

Date: 24th November 2017

Warrington Borough Council,
Planning Policy and Programmes,
New Town House,
Buttermarket Street,
Warrington,
Cheshire,
WA1 2NH

Email: ldf@warrington.gov.uk

For the attention of [REDACTED]

Dear Sir

WARRINGTON BOROUGH COUNCIL LOCAL PLAN PREFERRED DEVELOPMENT OPTION
REGULATION 18 CONSULTATION JULY 2017

Thank you for your consultation email of 16th October and for allowing us the opportunity to comment on the above document.

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. 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.

We have the following comments to make on the above document.

In brief, we are largely supportive of the Council's development aspirations to meet sustainable growth. However, it is important that the Authority is clearer on the requirements of the NPPF as it relates to mineral supply, development and safeguarding.

Paragraph 4.92 of the consultation states that:-

"The following aims and objectives for the Local Plan have been identified to ensure accordance with the NPPF in relation to mineral planning:

- *Seek to deliver a **steady and sustainable supply of minerals to meet Warrington's** needs, contribute to the maintenance of the sub-regional aggregate apportionment and safeguard valuable mineral resources and infrastructure;*
- *facilitate greater use of recycled aggregates and secondary mineral products;*
- *ensure effective site restoration is undertaken once operations have ceased; and*
- *support the development."*

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Registered at the above address

We feel that this falls a little short of the requirements of the NPPF, for example, but not limited to, the Council has not identified the need to maintain the specific landbanks for sand and gravel and for sandstone. The landbanks are indicated in paragraph 4.35, however, the figures quoted are for the end of 2015, almost 2 years ago. These figures should be routinely updated as the development options progress.

It is also notable that whilst the consultation refers to the need to safeguard sandstone, the accompanying mineral safeguarding plan does not identify the sandstone resources. This was raised in our previous comments to the Council in February 2017. It would be helpful if specific development areas could be superimposed on the mineral resource and infrastructure safeguarding plans to ensure there is no conflict between the development aspiration and national planning policy.

The document makes reference to the national guidelines and sub-regional apportionment. It is recognised that the guidelines are desperately in need of review by DCLG, a point emphasised at the recent National Coordinating Group meeting and reported back to the NAWP. In the absence of such a review taking place by DCLG, it may be prudent for the planning authority to undertake a resource assessment of the development aspirations contained within the plan to ensure the supply chain is fit for purpose. In addition, and in order to ensure heritage characteristics are maintained sources of indigenous building stone should be identified to ensure the characteristics of areas are maintained.

We trust the above comments are of use and would be happy to discuss further, the contents of the response, with the Council.

Yours faithfully

