

25th March 2017



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Dear Sirs

METHODOLOGY FOR DEFINING MINERAL SAFEGUARDING AND CONSULTATION AREAS WITHIN BUCKINGHAMSHIRE

Thank you for consulting us on the methodology for defining MSAs and MCAs.

Our comments are as follows:

Overall

We support the approach being taken to defining the MSAs, which take follows the BGS Good Practice guidance. It is important to stress that successful implementation depends on all planning authorities providing appropriate safeguarding to minerals resources. This includes improving understanding that safeguarding this is a long-term policy that helps ensure resources will be available for future generations (not only the plan period) and so is important to sustainable development, rather than an inconvenience that can be ignored.

Para 2.18

It may be helpful to explain that, as a result of consultation, the County may object to proposals that it believes will be contrary to Policy CS1 and so will result in unnecessary sterilisation of resources. It should also be stressed that Policy CS1 must be implemented by district councils as well as the County, as part of the development plan, especially as districts will be the planning authority for determining applications and making plan allocations for most potentially sterilising development.

Para 2.23

We support the pragmatic approach to safeguarding - and use of the thresholds for 'major' development is sensible (assuming that is what the reference to the GDPO means - perhaps clarify this). However, a degree of professional judgement and common sense should also be applied, so where a development is below the thresholds but is very obviously likely to cause sterilisation of a large amount of resource or constrain an existing site or the ability for it to be extended, this is subject to Policy CS1.

The Mineral Products Association is the trade association for the aggregates, asphalt, cement, concrete, lime, mortar and silica sand Industries

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Para 2.26

We strongly support the message to district councils that they should not allocate sites within or 'around' MSAs and MCAs. Perhaps this could be emphasised earlier in the document to help stress how important this is, and ensure that mineral safeguarding is considered properly at very early stages of local plan making.

We trust these comments are helpful.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'David Payne', written in a cursive style.

DAVID PAYNE
Senior Planning Advisor
Mineral Products Association