

Appendix A

Worcestershire Minerals Local Plan (WMLP) Climate Change and its impact

Climate change is the biggest challenge facing the world – yet there is only passing reference in the WMLP to the impact of minerals extraction and associated activities and it is unclear what role the WMLP can have in achieving the UK's carbon reduction targets.

Climate change and the role of mineral extraction – particularly relating to construction aggregates – does not have a prominent presence/position in the WMLP.

The WMLP lacks evidence or assumption on the likely contribution for recycled, secondary and substitute materials.

Overall view of the WMLP

The objectives of the WMLP are set out in M01-M06, but none of the objectives includes climate change. There should be an objective that reflects how the WMLP intends to meet the UK's carbon reduction targets.

Material Resources

One important area is the conservation of natural material resources. The greater use of substitute, secondary and recycled materials and mineral waste in aggregate supply needs to be strengthened and given an increased profile in the WMLP. A hierarchy of aggregates supply should be adopted which places “substitute, secondary and recycled materials and mineral waste” at the top of the pyramid followed by the extraction of primary materials from existing sites.

The draft Schedule of Main Modifications at paragraphs 2.40 – 2.43 includes phrases such as “It may be possible to reduce the need for primary aggregates...” and “....recycled and secondary aggregates accounted for 29% of UK aggregate sales.... but there is little scope to increase this further...”

Such pessimism dilutes the importance of substitute, secondary, recycled materials and mineral wastes. The WMLP should be seeking to increase the contribution from near 30% to 40%, 50% or even 60% over the plan period. Whilst recycled and secondary aggregates accounted for 29% of aggregates sales in the UK in 2013, the WMLP does not include any estimates and assumptions relating to the contribution of substitute materials in Worcestershire.

Substitute, secondary and recycled materials and minerals waste are a reasonable alternative and should contribute towards the supply of materials and should be taken into account in accordance with para 210(b) of the NPPF.

Contrary to statements regarding the lack of availability of substitute, secondary and recycled materials – there are opportunities to explore the ever increasing ash production. In Scotland production has commenced using wastes including recycled plastics in brick making. There are so many opportunities to explore greater use of alternatives rather than the negative approach within the WMLP which advocates no further increase in alternatives to primary extraction of materials. This negative approach is further demonstrated in para 2.63. “There is limited scope to substitute clay in brick manufacture...” On the positive side in para 2.79 there is recognition of the role of reclaimed building stone.

Spatial Strategy (Strategic Policies)

MLP1 (Objective M01-M06)

This policy should include reference to explore further opportunities of substitute, secondary, recycled materials and mineral wastes.

Supply of Mineral Resources (Strategic Policies)

The introduction to this section of the WMLP should include the hierarchy of materials supply which puts substitute, secondary and recycled materials and mineral wastes at the top of the pyramid of the supply chain.

Policy MLP13 is supported but reference should be included to the hierarchy of materials supply mentioned in the introduction above.

In conclusion, consideration should be given to the inclusion of a separate chapter relating to climate change and how the WMLP contributes towards the nationally set targets for carbon reduction.

In addition the WMLP should include a hierarchy of materials supply which clearly advances the role of substitute, secondary and recycled materials and mineral wastes.