

26<sup>th</sup> March 2009

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Dear Sirs

### **Rhondda Cynon Taff Local Development Plan Deposit Consultation**

Thank you for consulting the Mineral Products Association in respect of the Deposit LDP.

The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and ready-mixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar.

Having reviewed the document we have the following comments to make.

#### **Policy CS10 – Minerals**

The proposed 20 year landbank to be maintained for the plan period for all aggregates is a positive approach. However there is no evidence to show the individual landbanks for sand and gravel and crushed rock will be maintained at the end of the plan period. This makes it difficult to determine if landbanks are being maintained in line with national policy requirement of 7 year minimum landbank for sand and gravel and 10 year minimum landbank for crushed rock (MTAN, Para 49). The plan is therefore unsound as it is inconsistent with national policy and fails soundness test C2.

The third point should also be reworded. It is not clear what 'necessary' development is and no explanation is offered in the accompanying text. As result the plan could be considered unsound, failing tests CE2 and CE3.

**Policy AW14 – Safeguarding of Minerals**

The policy does not state how Mineral Safeguarding Areas will be defined and how they will fulfil a safeguarding function. There should be a set of criteria that future proposals would be judged against as advised in national policy (MTAN, Para. 32, bullet point 4). The document is therefore unsound as it is inconsistent with national policy, failing soundness test C2.

**Policy AW15 – Community Amenity Protection Buffer Zones**

The way the policy is titled gives the impression communities and amenities will have a buffer zone. It would be better worded along the lines on 'Quarry Buffer Zones or Mineral Extraction Buffer Zones'.

The policy is too restrictive and inflexible. It does not take into consideration paragraph 7.1 (MTAN), which states '.....minimum distances should be adopted unless there are clear and justifiable reasons for reducing the distance'. The policy as currently worded does not allow for this flexibility, which is inconsistent with national policy. The plan is therefore unsound failing tests C2 and CE4.

Yours sincerely

**Andrew Bromley**  
Planning Officer