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Dear Sir/Madam

PEMBROKESHIRE COAST NATIONAL PARK REPLACEMENT LOCAL PLAN (PREFERRED STRATEGY)

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.

We have the following comments to make on the above document.

| Para | Subject | Issue | Amendment required |
|------|-----------------|--|--|
| 1.27 | Constraints Map | There is no reference to Minerals Safeguarding Areas under the list of Constraints. Whilst it is recognised that minerals working should only take place under exceptional circumstances, this does not negate the need for the planning authority to safeguard mineral resources and infrastructure as required by paragraph 14.7.3 of PPW. | Include mineral safeguarding areas to the list of constraints and identify these on the Constraints Map. The plan highlights development needs for the respective settlements, but it is important that these are undertaken in a sustainable manner. To sterilise mineral resources through inappropriate development is not sustainable. |

| Para | Subject | Issue | Amendment required |
|------------------|-----------------------|--|---|
| 4.113 | Major Development | | We are pleased that the document refers to the tests set out for minerals proposals in National Parks |
| 4.114 - 4.116 | NSIPs | The document recognises that for NSIPs, the LPA should provide a comprehensive early assessment of all the main impacts. For this to truly reflect the impact of the proposed NSIP a full and proper resource assessment should be undertaken which identifies raw materials and minerals resources required to fulfil the development and provide an indication of supply chain issues. | This section should require NSIPs to provide a full and proper resource assessment which identifies raw materials and minerals resources required to deliver the development and provide an indication of supply chain issues. NSIPs may also have additional development consequences, the effects of which should also be considered. |
| 4.133 | Minerals Safeguarding | It is noted that MSAs are to be identified on the Proposals Map. In light of the above comments we wonder whether the MSAs should be shown on the Constraints Map. | Consider including MSAs and associated infrastructure on the Constraints Map. |

In brief, we are largely supportive of the wording of the preferred strategy. However, it is important that the Authority is clear on housing demand and on the constraints and proposals maps. The publication of these may have a bearing on future representations.

We trust the above comments are considered constructive and would

Yours sincerely



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