

17th December 2017



Andrew Farrow,
Chief Officer (Planning and Environment),
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County Hall,
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Dear Sir

FLINTSHIRE LOCAL DEVELOPMENT 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.

Thank you for providing the MPA with the opportunity to comment on the consultation. We are largely supportive of the document, however, we have the following comments to make.

We are aware that various changes are proposed to PPW by Welsh Government and understand these will be consulted upon in early 2018. We would therefore reserve the right to reassess our comments in light of any changes to PPW which may affect the Preferred Strategy. Also, we remain hopeful that Welsh Government will commit to updating the RTS during 2018/19 which may have implications on point iii of STR16

Strategic Policy STR16 - Strategic Planning for Minerals

We would express our surprise as to why the strategic minerals policy is contained within a chapter entitled "Valuing the Environment". This approach emphasises the fundamental disconnect between society's understanding and its need for minerals. The policy would be better located within Section 6 of the Preferred Strategy, "Supporting a Prosperous Economy". Minerals supply is fundamental to economic growth

We support the principle of seeking to avoid the sterilisation of mineral resources from inappropriate development, however, it would be helpful for the Council to indicate which minerals resources it intended to safeguard from sterilisation. We would suggest that this approach should be extended to cover minerals infrastructure.

At point iii, the proposed policy states that the Council will contribute "*towards the regional supply of mineral through the allocation of 1.4 million tonnes of sand and gravel and 3.84 million tonnes of crushed rock through the extension to existing quarries, in collaboration with Wrexham County Borough Council*". This is not a true reflection of the Regional Technical Statement (first review) which requires *new allocations totalling at least 1.4 million tonnes of sand & gravel and at least 3.84 million tonnes of crushed rock* (our underlining).

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It is appreciated that the RTS is scheduled for review, however, the policy as worded does not accord with current RTS requirement. Further, we believe that the wording which states “*through the extension to existing quarries*” may prove overly restrictive and may limit potential sites being brought forward for allocation. Such wording does not accord with PPW which states that “*such a policy should not rule out the possibility of new workings where these may be environmentally more acceptable*”. The important consideration is to ensure a continuing and adequate supply of minerals to accord with PPW.

It is not clear how the Council will address non-aggregate minerals within the plan. We would suggest the Council needs to address this.

Further, we note Policy STR4, ii) states “*Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;*”. We feel the Preferred Strategy Policy STR16 would benefit from a subsection on meeting the requirements for building stone. This should not be solely for historic buildings but to safeguard the character of the built environment for specific locations.

We seek clarity on the above points and welcome the opportunity for continued engagement.

Yours faithfully

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

Nick Horsley
Director of Planning, Industrial Minerals and MPA Wales