

18th March 2019

Planning Team Consultation,  
GMCA  
Church Gate House  
56 Oxford Street,  
Manchester,  
M1 6EU

Email: [planningandhousing@greatermanchester-ca.co.uk](mailto:planningandhousing@greatermanchester-ca.co.uk)

**Mineral Products Association Ltd**

Gillingham House  
38 - 44 Gillingham Street  
London SW1V 1HU  
Tel +44 (0)20 7963 8000  
Fax +44 (0)20 7963 8001  
[info@mineralproducts.org](mailto:info@mineralproducts.org)  
[www.mineralproducts.org](http://www.mineralproducts.org)

Dear Sir/Madam

**DRAFT GREATER MANCHESTER SPATIAL FRAMEWORK (GMSF) - REVISED DRAFT 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](http://www.mineralproducts.org).

Further to your recent consultation on the above document, it is disappointing that our previous comments on the Greater Manchester Spatial Framework (GMSF) (October 2016), do not appear to have been given due consideration.

Firstly, we note that the plan is relying solely on the 2013 Joint Minerals Plan for Greater Manchester which precedes the current NPPF. The joint Minerals Plan was prepared at a time when the average aggregate sales figures were heavily influenced by the recession. Historic aggregate sales, together with other local information, are used to project aggregate landbanks and future aggregate demand, in the absence of any updated national Government guidelines. The current Government guidelines expire in 2020. The current plan does little to consider the supply chain issues and resource considerations to meet its aspirations. We firmly believe that a review of the Joint Minerals Plan must run hand in hand with the GMSF. The absence of such a parallel strategic review could ultimately result in stated objectives being undeliverable. Mineral supply cannot be assumed and it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs.

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.

The Mineral Products Association is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries

Registered in England as Mineral Products Association Limited No. 1634996  
Registered at the above address

We note in the Major's foreword there is a strong reference to "brownfield" delivery. Whilst we recognise the spatial attraction of such, this must consider the "agent of change" principle inherent within the NPPF 2018 and facilities such as aggregate rail sidings, of which there are 5 within the GMSF, must be properly safeguarded.

In brief, the GMSF forecasts: -

- Up to an additional 180,000 jobs by 2037;
- 2,892,705 sq. m. of new office floorspace.
- 4,220,000 sq. m. of Industrial and warehousing floorspace
- A minimum 201,000 net additional dwellings

The current consultation pays only fleeting references to the Greater Manchester Joint Minerals Plan. If a parallel review of the Joint Minerals Plan is not undertaken to facilitate delivery of the GMSF, the GMSF must explain clearly how it proposes to integrate the development aspirations with the requirements of the specific minerals plan policies identified below: -

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. For example, Figure 3.1 Key Diagram, does not appear to take in to consideration minerals safeguarding areas. We appreciate the key diagram is a "broad brush" schematic, but such plans become drivers and over looking key matters such as minerals safeguarding become difficult to rectify as the local plans advance.

There is an 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 have a rich and varied resource base of indigenous construction minerals. However, in order for the demand for these materials to be realised in practice, both the mineral products industry and the wider mineral planning system require greater visibility around what the scale of demand is likely to deliver the infrastructure projects and the economic growth expressed in the GMSF, allowing 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 with, the GMSF. Supply cannot and should not be assumed.

### Objectives

Turning to the specifics of the plan, a marked omission is an Objective for the "sustainable management and safeguarding of mineral resources" to meet the other Objectives of the GMSF. Minerals can only be worked where they are found and inappropriately planned development can sterilise a valuable mineral resource in perpetuity.

### Efficient Use of Land Resources

It is disappointing that paragraph 4.8 has failed to recognise the sustainable management and safeguarding of mineral resources as critical to this section. Further this section should also recognise the “agent of change” principle when considering brownfield development as required by the NPPF 2018.

### Spatial Strategy

A key characteristic of the spatial strategy should be that **“minerals can only be worked where they are found”**. This separates minerals from most other forms of development.

### Minerals Safeguarding

Unfortunately, the graphics of the GMSF are schematic and are difficult to consider in light of Ordnance based plans. This causes great concern in that a number of the key growth areas appear to align with areas critical for minerals safeguarding. For example, the M62 North East Corridor would appear to overlie areas safeguarded for Sand and Gravel. We seek the Combined Authorities assurance that graphics will be improved for future versions of the plan and mineral resources will be properly safeguarded. In light of this we must place a holding objection until appropriate graphics allow the proper assessment and interpretation of proposed growth areas and their relationship to mineral developments (including minerals infrastructure) and minerals safeguarding areas.

### Resource Efficiency

Paragraph 5.41 is the first reference in the GMSF recognising the need that the growth in development is likely to impact upon future need for minerals and minerals products. However, we firmly believe that the GMSF has such strategic consequences, it such be accompanied by a resource assessment and consideration of supply chain issues. Greater Manchester is heavily reliant upon imported minerals and minerals products, not just from neighbouring areas such as Lancashire, Derbyshire and West Yorkshire, but from much further afield such as North Wales and Cumbria. There is no evidence of engagement with these authorities under the Duty to Cooperate, that the resource implications of the GMSF have been given full and proper consideration in order to plan strategically for its deliverability. Developments such as HS2, the Northern Powerhouse Rail links and other infrastructure proposals are resource reliant and without proper consideration, the plan cannot be considered sound.

### Policy Allocations

The graphics associated with the plan are poor. The proposed allocation plans should clearly indicate whether or not the allocations overlie Minerals Safeguarding Areas. The policies and the supporting text on occasion do recognise the presence of mineral resources. Where such text is included, we support the proposals to extract the economic minerals in advance of construction taking place, however, we do not believe all the proposed allocations properly consider MSAs. This should be clarified.

### Newhey Quarry

We object to the proposal to develop this site for housing whilst permitted reserves remain. Whilst housing may be considered as a beneficial after use for a former mineral sites, any permitted reserves of economic importance should be extracted prior to any housing development taking place.

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.

In conclusion, whilst we are generally supportive of the aspirations of the GMSF , we feel that in order to deliver these in a sustainable manner, the above considerations must be properly addressed. Without such, the GMSF must be considered UN SOUND.

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

Yours faithfully

A handwritten signature in blue ink, appearing to read 'N. Horsley', is written over a light blue horizontal line. The signature is fluid and cursive.

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