



RTPI

mediation of space · making of place

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To whom it may concern,

RTPI views on the proposed UK Minerals Strategy

Thank you for the opportunity to comment on the proposed UK Minerals Strategy, prepared on behalf of the UK Mineral Extraction Industry by the CBI Minerals Group and the Mineral Products Association.

The RTPI is the largest professional institute for planners in Europe, representing some 24,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Yours faithfully,

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General comments

This strategy comes at an important time, with the government's ambition to deliver one million homes by 2020 and major infrastructure projects like HS2 in the pipeline. Good forward planning in the minerals sector during the previous decade has provided a steady supply of minerals, but this strategy rightly recognises that continued supply requires a more coordinated approach from government. A strong connection is needed between planning for housing, infrastructure and minerals, driven by city-regions and counties and incentivised by DCLG, and with a national outlook that recognises the need for mineral products to be imported across strategic planning boundaries.

It is noted the strategy initially relates to England, but has an objective of engaging with the devolved administrations at a later date. As this is billed as a UK Minerals Strategy, it would be useful to set out the extent to which relevant bodies from the devolved administrations have been involved in its preparation.

The strategy focuses on primary aggregates and seems to take little account of the growing markets for secondary and recycled aggregates. It would be useful for the strategy to provide comparable data in the Appendix on the size of the markets for primary, secondary and recycled aggregates, and how these may change in the future. We also recommend including a clear statement on the need to utilise recycled and secondary aggregates in favour of primary aggregates wherever possible.

Access to minerals (page 3)

With regard to this paragraph:

The 'licence to operate', i.e. securing planning permission and environmental permits, is, at present, unnecessarily slow, complex and expensive. 5 to 15 years can elapse between the identification of a potentially workable deposit and production, so considerable lead-time is needed in planning for supply. Planning and permit costs are typically between £100k and £1m per development and can be higher for large scale projects. The cumulative impacts of regulation can be significant and are not well understood by Government. There is a need to 'cut red tape' and improve implementation particularly with regard to planning and permitting.

While the current system ensures that high environmental standards are maintained and that social and economic benefits are maximised, it can be wasteful and unjustifiably expensive. For some mineral operators, this can be an unacceptable commercial risk and discourages investment in new proposals.

The section requires evidence to support claims that high environmental standards are too expensive or slow. It is also difficult to ascertain whether this section incorporates the views of certain third and public sector bodies which are represented on the UK Minerals Forum, such as the Wildlife Trust and CPRE. References to 'red tape' should be clear on which aspects are thought to be problematic and why.

It would be helpful to frame this section in terms of the benefits that are achieved from a plan-led system, rather than as barrier to be overcome. This would reinforce later statements on the need for a properly resourced planning system (below). Our research into the value of planning describes in detail how early and proactive engagement with planning provides

developers with the certainty and confidence to invest, while improving the final quality and acceptability of schemes¹.

Indicative action plan (page 9-11)

The action plan proposes that planning decisions should have primacy over environmental permitting, and that the interface between these two aspects of regulation should be improved to achieve sustainable development. While there is room for improving the interface between planning and permitting bodies, it is hard to see how planning should have primacy over environmental permitting when the latter controls the operational aspects of development. However, we strongly agree with the following points, that:

The central importance of the plan-led system, the urgent need to secure up-to-date mineral planning documents and the need to ensure the process is properly resourced and efficiently implemented;

Mineral Planning Authorities need to be adequately resourced and, in particular, staffed with planners having specialist experience and skills required for dealing with mineral matters.

Addressing these issues may prove the most effective way of improving the interface between planning and permitting. Several RTPI reports have highlighted the need for proper resourcing in planning: our research in the North West of England found that average cuts in planning staff of more than 30% in local planning authorities over the past five years are now undermining economic recovery across the region², while in Scotland, our research found that only 63% of the costs of processing a planning application are recovered by the fee charged³. Members have raised concern about the urgent need to retain and recruit specialist mineral planning staff at a strategic level, and the lack of knowledge within local authorities.

Many mineral planning authorities find it challenging to assemble adequate data, and we would support further actions by industry which encourage members to engage promptly and positively as part of local surveys to inform the production of annual Local Aggregate Assessments and other documents. Government should also continue to invest in national surveys and ensure that these are detailed enough to be used to inform plan making at a local level. Finally, it is important that the expectations of planning inspectors and other regulators are realistic and proportionate with respect to mineral planning data.

Other points from the action plan

- The plan proposes that industry should undertake to ‘*use the most economically viable options for transporting mineral products to the point of use*’ – the need to reduce transport emissions should also be emphasised.
- We support the proposal for industry to encourage its members to be more proactive in engaging with local communities regarding the essential role of minerals, and the positive economic and social benefits that can result.

¹ www.rtpi.org.uk/media/1915891/rtpi_delivering_the_value_of_planning_full_report_august_2016.pdf

² www.rtpi.org.uk/media/1496890/RTPI%20Arup%20Research%20Report%20Investing%20in%20Delivery%2010%20October%202015.pdf

³ www.rtpi.org.uk/media/1496196/performance_and_resources_-_final_-_october_2015.pdf

- Another issues raised by our members related to the need to agree and monitor restoration bonds to ensure they will cover the costs of restoration.

Appendix A (page 5)

The reference to Scottish Planning Policy 4: Planning for Minerals, and the associated quotes, are out of date. The document should instead refer to the relevant section of the 2014 [Scottish Planning Policy](#) on Promoting Responsible Extraction of Resources (pages 52-55).

