

Planning for the future

Reform of the Minerals Planning System

INTRODUCTION

Success in achieving the Government's planning goals 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 can not be assumed for the largest material flow in the economy it has to planned, monitored and managed.

The proposals for planning reform outlined in 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, proper resourcing for planning departments. This paper outlines a number of additional reforms relevant to the minerals planning system.

Why minerals and mineral products are essential

Aggregate minerals (sand, gravel and crushed rock) represent the largest single component (by tonnage) of the construction sector supply chain, and with cement, are critical to the manufacture of essential mineral products such as concrete and asphalt. The supply of industrial minerals such as silica sand, lime and clays are also critical for a wide range of uses such as brick production, mortar, industrial uses 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 recovery following the Covid-19 lockdown.

Although the majority of planning applications for new mineral reserves are granted, the high costs (£100k-£1M per application), time taken for determination (30 months), and the uncertainty created by out-of-date plans failing to allocate sufficient sites, all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.

Looking at a 10-year average, MPA surveys¹ 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.

In the period leading up to 2030, the MPA² estimates that between 3.2 and 3.8 billion tonnes of construction aggregates will be required 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. When other minerals are included, the UK Mineral Strategy³ estimates that over the next generation (25 years) over 5 billion tonnes of minerals will be required in the UK.

The UK Minerals Strategy highlights the key issues facing the minerals industry and articulates potential solutions, a number of which relate to the planning system. Many of the issues and suggested solutions to resolve these are related:

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

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

KEY ISSUES & POTENTIAL SOLUTIONS

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 increases have not delivered the improvements required to deliver a more effective and efficient system.**
-  **Better resourcing of minerals planning authorities** in recognition of 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 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**, with a focus on simpler plans that can be produced more quickly to address genuinely local issues alongside spatially-specific policies and site allocations. The process should be supported by a 'template' approach to general and development management policies that are common throughout the country.
-  **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 through blanket application of extensive validation checklists.**
-  **Ensure that information requirements are material, reasonable and genuinely necessary** to formulate sound policies and make decisions. This would reduce delay and cost to developers providing superfluous information, and hyper-critical approaches and challenges to planning authority decisions and judgements.

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



2-2.5 years
to determine and issue a mineral planning application

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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 and mineral products. For construction aggregates, the largest material flow, national and sub-national Guidelines of demand are a fundamental part 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 'forecast of demand' required by national policy, instead relying on backwards looking past trends which risks under-provision. There is no visibility or clarity of the minerals required to support major infrastructure and housing developments, which hinders effective 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 and mineral products, including 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. Continued monitoring at national and local levels is essential, alongside better information on future demand for materials to support major infrastructure projects 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. A portion of revenue from the Aggregates Levy could be a suitable source of funding for surveys, and the wider Managed Aggregates Supply System.



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 teams of qualified, motivated and suitably rewarded professionals able to undertake strategic minerals planning across local authority boundaries. Improving status and remuneration would help create demand from students and investment in training.



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 dealt with through planning that may jeopardise or at least delay progress.



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



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FOOTNOTES:

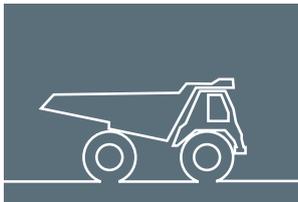
¹ Annual Mineral Planning Survey 2019, Mineral Products Association (2019) http://www.mineralproducts.org/documents/8th_AMPS_Report_2019.pdf

² Long-term aggregates demand and supply scenarios 2016-2030, Mineral Products Association (2016) https://mineralproducts.org/documents/MPA_Long_term_aggregates_demand_supply_scenarios_2016-30.pdf

³ UK Minerals Strategy. Mineral Products Association and CBI Minerals Group (2018) https://mineralproducts.org/documents/UK_Minerals_Strategy.pdf



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



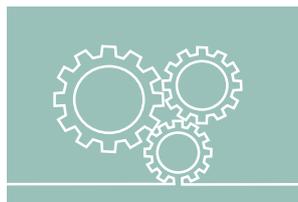
£18bn

Annual turnover for the Minerals and Mineral Products industry



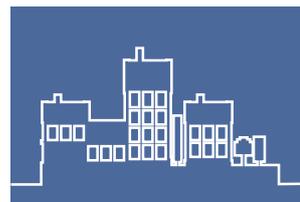
£6.8bn

Gross value added generated by the industry



£513bn

Annual turnover of the industries we supply



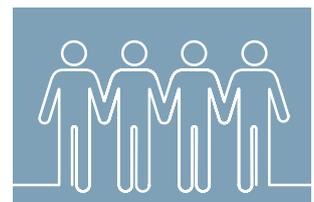
£152bn

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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