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The Planning Policy Team
Snowdonia National Park Authority
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Dear Sir/Madam

**ERYRI DEVELOPMENT PLAN 2016-2031 - MATTERS ARISING CHANGES DOCUMENT
SEPTEMBER 2018**

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 recent consultation we write to advise you that we cannot support the proposed modifications detailed under MAC number 28, on Page 52 and referring to Paragraph 3.41. There are a number of reasons why the approach proposed is not appropriate.

Firstly, Planning Policy Wales (PPW) (paragraph 14.2.1) does not seek to differentiate between areas of differing landscape value when addressing the specific requirement of the national policy to safeguard mineral resources. Mineral safeguarding does not necessarily indicate an acceptance of mineral working, but seeks to ensure mineral deposits which society may need, in the future, are safeguarded. Safeguarding is not specific to whether or not the mineral resource is of local, regional national or international importance.

In the absence of planning guidance in Wales supporting PPW and relating to this specific issue, it would seem logical to examine other established planning guidance relating to minerals safeguarding and National Parks such as that cited in the Planning Practice Guidance (PPG) in England. The National Parks in Wales and in England were established under the same legislation and have a comparable level of protection and policy consideration. Further, the tests relating to development in National Parks in England and Wales are also comparable. The PPG is clear, that in response to the question posed "*Is it appropriate to safeguard mineral resources in designated areas.....?*" "Safeguarding of mineral resources should be defined in designated areas" (our underlining).

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PPW (paragraph 14.7.3) requires that “*areas to be safeguarded should be identified on proposals maps and policies should protect mineral resources from other types of permanent development....*” Again the requirements of PPW do not differentiate between areas of differing landscape value.

In National Parks it can be appropriate to seek to promote or reinforce traditional and local distinctiveness. In those areas the impact of development on the existing character, the scale and siting of new development, **and the use of appropriate building materials (including where possible sustainably produced materials from local sources), will be particularly important. (PPW 4.11.10).** The wording proposed in paragraph 3.41 does not seek to safeguard these important mineral resources.

In addition, the wording proposed in paragraph 3.41 seeks only to safeguard “Category 1” aggregates. These are defined in the plan as “*Resources deemed to be of national significance at the Wales level (some resources may be of UK significance). They may be resources with limited occurrence, and therefore susceptible to sterilisation, or those which are economically important due to their high quality/purity and/or scarcity.*” The plan also defines Category 2 resources which “*have been mapped by the BGS, these are those of less than national significance, but which may be important at a regional or local level*” and Category 3 resources, “*which have not been mapped by BGS are low grade aggregates used at a local scale (e.g. for use on farms etc.) when no better quality aggregates are available*”. The proposed wording intimates that Category 2 resources are low grade, which conflicts with the categories identified in the plan.

The proposed approach seeks the inclusion of the proposed wording in order to remove a “*burden on developers in the National Park demonstrating the resource is not economically viable*”. This approach to minerals safeguarding is not recognised and is not supported by PPW.

The concluding sentence proposed suggests that Category 2 aggregates are to a great extent protected by other National and Local policies. We fail to see how such wording would stand scrutiny at a public inquiry.

We are therefore of the firm opinion that Category 1 and Category 2 resources identified in the plan area should be safeguarded on the proposals map; the proposed wording in paragraph 3.41 be deleted; and new wording added which would safeguard mineral resources in a clear and proper manner which would accord with PPW and not through luck, by a “back door” approach.

We trust these comments will be given proper consideration and appropriate amendments made to the text.

Yours faithfully



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Director of Planning

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