

23rd July 2018



deunyddiau hanfodel
atebion cynaliadwy

essential materials
sustainable solutions

Planning Directorate
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Dear Sir/Madam

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CHANGES TO THE CONSENTING OF INFRASTRUCTURE: WG34221

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 we have the following comments to make.

With reference to the foreword by the Cabinet Secretary, we seek Welsh Government confirmation that reference to “security of supply” is not just limited to energy matters but includes “security of supply” for raw materials to ensure the sustainable delivery of infrastructure in an economic, efficient and effective manner.

Any changes to the consenting process must accord with the principles indicated by the Cabinet Secretary although we do have concerns that a devolved approach may lead to an imbalance in infrastructure delivery and would seek assurance that the process will be proportionate and fit for purpose and comparable with the existing process in other parts of the UK so as not to disadvantage projects.

In section entitled “Reason and scope for the consultation” it is important that any changes to the consenting process dovetail with the outcomes of the Review of Planning Law in Wales currently being undertaken by the Law Commission. It would be pointless to implement changes to the planning system which are incompatible with changes to the consenting process for infrastructure and vice versa.

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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We are supportive of the “One Stop Shop” with clear and consistent policy and a flexible process.

With reference to the New Consenting Process for Infrastructure, we agree with the proposals, but would again seek confirmation of a consistent approach, compatible with any changes arising from the changes to the planning system being proposed under the Review of Planning Law in Wales by the Law Commission.

Under Section 4: Qualifying Projects. For consistency we would request the inclusion of the “Winning and Working of Minerals” for “Strategically Important Industrial Minerals or over 150ha surface or underground area” in Figure 4.3 Section 2. Although headed Minerals, Section 2 is limited to energy proposals. Non-energy minerals projects should qualify under the “optional criteria”. This would ensure compatibility with the scope elsewhere in the UK.

Under the Unified Consent Process, it is imperative that the forward planning of infrastructure projects gives full consideration to raw materials supply through the provision of a resource assessment and supply chain considerations. This requirement should be part of the statutory process and would ensure that the resources requirements are planned for and are available for individual developments with any potential shortfalls addressed at an early stage. Consideration should also be given to the downstream impacts of an Infrastructure proposal to ensure the full consequences of a development are considered

Under Section 5.4 we would suggest the inclusion of footpath/bridleway under the 9th bullet point and matters such as water transfer licences under the 12th Bullet Point. The legislation must also allow for inclusion of any future consenting or permitting requirements

In summary, we are generally supportive of the proposed consenting regime but would recommend the inclusion of specific minerals proposals under the optional criteria. The consenting process should also require a full consideration of supply chain considerations and be supported by a resource assessment.

We would welcome the opportunity to discuss the points further with Welsh Government officials.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', with a long horizontal flourish underneath.

Nick Horsley
Director of Planning

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