

9th November 2016

Informal Draft Local Plan Consultation
Development Plans Team
Planning and Building Control
Municipal Buildings
Dale Street
Liverpool L2 2DH

Email: development.plans@liverpool.gov.uk

Mineral Products Association Ltd

Gillingham House
38 - 44 Gillingham Street
London SW1V 1HU
Tel +44 (0)20 7963 8000
Fax +44 (0)20 7963 8001
info@mineralproducts.org
www.mineralproducts.org

Dear Sir/Madam

DRAFT LIVERPOOL LOCAL PLAN

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of British Precast and the British Association of Reinforcement (BAR), it has a growing membership of 480 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which has annual output valued at £144 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

We note the recent consultation of the above document and have the following comments to make.

We appreciate that the Draft Local Plan (DLP) is in its very early stages, but have some concerns over the absence of any serious consideration being given to mineral supply. The DLP seeks to deliver sustainable economic growth for the City which is supported by the Association. However, many of the aspirations require a steady and adequate supply of minerals products an inherent principle of the NPPF and we do not believe this has been properly considered in the DLP.

Duty to Cooperate

We note that the DLP refers to Cross Boundary Working - The *"Duty to Cooperate"*. However, there is no reference to the North-West Aggregate Working Party upon which the City Council is represented. With the stated absence in the DLP, of existing quarry sites within the boundary of the plan, there will be an undoubted reliance upon neighbouring mineral planning authorities within the NAWP; from with the Welsh mineral planning authorities and from Mineral Planning Authorities from further afield, for the supply of raw materials, to deliver the built development and major infrastructure projects.

Minerals Supply

Paragraph 1.3 of the DLP states the intention for an Infrastructure Delivery Programme (IDP) which will identify future infrastructure requirements (including physical, social and green infrastructure), to support population change and housing and employment growth.

The IDP will confirm, where possible, the type and location of new infrastructure provision required, the reason for its requirement, and the lead agency in its delivery, together with its cost, phasing and sources of funding. The working of the IDP should identify and be supported by appropriate resource assessment considerations addressing matters such as the availability of a sustainable minerals supply which will meet the Council's aspirations on Climate Change and other environmental considerations. In addition, further considerations should be given to the resource implications of other development for housing, employment, etc.. Our previous comments from March 2014 identified the need for a comprehensive mineral resourcing strategy to ensure provision of the required materials to support the planned regeneration and development. This has not been addressed within the current DLP.

There is significant reference within the DLP to heritage value; from the Liverpool City Centre Vision and the City Centre Wide Priorities, to the general text (6.118), and within specific policies such as Policies CC 8 and STP2 in the DLP. Indigenous supplies of local building stone are important to heritage assets and local distinctiveness. The alternative to an indigenous provision is to import materials. Imported materials can only compete in the UK market simply because their production is not subject to the costly cumulative regulatory burdens (including the planning constraints) which UK operators have to bear. In many cases, it has become easier to source dimension stone from abroad rather than negotiate the UK planning and environmental permitting systems, as is necessary to make supplies of indigenous materials available. Importing stone from remote sources such as India and China must raise questions on both economic and sustainability grounds, when suitable and often better materials can be made available in close proximity. Imported materials may be available which, on the face of it, appear to represent a "good match" for indigenous stone. However, these materials are unlikely to have the same workability or weathering characteristics as the indigenous building stone.

The conservation and restoration of our heritage assets makes a positive contribution to sustainable communities and brings wider social, cultural and environmental benefits. At paragraph 144 (Bullet Point 8) the NPPF recognises the need for small scale building stone extraction to provide materials for the repair of heritage assets. Although the maintenance of these historic assets is an important role, MPA members report that repairs account for only around 10% of their market. We would draw the Council's attention to the MPA publication "Dimension Stone - An essential UK industry"

Policy Approach to Minerals

With reference to Policy R6 *Minerals Safeguarding and Extraction*, we do not believe the approach to minerals provision and safeguarding has been clearly defined, not least having one policy for mineral provision and minerals safeguarding, which we believe is contrary to the Planning Practice Guidance. Separate planning policies for the provision of minerals and for mineral safeguarding represents best practice

As referred to above there has been no attempt to quantify the requirements for delivering the aspirations of the DLP through any form of mineral resourcing strategy to ensure provision of the required materials to support the regeneration planned. Policy R6 simply provides development control criteria against which proposed developments will be considered and unfortunately this has not been planned in a positive manner and the wording reconsidered.

Mineral Safeguarding

Mineral Resource safeguarding is mentioned at paragraph 5.12 and within Policy R6. However, it is not clear where the Mineral Safeguarding Areas are defined in the DLP (apologies if this has been overlooked). In accordance with national policy requirements, we would seek the Council's assurance that the identification of Mineral Safeguarding Areas will include not only mineral resources, but minerals infrastructure. Paragraph 143 of the NPPF requires the safeguarding of existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials; and existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material. We would draw the Council's attention to the British Geological Survey guidance on minerals safeguarding.

Prior Extraction

Where there is a risk of sterilisation, the DLP should set out policies to encourage the prior extraction of minerals, where practicable and environmentally feasible, if it is necessary for non-mineral development to take place.

We trust the above comments are considered. Please do not hesitate to contact me if you require any further information or wish to seek clarification on the above comments.

Yours faithfully



Nick Horsley

Director of Planning, Industrial Minerals and MPA Wales