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Sent via email to: sustainableplaces@environment-agency.gov.uk

Dear Ms. Foley,

MPA response to the consultation “Building a Better Environment”

Thank you for informing the Minerals Products Association of the revised document- “Building a Better Environment”.

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.

Mineral developers can potentially face a number of issues when making planning and permitting applications. Any document that assists with explaining the roles of the various regulators and advisors to the planning process is seen as positive by our industry. However, we have a number of comments to make on the content of the document and we have included these in our response.

We are particularly interested in the joint publication of the document by Natural England, the Environment Agency and the Forestry Commission. We note that the previous version of this document was published by the Environment Agency only. We are closely following the development of a single environmental body in Wales and question if this document indicates something similar developing in England?

The document as a whole is now predicated on promoting timber in construction as the only sustainable development solution and this clearly exceeds the permitted remit of The Forestry Commission as well as that of Environment Agency and Natural England. It will mislead the intended audience with a bias unsupported by fact or accepted opinion.

In addition this promotion is contrary to the ‘material neutral’ principle set out in the NPPF.

(Refer; Good practise Guidance; Sustainable Design and Construction published by Town and Country planning association and 19 different bodies including BRE.)

This predication is flawed in terms of the true whole life sustainability of every type of built development and will have an anti-competitive effect on the construction materials market if adopted as a policy.

It will have significant unintended consequences in both the materials and construction market and may well lead to a negative impact on the provision of housing and building of all types in the UK.

The appropriateness of materials must be gauged on a case-by-case basis. Timber is not a sustainable construction material in all cases. The strong presumption against materials other than timber is therefore seriously misguided.

All building materials give rise to sustainability issues that have to be effectively managed both in the provision of the materials and at the design stage. An unequivocal presumption in favour of timber construction cannot be supported at any significant level because of the demands it makes on land in competition with food and biomass resources. Attached as an appendix are our detailed comments on this matter.

Other than that we consider that the document provides a good starting point for developers who are initiating a planning application or when they need to consider input from the Environment Agency, Natural England or the Forestry Commission. It provides a clear guide as to when the separate bodies should be contacted to provide advice to the planning process and indicates to developers where to go for further information.

We also agree that early, pre-application discussions are advantageous to both developer and regulator. We have concerns over the new charges system that Natural England has recently implemented and the proposals suggested in the Environment Agency charges consultation. Pre-application discussions are to the benefit of both the developer and the regulator in question and one party should not be expected to foot the bill. There is no assurance that the advice provided will be good advice and assist in discussions further down the planning application/ permitting stage. MPA has provided extensive feedback to Natural England on their charges scheme and will do so to the Environment Agency through their charges consultation. These responses can be provided to the Sustainable Places Team if required. It is also essential that these discussions are organised through one central body and the advice provided consistent throughout the various agencies.

I hope you find our comments useful and informative, please do let me know if I can be of further assistance.

Yours sincerely,

Nicola Owen
Environment and Waste Policy Executive
Mineral Products Association