

12th March 2019

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Dear Sir/Madam

ST HELENS LOCAL PLAN 2020 - 2035 - SUBMISSION DRAFT (JANUARY 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 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.

We thank the council for consulting the MPA on the above document. We have the following comments to make.

Page/Policy	Current Wording	MPA Comment	Amendments required
Policy LPC14	1. The Council will seek to ensure that the Borough of St Helens provides a steady and adequate supply of minerals to contribute towards regional and national needs.	This does not accord with the NPPF which requires that planning policies provide for the extraction of minerals resources of local and national importance. Whilst we are happy for reference to be made to regional supply, local provision is also important.	1. The Council will seek to ensure that the Borough of St Helens provides a steady and adequate supply of minerals to contribute towards the local , regional and national needs.

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Policy LPC14	1. To minimise the need for primary mineral extraction, provision of substitute, secondary or recycled sources will be encouraged in preference to land won resources	This does not accord with the NPPF which requires that planning policies “ <u>so far as practicable</u> , take account of the contribution that substitute or secondary and recycled materials and mineral waste would make....”	1. To minimise the need for primary mineral extraction, provision of The use of substitute, secondary or recycled sources will be encouraged in preference to land won resources
Policy LPC14	4. Proposals for the exploration, extraction, storage, processing and/or distribution of minerals will only be permitted if it has been demonstrated that:...	Other subsections to this policy are planned positively in accordance with the requirements of the NPPF. Unfortunately, this is not the case for subsection 4. Amend the wording to ensure this accords with the NPPF requirement to plan positively	4. Proposals for the exploration, extraction, storage, processing and/or distribution of minerals will only be permitted if <u>where</u> it has been demonstrated that:...
Para 7.30.6	Paragraph 1 of Policy LPC14 aims, by prioritising the use of secondary and recycled materials, to reduce the need for production of new primary (land won aggregates)....	As referenced above, this does this does not accord with the NPPF which requires that planning policies “ <u>so far as practicable</u> , take account of the contribution that substitute or secondary and recycled materials and mineral waste would make....”	Paragraph 1 of Policy LPC14 aims, “ <u>so far as practicable, to take account of the contribution that substitute or secondary and recycled materials and mineral waste would make....”</u> ”.

We trust the above comments are helpful and would welcome the opportunity to meet with officers in advance of further iterations of the Local Plan.

Yours faithfully



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