30th August 2019

Strategic Planning and Housing
Denbighshire County Council
PO Box 62
Ruthin
Denbighshire
LL15 9AZ

For the attention of Angela Loftus, Strategic Planning Manager

Email: planningpolicy@denbighshire.gov.uk

Dear Ms Loftus

DENBIGHSHIRE LOCAL DEVELOPMENT PLAN 2018 - 2033 - DRAFT PREFERRED STRATEGY CONSULTATION

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 affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, QPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 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 UK cement production, 90% of GB 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 had annual output valued at £151 billion in 2016. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting the MPA on the above document. We have the following comments to make where we believe the preferred strategy would benefit.

<table>
<thead>
<tr>
<th>Page/Para/Policy</th>
<th>Current Wording</th>
<th>MPA Comment</th>
<th>Amendments required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Para 1.11</td>
<td>The paragraph and table identify the principle sources of supporting evidence.</td>
<td>We note there is no reference to the Regional Technical Statement for aggregate provision or the annual monitoring report produced by the North Wales Regional Aggregate Working Party which details the findings of the Annual Minerals Survey. In addition, Central Government carry out survey of Aggregate Minerals every 4 or 5 years. This survey details, local, regional and interregional aggregate movements.</td>
<td>Refer to the respective sources of information and include these within the evidence base.</td>
</tr>
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<tr>
<td>1.12</td>
<td>The paragraph refers to a register of “candidate sites”</td>
<td>The online register appears as a list of place names. In order to review the register of candidate sites one must open each tab and scroll though to ascertain the nature of each proposed candidate site.</td>
<td>It would be helpful to categorise each candidate site by proposal (housing, employment, minerals, etc.) to negate the need to open each online tab.</td>
</tr>
<tr>
<td>3.1.1</td>
<td>The fourth cell of the table states “Need to agree position with the minerals industry regarding areas of search or allocations”.</td>
<td>In order to explain why such a position needs to be agreed it would be helpful to set this wording in the context of PPW and to refer to the need for an “adequate supply of a diverse range of minerals is available over the long term”, being required. Further, it would be appropriate for the LDP to reflect the wording of PPW and refer to Areas of Search, Preferred Areas and Site-Specific allocations</td>
<td>Amend the text to read “Need to agree position with the minerals industry regarding areas of search or preferred areas or site-specific allocations to ensure an adequate supply of a diverse range of minerals is available over the long term”.</td>
</tr>
<tr>
<td>3.1.1</td>
<td>The table does not refer to the safeguarding of mineral resources or provision of Buffer Zones.</td>
<td>Safeguarding of mineral resources from inappropriate development is a requirement of PPW. An additional cell is required to reflect this requirement and to identify the mineral resource types to be safeguarded and the use of Buffer Zones.</td>
<td>Include an additional cell referring to the safeguarding of mineral resources and the use of appropriate Buffer Zones</td>
</tr>
<tr>
<td>Section 7</td>
<td>LDP Spatial Options</td>
<td>The LDP follows a rational approach towards the spatial options concluding in the Bodelwyddan Strategic Site. However, the sieve analysis applied to candidate sites is not evident and does not appear to address minerals safeguarding. The BGS resources map for Bodelwyddan would appear to indicate mineral resources are present within areas included in the Bodelwyddan Strategic Site. Further evidence needs to be presented to allay fears of mineral sterilization.</td>
<td>Provide detailed appraisal of mineral resource safeguarding areas for each of the proposed candidate sites and specifically those for the Bodelwyddan Strategic Site. This would then accord with the proposed strategic policy matters identified under Section 8.</td>
</tr>
<tr>
<td>Section 8</td>
<td>Minerals - The section following para 8.25 states “Wherever Possible, aggregate requirements”</td>
<td>To accord with the requirements of PPW, the policies within the local plan should strategically plan for mineral need with an adequate supply of a diverse range of minerals over the long term. Whilst</td>
<td>The wording needs to reflect the wording of the PPW.</td>
</tr>
</tbody>
</table>
should come from secondary and recycled sources, before consideration is given to primary aggregates”.

recognizing the need for the circular economy PPW seeks to promote the use of recycled and secondary materials where they are suitable and available. (Our underlining)

Section 8

Key Evidence includes the Regional Technical Statement 2014

A review of the RTS is currently taking place, a consultation on which, is scheduled for late 2019. This review of the RTS will be a material consideration to the developing local plan. Further the annual surveys undertaken by the NWRAWP also comprise a material consideration as is the BGS report.

The further sources of evidence identified should be cited within the text.

Para 8.27

This paragraph states that “the LDP will encourage the use of secondary and recycled resources, prior to permitting the extraction of mineral from primary sources”.

The wording of this paragraph should properly reflect the wording of PPW and recognize the limitations of secondary and recycled resources. Further, the objectives of the plan policies should be to deliver the material requirements of the RTS.

Amend the text to reflect PPW and ensure compliance with the RTS.

Section 7

Natural and Built Environment

We support the approach for enhancing and conserving the built environment. We would seek to ensure that this section recognises the local vernacular and the need for locally sourced building stone.

Recognise local building stones within the text.

We trust the above comments are helpful and would welcome the opportunity to further discuss the matters raised.

Yours sincerely

Nick Horsley
Director of Planning, MPA Wales

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