied energy in the products.

**Q16 What are the opportunities and priorities for the future restoration and after-use of completed building stone quarries?**

Completed building stone quarries can make significant contributions to biodiversity and geodiversity. However it should be kept in mind that successful habitat creation can sometimes work against the re-opening of a site from which material is needed sporadically for repair or maintenance work. This should be taken into account when restoration plans are considered.

**Q17 Should areas of proven local building stone sources be safeguarded for future extraction and if so how?**

Yes, selected key resources should be safeguarded from other forms of development that may prevent their future extraction. Consideration should be based on an understanding of demand and on information secured from the industry, the British Geological Survey and the English Heritage Strategic Stone Study. It is also worth referring to the work on safeguarding specifically relating to building stone resources, carried out by the National Stone Centre for Derbyshire County Council and English Heritage. In this context a hierarchical approach could be considered. This can enable comparisons to be made between the case for working and for addressing conflicting interests.

**Q18 If developments threaten to sterilise proven valuable resources of building stone, should these be extracted and stored prior to the development commencing?**

This is desirable if practicable but in many cases the pressure to get on with other use of land leaves insufficient time for prior extraction of stone. Therefore it is, in general, better to work the land well before other development and to make that other development part of the proposed after-use of the site. There may also be problems, as well as costs, in storing stone. For instance, if this is stored at another quarry for any length of time it may prevent the extraction of some of the permitted reserves from that quarry. Also there may be significant transport impacts from moving the stone to the storage site.

Yours sincerely

Brian Marker  
Chairman, English Stone Forum

## **Appendix A: English Stone Forum Terms of Reference and membership**

### **Aims:**

- a) To encourage greater public interest and awareness of the stone built heritage of England and the threat it faces.
- b) To promote research into all aspects relating to the English Stone Industry and to disseminate the findings publicly.
- c) To encourage greater interest and awareness within government, local authorities, and the business community of England's stone built heritage, and to encourage the use of indigenous stone as appropriate and for the public benefit.
- d) The encouragement and promotion of research into
  - the long term protection, repair and conservation of the stone built heritage
  - the use of stone in new building
  - innovation in the sourcing and use of building stone and
  - public dissemination of the results of such research.
- e) 4.1 To assist in promoting awareness of opportunities for the training of persons employed, to be employed, or associated with English Stone Industry and of the necessary skills and experience needed to construct, conserve, repair and maintain the stone built heritage.
- f) Addressing the question of availability of indigenous stone required for the maintenance of the built heritage and for their use in new build projects.
- g) The identification of trends and factors which could have a detrimental effect on the stone built heritage and seek to address these difficulties.
- h) Actively encourage the economic use of English stone.
- i) To actively lobby Government etc for the use and benefits of using indigenous stones.

### **Membership**

The English Stone Forum consists of representatives of 11 organisations:

British Geological Survey,  
Building Research Establishment,  
Council for the Care of Churches  
English Heritage,  
Geological Society Geoconservation Commission,  
Institute of Historic Building Conservation,  
National Stone Centre,  
Natural Stone Industry Training Group,  
Royal Institute of British Architects,  
Royal Institution of Chartered Surveyors Building Conservation Forum,  
Stone Federation of Great Britain,  
Stone Roofing Association.