

British Aggregates Association

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English Heritage - Mineral Extraction and the Historic Environment - Consultation Draft

Thank you for inviting us to comment on your draft [document](#).

The British Aggregates Association (BAA) represents the interests of some 80 members. 55 are independent and privately-owned SME quarry companies throughout the UK with some 10% of national output and who operate from over 100 sites. We are part of the consultation and lobbying process both in the UK and Europe – and are also represented through the Minerals group of the CBI (Confederation of British Industry), and CPA (Construction Products Association).

Introduction

1.1 and 1.2 We believe that the most appropriate status and primary aim of this document is to set out and guide the work of English Heritage as the government advisor on heritage issues, and the basis (internal EH policy) on which it suggests that their officers respond to specific consultation and planning applications.

National policy on mineral extraction is very clearly set out in the Planning and Compulsory Purchase Act, 2004 and recently published MPS1 and guidance, and is not the remit of advisory bodies.

This should be clearly stated to avoid any possible ambiguity and misunderstandings.

We would also note that impacts of mineral extraction are highly beneficial – not least in providing valuable historic and archaeological research and finds at minimal cost to heritage bodies and enthusiasts, the general public and taxpayer!

Background

2.2 Overstated landmass use for minerals – 0.12% for aggregates, some inactive sites.

The Planning Policy framework for Mineral extraction

3.1 The 2004 Act and MPS1 are the national policy and override all else.

Impacts of Extraction

6.2 The wording here of wholesale destruction is unnecessarily negative as noted in our comments above and unnecessarily provocative to an industry already willing to

cooperate – and provider of a cheap excavation resource for archaeology and historic relics!. More should be made of the positive contributions and the very highly regulated nature of the mineral industry and the almost universal environmentally-sensitive and responsible attitudes of operators (arguably over-regulated, certainly against other industry and other land-use activities!).

References to National Parks are considered irrelevant to the overall substance of the statement and should be removed. There is sufficient coverage already in MPS1.

Restoration, Aftercare and End Use

6.10 There is already good practice guidance in MPG7 which is an excellent document, totally appropriate to your suggestions, and should be referred to here.

Land-banks and Old Mineral Permissions

6.20 BAA has concluded that the situation with ROMPs is overstated on close analysis of the so-called stalled cases in England and we do not consider this relevant to your statement or pertinent to your remit; and certainly it is incorrect to conclude all the *fault* lies with mineral operators. You can read our response to the consultation [here](#).

Advice/Guidance (Internal Policy)

8.1 As noted in the Introduction, this should be clearly re-stated as internal advice and guidance for English Heritage to avoid any confusion with National Minerals Policy which is outside the remit of any individual stakeholders.

P3 Not sure of consistency here – are you suggesting aggregate levy relief for small quarries? If not the statement appears superfluous.

P5 Unsure where EH Conservation principles would conflict with MPS1. This is unnecessarily unhelpful and would be better if stated that you would normally fully support applications that met with MPS1 historic policy.

P10 This is largely superfluous, somewhat demeaning to the industry and using over-emotive language; and is already well covered in MPS1

P16 This is already the situation and is largely superfluous.

We trust that you will take our comments into consideration in the re-drafting of this guidance documentation.

If you have any questions concerning our response please contact me further.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Peter Huxtable', with a large loop at the top and a horizontal line extending to the right.

Peter Huxtable

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