

British Aggregates Association

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Fixing Our Broken Housing Market – Consultation Proposals

We are pleased to respond to this consultation in the appendix to the Government White Paper of February 2017.

The British Aggregates Association (BAA) represents the interests of some 120 members of which 70 are independent and privately-owned SME quarry companies throughout the UK with some 20% of national output and who operate out of nearly 300 sites. We are part of the consultation and lobbying process both in the UK and Europe – and are also represented through the CBI (Confederation of British Industry) Minerals Group and CPA (Construction Products Association); and actively and constructively engaged with the UK Minerals Forum which consists of all stakeholders with interests with the minerals industry. This includes central, devolved and local government officials; planners, heritage groups and NGOs as well as industry representatives.

General

We note with some surprise that the White paper has no mention anywhere of the key role of government and authorities in ensuring the availability of an adequate supply of aggregates and minerals to meet the national housing, and associated infrastructure, plans.

There is no reference to this essential link of ensuring the raw materials needed to achieve the ambitious housebuilding programme – nor the mechanism which includes the Managed Aggregate Supply (MASS) and the role of the eight regional technical Aggregate Working Parties (AWPS) in England (and two RAWPS in Wales); and the role of your department in managing and coordinating this activity.

Consultation Questions

Whilst noting the changes proposed to both “national policy” and the National Planning Policy Framework (NPPF) in questions 1, 8, 10, 12 and 36 we have no further comments on these as they do not appear to have relevance to, or impact on, the minerals industry.



Our comments are restricted to the proposals you have outlined in question 4.

We note that it is proposed that policy regarding "Ancient Woodlands and veteran trees" is added to the list in para 14 footnote ⁴ of the NPPF *presumption in favour to sustainable development policy* (as per your box 2 on p79)

It is our belief that current arrangements and guidance is already more than adequately covered in both Forestry Commission advice and in para18 of the National Planning Policy Guidance (NPPG).

Whilst we would not dispute giving adequate protection to areas of land that have been continuously covered by native species trees since 1600 (AWS), we do not think it is automatically reasonable to extend this to *plantations on ancient woodlands sites* (PAWS) which are generally and clearly commercial coniferous woodlands. Many of these latter sites were planted in more recent years since the 1950s encouraged by government policy.

Minerals can only be extracted where they occur and are already subject to many constraints. Industry, government and other stakeholders are also mindful to avoid further potential sterilisation of this valuable and irreplaceable resource.

The industry has a proven track record of responsible management and a high standard of restoration and aftercare, some of which includes woodland. We work closely with authorities, communities and conservation bodies to operate in a cooperative manner. In respect to AWS and PAWS we have already started and would welcome more discussion and rapport with the Woodlands Trust, Natural England and the Forestry Commission on a better way forward other than a *carte blanche* raising of both their status in planning.

We believe that the current proposal is an unnecessary, additional burden to the minerals industry. It is already of active concern to several of our members, and further restrictions on mineral supply is not commensurate with the national housing demand as outlined in the White paper – nor with other infrastructure projects needing mineral resource such as HS2.

If you have any queries on our response or would like further comment or explanation, please do not hesitate to contact.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Peter Huxtable', with a large, stylized flourish at the end.

Peter Huxtable

Secretary

MA(Cantab), CEng, FIMMM, FIQ