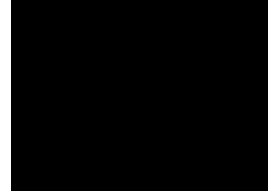


7<sup>th</sup> July 2026

Strategic Planning Team  
Telford and Wrekin Council

Mineral Products Association



Email: [localplan@telford.gov.uk](mailto:localplan@telford.gov.uk)

Dear Strategic Planning Team

### **LOCAL PLAN MAIN MODIFICATIONS CONSULTATION**

Thank you for consulting the MPA on the proposed main modifications to your Local Plan.

We object to Main Modification 118 and the proposed insertion of the additional criterion into policy ML1.

*“Sites have been allocated for development in the Local Plan.”*

Where other considerations indicate that a proposed site allocation within an MSA is appropriate, or the allocation for development is of overriding importance to safeguarding, mitigation measures to reduce the area and amount of resource sterilised should be considered.

The potential for prior extraction of mineral should be explored and maximised. The presence of safeguarded resources should be identified in the Local Plan in order that developers take these considerations into account at the earliest stage. This should be specified in site allocation policy and subsequently discussed at pre-application stage. Where prior extraction is found to be acceptable, consideration should be given to potential for phasing of development to enable this as part of the delivery programme.

Mineral safeguarding must therefore continue to be considered through the application process and the proposed modification excludes allocations from these considerations.

The purpose of safeguarding is to secure the long term conservation of a finite resource for future generations as set out in paragraph 222 of the NPPF.

*222. It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.*

The proposed new criterion should be deleted.

We object to Main Modification 119 and the proposed new paragraph after 14.9. The proposed exemption from prior extraction goes beyond national policy. Part d of paragraph 223 clearly states that policies should:

*“d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;”*

The proposed new paragraph after 14.9 should be deleted.

Yours faithfully

A large black rectangular redaction box covering the signature of Chris Herbert.

Chris Herbert  
Director of Planning

Email: 