

18/07367/FU planning application for Leeds flood alleviation scheme

Objection on behalf of the Mineral Products Association

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 500 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.

The MPA has concerns about some of the conclusions of the application in respect of the sterilisation of minerals, specifically sand and gravel, within identified mineral safeguarding areas (MSAs) within which most of the scheme falls.

The MPA except that due to the narrow footprint of the Scheme and in most areas its proximity to the river options for future removal are limited.

However, the area of circa 20 Ha at Claverley is another matter and we cannot see how the applicant has concluded that the sterilisation of the mineral in this area *is assessed as a minor impact.....resulting in a negligible impact (not significant)*. This conclusion is erroneous because from our reading of the application no mineral resource assessment by the applicant of this area has been undertaken so the quantum or quality of the resource is not known and therefore any conclusion is impossible. Assuming a 1 metre thickness of sand and gravel this would give a potential reserve of circa 200,000 tonnes. This would equate to the annual output of many quarries in the UK and cannot be considered to have *negligible impact*. Clearly the thicker the deposit the greater the resource.

Furthermore, the applicant, while recognising local plan policy in terms of MSAs, has failed to address national planning policy on the issue of safeguarding minerals which is the basis for the local MSA policy. The National Policy Planning Framework (NPPF) states at paragraph 204;

204. Planning policies should:

c) safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);

d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;

and at paragraph 206;

206. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.

The above comments also must be considered further in the context of the NPPF which at paragraph 207(f) states;

207. Minerals planning authorities should plan for a steady and adequate supply of aggregates by:

*f) **maintaining landbanks of at least 7 years for sand and gravel [emphasis added] and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised;***

The latest Local Aggregate Assessment (2018) for the area in question reported to the Yorkshire & Humberside Aggregate Working Party show a landbank of only 6 years and 1 month for sand and gravel with West Yorkshire. This is clearly less than the landbank required by the NPPF and must be a material consideration in considering this application in terms of West Yorkshire planning *for a steady and adequate supply of aggregates.*

There appears to have been no attempt to contact local operations to see if sand and gravel could be stockpiled at existing mineral operations for future processing and sale. Bearing in mind that the scheme, if developed, is likely to be phased in nature there is no good reason why the sand and gravel could not be removed at good time. Furthermore, this would have the added advantage of creating additional flood storage volume.

In conclusion we believe the applicant has failed to properly assess the impact of sterilisation of sand and gravel at Claverley in that they do not have the information to come to the conclusions they have. They need to undertake a mineral resource assessment to properly understand the situation at Claverley and seek practical options for prior extraction as required by policy. To this end the applicant should approach the British Geological Survey for the necessary criteria to undertake the necessary mineral resource assessment. In addition, the applicant has failed to address the requirement of national planning policy in respect of mineral safeguarding, prior extraction and the need to maintain a steady and adequate supply of aggregates. The current approach is not sustainable which is again in contradiction of the NPPF.

ME NORTH

On behalf of the Mineral Products Association