

British Aggregates Association

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Dear Richard

Planning Policy Statement 4: Planning for Prosperous Economies - Consultation paper

Thank you for the opportunity to comment on this consultation.

The British Aggregates Association (BAA) represents the interests of some 90 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 Minerals group of the CBI (Confederation of British Industry), and CPA (Construction Products Association).

BAA supports the Government's key policy outcomes for economic development and its desire that planning policy should support economic growth in line with the principles established in PPS1: Delivering sustainable development; and that Minerals Extraction is included.

We would prefer government to re-introduce a clear presumption in favour of economic development, but are encouraged by Policy EC12.3 that proposals should be considered favourably *unless there is good reason to believe that the social, economic, and/or environmental costs of development are likely to outweigh the benefits*; and Policy EC12.2 *...where development is in accordance with the plan it should normally be approved*. We also note the positive drivers for prosperous economies in Regional Planning Policy EC 2.1.

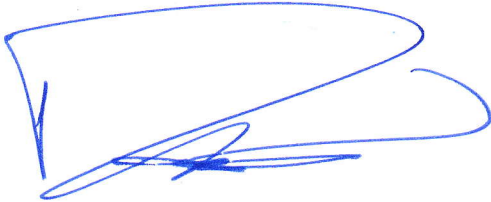
We believe PPS4 should specifically make reference to Minerals Policy Statement 1: Planning and Minerals (MPS1) which also (para 13) recognises the need to safeguard mineral resources from other forms of development when addressing positive plan-making for economic development. This places an obligation on authorities to define *Mineral Safeguarding Areas* to ensure that resources are not needlessly sterilised by non-mineral development. MPS 1 encourages the prior extraction of minerals, where practicable. Mineral extraction can also create opportunities for post restoration development.



We welcomed in your earlier draft PPS4 on March 2008 (para 28) that *full consideration should be given to the economic aspects of a planning proposal*. This regrettably does not appear to be incorporated in the current draft and we would suggest that it be re-introduced. In the case of minerals this should include also the employment created or maintained within the down-stream industries which depend on the mineral as its raw material.

We agree to our response being made public.

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'Peter Huxtable', with a large, sweeping flourish extending to the right.

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

1. **Do you support the consolidation and streamlining of national planning policy on economic development into a single policy statement? What do you think are the costs and benefits of the approach?**

Yes

Comment: The current draft has less clarity than the March 2008 draft PPS4

2. **Does the draft Statement include all that you understand to be policy from draft PPS4, PPG5, PPS6 and PPS7? If not, please be specific about what paragraphs in any of these documents you feel should be included in this document? Please can you explain why this should be the case?**

No

Comment: The PPS4 draft of March 2008 (para 28) stated "full consideration should be given to the economic aspects of a planning proposal" and this regrettably is missing from the current draft and we suggest is re-incorporated. In the case of minerals this should also include the employment created or maintained within the down-stream industries which depend on the mineral as its raw material. This will be essential in regenerating the construction and wider national industry during the current and ongoing extended recessionary period.

3. **Other than where specifically highlighted, the process of streamlining policy text previously in draft PPS4, PPS6 and PPS7 to focus on policy rather than guidance is not intended to result in a change in policy. Are there any policies which you feel have changed in this process? Please tell us what you think has changed and provide alternative wording that addresses your concerns.**

Yes

Comment: As in Q2 above.

4. **Does the structure of the draft Statement make it easier to understand what is required at different stages in the planning process? Are there any improvements you would like to see made?**

Yes

Comment: The draft lacks the clarity and greater brevity of the earlier draft PPS4.

5. **Do you think the restructuring of the impact test from the consultation draft of PPS6 achieves the right balance and is it robust enough to thoroughly test the positive and negative impacts of development outside town centres?**

No Comment:

6. **Should more be done to give priority in forward planning and development management to strategically important sectors such as those that support a move to a low carbon economy, and if so, what should this be?**

No specific comment:

7. **Is the approach to the determination of planning applications set out in policy EC21 proportionate?**

No Comment:

8. **Do you think the requirement for regional spatial strategies to set targets for employment land targets for each district in their area should be imposed? Please give reasons for your view.**

No Comment:

9. **Do you agree the policies do enough to protect small or rural shops and services, including public houses? If no, please explain what changes you would like to see.**

No Comment:

10. **In response to Matthew Taylor, we have altered the approach to issues such as farm diversification. What do you consider are the pros and cons of this approach?**

No Comment:

11. **Do you think that the proposals in this draft PPS will have a differential impact, either positive or negative, on people, because of their gender, race or disability? If so how in your view should we respond? We particularly welcome the views of organisations and individuals with specific expertise in these areas.**

No Comment: