

Andrew Lipiński
Office of the Deputy Prime Minister
Minerals and Waste Planning Division
Zone 4/A2
Eland House
Bressenden Place
London SW1E 5DU

2 March 2005

Dear Andrew Lipiński

Consultation on Draft Minerals Policy Statement 1 “Planning and Minerals” and Associated Good Practice Guidance

Wildlife and Countryside Link (Link) welcomes the opportunity to respond to the above consultation and hopes that the following comments can be taken on board by ODPM when it issues the final version of MPS1 and the associated Good Practice Guidance.

Link brings together voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management and food production and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of over 7 million people in the UK. This response is supported by the following Link members:

- Bat Conservation Trust
- British Mountaineering Council
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Council for British Archaeology
- Council for National Parks
- Friends of the Earth
- The Herpetological Conservation Trust
- National Federation of Badger Groups
- Open Spaces Society
- Ramblers’ Association
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust



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"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Hilary Allison, Director: Alexia Wellbelove

Wildlife and Countryside Link

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Link considers that it would have been helpful for ODPM to have consulted on the draft annexes to MPS1 (aggregates, oil and gas, building stone, brick clay) at the same time as the consultation on the MPS itself.

This response should be read in conjunction with the more detailed responses of Link members. Link particularly wishes to comment on the following aspects of the draft MPS1.

1. A policy hierarchy with priority to demand reduction and primary extraction as last resort

Link believes that MPS1 is the right vehicle to ensure that the minerals planning system promotes the long-term conservation of the non-renewable mineral resource by giving policy priority to demand minimisation, waste minimisation and increased use of recycled/secondary materials, with use of primary aggregate seen as a last resort.

Link welcomes the government's commitment to making the best use of minerals, for example as expressed in paragraph 8.62 of the UK sustainable development strategy. In order to achieve long-term conservation of the mineral resource (which would be essential to achieve more sustainable development) Link advocates an approach which gives priority to:

1. A reduction in the overall quantity of material used
2. Reduction in the generation of waste
3. Appropriate use of higher quality materials
4. Increased use of alternatives (recycled and secondary)
5. Use of primary material seen as a last resort

As all these principles have been accepted by the government in the UK sustainable development strategy, they should be expressed in MPS1 in the form of a policy hierarchy. The waste hierarchy has been helpful in promoting a more sustainable approach to waste management. Link believes that there is scope to extend a similar approach to minerals planning.

2. Integration rather than trade-off: avoiding 'balancing' environmental against social and economic considerations

Link is concerned that the references currently in the draft MPS1 to achieving balance (for example in paragraph 1) reflect an outdated approach to sustainable development. Link notes that since the consultation draft of MPS1 was published, the government has issued PPS1: delivering sustainable development. This provides very clear advice that the four aims of sustainable development should be pursued in an integrated way (paragraph 4) and that development plans promote outcomes in which environmental,



economic and social objectives are achieved together over time (paragraph 13i). Link therefore urges ODPM to ensure that references to sustainable development in the final MPS1 are consistent with PPS1 and the UK sustainable development strategy (new version expected in early March).

3. Conservation-led sustainable mineral objectives: reinstatement of appropriate end-use

Link would like to see a more robust approach to long-term conservation and safeguarding of mineral resources. We suggest that the objectives of MPS1 should be recast to include the following three new conservation-led sustainable mineral objectives:

- To maximise the benefits and minimise the impacts of minerals over their full life cycle
- To better integrate mineral planning policy with national policy on sustainable construction and waste management
- To use natural, recycled and secondary materials for the highest quality of end-use which their characteristics can support

A life-cycle approach to planning for minerals would ensure that the opportunity to reduce demand or supply at each stage of a mineral's life-cycle was systematically considered.

This approach would lend itself well to integration of minerals policy with sustainable construction and waste management policy. The synergy between these different policies stems from the fact that most aggregates are used in construction. Since 1997, the Government has supported an important body of work on sustainable construction and recycling of demolition waste, and on sustainable consumption and production, both of which should be integrated into minerals planning policy.

Link is extremely concerned that the principle of end-use of high grade minerals has been lost in draft MPS1 whereas MPG1 in paragraph 35(ii) states that natural, recycled and secondary materials should be used for the highest quality end uses which their characteristics can support. The UK sustainable development strategy recognises in paragraph 8.62 that the government will "help to make sure that higher quality materials are not used where lower quality materials are available".

As well as recommending it as a specific new sustainable mineral objective, Link strongly urges re-inserting the appropriate use of high grade materials in MPS1.



4. Removal of 'regional considerations' in the test for mineral working in National Parks and AONBs

For National Parks and AONBs, Link is concerned that paragraph 8 has been amended to introduce an inconsistency with Government policy¹ on assessing major developments in these areas. The introduction of regional need as a consideration to be assessed in deciding whether or not a proposal is exceptional represents a significant shift in government policy, which hitherto has centred on national need. No justification has been provided for this. It also potentially undermines the approach being taken by regional planning bodies (and which is referred to in paragraph 9 of draft MPS1) to reduce the amount and proportion of aggregate extracted from National Parks and AONBs. Link therefore considers that the reference to regional need should be removed from paragraph 8.

5. Environmental enhancement as the starting point for planning for minerals working

Link submits that MPS1 should set out an approach that seeks to ensure that minerals extraction firstly enhances the natural environment, secondly avoids damage, thirdly mitigates any residual damage and finally offers compensatory measures.

Such an approach would be wholly consistent with the government's approach to minimising impacts of extraction on the environment and local communities (as set out in paragraph 8.62 of the UK Sustainable Development strategy) and to identifying where extraction will have least effect on landscape, environment and quality of life of local communities (ibid). This would also be compatible with advice in paragraph 17 of PPS1 that "planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole".

Link therefore requests that section 11 on environmental protection is amended to encourage MPAs to follow this approach.

6. Environmental capacity

The concept of environmental capacity is fundamental to sustainable development. We note that this has now been recognised explicitly in PPS1, which states that: 'Plan policies and planning decisions should be based on ... recognition of the limits of the environment to accept further development without irreversible damage' (paragraph 19).

¹ Paragraph 22, PPS7



While welcoming the references in MPS1 to the prudent use of natural resources, Link is disappointed that it does not refer to environmental capacity or limits. We submit that this needs rethinking to ensure that MPS1 is consistent with PPS1, as well as the forthcoming revised UK Sustainable Development Strategy.

Link considers that Strategic Environmental Assessment (SEA) could be a particularly useful tool to deal with the issues of environmental capacity at the regional and local levels.

Draft Good Practice Guidance (GPG)

Link considers that the structure of the draft MPS1 and draft GPG could be more closely related so that policy and guidance could be considered in a more integrated way. Some of the elements of the draft GPG will be covered by other MPSs (for example on environmental effects or restoration) and Link suggests that these may best be addressed by a single GPG note once all the MPSs have been published.

Link welcomes the recognition in paragraph 49 that minerals workings can often provide the opportunity in their restoration and after-use to create new wildlife habitats. We suggest that the second sentence is revised to "In particular they should make a contribution, wherever possible, towards achieving specific targets set out in the UK Biodiversity Action Plan".

Link has no objection to this response being made available for public inspection in the ODPM library.

Link hopes that the above response is helpful. Please do not hesitate to contact me should you require clarification of any of the above or any further information.

Yours sincerely

R. M. Chambers

Ruth Chambers
Chair, Minerals Working Group



