

21st November 2008

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Minerals Core Strategy Issues & Options 2

We note your current consultation and whilst we do not normally comment on local issues directly there are some aspects of your proposals which are clearly contrary to MPS1 national policy and disadvantageous to national policy for both SMEs and also potentially to the proximity principle and government requirement and our intention to reduce the industry's carbon footprint.

The British Aggregates Association (BAA) represents the interests of some 85 members. 60 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 eight RAWPs groups in England and Wales, the Minerals group of the CBI (Confederation of British Industry), National Minerals Forum and CPA (Construction Products Association).

We specifically have concerns over your introduction of a new concept of *strategic* sites and the reference to those with outputs in excess of 100,000 tpa. This is not a nationally recognised concept or mechanism and clearly would disadvantage SME operators and favour larger companies if introduced. We understand that a similar approach in Derbyshire would result in a reduction of *so-called* preferred sites from 30 to 5.

This approach which might be bureaucratically simpler for your own employees and department is clearly contrary in our view to basic national policy and MPS1 where essentially all possible options should be available.

We believe that all sites **must** be considered on an equal and site specific basis notwithstanding that a smaller operation will have a smaller environmental impact locally. Minimising the distance (mineral miles) from producer to customer also better meets the proximity principle and also minimises the carbon footprint. This again will generally be better accomplished the smaller the site.

I trust that you will re-consider your suggested policy. Please do not hesitate to contact me if you require any further information.

Yours Sincerely



Peter Huxtable, Secretary
MA(Cantab), CEng, FIMMM, FIQ