

15th November 2021

Local Plan
Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH

Mineral Products Association Ltd



Email : localplan@warrington.gov.uk

Dear Sir/Madam

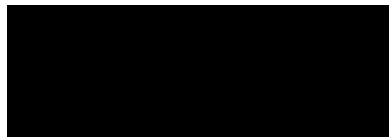
UPDATED WARRINGTON BOROUGH COUNCIL LOCAL PLAN 2021-2038: PROPOSED SUBMISSION VERSION

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 over 530 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.

Thank you for consulting us on the above document. We have the following comments to make. These follow on from the comments made in our previous submission date 17th June 2019. We are largely supportive of the proposed approach but have the following comments to make. We have highlighted where we believe improvements could be made to the text by ~~drawing through~~ suggested deletions and **underlining bold** text for insertions.

Please do not hesitate to contact us if you have any questions.

Yours faithfully

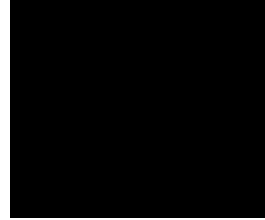


Nick Horsley
Director of Planning





Mineral Products Association Ltd



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

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Registered at the above address

Page/Policy/Para	Original Plan Wording	Original MPA Comment	Amendments required	Current Plan Wording	MPA Additional Comments	Suggested Amendments
Para 2.2.2	The paragraph identifies a number of challenges facing the borough	We suggest the addition of a further challenge to accord with national policy and help deliver the development aspirations and opportunities. This is to include reference to “the sustainable supply of minerals and mineral products to meet development aspirations”.	Include an additional bullet point as specified.	We note the amended wording which is supported	No additional comments	Amendment supported
Policy INF6 & Para 7.6.3	<i>“1.Development that would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted.”</i>			<i>“Policy INF6 - Aerodrome Safeguarding (Manchester Airport) 1.Development that would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted.”</i>	This policy and the supporting text in paragraph 7.6.3 appear to infer a blanket ban on mineral extraction within the 13km safeguarding of Manchester Airport or the Manchester Radar. Firstly the policy is not worded positively and secondly we object to this. We recognise the safety requirements associated with airports but the Safeguarding zones do not preclude mineral extraction	Object. Reword the policy to plan positively <u>“Development will only be permitted within the Manchester Airport 13km Safeguarding, where it would not adversely affect the operational integrity of the airport of the Manchester Radar.</u> Also para 7.6.3 must recognise that minerals extraction need not be inappropriate development within an airport safeguarding area.
9.3.1	This paragraph refers to the British	The paragraph and the associated bullet points	Amend the paragraph to	<i>“.....mineral resource identified</i>	Again we note that Clay and Sandstone	We seek clarification that sandstone and clay reserves

	<p>Geological Survey (BGS) report which identifies the group of minerals extracted.</p>	<p>need to be widened to reflect the wider scope of minerals found within the borough, notably section 4 of the BGS report and the crushed rock aggregate extracted at Southworth Quarry. We note the Local Plan does refer to sandstone at para 9.3.6, and therefore the list of bullets should be amended to reflect this.</p>	<p>reflect the BGS report and the subsequent paragraph 9.3.6</p>	<p><i>by the BGS, there are also known to be some clay and sandstone reserves. However, these only occur in isolated pockets; are of variable quality and thickness and hence are not mapped as a resource.</i></p>	<p>“reserves” are not mapped as a resource, however, Figure 14 appears to include an element of clay and sandstone safeguarding which we support. It is important that the Council appreciates the difference between a “reserve” and a “resource” and trust the wording will be tightened on this.. We seek clarification on the evidence that the resources occur “<i>in isolated pockets; are of variable quality and thickness</i>”. It is important that mineral resources are not unnecessarily sterilised.</p>	<p>are now being safeguarding and trust the Council will avoid confusion between a minerals resource and a mineral reserve.</p>
<p>Policy ENV3 - Safeguarding of Minerals Resources</p>				<p><i>“Safeguarding Mineral Resources</i> <i>1. Mineral Safeguarding areas (MSAs) are defined on the Policies Map.</i> <i>2. Sand, gravel and shallow coal resources and sandstone and brickclay workings</i></p>	<p>Figure 14 appears to include some element of mineral safeguarding for Sandstone and Clay at Southworth Quarry and Clay Pits.</p>	<p>We seek clarification as to whether or not the Council is or isn’t proposing to safeguard clay and sandstone resources. If the latter, we must maintain an objection as this approach does not accord with the NPPF and would render the plan unsound.</p>

				<i>within the Minerals Safeguarding Areas will be protected from permanent sterilisation by other development.....”</i>		
Table 9			Southworth Quarry - 500m, Clay Working - 250m	Mineral Resource Buffer Zones	It is unclear if the boundaries shown on Figure 14 represent mineral safeguarding areas or the buffer zones referred to in Table 9	Whilst we support the buffer zones, it is not clear if these represent the extent of the resource, or a zone simply drawn around the quarry. We reaffirm our need to ensure sandstone and clay resources.
Policy ENV4 - Primary Extraction of Minerals			Subsection 2a states <i>“The developer can provide evidence to support the need for departure from the Mineral Safeguarding Areas identified:”</i>	We query the use of the word departure. A proposal for mineral extraction outside of a mineral safeguarding area is not considered a “departure” in land-use planning terms. Amend the wording.	We suggest amending the wording to read <i>“The developer can provide evidence to support the need for extraction departure from the Mineral Safeguarding Areas identified:”</i>	
Para 9.4.2				This paragraph states that no new sites for minerals extraction have been identified.	We again question if the Council has considered identifying Areas of Search in order to address the recognised shortfall	Clarification sought

Para 9.4.5				<p><i>“The NPPF introduced a requirement for MPAs to prepare an annual Local Aggregates Assessment (LAA)....”</i></p>	<p>The PPG requires that LAAs must also include a forecast of the demand for aggregates. The wording should be amended to reflect the PPG.</p>	<p>Reword this paragraph to reflect the PPG <i>“The NPPF introduced a requirement for MPAs to forecast the demand for aggregates through the preparation of an annual Local Aggregates Assessment (LAA)....”</i></p>
Para 9.4.6				<p><i>“National policy requires that a stock of permitted reserves of 25 years be provided”</i></p>	<p>The wording does not truly represent the wording of the NPPF which requires at least 25 years or brick clay reserves</p>	<p>Amend the wording to read <i>“National policy requires that a stock of permitted reserves of at least 25 years be provided”</i></p>
Para 9.6.6				<p>This paragraph lists potential after uses for restored mineral sites.</p>	<p>Other forms of development may be appropriate on former mineral sites, and this may include built development. It should be made clear that the list provided is not exclusive.</p>	<p>Amend the paragraph accordingly.</p> <p>These may include:</p>