

## **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 of supply of sand and gravel and crushed rock is appropriate.*

*In particular:*

- *What is the Regional Context? Is the DPD compatible with RSS 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 fulfill its aggregate supply requirements?*

The Mineral Planning Group (MPG) comments:

1. Firstly, I am pleased to see that the MWPU have put forward a suggested amendment to Policy 2 that acknowledges the critically important words “*at least*” that must appear in references to the sand & gravel and crushed rock land bank requirement. Whilst MWPU suggests this as a “*minor change*” I believe the plan would not be in accord with government guidance rendering it unsound if the change is not made. I therefore strongly support the change (Ref: PAMC/Ag MA/3). The term “*at least*” should be inserted where relevant throughout the plan.

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

2. The RSS shows apportionment levels based on the National Guidelines (2001-2016) whereas the plan uses apportionment figures covering the period 2005-2020 derived from the latest NWAWP published report (Table 27 of para.12.3) although these figures appear, as if by osmosis, without reference to the NWAWP report.
3. Thus, the plan’s figures are not compatible with the RSS. However, to be fair, they are the latest figures agreed with the majority view of the NWAWP (Cumbria dissenting).

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

4. Future extraction of aggregates is provided for through the allocation of Areas of Search (AoS) and shortfalls (expressed in millions of tonnes) are referred to in the Background information on minerals and Area of Search Methodology for the maintenance of an appropriate rolling landbank (minimum).

There is a recognized shortfall for sand and gravel of 4.65mt. (para.1.13 Appendix 1).

Likewise, there is a recognized shortfall of crushed rock of 19.73mt. (para.1.13 Appendix 1).

5. In relation to crushed rock permitted reserves stood at 17.23mt at the end of 2009. These reserves were held in seven quarries in greater Manchester, one in Merseyside and one in Warrington. Only four of these GM quarries were declared as currently active at the date of publication (March 2011) (para.1.10 Appendix 1). Ironically, just three pages earlier, in Table 29 (page 58) the plan declares just three active Carboniferous Millstone Grit quarries listed as Pilkington, Montcliffe and Harwood. By the time of Plan publication (March 2011) Pilkington Quarry had been declared to the MPA as no longer producing stone, although an extension to Pilkington Quarry was later issued (Jan 2011) (containing 800,000 tonnes of dimension stone block and 2mt of ancillary crushed rock aggregate by-product). However, the permission has not been implemented as yet due to protracted JR proceedings.
6. The plan has not allocated any specific sites for future crushed rock aggregate extraction, nor has it allocated any “*Preferred Areas*”. It is relying on applications coming forward over the plan period (to 2026) from the Areas of Search and windfall sites. I should add here that the plan argues there is no need for specific allocations nor “*Preferred Area*” allocations since the latest NAWP reserve figures indicate a landbank at 2009 of 13.05 years for crushed rock. Thus, at Feb 2012 the landbank (which includes both hard gritstone/sst. of GM and soft red sandstone of Warrington/Halton/Merseyside) potentially stands at between 10-11 years. In one years time the crushed rock aggregate landbank will, therefore, fall below the “*at least 10 years*” requirement. On this basis, I have to admit that I find GM’s relaxed attitude to finding and approving 19.73mt of crushed rock by 2026 over-optimistic. It definitely does not justify their argument of no need to allocate sites or give suitable future sites “*Preferred Area*” status and does not bode well for maintaining the essential crushed rock landbank necessary for economic growth and prosperity in GM.

**Is there sufficient guidance to enable Greater Manchester to fulfill its aggregate supply requirements?**

7. I have my doubts!

There needs to be a recognition in the plan that at least some of the crushed rock aggregate quarries in GM (e.g. Montcliffe) have the potential to make a significant contribution of coarse washed gritsand towards the sand & gravel apportionment figure. This is simply not recognized in the plan.

8. Likewise, for the plan to say, on the one hand, that “*The quality of aggregate currently extracted from Carboniferous Millstone Grit in Greater Manchester is generally low*” (Ref: - page 58 – Background information or minerals Area of search Methodology), yet, in the same breath (page 57) states that “*...quality in some areas may be high...*” is misleading. I refer to my comments on the plan, Comment ID 42, made on 31/8/2011 and Comment ID 43, plus all ID 377386 comments made by The Mineral Planning Group

published as “Summary of Public Representations with response from the Mineral and Waste Planning Unit” 22<sup>nd</sup> July – 2<sup>nd</sup> September 2011. You will see from those comments that MPG predicted a ‘backlash’ from local pressure groups etc., regarding GM’s reference to “low quality” minerals. The comments from Bolton & Horwich Environmental Action Group (Unique ID 488243 – Ref: 1 & 2) confirm these predictions and unless the plan recognizes the production of high quality minerals/aggregates from specific sites e.g. Montcliffe & Pilkington quarries, there will be continued misunderstanding of the real situation.

9. I would only add that I strongly support the proposed additional policy put forward by the Mineral Products Association (MPA) in their submission on Matter 2 at para. 12 with the caveat that the term “at least” should also be inserted before the phrase “...seven years” and “...ten years” for consistency with government guidance.