



deunyddiau hanfodol
atebion cynaliadwy

essential materials
sustainable solutions

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Dear Sir/Madam

NATIONAL DEVELOPMENT FRAMEWORK: ISSUES, OPTIONS AND PREFERRED OPTION

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 500 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.

Further to the consultation on the above document and with reference to our previous comments, it remains imperative that the NDF clearly develops a resourcing strategy to identify the projected quantities and sources of materials for the medium to long term to deliver development proposals and aspirations. Wales' wealth of mineral resources has been the foundation of its modern society. As the UK leaves the EU, it is important that opportunities to deliver a sustainable Wales are not underestimated and that resources are sustainably managed to deliver the vision of health and the wellbeing goals for future generations. Health, transport connectivity, renewable energy, potable and waste water management, flood attenuation and alleviation and general economic and social wellbeing may all be delivered by the sustainable development of indigenous raw materials and the support for a local supply chain. Despite our previous representations, the current consultation document remains silent on how this will be achieved.

In the Cabinet Secretary's introduction, she refers to "planning our infrastructure and development together", to complement rather than compete against each other. This aspiration will only be achieved if the raw materials necessary to deliver projects are identified, planned and costed in to the developing concepts at an early stage and proper engagement with those who can deliver the supply options is carried out.

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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Introduction

We support the aspirations for a joined-up approach to delivering priorities and avoiding a proliferation of plans and strategies, however, this will only be achieved with a strong and direct steer from Government identifying the key priorities and their projected timescales, as well as identifying any downstream benefits and implications. For example, major new development proposals such as Wylfa Nuclear Power Station will require the building of additional new roads and infrastructure. We support WG for its current review of Welsh Planning Law and would stress the need for a simplified planning system which is effective, efficient and transparent, where the current inherent delays are addressed and reduced.

In identifying the key growth areas Welsh Government should liaise and engage with representatives of those sectors who experience and understand the challenges associated with growth delivery. This would ensure business investment in the key areas; however, commitment to deliver the NDF must be for the long term. Dialogue is a two-way process and simply “directing key partners” to help deliver the national spatial strategy is rather one sided. Engagement with those who can deliver and maintain supply chain requirements is key, yet such participants must be given a clear understanding of the timing of projects and materials required (supply audits) and a firm commitment so that investment can take place for the long term. Supply chain planning will ensure that economic, efficient and effective delivery can take place and will avoid competing interests chasing the same resources.

To achieve this, the NDF must undertake a comprehensive resource assessment of the Preferred Option and its aspirations.

NDF Vision

The desire to deliver sustainable places is an integral part of the Welsh Government’s agenda and is the foundation of NDF Vision. This vision must recognise that certain developments are constrained by location. For example, one wouldn’t construct a tidal lagoon where the tide has limited rise and fall; or erect wind turbines in areas of shelter or inconsistent wind. Critically, minerals may only be worked where they are found. In order to ensure a long-term strategy for the sustainable management of natural resources, these minerals must continue to be robustly safeguarded against inappropriate development and must not be needlessly sterilised by ill-conceived regulation and designations

NDF Objectives

The common denominator for the objectives identified in the consultation document is the need for a steady and adequate supply of raw materials. From housing and infrastructure to cultural heritage, transport and decarbonised energy, the use of minerals and mineral products from sustainable supplies will remain critical. Resource efficiency, minimising the unsustainable use of natural resources and supporting the development of a circular economy are identified as a key objective. Whilst this aspiration is supported, we continue to have concerns over the Welsh Government’s obsession with timber as a substitute for steel and concrete. Whilst timber clearly has its place in construction, the Government needs to be pragmatic over its application from treatment for fire proofing to the need to import. A low carbon economy, economic prosperity, housing, flood control transport will continue to be reliant upon mineral resources. Nuclear new build, tidal lagoons, wind turbines, energy storage technology will have minimum timber applications and we urge Welsh Government to adopt a realistic, transparent and deliverable NDF which recognises a balanced strategy on raw material uses. It is also important to recognise that the minerals industry, as well as supplying the raw materials to deliver the key objectives, offers

highly skilled and competitive salaries, with employment opportunities in rural areas and recognised downstream economic prosperity.

In brief, the minerals products industry in Wales is directly responsible for:-

Welsh sales of aggregates and manufactured mineral products	22.6mt
Annual turnover of the mineral products industry in Wales	£650m
People directly employed in our industry in Wales	3,800
Annual turnover in other sectors of the economy supported by the mineral products industry in Wales	£232m
People employed in other sectors of the mineral products industry in Wales	2,000
Value of the Welsh construction sector - our main customer	£3bn
Jobs supported through the Welsh construction sector	88,000

NDF Preferred Option

We are largely supportive of the NDF preferred option identified in the current consultation, but as detailed in this letter and in previous consultation responses, we urge Welsh Government to recognise the key points raised above.

Section P1, we seek clarification of how the decarbonisation goals will be achieved and the formula of how these targets have been set.

Section 3, PE4. We welcome the opportunity to discuss with Welsh Government its approach to identifying Nationally Important Mineral areas, as at present this is unclear.

Section 5, R1. We seek clarification on how the long established Regional Aggregate Working Parties, of which there are two (North Wales and South Wales), would fit within a 3-region structure.

Appendix A Issues Paper

The Issues Paper of the NDF appears big on aspiration, but very light on methodology and in particular how the aspirations will be delivered. There are some unhelpful comments and minerals continue to be excluded from Natural Resources. Notably, in the Natural Resources section, there is reference to “broad buffers” and “protect designated sites”. Such terms need to be qualified and quantified with a clear explanation in a glossary. Welsh Government should recognise that there are different levels of protection and the approach outlined infers a one size (of protection) fits all.

The section on the “Circular Economy” is of concern, particularly references to “limit the use of finite resources”. It is unclear what this actually means and how the aspirations of the NDF will be achieved whilst balancing the use of finite resources. As an industry sector we are not against maximising recycled and secondary materials, but the writers have failed to recognise the limitations of such particularly where higher specification materials are required. A move away from a carbon economy will limit the availability of materials such as PFA although it is recognised that resources

of such have been landfilled and could be available for extraction subject to appropriate environmental criteria being applied and the necessary consents and permits being granted.

We note there are references to amendments to building regulations to ensure a more sustainable use of materials, but trust these will not be timber-centric. Amendments must be realistic and deliverable and whilst timber may have certain applications in construction its limitations, supply chain consideration and the environmental consequences of fire proofing materials and transport/importing must be considered.

Cement manufacturing historically used only natural raw materials but the modern industry today contributes to the circular economy by:

- recycling mineral and metal content as well as recovering energy from fuels - known as ‘coprocessing’;
- taking wastes at the end of their valuable life;
- adding value via a quality product;
- restarting the value chain; and
- mainly finding use in durable and 100% recyclable concrete products.

The cement sector in Wales¹ is reliant on access to key materials, including suitable waste materials and the future availability of these materials is important to the continued environmentally and economically sustainable production of cement in Wales. Future availability of waste materials is a key concern for cement producers and whilst not a current barrier, should be considered when developing resource efficiency policies and to encourage investment.

Unlike other combustion processes, like power generation, incineration and biomass boilers, the ash from fossil and waste derived fuels form part of the mineral content of the cement and not a waste residue. The total recycled content of all cement manufactured in the UK, through the recycling of waste materials and the use of by-products, was 12.5% in 2015. Almost 2% of this was ash recycled from the fossil and waste-derived fuels.

As such, the cement sector provides local, high added-value opportunities for waste materials that have reached the end of the value chain, and cement manufacturing contributes significantly to the circular economy through resource efficiency in the production processes. Having a healthy domestic cement industry therefore reduces the nation’s need for landfills and incinerators.

Cement manufacturing produces almost no process waste and since 2012 manufacturers have avoided landfill by recovering all process wastes for beneficial uses - either into construction products or as a soil improver/fertiliser. The ability to accept additional waste streams for energy recovery and recycling at cement plants requires multi-million pound investments and are subject to planning and permitting processes. Such projects may take several years to plan, construct and commission. In order to make such an investment case, the long-term availability of materials to achieve an acceptable return on investment needs to be assured early in the decision-making process.

¹ There are currently two cement kiln sites in Wales, at Padeswood in Flintshire and at Aberthaw in the Vale of Glamorgan, which both use waste materials in their production processes, permitted by Natural Resources Wales.

Proposed changes to the Building Regulations must be supported by clear evidence, (not just anecdotal) to ensure the changes are fully justified and sustainable.

Page 41 of Appendix A is the first reference in the NDF consultation, to supply chain, and on page 43 it is recognised that the supply of materials for the construction sector is key. We note the reference to the need for aggregates but would highlight that other sectors are underpinned by the availability of raw materials. Similarly, a low carbon economy cannot be delivered without appropriate raw materials being available.

The strong thread for housing, transport and infrastructure delivery continues to fail to recognise that their delivery is wholly reliant on raw materials and therefore supply chain issues should be an integral part of the NDF rather than confined to a small section of an appendices.

Forward planning throughout the NDF should allow the most cost-effective and sustainable solutions to be put in place to support the delivery of strategic development and national infrastructure projects. Needless to say, this takes time and therefore needs to be planned in advance of, or at least in parallel to, the infrastructure projects themselves.

It is important to recognise that mineral resources are not evenly distributed around the country and that a considerable amount of inter-regional trade in materials already occurs to meet the base load demand for construction aggregates in the market. Consequently, it is likely that many areas of primary mineral supply will be required to support the demands from multiple infrastructure projects and strategic developments. The timings of prospective strategic developments and major individual infrastructure projects and their downstream consequences need to be understood, so that both the anticipated total cumulative and annual peak demands can be determined in order for sufficient production capacity and associated transport/delivery infrastructure to be put in place. This should form a fundamental element of the NDF, and each routine and regular review.

We trust the above comments will be taken on board as Welsh Government further develops the NDF and we would welcome the opportunity to discuss with you, the points raised above

Yours faithfully



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