



For Shropshire
Council use

Respondent
no:

Shropshire Council Site Allocations and Management of Development (SAMDEV) Plan

**Pre-Submission Draft (Final Plan)
17 March 2014 – 28 April 2014**

Representations Form

Please note you can also make representations to the SAMDev Pre-Submission Draft using our online form via:

www.shropshire.gov.uk/samdev

This is a formal consultation on the legal compliance and soundness of the Site Allocations and Management of Development (SAMDev) Plan before it is submitted to the Secretary of State for examination by an Independent Planning Inspector. For advice on how to respond to the consultation and fill in this representations form please see the guidance notes available on the Council's website at www.shropshire.gov.uk/samdev.

Your details: Who is making this representation?

Name:	M S Ratcliff
Organisation (if applicable):	Mineral Products Association
Address:	Gillingham House, 38-44 Gillingham Street LONDON SW1V 1HU
Email:	

If you are acting as an Agent, please use the following box to tell us who you are acting for:

Name:	
Organisation (if applicable):	
Address:	
Email:	

Your Representations

Please note, you must use a separate form for each representation you wish to make.

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy MD5: Sites for Sand and Gravel Working & Schedule MD5a & MD5b

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	
Justified	✓
Effective	
Consistent with National Policy	✓

In the box below please specify your reason for supporting or objecting.

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Policy MD5

General

Our comments on this policy are prefaced by the general observation that the levels of provision as set out in the Explanation (paras 4.38-4.42) should directly flow from an updated assessment of the Core Strategy proposals in an up-to-date LAA, which has yet to be endorsed by the West Midlands AWP. We have some reservations about the approach of the LAA and its effect on the SAMDeV plan and indeed, on

the Core Strategy. This is contained in a separate response to that document which is attached to these representations.

However, the lack of an endorsed LAA renders the plan **UNSOUND** because the MPA has not complied with NPPF paragraph 145. Specifically, Shropshire has not met the requirement to plan for a steady and adequate supply of aggregates because;

- It has not participated in the operation of an Aggregate Working Party and taken the advice of that Party into account when preparing its Local Aggregate Assessment, and
- It has not made provision for the land-won and other elements of its Local Aggregate Assessment in its mineral plan taking account of the advice of the Aggregate Working Party.

There is time between now and the Examination for this to be rectified but only if the AWP does not advise on any major changes to the LAA and its assessment of provision. As previously stated, the MPA (which is a full member of the West Midlands AWP) has reservations about the approach of the Shropshire & Telford LAA and its impact on plan provision. We therefore consider the plan unsound; whether it can be made sound by further changes is as yet unknown.

Part 1

We note you have continued to distinguish between three stages of site allocations (Permitted Sites, First Phase and Second Phase). We consider this approach to be unworkable and illogical in that all three sites are extensions and so will presumably be needed when existing reserves run out. There is nothing to be gained in phasing them in this way. Also, neither is it clear whether all allocations will be available to work in the plan period, or all of the existing reserves. The text states (para 4.42) that three currently unworked sites account for 70% of reserves and 65% of the apportionment. What is not clear is whether the figures mentioned in the plan include these sites, and what the constraints on them being developed are. Is it the recession or are there supply issues outside of this? For example, 4.6 Mt of unworked commitments is not 70% of an 8.96 Mt total reserve, but only 51% (Table MD5.3). Does this imply that 20% of the reserve is not expected to be worked within the plan period?

We also note that the LAA perpetuates the old system of historical shares without a causal link to the new NPPF methodology which might justify its retention. Neither

does the LAA include a forecast of aggregates demand despite the requirement to do so in NPPG para 062 using other relevant local information such as housing completions.

Thus it is not clear what level of allocation should be made in that the apportionment is not justified by reference to accepted NPPF and NPPG methodologies, which renders it **UNSOUND**.

Part 2

We object to the proposed requirement for consideration of need in applications made on allocated sites (i). The purpose of a development plan and its provision is that it should be made to meet objectively assessed needs. If so, why does an applicant need to demonstrate need again? Also, surely the process of site selection for allocation has already considered issues of cumulative impact (ii). If output restrictions are imposed this might severely constrain the ability of the county's operations in producing the level of forecast demand. We also consider the stated reasons for such restrictions of reducing the potential for market oversupply to be meaningless in the light of the purposes of an apportionment and NPPF policy, which sees mineral working as providing the raw materials to support economic growth.

Part 3

We also object to the proposed policy for applications outside allocated areas. The tests are cumulative and will only apply in such a narrow range of circumstances, if at all, that the supposed flexibility shown in the policy disappears on further analysis. We have no objection necessarily to any of the three criteria on their own but believe that they should be ranked as 'or' instead of 'and'.

Schedule MD5a and MD5b – no comments on the suitability of the sites but would only observe that the two schedules should be amalgamated and those allocations in MD5b should be included in Schedule MD5a.

Please see separate Appendix for discussion of the Local Aggregates

Assessment

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or

sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

We therefore suggest the following changes to the plan. Deletions are in ~~strike~~through; insertions are in **bold**.

MD5: Sites for Sand and Gravel Working

1. The supply of sand and gravel during the Plan period should be provided in the first instance from existing permitted sites and then from the development of mineral working at the sites identified on the Proposals Map and allocated in Schedule MD5a below;

~~2. Where monitoring demonstrates that the further controlled release of sand and gravel reserves is required, then the subsequent development of mineral working will be considered at the sites identified in Schedule MD5b below. Applications for earlier development of these sites will be considered on their merits. In considering any such application, particular regard will be paid to:~~

~~i. the need for minerals development to maintain an adequate and steady supply of sand and gravel consistent with the established production guideline;~~

~~ii. the need to control potential cumulative impacts associated with concurrent or sequential mineral extraction operations in a specific area, including through the imposition of output or timescale restrictions where these are necessary to reduce the potential for market oversupply and cumulative adverse environmental impacts;~~

~~iii. whether the early release of the site would enhance sustainability through meeting an identified local need.~~

3. Proposals for mineral working falling outside the allocated areas will be permitted where developers can demonstrate that:

i. the proposal would meet an unmet need or would prevent the sterilisation of the resource; ~~and or~~,

ii. the proposal would not prejudice the development of the allocated sites; ~~and or~~,

iii. significant environmental benefits would be obtained as a result of the exchange or surrender of existing permissions or the site might be significantly more acceptable overall than the allocated sites, and would offer significant environmental benefits.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this

stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

☒

No, I wish to pursue my representations through this written representation.

☐

If you wish to attend the examination, please explain why you think this is necessary in the box below:

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 The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME 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 and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Given the NPPF's recognition of the economic and employment benefits of the extractive industries (paras 28 & 144) we should like to direct your attention to 'Making the Link', a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website.

http://www.mineralproducts.org/documents/MPA_MTL_Document.pdf

Appendix to Objection on MD5

Shropshire & Telford and Wrekin Draft Local Aggregates Assessment 2013

Comments of the Mineral Products Association

Thankyou for the opportunity to comment on the Draft LAA. In general we compliment the joint authorities on the production of a concise and clear document. However, we have some reservations about the analysis which we should like the final document to address.

We would have liked to see more detail on the position with respect of the closed sites and those which are commitments which features in the SAMDeV and in **paragraph 8**. The document deals with this in only a cursory way. We should like to see (subject to confidentiality restrictions) what sites are referred to, their status and the reasons for being unworked. It is important for the LAA to demonstrate with evidence that the production capacity of the county is capable of being realised and that the NPPF requirement not to have landbanks bound up in very few sites has been duly considered. What we are looking for is a more detailed explanation; we do not necessarily dispute the conclusions.

In **paragraph 9** we believe that you have not given sufficient consideration to the new NPPF methodology for calculating a local apportionment and have relied on an out of date historic shares figure which is not justified by the evidence. There is no bar on continuing to use a historic shares model if it is backed by robust evidence. However, in this case (and supported by Core Strategy policy) the local evidence is we suggest, indicative that a different approach is called for (see below).

For the ten year trend of sand and gravel output shown in **paragraph 9 and Figure 1**, we think the statement that a ten year average to 770,000 tonnes pa is “well below the current production guideline of 0.82mt” is an overstatement. On the contrary, given the recession which has seen outputs fall nationally by 30%, the average in Shropshire is only 6 % below the apportionment. This shows an unusually high demand for local sand and gravel notwithstanding the closure of some sites. Comparing this with the situation for crushed rock outputs in the county makes the point even more clearly.

Paragraph 10 deals with the market areas for sand and gravel and we do not dispute the figures presented. However, it needs to be put into context. Even Staffordshire which produced 3.75 Mt in 2009 retained 50% of its own material. Shropshire was still a marginal net exporter of sand and gravel in 2009 according to your figures.

Paragraph 11 and Table 3 show that although the landbank has been consistently above minimum levels it has been falling by 18% in the last ten years. The document should show how the landbank of working sites (and the productive capacity of those sites) is being maintained and not rely on a total landbank if there are availability issues about bringing this into production.

Paragraphs 20 – 21 are disappointing in not providing a forecast of aggregates demand as required by the advice of NPPG. We should have expected you to propose a proxy for demand (say, housing completions for sand and gravel) and to compare past rates of completions with development plan provisions. You go some way to do this but stop at producing figures which would be a true forecast.

We have calculated a rough figure (it is for the joint authorities to carry out this exercise for themselves) which shows the following

- Completions 2006-2013 Shropshire 7,271 (1,038pa)
- Projected completions 2006-2026 Shropshire 27,500
- Remaining completions 2013 -26 Shropshire 20,229 (1,556pa)
- Increase in rate of completions required 149.9%
- Therefore, expect rate of increase in sand and gravel demand of 50%
- Average sand and gravel output 2006-2011 Shropshire 0.71Mtpa
- Therefore, future demand for Shropshire likely to be 1.06 Mtpa.

We have not carried out a similar exercise for Telford and Wrekin but the document indicates exceptionally high continuing demand for housing despite the recession. A calculation should be carried out to determine the demand for sand and gravel in Telford and Wrekin and to add this to the Shropshire figure. If it is expected that this material will be imported then the additional call on reserves from other areas needs to be spelled out. Such an exercise may also inform Telford's emerging Local Plan about the need for reserves from within its own borders to reduce the call on reserves from other areas.

The LAA also needs to do much more to assess the quality and capacity limitations

it identifies and whether it is reasonable or possible to increase production. In other words, is the quality of material found in Shropshire likely to satisfy demand or are significant quantities of material likely to be needed from other areas?

We would expect the points we have made to be addressed in any revision of the LAA and intend to press the arguments over the shortcomings of the document in the SAMDeV Examination if these are not addressed. We remain willing to discuss these points with officers in order to come to some agreement before the Hearings.

Your Representations

Please note, you must use a separate form for each representation you wish to make.

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy MD16: Mineral Safeguarding

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	
Justified	✓
Effective	
Consistent with National Policy	✓

In the box below please specify your reason for supporting or objecting.

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Policy MD16: Mineral Safeguarding

We generally support this policy and the proposed exemptions (Explanation para 4.151) and buffers (Explanation para 4.152). However, what is missing is any identification of the minerals to be protected. The Draft Policies Map does not differentiate between minerals and neither does the Policy itself say which minerals are considered to be of economic value. This is a serious omission which means that the policy is not in accordance with national guidance produced by the BGS.

The BGS guidance encourages maps to clearly identify the minerals of economic value in policies. We are concerned that unless the outcrops of mineral are identified on the Proposals Map then valuable mineral deposits may risk being unidentified or assessed in any development proposal.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

We therefore suggest the following changes. Deletions are in ~~strikethrough~~; insertions are in **bold**.

MD16 - Mineral Safeguarding

1. Applications for non-mineral development which fall within **the** Mineral Safeguarding Areas (MSA) **for sand and gravel, crushed rock, building stone, brickclay and fireclay** and which could have the effect of sterilising mineral resources will not be granted unless:

- i. The applicant can demonstrate that the mineral resource concerned is not of economic value; or
- ii. The mineral can be extracted to prevent the unnecessary sterilisation of the resource prior to the development taking place without causing unacceptable adverse impacts on the environment and local community; or
- iii. The development is exempt as set out in the supporting text below.

2. Consistent with the requirements of Policy MD8, applications for non-mineral development within the identified buffer zone surrounding identified mineral transport and processing facilities will not be granted unless the applicant can demonstrate that:

- i. The development proposed would not prevent or unduly restrict the continued operation of the protected infrastructure; or,
- ii. That the identified facilities are no longer required or that viable alternative facilities are available.

MSA boundaries and protected mineral transport and processing facilities are identified on the Policies map and insets. The buffer zones which will apply to protected resources and facilities are identified in the explanatory text below.

3. Applications for permission for non-mineral development in a MSA

must include an assessment of the effect of the proposed development on the mineral resource beneath or adjacent to the site of the development or the protected mineral handling facility (termed a Mineral Assessment). This assessment will provide information to accompany the planning application to demonstrate to the satisfaction of the MPA that mineral interests have been adequately considered and that known mineral resources will be prevented, where possible, from being sterilised or unduly restricted by other forms of development occurring on or close to the resource;

4. Identification of the areas does not imply that any application for the working of minerals within them will be granted planning permission.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

☒

No, I wish to pursue my representations through this written representation.

☐

If you wish to attend the examination, please explain why you think this is necessary in the box below:

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 The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME 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 and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Given the NPPF's recognition of the economic and employment benefits of the extractive industries (paras 28 & 144) we should like to direct your attention to 'Making the Link', a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website.

http://www.mineralproducts.org/documents/MPA_MTL_Document.pdf

Your Representations

Please note, you must use a separate form for each representation you wish to make.

(Please refer to the accompanying Guidance Notes on Making Representations when completing this section)

In the box below please give the policy, paragraph or section of the Policies Map your representation relates to:

Policy MD17: Managing the Development and Operation of Mineral Sites

Is your representation in support or objection? (please tick as appropriate)

Support	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Object	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not (*Please tick all that apply*):

Positively prepared	
Justified	✓
Effective	
Consistent with National Policy	✓

In the box below please specify your reason for supporting or objecting.

If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Policy MD17: Managing the Development and Operation of Mineral Sites

Part 1

We object to the proposal to restrict outputs, which we strongly oppose. This is covered in sub section (i) in the measures to protect people and the environment where it may be up to the applicant to suggest ways in which to limit amenity impacts. We strongly object to any unilateral imposition of production restrictions

which might be arbitrary or which might prejudice the viability of the mineral operation.

Part 5

This section could be used to justify unprofessional proposals that damage the environment or create unfair competition. The regulatory regime should be applied equally across all proposals. For this reason (to provide a level playing field) we are opposed to a more lenient treatment for some operations if they are to be managed and worked in an unprofessional manner. This is anti-competitive since it allows the regulatory regime to discriminate against the more professional operators, whose extra costs put them at a competitive disadvantage compared to others more favoured who do not face the same cost burden. We believe that references in policy statements like local markets, heritage demand and small scale operations should be avoided since they are descriptive of the traditional character of the industry and are not prescriptive. This should not be taken as a description of how the industry must be since it is changing rapidly in the light of regulatory drivers and commercial pressures. We wish to avoid a plan that does not recognise the special character of dimension stone production and operations and that hinders the development of the industry and its markets. In conclusion, we believe that the plan's policy should be based on providing a steady and adequate supply of dimension stone under NPPF paragraph 146 and by maintaining stocks of permitted reserves at each individual site, the length of which recognises the need to ensure continuity and certainty of supply for its customer base. As such, the proposed policy will need to be applied more evenly and be careful to allow all operators of whatever size, to grow their businesses as intended by NPPF.

New Part 7

We suggest that the policy includes an additional criterion that applications should demonstrate the quantity and quality of mineral present according to a professionally undertaken programme of drilling and mineral assessment. This should avoid any mineral finding its way into the landfillbank which is sub standard in quality and quantity, and for which it would be difficult to find a market.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

We therefore suggest the following changes. Deletions are in ~~strikethrough~~; insertions are in **bold**

Policy MD17: Managing the Development and Operation of Mineral Sites

1. Applications for mineral development will be supported where applicants can demonstrate that potential adverse impacts on the local community and Shropshire's natural and historic environment can be satisfactorily controlled. Particular consideration will be given (where relevant) to:

i. Measures to protect people and the environment from adverse effects, including visual, noise, dust, vibration and traffic impacts;

ii. The site access and traffic movements, including the impact of heavy lorry traffic on the transportation network and the potential to transport minerals by rail. Where opportunities to transport minerals by rail are not feasible there will be a preference for new mineral sites to be located where they can obtain satisfactory access to the Primary Route Network;

iii. The cumulative impact of mineral working, including the concurrent impact of more than one working in a specific area and the impact of sustained working in a specific area;

iv. Impacts on the stability of the site and adjoining land and opportunities to reclaim derelict, contaminated or degraded land (Policy CS6);

v. Effects on surface waters or groundwater and from the risk of flooding (Policy CS18);

vi. Effects on ecology and the potential to enhance biodiversity;

vii. The method, phasing and management of the working proposals;

viii. The extent to which the proposed development contributes to the comprehensive working of mineral resources and appropriate use of high quality materials;

~~Where necessary, output restrictions may be imposed to make a development proposal environmentally acceptable;~~

2. Mineral working proposals should include details of the proposed method, phasing, long term management and maintenance of the site restoration, including progressive restoration towards full reinstatement of occupied land and removal of all temporary and permanent works. A satisfactory approach will avoid the creation of future liabilities and will deliver restoration at the earliest practicable opportunity to an agreed after-use or to a state capable of beneficial after-use. Where the proposed after-use includes agriculture, woodland, amenity (including

nature conservation) or other uses, a satisfactory scheme will need to include the following:

- i. Proposals which take account of the site, its surroundings, and any development plan policies relevant to the area;
- ii. Evidence to show that the scheme incorporates best practice advice and is practical and achievable;
- iii. A Management Plan, which should address the management requirements during each phase of the proposed development;
- iv. A Reclamation Plan;
- v. Provision for a 5 year period of aftercare;

Where appropriate, a planning obligation will be sought in order to secure the after-use, long term management and maintenance of the site;

3. Proposals for the working of unconventional hydrocarbons should clearly distinguish between exploration, appraisal and production phases and must demonstrate that they can satisfactorily address constraints on production and processing within areas that are licensed for oil and gas exploration or production. Particular consideration will be given to the need for comprehensive information and controls relevant to the protection of water resources;

4. Where relevant, applications for the winning and working of coal should include proposals for the separation and stockpiling of fireclay so that its value as a mineral resource can be captured;

~~5. A flexible approach will be adopted to the duration of planning consents for very small scale, intermittent but long term or temporary working to work locally distinctive building and roofing stone consistent with the objectives of Policy MD2;~~ **Applications for building stone development will be supported where applicants can demonstrate that the extraction of natural building and roofing stone is needed for architectural and heritage purposes where environmental y acceptable.**

6. Where an ancillary development is proposed, proposals should include satisfactory measures to minimise adverse effects, including:

- i. Locating the ancillary development within or immediately adjacent to the area proposed for mineral working or on an established plant site;
- ii. Restricting the principal purpose to a purpose in connection with the winning and working of minerals at the site or the treatment, storage or removal of minerals excavated or brought to the surface at that site;
- iii. For imported minerals, where necessary, to limit the quantities involved to control the volume and type of traffic, and the establishment

of an acceptable route for the traffic to and from the site;

iv. The cessation of the ancillary development when working of the mineral for which the site was primarily permitted has ceased and removal of plant and machinery to allow full restoration of the site.

Where ancillary development could have an adverse effect on the local environment which cannot be mitigated to acceptable levels, a condition may be attached to the planning permission to control the adverse effects by limiting development to an established plant site, or introducing a stand off from sensitive land uses, or mitigating effects in other ways, or as a last resort, with drawing permitted development rights so that the ancillary development can be properly controlled by the terms of the planning permission.

7. Applications for mineral extraction should demonstrate the quantity and quality of mineral present according to a professionally undertaken programme of drilling and mineral assessment.

Please be sure that you have provided all the information necessary to support your representations and any changes you are proposing. After this stage you will not be able to make any further representations about the SAMDev Plan to Shropshire Council. Any further submissions will only be possible at the invitation of the Inspector conducting the examination, who may seek additional information about the issues he/she has identified.

Do you consider it necessary to attend and give evidence at the examination?

Yes, I wish to give evidence about my representation at the examination.

☒

No, I wish to pursue my representations through this written representation.

☐

If you wish to attend the examination, please explain why you think this is necessary in the box below:

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 The British Precast Concrete Federation (BPCF) and the British Association of Reinforcement (BAR), it has a growing membership of 450 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME 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 and 95% of asphalt and ready-mixed concrete production and 70% of precast concrete production. Each year the industry supplies £9 billion of materials and services to

the £120 billion construction and other sectors. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

Given the NPPF's recognition of the economic and employment benefits of the extractive industries (paras 28 & 144) we should like to direct your attention to 'Making the Link', a document produced by the MPA to highlight the contribution that the sector makes to the economy. The document can be downloaded from the following website.

http://www.mineralproducts.org/documents/MPA_MTL_Document.pdf

Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.

When the SAMDev Plan has been submitted for examination	✓
When the Inspector's Report is published	✓
When the SAMDev Plan is adopted	✓

Please return this form by 5pm on Monday 28 April 2014

You can e-mail it to:

Planning.policy@shropshire.gov.uk

Or return it to: Planning Policy Team, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

Please note, we will acknowledge receipt of representations made by e-mail.

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. The Council will place all the representations and the names of those who made them on its website, but will not publish personal information such as telephone numbers, emails or private addresses. By submitting a representation on the Pre-Submission SAMDev Plan you confirm that you agree to this.