

## MPS1: BAA view

The British Aggregates Association response to the MPS1 annexes in October noted that "*along with most other stakeholders*", it had serious concerns over the original MPS1 draft and guidance as "*it lacked clear unequivocal national government policy and resolve to ensure a security of supply to meet society long-term needs/or materials in a timely manner*". The draft aggregates annex also did not clearly address this need and lacked clear, unambiguous use of language.

BAA understood that MPS1 *and* the annexes have equivalent status and that there will be no further annexes to cover other minerals (eg Industrial limestone). This would indicate that the final MPS1 will be the principal over-arching document. Overall BAA wished to ensure minimal duplication but that where it occurred it did not create any distortion and ambiguity to fuel litigation.

Particular primary concerns were:

- The lack of a clear and positive commitment and a mechanism to ensure the supply of the nation's long-term mineral needs, and a clear responsibility, accountability and methodology for the MPAs and regions to deliver 'an adequate and steady supply' in a timely manner. Stronger intent and clearer commitment from government was essential if aggregate producers are to make long term investment to secure and maintain long term supplies to meet the needs of the economy.
- No mention of a presumption in favour of development unless it causes demonstrable harm. BAA believed that preference should be given for extensions to existing operations where geological knowledge and reserve information is often more robust, infrastructure, access and traffic routing is established and community relationships are in place. MPA's should be guided to consider the opportunities for extending existing quarries before considering

greenfield proposals.

- No reference to the proximity principle favouring local sourcing of minerals and minimising distance from supplier to customer. Often rail and water transport involves double-handling of materials at one or both ends of the supply chain and with **no** reduction in overall road transport.
  - The proposed landbank allocations did not adequately address needs of society or hard-rock suppliers, or address where the landbank is controlled by one or two dominant suppliers. Policy should emphasise the over-riding need to deliver, and that the landbank is just one method of achieving this.
  - References to extraction in sensitive areas such as National Parks and AONBs did not adequately reflect that longer-term extraction could be met at the lowest environmental cost without compromising their special status.
- BAA felt that these concerns had a disproportionate impact on smaller companies, the majority of its membership.

*Mineral Planning*, December 2005