mpa
Mineral Products Association
The Trade Association for the Aggregates, Asphalt, Cement, Concrete, Dimension Stone, Lime, Mortar and Silica Sand Industries

Planning for the future
Reform of the Minerals Planning System

INTRODUCTION

Success in achieving the Government's ambitions around planning and economic growth rests on its policy making the link between delivery of housing, commercial development and infrastructure and the critical need for a steady and adequate supply of essential mineral products for construction and manufacturing and other strategic sectors. Supply cannot be assumed for the largest material flow in the economy, it has to planned, monitored and managed.

The proposals for planning reform outlined in the Planning White Paper Planning for the Future unsurprisingly centre on increasing delivery of new housing. We support a number of the proposed reforms – deadlines for adoption of local plans, speeding-up decision making and the proper resourcing for planning departments. This paper outlines a number of additional reforms specific to the minerals planning system.

Why minerals are essential

Aggregate minerals (sand, gravel and crushed rock) represent the largest single component of the construction sector supply chain, and with cement, are critical to the manufacture of concrete and asphalt. The supply of industrial minerals such as industrial sand, lime and clays are also critical for a wide range of uses such as brick production, mortar and, glass manufacture.

Development of new housing represents around 25% of construction demand for aggregates. The remaining balance (75%) supports infrastructure, commercial and industrial development alongside the repair and maintenance of existing housing stock. A steady and adequate supply of aggregates will be essential in driving and delivering the economic recovery as we transition through the consequences of Covid-19.

Looking at a 10-year average, MPA surveys[1] show the quantity of aggregate extracted and used each year exceeds the new reserves granted planning permission, resulting in a long-term trend of reserve depletion. This is a particular issue for sand and gravel, with current reserves in England equivalent to only 8 years' supply.

The high cumulative costs and impacts of planning and permitting (£100k-£1M), time taken for determination (30 months), and the uncertainty created by out-of-date plans failing to allocate sufficient sites, all serve to deter the submission of new applications supported by the necessary investment by industry.

In the period leading up to 2030, the MPA[2] estimates that between 3.2 and 3.8 billion tonnes of construction aggregates will be required in GB. Even with increasing efficiency of use and Modern Methods of Construction. Over two thirds (70%) of this will be primary materials dug from the ground or dredged from the seabed and landed at wharves. The remaining 30% is fulfilled by recycled and secondary sources of aggregates - the highest contribution in Europe[3]. When other minerals are included, the UK Mineral Strategy[4] estimates that over the next generation (25 years) in excess of 5 billion tonnes of minerals will be required in the UK.

Land-won aggregates consumption outstrips the new reserves permitted

Only 63%
sand and gravel reserves replenished between 2009-2018

Only 75%
crushed rock reserves replenished between 2009-2018

Securing long-term supply requires long-term plans

c.2.4 billion tonnes
primary construction aggregates required to service GB demands between 2016 - 2030

25%
construction aggregate demand associated with new housing

5-15 years
to convert a new mineral site from exploration to operation

Mineral Products: essential for schools . . . hospitals . . . homes . . . roads . . . railways . . . energy supply . . . airports . . . ports . . . food . . . water . . . agriculture

KEY ISSUES & POTENTIAL SOLUTIONS

The UK Minerals Strategy[4] highlights the key issues facing the minerals industry and articulates potential solutions, a number of which relate to the planning system.

There is a strong case to refine and strengthen the existing minerals planning system, rather than embark on wholesale radical and destabilising restructuring. The key components are sound and reflect the fact that, unlike other forms of development, minerals can only be worked where they are found. However, effective implementation is hindered by a lack or resourcing, confidence and a skills shortage. As with housing, a stronger and clearer lead at national level is also required to provide a necessary 'push' to ensure that society's need for minerals is properly assessed, planned for and delivered.

The area-based designations proposed in the Planning White Paper do not directly translate to minerals: Minerals can only be worked where they occur, and an 'area' based approach already applies, with plans expected to allocate 'specific sites', and identify 'preferred areas' and 'areas of search' for minerals extraction[5]. The principles proposed in the White Paper, including permission in principle and presumption in favour of development, could be applied to these areas and provide a greater degree of certainty, but flexibility for sites to also come forward outside of these areas will still be necessary.

A reformed local planning system in which areas are designated for growth or renewal, must also properly maintain safeguarding of mineral resources and infrastructure, so as to avoid sterilising or jeopardising supplies for future generations.

Minerals planning suffers from the same issues as the planning system in general:

Chronic under-resourcing of planning departments: Many minerals planning authorities have inadequate funding to discharge their responsibilities effectively, resulting in delays to plan and decision making. Planning fees are not ring-fenced, and successive increases have failed to deliver the improvements required to operate the more effective and efficient system, upon which the marked fee increases have been justified.

Better resourcing of minerals planning authorities: Recognising the critical role of planning to achieve a steady and adequate supply of minerals to the economy and society, as well as addressing and responding to challenges of climate change mitigation and adaptation. Similar to environmental permitting regimes, fees should directly relate to the planning services that are being delivered and should not be used to subsidise other functions. Enhancing the status and remuneration of planners could attract greater interest in the profession.

Slow plan making/adoption and decision making: Lack of up-to-date plans, particularly site allocations, reducing certainty for investment by industry. While the majority of planning applications for mineral extraction are permitted, decisions take an average of 30 months.

Streamline the plan-making process: A focus on simpler plans that can be produced more quickly that address genuinely local issues and spatially-specific policies including site specific allocations, preferred areas and areas of search providing an appropriate mix of certainty and flexibility for investment and development. Development management policies for minerals should be set at national level and not duplicated or translated locally to provide consistency. Issues settled during the plan making process such as suitability in principle of allocated sites and preferred areas for minerals development, as well as access design and other technical matters should be 'banked' and not require a fresh start as part of the application unless the applicant chooses to apply material changes.

Increasing and superfluous information demands: Minerals developments are complex and generally require Environmental Impact Assessment preceded by screening and scoping. All applications need to be supported by robust and objective evidence. However, planning authorities often seek additional information as a result of consultee and objector comments which are not necessary to determination but can result in significant additional unnecessary expenditure and delay, for example validation checklists.

Ensure that information requirements are material, reasonable and genuinely necessary to formulate sound policies and make decisions: There is a need to reduce hyper-critical approaches to planning authority decisions and judgements and establish processes that are based on reasonable consideration of information and planning balance. The EIA and SEA processes need to be streamlined and the scope for vexatious legal challenges reduced.

SPECIFIC ISSUES FACING MINERALS PLANNING INCLUDE:

Lack of proper forecasting and provision to meet future demand: There is no national 'statement of need' for minerals. For construction aggregates, the largest material flow, national and sub-national Guidelines of demand are a fundamental component of the Managed Aggregates Supply System, but are in need of review and update. Local Aggregates Assessments produced by planning authorities are inconsistent and rarely include a genuine forward looking 'forecast of demand' required by national policy, instead relying on past trends which is backwards looking and risks under-provision. There is no visibility or clarity of the minerals required to support major infrastructure and housing developments, which hinders forward planning for this supply. New capacity cannot be simply 'switched on', it takes years to bring new minerals sites and reserves into production following extensive investment and planning.

National statements of need for minerals: New National and sub-national Guidelines for aggregates provision are urgently required to provide context on their essentiality and benchmarks for provision for minerals at national, regional and local levels to underpin the Managed Aggregates Supply System. The Aggregates Working Parties should continue to be funded but be rejuvenated and tasked with apportionment of the Guidelines to local level overseen by a National Coordination Group chaired by MHCLG. Continued monitoring at national and local levels is essential, and better information on future demand for materials to support major infrastructure projects is required to ensure the right resources can be made available in the right location and at the right time. This would be facilitated by a requirement for 'resource assessments and material supply audits' to form part of the decision-making process for such developments.

Lack of specialist minerals planning skills and experience in planning departments: Minerals planning authorities struggle to recruit and retain qualified planners, especially those with specialist minerals planning knowledge and experience. This is a result of inadequate resourcing, and poor pay and status of local authority planners, as well as a general lack of training in minerals planning by the remaining planning schools. This all contributes to the system performing poorly.

Establish regional 'centres of excellence': Pooling resources and cooperation between minerals planning authorities with regional teams of qualified, motivated and suitably rewarded professionals able to undertake strategic minerals planning would support the production of joint plans and shared development management services across local authority boundaries reflecting sub national supply patterns of construction mineral. Improving status and remuneration would help create demand from students and investment in training re-establishing mineral planning as a valued career

Duplication with other regulatory regimes: Planning permission should provide the main 'licence to operate', with applications supported by extensive information, and public consultation, to demonstrate that the land use is acceptable and sustainable. However, despite clear guidance in national policy, the environmental permitting process, which determines operational matters, often re-visits issues addressed through planning that may jeopardise or at least delay progress.

Establish the primacy of planning permission as the main 'licence to operate': It is essential to clearly define the role of regulators and planners. This may be achieved through combining responsibility for planning and permitting within one government department.

Mineral Products: essential for schools . . . hospitals . . . homes . . . roads . . . railways . . . energy supply . . . airports . . . ports . . . food . . . water . . . agriculture

FOOTNOTES:

[1] Annual Mineral Planning Survey 2019, Mineral Products Association (2019).
http://www.mineralproducts.org/documents/8th_AMPS_Report_2019.pdf

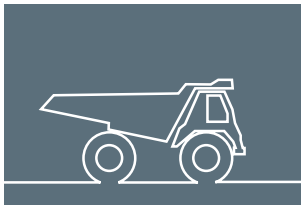
[2] Long-term aggregates demand and supply scenarios 2016-2030, Mineral Products Association (2016).
https://mineralproducts.org/documents/MPA_Long_term_aggregates_demand_supply_scenariors_2016-30.pdf

[3] The contribution of recycled and secondary materials to total aggregates supply in Great Britain in 2018 (2020)
https://mineralproducts.org/documents/Contribution_of_Recycled_and_Secondary_Materials_to_Total_Aggregates_Supply_in_GB_in_2018.pdf

[4] UK Minerals Strategy. Mineral Products Association and CBI Minerals Group (2018)
https://mineralproducts.org/documents/UK_Minerals_Strategy.pdf

[5] As required by the NPPF para 207c, and Planning Practice Guidance Paragraph: 008 Reference ID: 27-008-20140306

Mineral Products Industry at a Glance

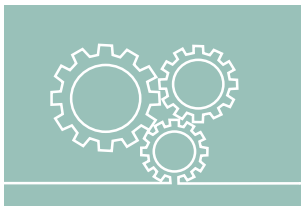


390mt
GB production of aggregates and manufactured mineral products

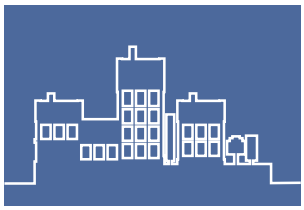
4 times
The volume of energy minerals produced in the UK including oil, gas and coal

£18bn
Annual turnover for the Minerals and Mineral Products industry

£6.8bn
Gross value added generated by the industry

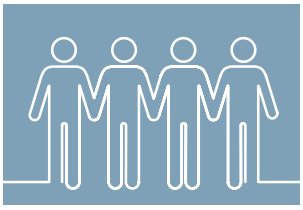


£513bn
Annual turnover of the industries we supply



£152bn
Value of construction, output, our main customer

74,000
People employed in the industry



3.5m
Jobs supported through our supply chain

The Mineral Products Association is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries.

For further MPA information visit www.mineralproducts.org

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essential materials
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