



deunyddiau hanfodol  
atebion cynaliadwy

essential materials  
sustainable solutions

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Dear Sir/Madam

**THE SLATE LANDSCAPE OF NORTH WEST WALES UNESCO NOMINATION PROPOSALS AND MANAGEMENT PLAN**

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](http://www.mineralproducts.org).

In many respects we welcome the recognition of the contribution of the extractives industry to not only the local economy, but the worldwide distribution of slate products over the centuries. We have, however, the following comments to make on the proposed application for WHS status for the Nominated Property.

Page/Para/ Policy	Current Wording	MPA Comment	Amendments required
Page 6	“....slate to produce roofing materials and architectural materials for global markets, from the late eighteenth century to the twentieth.....”.	This wording infers that the slate industry ceased in the 20 <sup>th</sup> Century. This is <u>not</u> the case. There remain consented operations in the proposed WHS Nominated Property, its Buffer Zones and the setting of these which continue to this day and will do so in to the future.	The current wording should be amended and it should be recognised that consented operations and infrastructure, remain.

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
Para 1.2	Again the text states “...slate to produce roofing materials and architectural materials for global markets, from the late eighteenth century to the twentieth.....”.	This wording infers that the slate industry ceased in the 20 <sup>th</sup> Century. This is <u>not</u> the case. There remain consented operations in the proposed WHS Nominated Property, its Buffer Zones and the setting of these which continue to this day and will do so in to the future.	The current wording should be amended and it should be recognised that consented operations and infrastructure, remain.
Para 1.2	“...landscape in which quarrying once flourished...”	Again, there is an inference that quarrying no longer takes place in the area. Quarrying and in particular slate quarrying continues to this day contributing to the local economy and to the wider benefit of society	The current wording should be amended and it should be recognised that consented operations remain.
Page 27	The text states that “Slate is still quarried within the region, immediately adjacent to the nominated property”	Our records suggest that valid consents and mineral production processes remain within the nominated properties. We have concerns that there may well be unintended consequences of overly restrictive constraints on these activities arising from WHS status.	Careful consideration should be given to existing activities and consented reserves so that any legitimate activities are not unduly constrained.
Page 38	This states that there are “...no active mineral permissions included...”	Our records suggest there may well be consented reserves within the Nominated Property and Buffer Zones. We are also aware of important minerals infrastructure, transportation and processing facilities which add value to the raw materials and are critical to the mineral supply chain and support sustainable economic growth and regeneration in the North West Wales catchment and beyond.	The proposals must recognise the legitimacy of existing businesses and not seek to impact negatively on their economic viability.
Page 39 Para 3.2	<b>Attributes.</b> This section deals with the historic “attributes of the mining legacy”	The attributes section appears to refer solely to the historic legacy of the slate industry, including its societal and community legacies. The Management Plan could seek a greater understanding of slate quarrying and mining through better engagement with the developers of current and future minerals reserves.	Seek to engage better with current operators to provide a better understanding of the mining legacy through the development of future reserves from an educational perspective.
Para 2.4.1	Penrhyn Quarry	Earlier in the document (Page 38) it is stated that there are no active mineral permissions. Penrhyn quarry is active	This site remains important in the production of slate to a global market.

<p>Page 70 Para 2.7</p>	<p>Active Slate Quarrying. The paragraph states that slate extraction will not be permitted in specific buffer zones</p>	<p>It is somewhat disappointing that the proposals seek to restrict future slate workings in an area where the legacy of slate workings is providing the justification for the WHS status. The sustainable management of resources and reserves is the way forward. This is clearly an industrial and working landscape.</p>	<p>The element of the report should be reconsidered.</p>
<p>Page 72 Para 3.1</p>	<p>This paragraph, highlights the partnership's vision "To protect, conserve, enhance and transmit the proposed Outstanding Universal Value of The Slate Landscape or Northwest Wales to reinforce cultural distinctiveness and strengthen the Welsh language, and become a significant driver for economic regeneration and social inclusion"</p>	<p>It does not appear that the mining industry has been included within the partnership to influence what is in effect a mining landscape and not a museum. The WHS components and buffer zones contain world class resources and reserves of Welsh slate which has been instrumental to the social, economic and environmental well-being of the area for centuries. The vision should be revised to reflect this and read "To protect, conserve, enhance and transmit the proposed Outstanding Universal Value of The Slate Landscape or Northwest Wales, to <b><u>sustainably manage the mineral resources and reserves which have delivered the landscape, to</u></b> reinforce cultural distinctiveness and strengthen the Welsh language, and become a significant driver for economic regeneration and social inclusion"</p>	<p>Amend the vision accordingly in recognition of the fundamental foundation of this man-made landscape. This better reflects the subsequent bullet points following the vision and the identified Themes.</p>
<p>Page 77</p>	<p>Business Engagement is identified in the Management and Governance Organogram</p>	<p>We welcome that there has been some engagement with the minerals industry on the steering group. However, it is not clear from the consultation document, just to what extent the wider minerals industry (non-slate) has been invited to contribute and develop the proposal's details, or influence the management plan.</p>	<p>The submission and ultimate determination of the proposals should include better engagement with the wider minerals industry and not solely limited to the late industry.</p>
<p>Page 80 Para 5 &amp; Policies 3.1 to 3.4</p>	<p>Objective 3. "Fulfil the obligations of the World Heritage Convention to protect and preserve..."</p>	<p>The essence behind this application for WHS is sustaining a manmade, mining and industrial landscape. To protect and preserve, suggests all future development, including mining, in the Nominated Property will be constrained. The thrust of this objective and the policies proposed should be to sustainably</p>	<p>Take note that this is a working landscape and in order to sustain its character in the long term, it should be actively managed with regard to the reasoning behind and justification for its nomination. Protection and</p>

		manage the landscape and <u>not</u> treat this as a museum.	preservation should equally focus on a sustainable minerals industry which has influenced this landscape over the centuries.
Page 87	Risks “...there will be no active quarrying or working of slate within the boundary of the nominated property	We object most strongly to this statement. It wholly undermines the context within which this application has been made. Future working can help facilitate the management of quarry faces as well as providing huge economic and social benefits	Remove this statement.
Page 89	Opportunities	We would suggest, the principal opportunity should be the sustainable management of mineral resources and reserves, the development of which have provided the foundation for this proposal.	Reconsider the opportunities section.
Page 105	Buffer Zones	The use of buffer zones is a little confusing in mineral planning terms as in PPW, these are drawn around existing mineral operations to safeguard these from the encroachment of inappropriate development. In the context of this application, the buffer zones appear to be identified to protect the setting of the nominated sites. However, there are a number of operational extraction sites within these buffer zones where the economic viability of such could be seriously affected by the inappropriate application of a buffer zone policy. Again, this appears non-sensical bearing in mind the principles behind the slate landscape WHS proposals. World class mineral reserves and resources are at risk	This matter needs to be given careful consideration with full engagement of the minerals industry. The proposals are at risk of undermining the very industry upon which the application is founded. All accompanying plans would benefit from showing where precisely existing mineral operations are located to enable those reviewing the application to comprehensively assess the applications for WHS status.
Page 115	Policy 6.3 states “To ensure slate heritage remains a priority within Gwynedd Council	The Council should be ensuring that the slate industry remains sustainable and a priority, not just the industry’s heritage	Reconsider this policy.
Page 118	Policy 7.1 states “Quarrying will not take place within the boundary of the	This policy is non-sensical. The creation of the landscape is a result of quarrying. To exclude quarrying flies in the face of the sustainable management of natural	This Policy overtly restricts all quarrying activities, not solely the slate industry. It should be removed and

	Nominated Property”	resources. Further, Objective 7 references “a sustainable slate industry” yet the Policy talks about quarrying in general.	replaced with a more constructive and sustainable policy which recognizes the world class resources and reserves within the nominated property.
Page 118	Policy 7.2 Quarrying for slate within the Buffer Zones of the Nominated Property, will be managed through the existing mineral planning process	This statement appears to contradict previous text on Page 70 which states that quarrying will not take place in Buffer Zones 2, 4 & 6.	This point needs to be clarified.

Overall, we are supportive of the application for the Nominated Property, but are vehemently opposed to any constraints on the minerals industry within the Nominated Property and the indicated Buffer Zones. We believe there are world class reserves and resources which have been overlooked in drawing up these proposals and must express disappointment that as the main trade association for the UK minerals industry, direct consultation with this industry appears to be limited. The partnership which has drawn up the vision and produced the management plan does not appear to have engaged with this sector until the very last stage before submission.

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

Yours sincerely



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