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Dear Sir/Madam

CESHIRE EAST - PUBLICATION DRAFT SITE ALLOCATIONS AND DEVELOPMENT POLICIES DOCUMENT (SADPD) - AUGUST 2019

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.

With reference to the current consultation we reiterate our concerns and express our disappointment that the Council has failed to address the points raised in our initial consultation response (October 2018) that this document is being advanced in the absence of a strategic minerals' spatial strategy. We consider the current consultation unjustified, ineffective and contrary to national policy in the **National Planning Policy Framework (NPPF)**. The SADPD does not comply with the Cheshire East Local Plan Strategy adopted in July 2017. It is over 5 years since the initial EiP sought to address minerals matters and no formal spatial strategy for the provision and safeguarding of minerals has been produced.

The current consultation document conflicts with **Policy SE10** of the adopted Local Plan Strategy (2017) which clearly states that "**the Council will** (our underlining):-

4. Identify suitable locations for potential sand and gravel, silica sand and salt extraction in the Site Allocations and Development Policies Document.

6. Safeguard Cheshire East's important mineral resources of silica sand, sand and gravel, sandstone (including building stone), salt, surface coal through the definition of mineral safeguarding areas, which will be defined in the Site Allocations and Development Policies Document and will include environmental designations, urban areas and buffer zones, plus development management criteria. Within these areas mineral resources will be protected from unnecessary sterilisation by other development,

13. Set out environmental criteria in the Site Allocations and Development Policies Document against which all minerals proposals will be assessed to ensure operations do not have unacceptable impacts on natural and historic environment or on human health."

The current consultation fails to deliver on all of these key points and must therefore be considered **unsound**.

Paragraph 1.2 of the SADPD (August 2019), subsection 3 states:-

“The Minerals and Waste Development Plan Document (MWDPD), which will set out planning policies for minerals and waste, including the identification of specific sites for these uses. The current first draft of the MWDPD is currently being prepared.”

This statement alone renders the current SADPD consultation **unsound** and therefore contrary to the Council’s adopted Local Plan.

Paragraph 1.17 and 1.18

These paragraphs infer that Policies from the Cheshire Minerals Plan have been carried over to the Draft Adopted Policies Map document. Unfortunately, there are no references to minerals within the Draft Adopted Policies Map Document and there is no evidence that locally and nationally important mineral resources will be safeguarded and not sterilised by non-mineral development sterilise.

This is contrary to the NPPF and therefore renders the document **unsound**.

Sustainability Appraisal

We reiterate our concerns with reference to the Publication Draft SADPD Interim Sustainability Appraisal which at paragraph 4.89 (formerly 4.86) which states:-

“Minerals

All of the proposed employment allocations under the proposed SADPD Policy EMP 2 are in a Minerals Safeguarding Area (including the 250m Buffer Zone) or an Area of Search.....”

This approach is unsustainable and contrary to the requirements of the NPPF 2018. The SA under values the sterilisation of minerals by suggesting this is a minor negative impact. This is an unsustainable approach to minerals planning and questions the SA writers competence.

The Council’s review of the consultation responses appears suggest that the fact that a Minerals DPD is being prepared is acceptable. This ignores the fact that progressing the SADPD in isolation is putting the cart before the horse, risking the sterilisation of mineral resources.

The current consultation is fundamentally flawed and disregards not only national planning policy, but the Council’s own adopted Local Plan Strategy.

The Council should withdraw or suspend progress on the current SADPD until such time as it is able to deliver a spatial strategy and site allocations document which addresses minerals, in parallel to other forms of development as stated in the adopted Local Plan.

We trust you will give this representation due consideration.

Yours faithfully



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