

17<sup>th</sup> June 2019

Local Plan  
Planning Policy and Programmes  
Warrington Borough Council  
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Dear Sir/Madam

**WARRINGTON BOROUGH COUNCIL LOCAL PLAN 2017-2037: PROPOSED SUBMISSION VERSION**

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 affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, QPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 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 UK cement production, 90% of GB 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 had annual output valued at £151 billion in 2016. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: [www.mineralproducts.org](http://www.mineralproducts.org).

We thank you for allowing us the opportunity to comment on the proposed plan and have the following comments to make.

Page/Policy/Para	Current Wording	MPA Comment	Amendments required
Para 2.2.2	The paragraph identifies a number of challenges facing the borough	We suggest the addition of a further challenge to accord with national policy and help deliver the development aspirations and opportunities. This is to include reference to “the sustainable supply of minerals and mineral products to meet development aspirations”.	Include an additional bullet point as specified.

Page/Policy/Para	Current Wording	MPA Comment	Amendments required
9.3.1	This paragraph refers to the British Geological Survey (BGS) report which identifies the group of minerals extracted.	The paragraph and the associated bullet points need to be widened to reflect the wider scope of minerals found within the borough, notably section 4 of the BGS report and the crushed rock aggregate extracted at Southworth Quarry. We note the Local Plan does refer to sandstone at para 9.3.6, and therefore the list of bullets should be amended to reflect this.	Amend the paragraph to reflect the BGS report and the subsequent paragraph 9.3.6

### Minerals Safeguarding

We are generally supportive of the approach within the plan to Minerals Safeguarding with the following exceptions. Policy ENV3 pts 4 & 6, would benefit from making direct reference to the “Agent of Change” principle referred to under para 182 of the NPPF. This will ensure that mineral sites and infrastructure shown on Figure 15 are not needlessly sterilised.

Of concern, is the approach taken by the council under Figure 14 in identifying limited Minerals Safeguarding Areas. The plan only identifies Sand and Gravel and Coal resources and it is not clear why the resources of sandstone within the borough have not been identified on the plan, particularly as these are referred to under point 2. of Policy ENV3 and are currently worked within the borough at Southworth Quarry.

Finally, Table 9 refers to Buffer Zones applicable to specific mineral resources, however, no such safeguarding is given to minerals infrastructure within urban areas. This would reinforce the need for the council to include reference to the Agent of Change principle.

### Paragraph 9.4.2

This paragraph states that no new sites for minerals extraction have been identified. It would appear from the plan and the supporting evidence that only one site allocation has been considered as part of the site allocations process. It may be that only one site was brought forward however, it is not clear if the principles outlined in the NPPG have been followed (see below). It should not be beyond the expertise of the Council to identify Areas or Search over and above MSAs, if no Specific Sites or Preferred Areas have been identified.

### Policy ENV4 - Primary Extraction of Minerals

This policy is planned positively, identifying that applications will be approved where the mineral is required to meet the required landbank of at least 7 years for sand and gravel and at least 10 years for crushed rock. However, whilst reference is made to the Local Aggregate Assessment, we would question whether or not the plan should look closer at the minerals provision required to meet future development aspirations highlighted within the plan. The Planning Practice Guidance is clear in that it states:-

***“How should mineral planning authorities plan for minerals extraction?”***

*Mineral planning authorities should plan for the steady and adequate supply of minerals in one or more of the following ways (in order of priority):*

1. *Designating Specific Sites - where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely*

*to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;*

- 2. Designating Preferred Areas, which are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or*
- 3. Designating Areas of Search - areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply.*

However, there is clearly a shortfall for sand and gravel provision as identified in the plan. Further, it is noted that the one site for crushed rock aggregate extraction in Warrington, Southworth Quarry, which is referred to in the LAA, has planning permission which expires in 2025. In addition, of the other sites referred to in the LAA, but outside Warrington, only one site, Harrop Edge quarry has planning permission which goes beyond the end of the plan period. It is therefore not clear from either the Local Plan, or the LAA how future aggregate provision will be achieved to meet the inevitable increases in demand arising from the Council's development aspiration and other regional projects such as those associated with HS2 and the Northern Powerhouse. As such, we regard this element of the plan as unsound.

We would welcome the opportunity to discuss the proposed minerals policy elements of the plan further, prior to the formal submission.

We look forward to hearing from you.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', is written over a light blue rectangular background.

Nick Horsley

Director of Planning

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