

British Aggregates Association

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25th June 2009

Barbara Bay
Panel Secretary
The Planning Inspectorate
Room 4/02 Temple Quay House
2 The Square, Temple Quay
Bristol
BS1 6PN

http://www.planning-inspectorate.gov.uk/pins/rss/south_east_m/index.htm

Dear Barbara

**Partial review of the South East RSS
Review of Policy M3 – Primary land-won aggregates and sub-regional apportionment**

Thank you for the opportunity to comment on these proposals.

The British Aggregates Association (BAA) represents the interests of some 80 members of which 60 are independent and privately-owned SME quarry companies based throughout the UK accounting for some 10% of national aggregate output and together operate out of over 100 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). We have individual member representation on all the ten Regional Aggregates Working Parties (RAWPs) in England and Wales, and through the national steering groups; and work closely and constructively with other stakeholders including the Planning Officers' Society (POS).

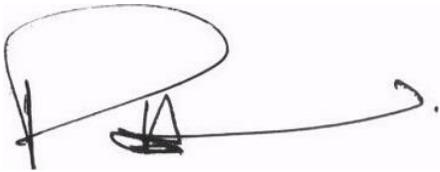
BAA strongly opposes the Revised Policy M3, and the relevant changes to the supporting text where it does not fully endorse the government's published National Aggregate Guidelines, for the following reasons:

1. The region's unilateral departure from the agreed current National Aggregate Guideline figure for the South East is contrary to Government policy, guidance and established practice for the national managed aggregate supply for England and takes little account of the advice from the non-political RAWPs technical bodies.
2. The sand and gravel landbanks in many South East sub-regions are already below the minimum seven year level set out in Mineral planning Policy MPS1 (Annex 1, paragraph 4.1). Promoting lower levels of provision is likely to jeopardise adequate and steady supplies of locally won aggregate in accordance with Government policy and national objectives (MPS1 paragraphs 1 and 9).

3. In order to meet the National Aggregate Guideline figure any under-provision in the South East will require this deficit to be provided by other regions, most probably the East Midlands and the South West. This outcome will result in much greater distances between the aggregate source and the market and be contrary to government's proximity policy and aim of reducing the UK's carbon footprint.
4. Lobbying and promoting under-provision of aggregate will have a direct impact on specific proposals for future mineral supply sites, leading to unnecessary uncertainties to individual companies and their future contribution to the nation's wealth, and to local employment.

We enclose your completed comments form.

Yours Sincerely

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

Peter Huxtable
MA(Cantab) CEng FIQ FIMMM
Secretary