

13th January 2017

Charging Consultation Response
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Dear Sir/Madam

Consultation on Fees and Charges for 2017-18

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the recent addition of British Precast and the British Association of Reinforcement (BAR), it has a growing membership of over 480 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of GB cement production, 90% of aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which has annual output valued at £144 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

With reference to the above consultation, we are extremely disappointed that in the first instance and as the principal trade association for the mineral industry, we have not been consulted directly on the consultation. We therefore request that the MPA be added to the NRW consultation list. Knowledge of the consultation has only come about by chance and it is hoped that this matter can be rectified for future consultations.

We note the proposals to implement a Discretionary Advice Service. It is imperative that duties to fulfil statutory responsibilities for planning and licensing remain exempt from all charges, this includes NRW's formal responsibilities under the EIA Regulations and the Development Management Procedure Order. NRW responses under these regulations, must be detailed, considered and comprehensive to fulfil the duties as a statutory consultee.

Where the DAS is employed all advice given must be binding upon NRW if the parameters of the proposed matter do not undergo any material change.

The proposed charges of £125/hr are considered excessive particularly as an applicant seeking advice from NRW does not have any option but to use NRW for the advice. In effect, they are a captive customer and NRW has a monopoly over the advice being sought. Furthermore, the figure far exceeds the average cost per hour of an experienced ecological consultant which is generally half that now being proposed by NRW.

It is disappointing that the consultation document was not accompanied by a regulatory impact assessment to show transparency over the structure of the charges and how these have been determined, as well as considering the external effects of the proposed charges.

We look forward to being consulted upon the scope and nature of any standardised agreements and any supporting guidance in advance of the implementation of the service.

We trust the above comments are helpful and we would be happy to discuss any of the points raised.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'N Horsley', is written over a light blue horizontal line.

Mr Nick Horsley
Director of Planning, Industrial Minerals and MPA Wales