



**British  
Geological Survey**

NATURAL ENVIRONMENT RESEARCH COUNCIL



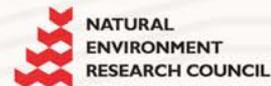
[www.bgs.ac.uk](http://www.bgs.ac.uk)

# **PERCEIVED ISSUES (Or, a reply to; “Not another thing I’ve got to do!!”)**

**John Cowley**

**Mineral and Resource Planning Associates Ltd**

Kingsley Dunham Centre  
Keyworth  
Nottingham NG12 5GG  
Tel 0115 936 3100



NATURAL  
ENVIRONMENT  
RESEARCH COUNCIL



# With Apologies to Mark Twain

- “Protect minerals – they’re not making them anymore”
- “Denial ain’t just a river in Egypt”





# IS THE ISSUE SIGNIFICANT?

- “construction materials are at risk of sterilisation through urban development” – SOUTH AFRICA
- “mineral resources have been made unfeasible by local planners” – NORWAY
- “local government realised that sterilisation was a threat to aggregate availability” – UNITED STATES
- Not only significant – but a wide problem



# SO, A MINERAL PLANNING ISSUE?

- Actually, no. It's just an ordinary planning issue concerned with the sustainable management of resources, but in this case relating to minerals, instead of water, habitat, etc.
- The actions required from the whole planning process are no less or no more than sought in relation to other resources or factors.





# FAILURE TO UNDERSTAND

- Inspector *“safeguarding could lead to an expectation that some mineral extraction could take place”*
- RPG9/RSS.SE – policy to only safeguard *“existing mineral sites, proposed sites and ‘areas of search’”*
- Nothing, absolutely nothing, to do with extraction and everything to do with unallocated resources
- The more this is said, and the more that is the process – the more this will be the outcome



# PERCEIVED ISSUES

- Knowledge – How to define?
- Value – How to assess importance?
- Extent – How to relate to other factors?
- Cost – Who foots the bill?
- Scale – Consultation overload and delay





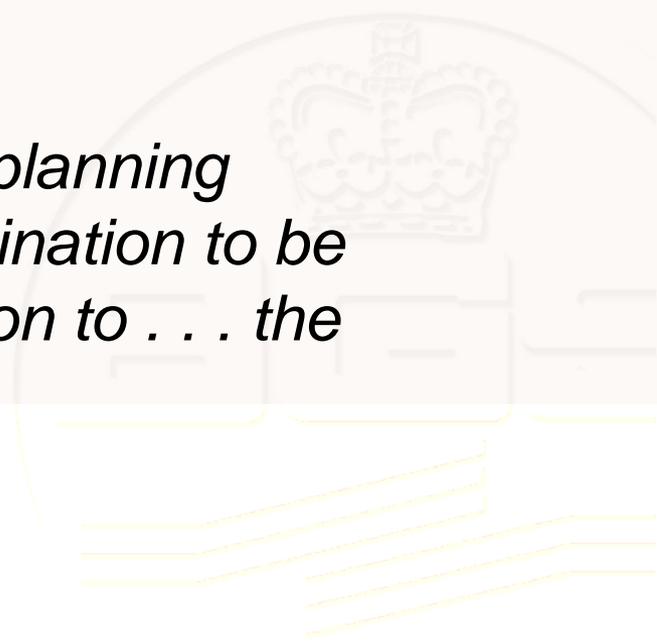
# CONTEXT

- But we don't know the presence, value or extent of other factors (archaeology, habitat, agricultural land, etc, etc, etc, etc) either. Yet that is not a constraint to the planning process requiring a developer to demonstrate, at his cost, no harm prior to granting consent.
- What's the difference?
- What's the problem?



# TYPICAL OBLIGATIONS

- Archaeology *“it is reasonable for the planning authority to request the prospective developer to arrange for an archaeological field evaluation . . . before any decision”* PPG16
- Contaminated Land *“In considering planning applications the potential for contamination to be present must be considered in relation to . . . the proposed new use”* PPS23





# EVALUATION COSTS

- Normally only for soft rocks (don't normally need to prove presence of rock)
- Only simple trial pit/drilling costs normally involved
- Likely costs (5 ha site) – trial pits <£1,000)
- Archaeology costs £5,000 plus curation
- Ecological survey £6,000 plus, if species of interest found
- Specialist minerals will require more detailed work – but these cases will be few and far between



# HOLD THOSE COSTS!

- Ground Evaluation
  - Archaeology
  - Agricultural Land
  - Contamination
- 
- ALL INVOLVE DIGGING INTO THE GROUND!
  - ALL UNDERTAKEN ANYWAY!
  - JUST A BIT MORE WORK





# CONSULTATION OVERLOAD?

- Actually no. MSAs/MCAs will primarily cover open countryside.
- Most of the open countryside is protected from development (is there any 'White Land' left?)
- Ergo, there is unlikely to be significant numbers of applications for other development requiring consultation
- Minor development to be excluded anyway
- Can this be said with confidence?



# BALL CLAY

- Process operated for over 50 years
- Most of the resource area
- Extensive area with high value constraints (Ramsar, SPA/SAC, AONB, Heritage Coast)
- Fringe of Bournemouth – high development pressure
- Pressure from very buoyant tourism industry
- Never been a flood of consultation
- No harm to other resources
- No significant blight or harm to other development



# CONCLUSION

- Some extra work – but experience suggests only a limited increase
- Costs to developers – but minor and already partly undertaken
- No impact on the integrity or conservation of National Parks, SPAs, etc
- No more an ‘uncertainty’ or blight issue than just about every other planning consideration
- An important element of sustainability – mineral resources are fixed – got to make it work!!!