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Dear Sir/Madam

**DENBIGHSHIRE COUNTY COUNCIL, LOCAL DEVELOPMENT PLAN 2006-2021-
LDP REVIEW REPORT (AUGUST 2017)**

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
1.2	Reference is made to development needs.	Whilst it is appreciated the list is not exclusive, it would be worth referencing minerals as they are critical to most if not all other forms of development
2.4	Typographic error -Does the adopted Plan still complies.....	Should be "comply"
2.7 to 2.11	Whilst we support the Councils approach and aspirations, WG will be reviewing PPW in 2018 together with a NDF consultation in March 2018. In November 2017, there will be a planning consolidation Bill which will be followed by procedural guidance on Development Management and Policy. It is hoped a review of the RTS will also be forthcoming	Any review of the LDP must be flexible to incorporate reviewed policy, guidance and the consolidation of planning legislation.

2.10	Reference is made to larger scale issues such as housing numbers, strategic housing allocations, strategic employment sites and transport infrastructure.	The raw materials and resources for such development must not be underestimated and the local plan review provides a good opportunity for this to be incorporated.
3.6	Typographic error -should the LDP Vision require a revision than.....	Should be “then”
4.10	This states “ <i>The Denbighshire LDP was adopted in 2013; six years have passed since the start of the plan period.</i> ”	This is a little confusing. The plan date runs from 2006 - 2021. If the plan was adopted in 2013, the period from 2006 to 2013 is 7 years from commencement. However, we are now 11 years since the beginning of the plan period (2006 - 2017) or if we are looking at the period from when the plan was adopted (2013 - 2017) this period is 4 years.
4.12	This states “The housing completions dates have not reached the annual minimum requirement of 533 dwellings....”	Should this read “The housing completions to date have not reached the annual minimum requirement of 533 dwellings....”
4.13	This states “ <i>It is apparent that the annual growth levels is unrealistic.....</i> ”.	It is assumed that this is referring to the “growth levels” predicted in the LDP, but this is not clear. Also this should read “annual growth levels are..... ”
4.18	This states “ <i>...where development opportunities will is....</i> ”	This should read “will be” or “is”
4.21	This states that “ <i>Table 4 indicates that the delivery of houses has been very much in line with the settlement hierarchy identified in the adopted LDP</i> ”	We don’t believe Table 4 does show this. There have been no houses delivered on the key strategic site, Bodelyyddan; and the percentage of houses delivered in open countryside exceeds that for villages and hamlets, although there may be policy compliance considerations here.
4.23	This states that “ <i>Both tables indicate that housing completions are located in line with the spatial distribution and settlement hierarchy, as laid out in the LDP</i> ”.	See above comment
5.8	This states “ <i>There is sufficient land available for residential development but delivery is dependent on developers. The industry has not taken up the land available to deliver as many houses per year as required by the Plan; partly due to viability concerns.</i> ”	The review should consider why delivery is not being achieved. Are the allocated sites in the right place; are there any constraints, planning or otherwise; are there infrastructure issues?

5.21 to 5.23	These paragraphs consider mineral provision and the need to review is supported in light of the potential review of PPW and the RTS.	It is important that the review also considers non- aggregate production, such as, but not limited to, building stone for architectural purposes. Further the safeguarding of mineral resources and minerals infrastructure must be an integral part of the review. Most notable, is development on brownfield sites where proximity to existing infrastructure may impede lawful operations
Information Paper: Promoting a Sustainable Economy		
3.6.1	This states that <i>“The local planning authority will therefore seek to reduce the need for minerals through sustainable construction practices.”</i>	<p>The statement does not reflect PPW Chapter 14: Minerals. PPW requires that LPAs provide positively for the safeguarding and working of mineral resources to meet society’s needs. There is however a requirement for LPAs:</p> <ul style="list-style-type: none"> • to provide for an adequate supply of minerals that society needs now and in the future, together with protecting and improving amenity; • to protect things that are highly cherished for their intrinsic qualities, such as wildlife, landscapes and historic features; and to protect human health and safety by ensuring that environmental impacts caused by mineral extraction and transportation are within acceptable limits; and to secure, without compromise, restoration and aftercare to provide for appropriate and beneficial after-use; • to help conserve non-renewable resources for future generations through efficient use, recycling and waste prevention; to protect renewable resources from serious harm or pollution; and to promote the use of appropriate alternative materials; • to ensure an adequate supply of minerals that are needed at prices that are reasonable; and to safeguard mineral resources for future generations. <p>We would seek clarification of the LPA’s proposed measures to reduce the need for minerals and the precise details of the sustainable construction practices referred to.</p>
3.6.6	This paragraph proposes a review of local plan policy for the	We would support this approach and would be happy to discuss this with the LPA.

	delivery of sand and gravel reserves, as no sites have been brought forward.	
3.6.9	This paragraph identifies a sieve approach which indicate where development will be excluded	In view of the lack policy failure to deliver sites, these criteria may need to be reviewed.
3.6.11	This paragraph states that visual impact is a constraint	We do not believe visual impact is a constraint per se, but is a matter which needs to be considered during the application process. It is evident that the visual effects of mineral working can be mitigated through appropriate measures and is part of the overall planning balance as to whether or not proposals are acceptable.
3.6.19 to 3.6.22	Table of Safeguarded Minerals and subsequent text	We question the selection process to determine which minerals are excluded from this table. Of particular note is the failure to safeguard building stone, coal, metalliferous minerals and silica rock. The LPA must provide a clear and detailed consideration to justify this table. Sterilising mineral resources is not sustainable.
3.6.23	Safeguarding	We support the LPA's statement that a review of the safeguarding approach will be undertaken as part of the LDP review and would suggest that the review includes minerals infrastructure.
3.6.24	Buffer zones	This section is a little confusing and we would seek the LPA's clarification on what it is seeking to achieve.

We thank you for allowing us the opportunity to consider the contents of the review.

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

Yours faithfully



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