

25th January 2019



deunyddiau hanfodel
atebion cynaliadwy

essential materials
sustainable solutions

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Dear Sir/Madam

CONWY REPLACEMENT LOCAL DEVELOPMENT PLAN 2018-2033

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.

Paper 1: Priority Issues Vision and Objectives

Further to the consultation on the above document we have the following comments to make.

Question 1: *Do you agree that the RLDP Structure should be aligned to reflect the obligations of the WFG Act and the subject areas set in the draft PPW (Edition 10) that being as set out above in Table 1?*

MPA Response: Yes, we agree the structure should be aligned to reflect the obligations of the WFG Act and the subject areas set in the adopted PPW (Edition 10)

Question 2: *Do you think that this is the right vision for the Conwy RLDP?*

MPA Response: Yes

Question 3: *Do you think the Vision is well placed to deliver Sustainable Places in Conwy?*

MPA Response: Yes

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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Question 4: Do you agree with the Objectives?

MPA Response: In general, we agree with the objectives as indicated.

Question 5: Are there any other objectives that should be considered?

MPA Response:No

Further comments

Page/Para	Current Wording	MPA Comment	Required amendment
Page 31	Reference is made to 3 Special Landscape Areas (SPA).	Should this read “Special Protection Areas (SPAs)	Check text and amend if required..
Appendix 1 - Background Evidence Base Papers			
BP37 Minerals	The table suggests that the purpose of the minerals Background Paper is to avoid the sterilization of aggregate resources by construction projects through the safeguarding of aggregate reserves.	The Background Paper should go much further than simply avoiding the sterilisation of aggregate resources. The paper should be about ensuring the sustainable management of minerals resources to meet the CCBC growth aspirations in terms of social, economic and environmental considerations. As mentioned in the Consultation Paper the Council is required to ensure an adequate supply of minerals is maintained. This must be done to accord with PPWv10, the RTS and using such information as the AM Surveys and the documentation produced by the NWRWP. There is also an element of confusion arising from the notion that terms such as “aggregate” and “minerals” and also “reserves” and resources are interchangeable.	It is hoped that BP37 has a wider scope using a braised evidence base and the proper use of recognized terms is incorporated.
Appendix 2			
Page 43	This states that in terms of the 5 Key Principles,” Making best use of Resources” is about Placemaking and Environmental and Cultural.	We feel “Making best use of resources has a wider scope, benefiting both social and economic criteria	Amend the table accordingly.

Paper 2: Strategic Growth and Spatial Distribution Options

We note that reference is again made to the Purpose of BP37 and would refer you to the comments made above.

We note that the proposed Background Paper is scheduled for release in Summer 2019 and would welcome the opportunity to discuss this in draft if CCBC were amenable to this.

We trust the above comments are helpful and would welcome the opportunity to discuss with you, the points raised.

Yours faithfully

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

Nick Horsley
Director of Planning

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