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Gemma Christian,  
Welsh Government,  
Cathays Park,  
Cardiff,  
CF10 3NQ

Email: [planconsultations-a@wales.gsi.gov.uk](mailto:planconsultations-a@wales.gsi.gov.uk)

Dear Ms Christian

**Mineral Products Association Ltd**

Gillingham House  
38 - 44 Gillingham Street  
London SW1V 1HU  
Tel +44 (0)20 7963 8000  
Fax +44 (0)20 7963 8001  
[info@mineralproducts.org](mailto:info@mineralproducts.org)  
[www.mineralproducts.org](http://www.mineralproducts.org)

**CONSULTATION ON THE DRAFT INTEGRATED SUSTAINABILITY APPRAISAL SCOPING REPORT FOR THE NATIONAL DEVELOPMENT FRAMEWORK**

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 recent addition of British Precast and the British Association of Reinforcement (BAR), it has a growing membership of over 480 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 GB cement production, 90% of 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 has annual output valued at £144 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

We thank you for providing the MPA with the opportunity to comment on the consultation draft. A response has been provided to the respective questions where relevant, however, more specific responses are detailed in the table below. The following comments are submitted on behalf of MPA Members.

*a. Do you support the findings of the review of relevant plans, programmes and environmental protection objectives? Are there any additional plans, programmes or environmental protection objectives you would like to add? Are there any that you would like to remove from the review? (Section 3).*

**MPA Comments**

The findings are somewhat scant and a little one sided particularly with respect to the minerals industry, where the documents fails to recognise any of the positive contributions made to society by this sector. This lack of balance may be down to inexperience or an unwillingness to look deeper in to the contributions of the sector. No houses, no schools, no hospitals, no roads, no clean water, no paper, no pharmaceuticals, no solar panels, no wind turbines, no mobile phones or PCs. There are no references to Planning Policy Wales or National Infrastructure plans.

*b. Do you agree with the sustainability issues that we have identified? Are there additional issues that the ISA should consider? If so, what are they? (Section 4)*

**MPA Comments**

Sadly, there is a far from balanced understanding of the contribution made by the minerals industry to society and to local economies through the sustainable management and development of mineral reserves. A proper baseline assessment and understanding of the industry would be beneficial. Welsh Government has been consulted upon the draft UK Minerals Strategy, however, it is evident that this and industry's discussions with WG have been overlooked.

*c. Are there any particular topics or geographical areas of specific concern to you or your organisation? (Section 4)*

**MPA Comments**

See the above comments. You will appreciate that this lack of balance is of serious concern to the minerals industry. The shortcomings in SoNaRR were highlighted by the MPA to both WG and NRW.

*d. Are there any changes you consider should be made to the ISA Objectives or Questions? (Section 5)*

**MPA Comments**

Yes we would question how the aspirations and objectives of NDF and WG could be achieved with a policy focussed on the direct reduction of demand for raw material.

*e. Do you have any comments regarding how reasonable alternatives should be developed?*

**MPA Comments**

This is difficult to consider in light of the lack of baseline data and an absence of any balanced consideration of existing issues, let alone alternatives.

*f. Do you have any further suggestions regarding the scope of the ISA and its proposed appraisal of the NDF?*

**MPA Comments**

There is a clear need for thorough and sound baseline data from which the scope of the ISA can be developed.

*g. Do you support the approach to the integration of the impact assessments?*

**MPA Comments**

Only if this is based upon sound baseline data and a balance assessment of sustainable development. At present, the document is short-sighted and unbalanced.

*h. Do you support the findings of the initial screening work for the impact assessments in Table 2-1?*

**MPA Comments**

Yes, but this will only be of worth if proper baseline data is obtained and a balanced assessment included

*i. Are there additional pieces of baseline data or evidence that the ISA should consider with specific regard to the impact assessments in Table 2-1?*

**MPA Comments**

No comments

*j. Do you have any other comments?*

**MPA Comments**

Please see the table below.

Paragraph	Reference in text	Comment
1.4.1	“over the long term”	We are interested in what period is considered long term and if this could be quantified. Is the timescale consistent with NICfW 5-30 years?
3.1	Of particular importance are the following national documents which the NDF will work with and share common aims and objectives: <ul style="list-style-type: none"> <li>• Taking Wales Forward 2016-2021;</li> <li>• The Natural Resources Policy for Wales;</li> <li>• SoNaRR6; and</li> </ul>	We question why PPW is not included in the list of National documents.

	<ul style="list-style-type: none"> <li>• The emerging Welsh National Marine Plan</li> </ul>	
<b>Paragraph</b>	<b>Reference in text</b>	<b>Comment</b>
Table 3.1		Whilst we appreciate this document is draft, it would be appropriate to reference the Brexit process which will undoubtedly influence the effect of European Directives in the “long term”.
Table 3.1		There is no reference to the work of the NICfW which must be a key consideration in the NDF.
Table 3.2	A globally “gesponsible”	Typographic error - “responsible”
Table 3.3		The term, natural resources, is referenced twice in the table linked on both occasions to energy and climate change. The inference is that natural resources are solely hydrocarbons. Soil resources and water resources, both natural resources have individual references. There is no specific reference to the sustainable management and development of mineral resources, which can contribute to many of the sustainability goals highlighted in the document.
4.2	This section references the SoNaRR report, produced by Natural Resources Wales in 2016, as a key document for the source of baseline data	<p>NRW has recognised that SoNaRR does not include a discussion on the use and management of minerals. NRW chose to evaluate a cross section of natural resources and their management, based on the evidence readily available to us in a short space of time. They considered that the use and management of minerals as a raw material is very much covered through the existing land use planning regime, and as such did not have the expertise available in house to help them to undertake an assessment. NRW acknowledged that it could have engaged more with others and sought their views on minerals matters, particularly with respect to the wider impacts that management and use of management has on ecosystems and their benefits for wellbeing, but it was claimed that time constraints did not enable NRW this time round.</p> <p>Sadly, the current document appears to have fallen in to the same hole.</p>
4.2	Baseline datasets have been developed and are presented in Appendix B	<p>There are no baseline datasets included in Appendix B and none of the figures are included.</p> <ul style="list-style-type: none"> <li>• Figure 1 Designated Nature Conservation Sites;</li> <li>• Figure 2 Landscape Features;</li> <li>• Figure 3 Heritage Features; and</li> <li>• Figure 4 Transportation Network.</li> </ul>
4.2		The Welsh Government’s “Practical Guide to the Strategic Environmental Assessment Directive, indicates at paragraph 5.A.5 that

		the baseline and environmental effects should also include matters not listed in Annex I, “.....such as geological conditions, mineral resources....”. The document is silent on these matters.
4.3	Table 4-1 presents the key sustainability issues and opportunities for Wales identified across the seven Wellbeing goals and ISA topic subheadings which stem from the baseline data (Appendix B)	See comment above re absence of baseline data.
Table 4.1	A prosperous Wales	It is very surprising that there is no reference to National Infrastructure proposals or NICfW within this section. Some significant infrastructure projects are planned for Wales directly, whilst other bordering Wales have the potential to create significant raw materials demand. This in itself will create economic and skills development opportunities, such as those linked to HS2 and the tidal lagoon/barrage developments.
Table 4.1	A resilient Wales “The NDF has an opportunity to guide the sustainable use of Wales’ geology”	This reference is very fleeting and underestimates and under values the potential contribution to be made by the sustainable management and development of Wales’ geological resources.
Table 4.1	<b>Minerals and Waste</b> • The country still has substantial resources if required. However, such extraction can be very damaging to the natural and human environment and as such sustainable management of this is a key issue for any ongoing or future activity. Minerals safeguarding can sometimes also conflict with other forms of development.	This is a typically negative and ill-informed consideration of the value of Welsh mineral resources. Such perceptions referenced in Government documents are unhelpful and now largely unfounded.  Furthermore, it is other forms of development that can conflict with the need to safeguard valuable mineral resources and minerals infrastructure.
Table 4.1	<b>Minerals and Waste</b> • The NDF has an important role to play with regard to minerals demand (through economic aspirations), planning and management. It can help to guide the sustainable use of such resources through its policy and strategic development proposals.	At last an almost positive consideration and comment, although minerals development is still not considered an “opportunity”, unlike waste.
Table 5.3	Encourage a reduction in the demand for raw materials?	It is difficult to see how the aspirations and objectives of NDF and WG could be achieved with a policy focussed on the direct reduction of demand for raw material. We ask the direct question of WG to demonstrate this. Renewable and low carbon energy schemes will increase the demand for raw materials. One would question how an improved housing stock of affordable housing

		will be delivered; how built heritage assets can be restored, how water quality will be improved without raw materials. The focus should be on the sustainable management and development of Wales' raw materials. Development plans, major infrastructure projects and projects such as major housing developments should be accompanied by a comprehensive resource assessment, identifying quantities and supply chain considerations. Until this takes place, it is unlikely that neither WG or the policy makers will actually "get it"! Further, minerals developments create opportunities for landscape scale biodiversity enhancement, flood alleviation, water storage, etc.. It is frustrating that the inherent mindset of document writers sees only negative elements of raw materials supply
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In conclusion, the draft document is disappointing and demonstrates a lack of understanding in the subject.

We would be more than happy to follow up our attendance at NDF events and our previously submitted comments on the NDF, to meet with WG to ensure a balanced and constructive consideration of the minerals industry is presented in the ISA and future NDF documentation.

Yours sincerely



**Nick Horsley**  
Director of Planning, Industrial Minerals and MPA Wales