

By email to: [raynesfordreview@tcpa.org.uk](mailto:raynesfordreview@tcpa.org.uk)

31<sup>st</sup> October 2017

**Mineral Products Association Ltd**  
Gillingham House  
38 - 44 Gillingham Street  
London SW1V 1HU  
Tel +44 (0)20 7963 8000  
Fax +44 (0)20 7963 8001  
[info@mineralproducts.org](mailto:info@mineralproducts.org)  
[www.mineralproducts.org](http://www.mineralproducts.org)

Dear Sirs

## **RAYNSFORD REVIEW OF PLANNING**

### **Introduction**

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 British Precast and the British Association of Reinforcement (BAR), it has a growing membership of 480 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying 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, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which has annual output valued at £144 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

We have major concerns over the operation and performance of the planning system and the delivery of the necessary permissions to enable a steady and adequate supply of minerals for the economy and society.

Our comments below reflect our perspective on minerals planning in particular. These do not easily fit within each of the themes, but are relevant to a number of these.

### **Overview of concerns**

It is not just about housing!

Delivery of the housing and associated infrastructure depends on the supply of construction materials - largely construction aggregates (sand, gravel and rock).

There is a disconnect, at national and local levels, between aspirations to deliver regeneration, increasing housing supply, and infrastructure, with the supply of construction materials necessary to enable this. Current strategies (National Infrastructure Delivery Plan, Industrial Strategy), consultations, and much of government attention, focus on housing supply and infrastructure but give no consideration at all to the supply of raw minerals materials that are needed for their delivery.

Supply of minerals is a strategic issue as resources are not evenly distributed, they can only be dug where they lie, and the distribution does not always reflect the market. This is the reason the Managed Aggregate Supply System (MASS) has been a key part of the minerals planning system for many years, to ensure a steady and adequate supply of construction aggregates. This enabled strategic consideration of likely demand, reflecting forecast construction and growth, at national level being broken down to regional and local scale. Since the abolition of regional strategies and the introduction of the NPPF, there has been considerable weakening of the 'managed' aspect of the MASS. Each mineral planning authority is now charged with producing its own Local Aggregates Assessment (LAA) that is expected to include a forecast of demand. No surprisingly, most are struggling to do this properly and relying on backwards-looking sales data instead - an unreliable predictor of demand especially given the recent severe recession.

Part of MASS is the *National and Regional Guidelines for aggregates provision in England 2005-2020*, that set out the supply requirements for each planning region over a 15-year period. These were then broken down to each mineral planning authority through agreement at the regional Aggregate Working Parties (AWPs). The AWPs are still operating, although continuing DCLG funding is uncertain, but the *Guidelines* are now out of date and not being renewed, meaning there are no up-to-date national (England) or regional assessment of need to provide the context for local minerals planning. The MPA estimates that in the next 15 years' demand for construction aggregates in GB will be about 3.5 billion tonnes.

The loss of crucial parts of MASS, and cut in resources at DCLG (including to undertake essential surveys of sales and reserves) has also resulted in a loss of strategic direction and in surveys that are essential to provide the information to underpin planning.

It has resulted in some mineral planning authorities providing for a declining amount of mineral and assuming that supply will be provided from elsewhere. This may be the case for certain materials, such as rock that is transported long distances from major quarries in the Midlands and South west to markets in the SE and London. However, it is also leading to a tendency to under-provide for sand and gravel which serves more local markets. This in turn, together with other factors, is resulting in continually falling levels of permitted reserves, which on average over the last 10 years has been running at 60% ie only 60% of sand and gravel sold is being replaced with new permitted reserves. The real danger is that there will not be sufficient reserves available to supply construction when and where it is needed. This should be a major concern for local planners and government.

The plan-led system is also failing. While almost 74% of mineral planning authorities have an adopted minerals plan core strategy, a number of minerals plans have recently been withdrawn at a late stage as politicians seek to reduce their planned provision for minerals, reflecting the backwards-looking 'forecasts' of demand in their LAAs. Site-specific plans are an essential part of the plan-led system for minerals, identifying sites for mineral extraction and providing a degree of certainty for the multi-£million investment required. However, in many areas there is no adopted sites plan, or the amount of mineral being planned for and sites allocated is too low to reflect future demand.

## Some solutions

### Assessment and Statements of need

National and regional statements of need for minerals, particularly for aggregates in updated *National and Regional Guidelines*, to provide clarity over long-term needs and the context for local planning. These would need to be based on likely demand created by housing, commercial development and infrastructure. This in turn requires better auditing of demand and identification of potential sources of supply of aggregates for major projects, and joining-up of planning disciplines.

At the local level, ensuring that major housing, commercial and infrastructure projects have a material supply audit and resource assessment integrated into the design and consenting process could then allow mineral planning authorities and industry to better be able to consider likely demand for minerals so that a steady and adequate supply can be maintained.

This would help to resolve the unsatisfactory situation of each mineral planning authority attempting to forecast demand for its own area based on past sales data (rather than robust methodology taking account of future demand).

### Evidence base and surveys

In terms of plan-making, most of the recommendations in the Local Plan Expert Group (LPEG) report to Government last year, albeit focused on housing, could apply to mineral plans. If implemented, this may help speed the plan-making process and reduce the burden on both mineral planning authorities and industry in terms of expenditure and delay. Requiring a proportionate evidence base is particularly important. Part of this evidence base is data on sales and reserves. Re-instatement of the Annual Mineral Raised Inquiry survey (AMRI) undertaken by the Office of National Statistics every year since 1973, as the principle source of data on non-energy minerals production in Great Britain, is essential. The data was used by minerals planning authorities to assist land use planning and decision-making for the supply of minerals in Great Britain. The survey was used to collect data on the extracted sales of crushed rock, limestone, sandstone, sand and gravel, chalk, clays, and other minerals. Its discontinuation on the basis of saving a few £thousand was short sighted and detrimental to planning.

### Resourcing

Combined with doubts over AWP funding and the future funding of the Aggregate Minerals Survey (AMR) undertaken every 4 years by the BGS, it is highly probable that soon Government, Industry and other interested stakeholders will have no visibility of the data for the construction mineral reserve and production within the England and Wales. This will further put in jeopardy the ability of the mineral planning authorities and industry to plan in a sustainable way future mineral supply to the construction and housing industries.

The loss of experienced staff in mineral planning authorities and in DCLG (currently 0.3 fte now works on minerals) reflecting the lack of resources but also priorities, also hinders proper planning for minerals, including officers having sufficient confidence and authority to defend policy and decisions in the light of often hostile political and public pressure.

### Cross-boundary working

As highlighted, minerals planning is a strategic issue, not least due to the uneven distribution of resources. The AWP Structures are in place to enable some strategic planning but have limited influence over local plans. The Duty to Cooperate can be helpful in identifying strategic minerals supply options beyond an authority's boundaries, as can Statements of Common Ground, but recent experience is that these tend to identify issues (for example the supply of soft sand in the south east of England) without effectively addressing them. The pooling of increasingly diminishing resources and expertise by a number of neighbouring mineral planning authorities, to speed the delivery of mineral plans and consents in response to the increased demand generated by the housing and infrastructure developments, but also to reflect minerals resources availability, may be a sensible solution.

I trust these comments are helpful. In summary, we wish to put a marker down about the need for planning for housing and infrastructure to also consider the supply of construction material necessary for its delivery, and to highlight some of the concerns over the working of the minerals planning system and draw some parallels with wider concerns over the planning system in general. We would be happy to contribute further to the Review.

Yours faithfully,



DAVID PAYNE  
Senior Planning Advisor  
Mineral Products Association

m. 07834 268407

e. [david.payne@mineralproducts.org](mailto:david.payne@mineralproducts.org)