

**ST HELENS BOROUGH LOCAL PLAN 2020–2035  
EXAMINATION**

**MATTERS, ISSUES AND QUESTIONS  
FOR THE EXAMINATION AND HEARING SESSIONS**

**Session 10 - 09.30 Friday 18 June 2021**

**Matters 8 & 9**

**8 - Minerals Policies**

***Issue 1: Minerals and Waste Policies***

*Policy LPC14 contains a number of provisions relating to minerals. The Council has agreed to modify the policy to refer to ‘local, regional and national needs’ so that it is consistent with paragraph 204 of the Framework (SHBC002 - Matter 8).*

1. *Is Policy LPC14 positively prepared and consistent with the Framework?*
  - 1.1 The Minerals Products Association (MPA) responded to the Submission Draft of the St Helen’s Local Plan 2020-2035 on 12<sup>th</sup> March 2019. That response highlighted matters relating to the positivity of the wording of the plan within Policy LPC14: Minerals. We provided suggested amendments to improve the wording of the policy to ensure the policy planned positively and is consistent with the National Planning Policy Framework (NPPF). A minor amendment has been made by the Council in the proposed modifications, but we feel this do not fulfil the requirements of the NPPF.
  - 1.2 It is understood that for some smaller local minerals planning authorities (lmpa), particularly on the edge of major conurbations, there are challenges for maintaining the requisite a steady and adequate supply of aggregates as required by Para 207 of the NPPF.
  - 1.3 The usual approach and recognised process for delivering a steady and adequate supply of essential minerals would be for the Local Development Plan to identify Specific Sites, Preferred Areas or Areas of Search for minerals developments. These are not part of the Council’s approach.
  - 1.4 The Council has chosen the alternative approach of a criteria-based policy, which offers significantly less certainty than the identification of allocations.
  - 1.5 The Local Aggregates Assessment (LAA) for the area is a joint LAA covering Greater Manchester, Merseyside and Halton, and Warrington (GMMHW). The LAA should be based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources). Further, the LAA should conclude if there is a shortage or a surplus of supply and, if the former, how this is being addressed.

- 1.6 To this end, the GMMHW LAA recognises that there is no easy solution to increasing the sales of both crushed rock and sand and gravel to match the consumption levels required to service the area. Aggregates imported from elsewhere will likely continue to be important in terms of meeting demand within the sub-region, as such, it is important to acknowledge the need to continue to engage in duty to cooperate discussions with those MPAs from which aggregates are being imported. It should be noted that there is also recognition at a wider strategic level within the sub-region of the important link between minerals and growth.
- 1.7 Despite the acknowledged shortfall of primary land won aggregates we believe the wording of Policy LPC14 should be more focussed ensuring the supply of aggregates is met, from whichever source may be available.
- 1.8 The NPPF states at:-  
*“204. Planning policies should:  
b) so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;”*
- 1.9 The NPPF does not state that primary minerals extraction will be minimised in preference for secondary and recycled aggregates, not least where there is a recognised shortfall of all aggregates and very little up to date data on the availability of and contribution made by secondary and recycled materials.
- 1.10 We feel the amendments suggested in our submission of 12<sup>th</sup> March 2019 are appropriate, positive and consistent with the NPPF.