

# **SUBMISSION BY THE MINERAL PRODUCTS ASSOCIATION TO THE DCLG COMMITTEE INQUIRY INTO THE OPERATION OF THE NATIONAL PLANNING POLICY FRAMEWORK.**

**MAY 2014**

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.

The membership of the MPA has no direct connection with the planning system in relation to housing, town centres or energy infrastructure but nonetheless planning permission constitutes the main element of every mineral operator's permit to work. They do therefore have a vital interest in the NPPF and the way it operates.

Mineral planning permissions are some of the most costly to obtain. It is perhaps not surprising that the number of mineral planning applications has declined dramatically during the economic recession and whilst the NPPF has been in place. Whilst our members have not expressed any particular concern about the content of the NPPF, it is very likely that any problems are being masked by the low level of planning activity. In truth therefore, we have little hard evidence that the introduction of the NPPF has or has not had an effect upon the operation of the mineral planning system.

Nevertheless our members share many of the concerns of the housebuilders that were highlighted as key findings in the earlier "Research on the nature of planning constraints", and one concern in particular; the loss of experienced planning officers and constraints on resources available to local authority planning departments.

The NPPF has reduced the volume of extant planning policy and guidance. Whilst the MPA is happy that the essential mineral planning principals have been retained, it is now of great importance that the correct interpretation is placed on those words that remain. Evidence is emerging however, that younger less experienced mineral planning officers are in many cases finding it difficult to interpret the NPPF correctly. An even greater worry is that planning inspectors appear to be having the same difficulty.

As far as Mineral Local Plans are concerned, the NPPF has done little to stimulate the adoption of up-to-date documents. The additional work introduced by the NPPF to address the Localism agenda has delayed matters considerably and the MPA have committed considerable resources to assisting authorities in understanding the concept of Local Aggregate Assessments. At the end of 2014, less than half of the mineral planning authorities in England had adopted Core Strategies.

Minerals operators rely on up-to-date Development Plans to reduce uncertainty and to keep the risk associated with investment in new planning applications to acceptable levels. The poor plan-making

performance of many authorities, taken together with the staff resource issues mentioned above, are undoubtedly acting as a disincentive to the submission of planning applications.

That is particularly evident in the case of applications for new sand and gravel sites. Averaged over ten years, less than half of the material excavated has been replenished by new permissions. Despite a much lower number of applications, only 75% of the tonnage applied for in 2012 was granted permission. As a consequence, areas that have depended on sand and gravel in the past (such as the South East) are relying more heavily on crushed rock imported from more distant sources. Mineral operators are opting to submit applications at hard rock sites rather than in the more risky sand and gravel areas of the South East. The scope for interpretation of the NPPF is leading to inconsistent decision making when it should be a basis for consistency.

Typical examples of this are the continued efforts of many planning authorities to treat the minimum "landbank" requirements (stocks of aggregate resources with planning permission) set out in the NPPF as the maximum that should be permitted at one time. Strict enforcement of the NPPF requirements on this matter is essential.

The MPA conducts an annual survey of members, on which many of the comments above are based. We would be happy to provide copies of our AMPS reports to the DCLG Committee and they are available on the Mineral Products Association website.

The NPPF is undoubtedly intended to be pro-growth and it includes a re-assertion of the statement "Minerals are essential to support sustainable economic growth and our quality of life", which is welcomed. Aggregates in particular are essential to the provision of housing, power generation and major transport infrastructure, all of which are, in turn, components of economic growth. Whilst at this point there is little in the NPPF itself that can be identified as hampering short term mineral supply, in the longer term it could well become an issue if the provisions of national planning policy it contains are not vigorously upheld.