

13th January 2017

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Dear Sir/Madam

DRAFT GREATER MANCHESTER SPATIAL FRAMEWORK

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 over 480 companies and is the sectoral voice for mineral products. The 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.

Further to your recent consultation on the consultation draft of the Greater Manchester Spatial Framework (GMSF) (October 2016), we note the extended period of consultation and have the following observations to make.

Firstly, we note that there is no section dealing specifically with mineral matters in the GMSF which we believe is a serious omission. We appreciate that the current the Greater Manchester Joint Minerals Plan (April 2013) remains the key document in the delivery of important mineral products to the Greater Manchester area. However, the levels of growth and development proposed within the GMSF to deliver the “full economic potential”, are likely to place significant demands on mineral resources and minerals infrastructure, including wharves, sidings, ready mix plants, coating plants, etc.. In order to realise this potential, these essential supporting assets need to be factored in to the planning for the entire lifecycle of GMSF, so the needs and opportunities are fully considered.

In brief, the GMSF agreed forecasts equates to:-

- GVA growth of 2.5% year on year, giving an uplift of £5bn above baseline conditions by 2035;
- Additional 199,700 jobs;
- Population growth of 294,800, which translates into 227,200 net new homes.

In order to deliver this, it is important that the GMSF gives full consideration to key elements of the Greater Manchester Joint Minerals Plan, in particular the following policies: -

Policy 1 The Presumption in Favour of Sustainable Minerals Development

Policy 2 Key Planning and Environmental Criteria

Policy 3 Primary Extraction of Minerals - Aggregates

Policy 4 Natural Building Stone

Policy 5 Primary Extraction of Minerals - Non-Aggregates

Policy 8 Prior Extraction of Mineral Resources

Policy 9 Sustainable Transport of Minerals

Policy 11 Protecting existing mineral site/infrastructure

At present the GMSF does not do this and we question what considerations have been given to the demand for raw materials and would seek evidence on this through the requisite duty to cooperate.

There is an unwritten assumption in the planning and development sector that if you create the demand for construction materials, this demand will be met. The UK and more specifically the north-west region undoubtedly has a rich and varied resource base of indigenous construction minerals. However, in order for these resources to be realised in practice, both the mineral products industry and the wider mineral planning system, require greater visibility around what scale of demand is likely to be required by infrastructure projects and the economic growth expressed in the GMSF, to allow suitable provisions to be made alongside the existing base demands in the market. This forward planning should allow for the most cost-effective and sustainable solutions to be put in place to support the delivery of the GMSF. Needless to say, this takes time and therefore needs to be planned in advance of, or at least in parallel to, the GMSF.

Further, the challenges of meeting the growth aspirations must not undermine the need to safeguard both mineral resources and the minerals infrastructure referred to above (wharves, sidings, ready mix plants, coating plants, etc.), necessary to deliver a steady and adequate supply of minerals as required by the NPPF.

Pressures to release Green Belt land for built development must not override the need to safeguard important minerals resources directly or by proximity, unless, a sustainable scheme of prior extraction can be implemented. We note that this is reflected in Policy GM25 (under Section 28 - Allocations). However, whilst the text accompanying the proposed individual site allocations, reflects the text of Policy GM25, the corresponding plans do not show Mineral Safeguarding Areas or infrastructure. Unfortunately, the scale of the plans in the Greater Manchester Joint Minerals Plan do not correspond with the proposed site allocation plans making it extremely difficult to compare the two. These plans should be reviewed to show MSAs and minerals infrastructure and more detail provided in the supporting text.

In the exceptional circumstances where prior extraction within an MSA is necessary to allow built development or infrastructure to proceed, the remaining landform can be used to contribute to the overall development, through mitigation landscaping, SUDS, or other such features and this must be considered as part of the allocation process.

in addition, the heritage characteristics of many of the urban areas within the GMSF are distinctive through the building materials used. These characteristics should be retained through the use of traditional, locally sourced building materials.

In conclusion, we are generally supportive of the aspirations of the GMSF, however, we feel that in order to deliver these in a sustainable manner, the above considerations must be properly addressed.

We would welcome the opportunity to discuss these matters further with you.

Yours faithfully

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

Mr Nick Horsley
Director of Planning, Industrial Minerals and MPA Wales