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Dear Sir/Madam

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DRAFT DEVELOPMENT MANAGEMENT AND AIR QUALITY SPG

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.

Further to the recent consultation, we have the following comments to make

Para	Issue	Comment/suggestion
1.1	The supplementary planning guidance is tentatively welcomed, however, we wondered if it would be more prudent to await further response from WG on their Local Air Quality Management consultation from 2016 and the pending review of PPW	Ensure any formal adoption of the SPG gives due regard to WG's Local Air Quality Management programme and review of PPW. This may necessitate building in sufficient flexibility in to the SPG or ensuring an early review.
1.2	Although para 1.3 references the EIA process, it is not clear how the SPG will dovetail with the Screening and Scoping for EIAs	The SPG should clarify the relationship with the Screening and Scoping to avoid duplication.
1.3	Reference is made to developers applying for permits before applying for planning permission.	We seek assurance that any changes arising out of the planning process will be readily incorporated in to any permit.
1.7	Reference is made to increases in air pollution arising from construction potentially impacting up on human health.	It should be recognised that construction activity may have short term impact upon air quality in order to deliver longer term benefits. Whilst air quality impacts of construction need to be managed, they should be taken in the context of the whole life benefit of the works.

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3.1	The intent of an Air Quality Assessment (AQA) is to demonstrate the likely changes in air quality or exposure to air pollution as a result of proposed development. Other matters should, however, also be taken in to consideration.	The increased production (and economic growth) of an existing asphalt plant as a result of major road improvement works should not be prevented because residential development has been allowed on a nearby brownfield site to the extent that any growth in the business may be constrained due to perceived air quality issues. To do so would be counterintuitive as such business would be driven out of the local area and (in this example) replaced by goods brought in, by road, from other locations.
Pg 9	Air Quality Assessment Questionnaire	Scenario 4 assumes all major development will involve an increase in HGV Movements (See below)
Pg 9	Will the Development result in more than 10 HGV movements a week	It is not clear where the threshold of 10 HGV movements per week has been derived. If such a figure is to be quantified, such quantification should be justified. The likelihood is that 100 cars per day will have more of an effect than 10 HGVs per week.
Pg 11	Scenario 4. This assumes that any major development will involve an increase in road traffic. This is clearly not correct. For example, a quarry extension or new processing plant, at or too an existing site need note increase vehicle movements, yet there is an automatic presumption that Scenario 4 applies.	The questionnaire and scenarios need to be reviewed. Consideration should be made to making these more development specific

In brief, we question whether or not the timing of the SPG is correct in view of recent WG consultation and pending review of PPW. We also feel that greater clarification and justification are given to stated vehicle numbers and types of development.

We trust the above comments are considered constructive and would welcome the opportunity to discuss the document with you further.

Yours faithfully



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