



deunyddiau hanfodol
atebion cynaliadwy

essential materials
sustainable solutions

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20th September 2019

Conwy County Council,
Strategic Planning Policy Service,
Coed Pella,
Conwy Road,
COLWYN BAY
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Email: cdll-ldp@conwy.gov.uk

Dear Sir/Madam

**CONWY COUNTY COUNCIL REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP)
2018- 2033 - PREFERRED STRATEGY REPRESENTATION**

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 recognise many positive comments within the preferred strategy and have therefore reserved our comments to areas where we believe the approach to the policies within the preferred strategy would benefit.

Page/Para/ Policy	Current Wording	MPA Comment	Amendments required
Para 2.13	Baseline Key Characteristics of Conwy.	The section does not appear to make reference to the benefits of mineral extraction to the local and wider economy and influencing the baseline characteristics of many of the topics identified	Amend the text to recognise the positive contribution the sustainable development of minerals has in delivering the key characteristics

MPA Wales/Cymru is part of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries

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Page/Para/ Policy	Current Wording	MPA Comment	Amendments required
Page 27	Under the column headed implications for the RLDP, the first paragraphs states “.....the LDP review period plus the required 10 years landbank...”	To reflect the wording of PPW the reference to the 10 years landbank should recognise that this figure is the minimum as indicated in the “Priority Issues” column.	Amend the text to read “.....the LDP review period plus the required <u>minimum</u> 10 years landbank...”
Table 4	Key Strategy Component “Considers and plans for the protection and allocation of mineral needs over the Plan Period”	Table 4, references minerals, however, the statement could be improved by recognizing that it is society’s needs which are to be met and not solely over the plan period.	Amend the text to read “Considers and plans for the protection and allocation of mineral <u>to meet society’s needs over during and beyond</u> the Plan Period”
Strategic Policy 33	The policy states “The Council will manage the mineral resources in a sustainable manner which will support the construction economy,.....”	Mineral resources support much more than the “construction economy”. Whilst aggregates and other minerals products provide many of the raw materials for the construction industry, they benefit the wider economy.	Amend the text to read “The Council will manage the mineral resources in a sustainable manner which will support the construction <u>industry and wider</u> economy,.....”
Strategic Policy 33 a)	The policy states “Ensuring that there is sufficient provision of permitted reserves of aggregates to meet local and regional supply needs throughout the duration of the plan”	Whilst we support the commitment to ensuring a sufficient provision of permitted reserves, the subsection of the policy would benefit from a brief indication of how this would be achieved, i.e. through the provision of landbanks as referred to in paragraph 6.8.3. We do however believe this should be a policy commitment.	Amend the text accordingly.
Strategic Policy 33 e)	This point states “e) Safeguarding sand & gravel and hard rock resources as identified on the proposals map and at existing permitted reserves of hard rock at.....and St George Quarries.”	Paragraph 5.14.7 of PPW addresses the Safeguarding of Mineral Resources and <u>Infrastructure</u> . As proposed the wording of this section of the policy does not safeguard the infrastructure associated with minerals processing activities, storage transportation and added value facilities.	Amend the text to read “e) Safeguarding sand & gravel and hard rock resources as identified on the proposals map and at existing permitted reserves of hard rock at..... and St George Quarries; <u>together with the safeguarding of existing or planned wharves, railheads, associated</u>

			<u>processing facilities and batching plants</u>
6.8.2	This paragraph states “..... <i>Policies will be developed to ensure that the County provides mineral resources in sustainable locations.....</i> ”	Whilst the principal of this statement is supported, we wonder if reference should be mineral “reserves” not resources. Reserves are mineral resources with the benefit of planning permission.	Amend the text to read “..... <i>Policies will be developed to ensure that the County provides mineral resources <u>reserves</u> in sustainable locations.....</i> ”
6.8.7	This paragraph states, “ <i>It is proposed to only safeguard deposits which exceed a defined threshold of size....</i> ”	There is no indication of the “size threshold” in the text. We would also question this approach as consideration must be given to area, quantity and quality of the mineral, together with other economic considerations.	Amend the text accordingly.
6.8.7	This paragraph does not refer to the requirements within PPW to safeguard minerals infrastructure	As stated above, Paragraph 5.14.7 of PPW addresses the <u>Safeguarding of Mineral Resources and Infrastructure</u> . As proposed the wording of this paragraph does not recognize the need to safeguard the infrastructure associated with minerals processing activities, storage transportation and added value facilities.	Amend the text accordingly.

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

Yours sincerely



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