

**Lafarge Aggregates**  
**Rep no.: C1062 – C1070**  
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Mr M Tinsley  
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BY FAX 01743 252505  
AND EMAIL

Dear Mr Tinsley

**Shropshire County Council**  
**Submission of Core Strategy and Mineral Resources Development Plan**  
**documents to the Secretary of State and invitation to make representations**

With reference to the above and your letter ref P/LDF/4 dated 18 October 2006 addressed to my colleague Gary Staddon I present below the comments on behalf of Lafarge Aggregates Ltd. The comments have been discussed with the industry trade association, The Quarry Products Association, and are reflective of general concerns.

The areas where Lafarge have most concern relate to the calculation and methodology applied to the matter of landbanks for sand and gravel, which we consider differ from the national planning policy.

Further comments are as follows:

**1. THE CORE STRATEGY DPD**

**Evidence base and sources of information: (Paragraph 2.2)**

Information contained within the annual monitoring returns coordinated by the RAWPs is provided by QPA members on the understanding that it is kept confidential. Only the collations of that information made by the RAWP secretaries can be made public or retained. The annual monitoring returns should not be listed as sources of information in the Core Strategy DPD.

**Table 2.1**

The target for Local Indicator M2 should be a landbank of permitted reserves of at least 10 years in accordance with MPS1, Annex1, paragraph 4.1.

### **Paragraphs 2.36 and 2.37**

These should be updated to reflect the fact that MPS1 has been published and MPG1 and MPG6 have consequently been cancelled. Therefore it is not correct to state that all of the Mineral Planning Guidance Notes 1 – 15 are valid.

### **Policy CP2(b):**

The wrong terminology is used in this subsection of CP2. Mineral reserves are resources which have planning permission. The landbank is the sum in tonnes of all reserves with planning permission (MPS1 Practice Guide, Paragraph 70). Reserves and landbanks cannot therefore be “identified”. It is suggested that CP2(b) is reworded:

*Identifies areas for future mineral working sufficient to meet appropriate local, regional and national requirements, including provision for aggregates supply in accordance with the sub-regional apportionment agreed by the Regional Planning Body; and,*

### **Paragraph 4.30(x)**

Minerals resources that are not yet being exploited and have not been granted planning permission should also be safeguarded against incompatible development. As worded, the statement is not consistent with national policy.

### **Paragraph 4.38**

Shropshire County Council should consider showing support for renewable energy installations at minerals sites by including a “presumption in favour” policy (see also the comments on CP10).

### **Policy CP10(d)**

Whilst the QPA would not disagree with the objectives behind this policy, it should be acknowledged that at the current time in the majority of cases it is not practicable to derive 10% of energy requirements from renewable sources. A policy that gave support through a presumption in favour of wind turbines, photovoltaic arrays etc at quarry sites (in the same manner as CP11 on resource efficiency) would be a far more effective incentive to minerals operators. At the moment, operators are aware that renewable energy generation is as unpopular as the mineral extraction operation itself and will not risk making a proposal unacceptable overall by including such development. The proposed policy CP10 does not therefore “encourage” renewable energy provision and so is not in accord with RSS Policy EN1.

### **Policy CP13**

The issue of flood risk is covered in CP1, CP5, CP7, CP10 and CP13 which is confusing. As most of the explanatory text accompanies CP13 it should perhaps be dealt with in that policy. However, that policy should acknowledge that mineral working can have a positive effect upon flood management (see 4.43).

### **Policy CP15**

In order for the mechanism for the implementation of this policy to be clear and for the credibility of the archaeological evidence base to be established, areas where information indicates the potential presence of archaeological remains should be shown on the Proposals Map.

It is not clear how the importance of archaeological remains can be assessed if reliance cannot be placed on the accepted National system of scheduling. The policy therefore has no clear mechanism for implementation, does not demonstrate that it is founded on a robust and credible evidence base or appropriate in all circumstances.

## **2.THE MINERAL RESOURCES DPD**

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### **Table 2.1**

The target for Local Indicator M2 should be a landbank of permitted reserves of at least 10 years in accordance with MPS1, Annex1, paragraph 4.1.

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### **Paragraphs 4.4 and 4.7**

The reasoning behind paragraphs 4.4 and 4.7 is unclear. The objective should be to meet need from the most sustainable sources. It should not be assumed that the provision of alternative aggregates is necessarily more sustainable than the use of primary materials which, if not used, would become waste. (See also the comments on M9)

### **Policy M2**

Policy M2 and paragraphs 4.6 and 4.8 all make reference to the requirement for development to take place “in a comprehensive and efficient manner”. Because no definitive explanation is given for that term, there is no clear mechanism for the implementation of the policy.

It is not clear what is meant by “development” in the second sentence of M2.

### **Policy M3**

MPS1 and the accompanying Practice Guide now set out a clear mechanism for the safeguarding of mineral resources. This involves the designation of Mineral Safeguarding Areas and the introduction of policy links to those areas. Policy M3 and paragraphs 4.8 to 4.10 should be amended bring them into line with MPS1.

### **Policy M7**

MPS1 (Annex 1, Paragraph 4.1) states that the minimum landbank for sand and gravel is 7 years and for crushed rock is 10 years. As written, neither this policy nor the accompanying text in 4.26 is consistent with national planning policy.

In addition the policy fails to recognise the significant variation in type and quality of sand and gravel held within the landbank, and the distinct and separate markets that exist for the material. Within the landbank are substantial differences in deposit quality, and Lafarge Aggregates Ltd believe that the landbank needs to be split to address these variations and to ensure that sufficient quantities of concreting aggregates are available in addition to the inferior building and fill sands. Again, as written neither the policy nor accompanying text in 4.25, 4.26 or 4.27 is consistent with national planning policy.

### **Paragraph 4.26**

The maintenance of a landbank beyond the end of the plan period is not an issue provided that the Shropshire LDDs and particularly the areas designated for minerals working are reviewed in time for action before the remaining provision falls below the agreed apportioned level (MPS1 Annex1, Paragraph 4.2). Without that further qualification this statement is not consistent with national policy and will not ensure that action is taken that is appropriate in all circumstances.

### **Paragraph 4.31**

Revisions to sub-regional apportionments are for the Regional Planning Body to agree, not the RAWP (see MPS1, Annex 1, Paragraphs 3.2 to 3.11)

### **Paragraph 4.36 and 4.37**

There is already a strong incentive for the use of recycled and secondary materials in the form of the Aggregates Levy and Landfill Tax. In arriving at a figure for primary aggregate provision, the sub-regional apportionment already makes assumptions about a

realistic level of recycled and secondary use. The use of unprocessed C&D waste for low grade purposes does not necessarily represent the most sustainable use of that resource. The working of secondary and recycled materials should not be assumed to have less environmental impact than the use of a low grade primary material (see MPS1, Annex 1, Paragraph 5.2) Statements in these paragraphs therefore are not the most appropriate in all circumstances.

**Paragraph 4.38**

This should make reference to a minimum landbank of 10 years for crushed rock.

As you will be aware Lafarge Aggregates Ltd. have and are committed to the construction of a robust Mineral and Waste Development Framework in Shropshire and as such would be happy to attend a meeting should you consider it useful, to discuss the points raised in this letter.

Yours sincerely  
for LAFARGE AGGREGATES LTD

**Ross Halley**  
**Senior Planning and Estates Mgr**