

Greater Manchester Minerals Plan

Examination in Public

Matter 2 Aggregate Requirements and Land Banks

Issue: Whether the provision made in the Plan for the future supply of sand and gravel and crushed rock is appropriate. In particular:

- *What is the Regional Context? Is the DPD compatible with RSS policy and RAWP information?*
- *Assuming the apportionment is correct, how does the Plan provide for future extraction of aggregates?*
- *Is there sufficient policy guidance to enable Greater Manchester to fulfil its aggregate supply requirements?*

MPA Comment

Introduction

1. First, a couple of general points to put the MPA's position in context.
2. Our principal objection to the approach of the Plan is that there is only one reference in the text to aggregates need which is paragraph 5.10. All of the necessary information that establishes need is relegated to an Appendix and there is no policy commitment to a quantified need. Although Policy 2 refers to 'demonstrated need' this remains undefined. It is almost as if the authorities assume that everyone reading the Plan will know what is meant by the term.
3. Secondly, MPS1 Annex 1 (para 3.8) says that the publication of a Plan is an opportunity to test the apportionment. We remain confused about what the authorities are saying about this since on the one hand they cite lack of industry interest due to poor quality resources and uncertain presence of mineral in the Areas of Search yet point to the healthy landbank which presumably indicates continued demand and have not sought to reduce the apportionments in line with expectations. RAWP figures show that sand and gravel production has consistently been above the apportionment level.

What is the regional context? Is the DPD compatible with RSS policy and RAWP information?

4. RSS shows apportionment levels based on the National Guidelines (2001-2016) which are set out in policy EM8 and Table 9.2. These are 26 Mt and 4.1 Mt for crushed rock and sand and gravel respectively. The 2009 NWRAP report figures for landbanks is based on the 2001-2016 National Guidelines (paras 5.12, 5.18, 7.6, 7.11, Table 9, 11.40-41 refers). However,

Section 12 of the report contains the details of the calculations of the new sub regional apportionments which were agreed by a majority of mpas in the region with Cumbria dissenting.

5. Thus table 27 of paragraph 12.3 of the RAWP report sets out the figures used in this plan despite not being referenced (*Background information on minerals and Area of Search Methodology, paras 1.2-1.14* refers).
6. Therefore, it appears that the Plan's figures are not compatible with the RSS in that they update the previous apportionments. However, the GMMP is compatible with the RAWP majority view.

Assuming the apportionment is correct, how does the Plan provide for future extraction of aggregates?

7. As we understand it, the plan makes provision by identifying Areas of Search (AoS) (which we do not object to) and sees this as 'making provision' in accordance with MPS1 (para 5.15). However, the quantum of mineral to be aimed for is not stated. All that is referred to is in Policy 2 (1) where a proposal may be justified if *'the mineral is required to meet a demonstrated need'*, and in para 5.14 which mentions the treatment of applications in AoS which could contribute to meeting *'any shortfall in provision'*. The omission of quanta of mineral may have been influenced by the expressed lack of interest by major companies in the sub region and sites coming forward.
8. The AoS have been selected in accordance with the Spatial Strategy which excludes a number of Category 1 (absolute) and Category 2 constraints plus a separate site specific exercise to take out further land. Thus there is a possibility that sites could come forward from outside the AoS presumably if they include one or more of the Category 2 constraints. Appendix 1 para 1.18 includes a reference to such constraints, *"Category 2 constraints include those where the Mineral Planning Authority would normally prefer mineral working did not take place, particularly where it can be demonstrated that adequate reserves exist elsewhere."* This statement may provide an explanation for the somewhat obtuse reference in Policy 2 to *"the need for departure from the Areas of Search"*. If so, it would have been helpful to have included this within the supporting text and not bury it in an appendix. In ordinary circumstances it would not be possible for an applicant to demonstrate that the AoS were incapable of providing the necessary provision, because they would have to show that all of such areas contained little or no relevant mineral. This would make the second part of the policy undeliverable. However, if the mpas are thinking of entertaining applications favourably when it is evident the landbank is below the policy minimum with no proposals coming forward from AoS then that is a helpful sign of

flexibility. However, it would be even more helpful if it were explained what is meant by the phrase. We remain sceptical that the second part of the policy helps the industry at all.

9. There is one further aspect of flexibility that is not covered by the plan, and the distribution of reserves within the landbank. If it is concentrated in a few sites and others need to extend during the lifetime of the plan there is no apparent comfort provided to operators that the policy takes this into account. We should like to see this remedied if possible.

Is there sufficient policy guidance to enable Greater Manchester to fulfil its aggregate supply requirements?

10. Our observations that no quantum is expressed as a target figure (even as part of a larger grouping of authorities) is a major flaw in the plan, which is more significant in that it appears that if the sub region including Merseyside, is to maintain sand and gravel production, it is likely to be from the Greater Manchester area. This lack makes the plan unsound because it is not effective.
11. The situation is therefore similar to Shropshire where the Core Strategy Examination concluded that it would be right to set out the quantum of provision (see extract from the *Shropshire CS Inspectors Report, paras 100-105* appended). Like this plan the Shropshire CS policy and text contained no assessment of a future level of production (para 101) in response to regional uncertainty. The Inspector's Report noted that following discussion Shropshire agreed to make changes to the plan to "*indicate the current and expected scale of aggregates production*" (para 102) which is what we would argue the GM authorities should do to this plan.
12. We therefore remain of the view that the plan should include a new policy that specifically identifies the quantum of aggregate mineral being provided and suggest the following,
"The Councils will make an appropriate contribution towards the calculated sub regional apportionment for the plan period of 10.75 Mt of sand and gravel and 36.96 Mt of crushed rock and will aim to maintain minimum landbanks equivalent to seven years' production of sand and gravel at a rate of 0.43 Mtpa and ten years production of crushed rock at a rate of 1.32 Mtpa."
13. We should like to see the supporting text beefed up with existing text from Appendix 1 paragraphs 1.2 to 1.14 to support the new policy, plus explanations of certain terms in Policy 2 such as, what does a demonstrated need entail? Would this include not only the size of the landbank but also the distribution of material within it, for example? Would an operator that needed to extend his operation receive favourable consideration even if the landbank was

above the policy minimum? What does the 'need for departure from the Areas of Search' mean?
How does this differ from the first requirement of the policy?

14. It may be argued in response that the Core Strategies of the individual authorities cover the point adequately. However, not all of them are adopted and not all of them mention the need to maintain landbanks (e.g. Bury, Manchester, Salford, and Trafford) and not one of them mentions the quantum of mineral to be provided.