Heatons
Planning Environment Design

Our Ref: TAR-364-P
Your Ref: Scoping Consultation
Date: 11th September 2026

Sent by email only to: localplan@cheshireeast.gov.uk

Dear Sir/Madam,

RE: Representations on behalf of Tarmac Trading Limited to the new Cheshire East Local Plan Scoping Consultation

This letter of representation has been prepared in response to the Cheshire East New Local Plan Scoping Consultation, on behalf of Tarmac Trading Limited ('Tarmac').

Tarmac is keen to engage at this stage of plan making to highlight as early as possible the importance of mineral resource, minerals development, and mineral safeguarding in the new Local Plan.

Tarmac is one of the UK's leading sustainable building materials companies with innovative products, solutions, and services that not only deliver the infrastructure needed to grow the UK economy but also enable a more sustainable built environment for the country's long-term future.

Within Cheshire East, Tarmac has several mineral interests, including:

- Eaton Hall Quarry
- Gawsworth (Readymix plant)
- Middlewich Asphalt

Since the commencement of the scoping consultation for the new Cheshire East Local Plan, the Government has published the new National Planning Policy Framework (NPPF) (2026). In the making of the new local plan, the Council should ensure it reflects the key principles set out in the new NPPF plan-making policies.

Tarmac Comments to Cheshire East Scoping Document (2026)

As identified in paragraph 5.77 of the Cheshire East Scoping Document, national policy requires plans to maintain a sufficient (and timely) supply of minerals of national and local importance, of which aggregates and industrial minerals are identified. The AMPS 2025 details that the rate at which new reserves of sand, gravel and crushed rock are being permitted or replenished is continuing to fall, and so Cheshire East should take a proactive approach in planning for mineral supply in the new Local Plan, as a maintained supply of aggregates is essential.

The national importance of mineral resources is recognised in Chapter 11 of the NPPF, and facilitates the sustainable use of minerals, as they play an essential role in the development of our built environment, through the delivery of housing, infrastructure, buildings, and green energy.

Tarmac supports Cheshire East Council's transition away from fossil fuels in accordance with national policy and supports their focus on sustainable minerals, in an aim to boost the aggregate sand and gravel provision which is currently below national policy requirements.

To ensure that boosting the aggregate sand and gravel provision remains achievable, the preparation of the local plan should be underpinned by relevant and up to date evidence, with the council having regard to National Policy PM7: *Initiating plan-making for local plans and minerals and waste plans*, which states that:

> *1. Prior to initiating the preparation of a local plan or minerals and waste plan, planning authorities should, with reference to national guidance, design an approach to preparing and adopting the plan within 30 months. This should involve:*
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> > *a. Setting realistic timings for key milestones and reflecting these in the local plan or minerals and waste plan timetable, which thereafter must be updated at prescribed points;*
> >
> > *b. Identifying how the plan and associated documents will be signed off expediently and efficiently at appropriate points in its development; c. Using a project initiation document to develop and collate key information about how the plan will be resourced, managed and consulted on throughout its preparation; and*
> >
> > *d. Planning regular engagement with key stakeholders who are likely to be critical to the delivery of the plan.*
>
> *2. When considering the scope of a local plan or minerals and waste plan, planning authorities should use their four-year plan evaluation report (or other relevant monitoring information, where necessary) to identify and consider what*

preexisting plan policies and content should be wholly replaced, amended or carried forward without change, though all elements will be subject to consultation and examination.

As such, in accordance with Policy PM7, the council should ensure that key milestones within the local plan timetable are realistic, and with the use of a project initiation document should develop and gather evidence on how the plan will be managed.

The council should also have regard to Policy PM8: *Evidence for plan making* which sets out that:

'All plans should be informed by a baseline understanding of the needs, opportunities, constraints and wider context of the area to which they relate. The preparation of plans should then be shaped and underpinned by information and data that is: relevant to the matters being considered in the plan; proportionate, so that it is focused and not unnecessarily extensive; and drawn from suitable and reliable sources that are sufficiently up-to-date.'

The Planning Practice Guidance for Plan-Making (Paragraph 038, Reference ID 61-038-20190315) supports this, stating that policies must be justified, and any evidence should inform what is in the plan and shape its development, rather than being collected retrospectively. As the new Local Plan will include minerals policy and therefore replace the current Cheshire Replacement Minerals Local Plan 1999, robust minerals-specific evidence should be provided to justify future minerals policies and to shape the spatial strategy. Without this, the Council risk the potential of boosting the provision of sand and gravel in the area, which is necessary to achieve the mandatory seven year landbank.

On this basis Tarmac supports the need to establish a minerals-based strategy based on an understanding of Cheshire East's mineral resources, future demand, and environmental and community constraints affecting extraction, as set out in paragraph 5.76.

National Policy M1: *Planning for a sufficient supply of minerals* requires Local Authorities to provide a sufficient and timely supply of minerals of national and local importance, which in relation to aggregate minerals means using the Local Aggregate Assessment and advice of the Aggregate Working Parties to identify the provision needed in the plan area. Policy M1 also states that the development plan should allocate sites and/or identify preferred areas to maintain this provision. Paragraph 5.78 however identifies that several minerals resources within Cheshire East have limited future potential, and 5.80 states that the authority are currently struggling to meet national policy requirements for sand and gravel and crushed rock. Taking this, and the regional trend of decline of reserves into account, Tarmac supports the council's approach to identifying minerals sites for the new Local Plan through the call for sites, and stress the importance that the Local Plan must be clear in its intention to provide a steady and adequate supply of mineral

resources to maintain its required aggregate landbanks and to safeguard existing mineral sites and infrastructure, in accordance with national policy and Cheshire East's role as an MPA.

The importance of mineral safeguarding has been carried through in the new NPPF under Policy M2: *Safeguarding mineral resources and infrastructure through plan-making*, which states that development plans should define mineral safeguarding areas and mineral consultation areas to support the safeguarding of mineral resources, and identify existing, planned, and potential sites which need to be safeguarded for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material. Tarmac supports that the local plan must identify Mineral Safeguarding Areas in accordance with national policy, and in the context of Cheshire East's need to boost sand and gravel provision, and identify crushed rock aggregate opportunities.

As established, currently Cheshire East's aggregate minerals reserves are currently lower than the national requirement, and therefore Tarmac stress the importance that the safeguarding of minerals resources is not compromised during the allocation of housing to meet the significant housing growth targets. Policy M2(b) of the NPPF 2026 is directly relevant in this regard, as it requires policies and allocations in development plans to ensure that minerals resources are not needlessly sterilised by non-mineral development. This is necessary because minerals are a finite and location-specific resource: they can only be worked where they occur, and once land is sterilised by incompatible development, the opportunity to recover that resource may be permanently lost.

As set out in Policy P4: *Impact of development on existing activities*, proposed development is required to identify the potential impacts on existing operations and where necessary, demonstrate that suitable mitigation can be provided. This is also known as the Agent of Change principle. Additionally, it recognises the importance of taking into account both the current and permitted levels of operation of existing activities. Therefore, careful consideration should be given to the proximity of existing permitted sites and their uses when considering the appropriateness and delivery of new allocations as mineral working and mineral infrastructure can be incompatible with sensitive land uses such as housing.

Mineral resources, products, and infrastructure underpin the ability to deliver housing developments. Without the adequate safeguarding of mineral resources and mineral infrastructure, the plan would be unable to meet housing growth and development objectives over the plan period. Consideration should therefore be given to the wording of local plan policies to ensure they are justified and effective, and do not impose unnecessary blanket restrictions or constraints on existing minerals development.

Conclusion

In consideration of the above, Tarmac considers it important that the emerging local plan:

- Provides sufficient and timely supply of mineral resources;
- Maintains required aggregate landbanks;
- Defines and reviews mineral safeguarding areas and mineral consultation areas;
- Safeguards mineral infrastructure including concrete, asphalt, and aggregate facilities; and
- Ensures that future allocations do not unnecessarily sterilise mineral resources or prejudice existing operations

As indicated above, the Plan must be clear in its intention to provide of a steady and adequate supply of mineral resource, to maintain its required aggregate landbanks and to safeguard existing mineral sites/infrastructure.

We trust that these comments made are helpful to you in progressing the preparation of the emerging draft Plan. Should you wish to discuss any of the matters raised in more detail, please do not hesitate to contact me.

Yours Sincerely,



Heatons