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Dear Ms Williams

WG29899: A NATIONAL INFRASTRUCTURE COMMISSION FOR WALES

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 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.

Further to the recent consultation on **A National Infrastructure Commission for Wales (WG29899)**, we believe it is important to set out the context for our response to the questions posed in the consultation.

UK infrastructure ambitions have huge implications for the UK mineral products sector. This is equally as applicable to Wales, with national resources being used to support national infrastructure beyond the devolved administrative boundaries. However, in order to realise this potential, these essential supporting assets need to be factored in to the planning for the entire lifecycle of projects, so the needs and opportunities pre- and post- construction are fully considered.

The Cardiff Bay Barrage is a good example of this, with the original £200m cost for the infrastructure leveraging a further £2.3 billion of public/private investment to redevelop and regenerate the Cardiff Bay area in following years. Scaled up (to say one of the larger Tidal Lagoons in the Bristol Channel), the demands on resources and skills could be considerable. However, these opportunities to unlock and compound the growth potential realised by national infrastructure will only be realised if they are fully accounted for in the wider policy and planning processes.

It is therefore important that national infrastructure projects are not considered in their own 'bubble', as appears to be the case at present. Currently, there appears to be a fundamental dislocation between infrastructure policy and the supporting policies for those activities (such as minerals and construction products) needed to support and enable the delivery of projects. To ensure that infrastructure projects can be delivered effectively, the supporting activities required to ensure delivery have to be identified. These activities then need to be given proper consideration so that the potential needs and opportunities can be considered in advance, along with any risks or gaps that may have to be addressed.

At present the unwritten assumption appears to be that if you create the demand for construction materials this demand will be met. While Wales, and the UK in general undoubtedly have a rich and varied resource of indigenous construction minerals, in order for these to be realised in practice both the mineral products industry and the wider mineral planning system require greater visibility around what scale of demand is likely to be required by infrastructure projects to allow suitable provisions to be made alongside the existing base demands in the market. This forward planning should allow the most cost-effective and sustainable solutions to be put in place to support the delivery of infrastructure projects. Needless to say, this takes time and therefore needs to be planned in advance of, or at least in parallel to, the infrastructure projects themselves.

It is important to recognise that mineral product resources are not evenly distributed around the country and that a considerable amount of inter-regional trade in materials already occurs to meet the base load demand for construction aggregates in the market. Consequently, it is likely that many areas of primary mineral supply will be required to support the demands from multiple infrastructure projects. The timings of prospective individual infrastructure projects therefore need to be understood, so that both the anticipated total cumulative and annual peak demands can be determined in order for sufficient production capacity and associated transport/delivery infrastructure to be put in place.

We have the following comments to make in response to the questions posed.

Question 1: Do you agree that NIFCfW's remit and output should comprise analysis, advice and recommendation to the Welsh Ministers?

MPA Response

No, we believe the NIFCfW should be a body which has the authority to issue determinations and consents on infrastructure projects, not just an advisory body.

Question 2: Do you agree that NIFCfW's remit should extend to non-devolved as well as devolved infrastructure?

MPA Response

Yes, however, greater details of the relationship with NIC on non-devolved matters should be provided, including the scope and thresholds for Infrastructure Developments.

Question 3: Do you agree that NIFCfW should not advise on programmes and work that have already been decided, or will be decided in the immediate future, by statutory and regulatory bodies?

MPA Response

The response to this question depends upon when the NIFCfW will be formally commissioned.

Question 4: Do you agree that NIFCfW should be able to look at cross-cutting delivery issues if it considers them a barrier to delivering infrastructure needs, including governance, costs, financing and programme/project management methodology?

Please specify any other delivery issues that you consider NIFCfW should be able to look at and the reason.

MPA Response

Yes, this is imperative

As referred to above, the NIFCfW must consider resource implications and availability required to support the delivery of Infrastructure projects, including the sustainable use of indigenous mineral resources for both the development proposed and any potential “downstream” developments arising expected in the longer-term. Further a formal consent from the NIFCfW should cut across all planning and licensing regimes, but being accountable and transparent in its delivery.

Question 5: Do you agree that NIFCfW should engage closely with and consult other bodies that may have an economic and environmental infrastructure remit?

Who do you think are the key bodies that NIFCfW should engage with and consult?

MPA Response

Yes.

Close dialogue or formal consultation with bodies such as trade associations, with a knowledge of the type of infrastructure, whose expertise in specific proposals or the supporting activities required to enable their delivery, would greatly benefit the process.

Question 6: Do you agree that NIFCfW should be remitted to participate in other relevant strategic advisory fora, such as the Council for Economic Renewal?

Please specify any other forum you consider NIFCfW should participate and the reason.

MPA Response

Yes, there would be benefits in such consultations.

Question 7: Do you agree that the Welsh Government should undertake and publish a review of NIFCfW’s status and remit before the next Assembly election in 2021?

MPA Response

Yes, we believe this should be routine and mandatory in order to ensure the efficiency, effectiveness and accountability of the NIFCfW

Question 8: Do you agree that NIFCfW should work collaboratively with the UK National Infrastructure Commission where relevant?

MPA Response

Yes, we believe that the NIFCfW should work to agreed parameters and thresholds with the NIC on proposals, where the effects are likely to be cross-boundary.

Question 9: Do you agree that NIFCfW members should be appointed by virtue of their expert knowledge and experience?

MPA Response

Yes, members of the NIFCfW should be appointed by virtue of their expert knowledge and experience in a clearly defined and transparent process.

Question 10: Do you agree that all appointments to NIFCfW should be made through an open public appointments exercise?

MPA Response

Yes, appointments to NIFCfW should be made through an open public appointments exercise

Question 11: How do you think we should promote this public appointments process to under-represented groups?

MPA Response

Appointments must be made on a “best candidate for the role” basis in a clear and transparent process.

Question 12: Do you agree that NIFCfW should be able to commission targeted research?

Please identify any specific research you think NIFCfW should commission as a priority in order to best inform its work, and explain why.

MPA Response

Yes. There may be benefits in research focussed on the sustainable supply of indigenous resources to meet the infrastructure projects selected.

Question 13: Do you agree that NIFCfW should publish an annual report on its work? What factors do you think might require reports to be published more than once a year?

MPA Response

Yes, the NIFCfW should publish an annual report on its work. Circumstances may arise where interim reports may need to be published, say for examples on key milestones on projects; where specific criteria have not been met; or where costs will clearly exceed identified budgets.

Question 14: Do you agree that NIFCfW should hold public meetings in North, Mid, South and West Wales to explain and promote its role?

MPA Response

Yes, but the agenda should be clearly defined and parameters for public engagement published in advance of meetings. Reports of public meetings must be available for public scrutiny.

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

Yours sincerely



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