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NIA Consultation
National Infrastructure Commission
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Dear Sir/Madam

**NATIONAL INFRASTRUCTURE ASSESSMENT
CONGESTION, CAPACITY, CARBON: PRIORITIES FOR NATIONAL INFRASTRUCTURE**

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 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.

The Mineral Products industry is the major supplier to the construction and maintenance of infrastructure projects in the UK in terms of delivered tonnages of materials. We estimate that over 100 million tonnes of aggregates and mineral products are required annually for infrastructure projects. As such, the ability of the supply chain to provide these materials is a critical aspect of the implementation of the long-term infrastructure aspirations set out in the Consultation. The work of the Commission and Infrastructure and Projects Authority is extremely valuable to our industry in that it helps to provide the evidence base and confidence for our industry to invest in the resources, skills and capabilities to enable future supply.

Key Issue - The continuing lack of any integrated consideration of the supply chain implications of infrastructure ambitions within the NIA or more generally within Government.

We remain concerned that strategic supply chain issues do not appear to be of concern for either the NIC or IPA. The Consultation sets out key challenges related to congestion, capacity and carbon and the IPA focusses on project delivery, highlighting “projects, people and processes”. More specifically the long-term supply of mineral products for infrastructure projects will be heavily dependent on the performance of the mineral planning system to deliver the right resources in the right place and at the right time. The implementation and maintenance of infrastructure projects over the

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next twenty years is likely to require two billion tonnes of aggregates and mineral products. In addition, ambitious statements by Government about the delivery of new housing and associated infrastructure indicates a significant long-term demand for aggregates and mineral products.

In spite of such identifiable future demands for mineral products, Government, through the Department of Communities and Local Government (DCLG now DHCLG), appears to be withdrawing from engagement in mineral planning issues. Historically, the Managed Aggregates Supply System (MASS) has helped ensure that national mineral planning policies and the implementation of policies regionally and by local mineral planning authorities (typically County Councils) operate so that the construction industry has an adequate, steady and sustainable supply of aggregates. Without a strategic approach supporting the future supply of aggregates and mineral products, which is integrated with infrastructure and construction objectives within Government and amongst stakeholders, there is no guarantee that projects can be delivered in the medium to long term.

We believe that it would be appropriate for the National Infrastructure Assessment to recognise the significance of such supply chain issues and to help stimulate a more strategic consideration of how to integrate long term supply chain implications with project and programme delivery.

Key Issue - The Role of Rail Freight

The Consultation's perception of Rail Freight is simplistic and contradicts Government ambitions for rail freight set out elsewhere. The consultation uses a simplistic metric that *"reducing road freight by one-third would require more than a three-fold increase in rail freight capacity, which simply could not be accommodated on today's busy railway"* to define the significance of rail freight and goes on to suggest that truck platooning is a more viable option for freight movements. This viewpoint is contradictory to the UK Government ambition that was set out in the Clean Growth Strategy published in October 2017 to *"work to enable cost-effective options for shifting more freight from road to rail, including using low emission rail freight for deliveries into urban areas, with zero emission last mile deliveries"*. This recognised the carbon savings that can be made from increasing the use of rail to transport freight and was listed alongside the need to trial HGV platoons. Clear Government policy is evidently needed in this area to ensure best use of the limited capacity on the rail network. It is clear that some of the evidence for such policy will come from the national freight study, to be carried out by NIC as announced by the Chancellor in the Autumn budget. It is vital that this study is evidence based and investigates the strategic nature of rail freight in depth rather than disregarding it out of hand in favour of HGV platoons.

The Mineral Products industry transports over 250 million tonnes of materials/products annually. The industry uses road, rail and water transport and is well placed to comment on the significance of rail freight. The industry recognises the importance of the road network which accounts for (and will continue to account for) most aggregates deliveries. However, twenty million tonnes of mineral products, mainly, but not exclusively, aggregates, are transported by rail annually and this delivery mode is critical for our industry and for our infrastructure, construction and manufacturing customers. The average delivered trainload of aggregates is equivalent to 75 long distance lorry deliveries. The use of rail is particularly significant in delivering aggregates into urban centres such as London and Manchester and a network of urban rail depots has been developed to accommodate rail deliveries and to act as hubs for

onward deliveries of aggregates, concrete and asphalt to construction sites. This integrated rail, road and sometimes wharf infrastructure reduces carbon emissions, road congestion and improves air quality and road safety in the delivery of aggregates, other mineral products and construction materials. It also meets the demands of construction and infrastructure clients for more sustainable supply chains.

While recognising that there are and will be inevitable constraints on the role of rail freight, the NIA should adopt a more positive approach to the benefits of rail freight in the foreseeable future. The implication in the Consultation that rail freight is of little consequence compared with future road platooning of lorries needs to be tempered with a more practical appreciation that this modal shift is unlikely to be practical or sustainable for many existing rail freight users in the reasonably foreseeable future. In particular the use of rail (and water) to deliver bulk materials required for construction and infrastructure projects is likely to remain a significant element of sustainable supply chains.

Key Issue - Urban Freight.

The Consultation is right to highlight the issue of urban freight (page 76) and a “*lack of integration between land use planning and transport*”. We would like to highlight this issue in relation to the transport and delivery of mineral products and other construction materials. MPA is currently gathering national data on mineral sites which are not adequately safeguarded within the planning system and has recently published information relating to London. 97% of primary aggregates used in London are transported into the Capital by rail and water. The network of rail depots and wharves developed to manage the delivery and onward transport of aggregates are, in a number of cases, threatened by alternative land uses, for example the grant of planning permissions for housing in the vicinity of such sites. Such development adjacent to wharves and depots can constrain their operation, particularly where sites operate on 24-hour cycles to accommodate river deliveries linked to high tides and rail freight deliveries timed to avoid peak passenger train demands on the rail network. In some cases, such transport and other land use conflicts arise due to lack of awareness by planning authorities, in other cases industrial sites such as transport sites are replaced to facilitate higher land value uses.

Key Issue - Road Maintenance

The consultation is right to draw attention to the lack of priority given to road maintenance, particularly the 98% of the network managed by local authorities. While Government has highlighted the significant increase in the funding of Highways England to implement the Road Investment Strategies (RIS 1 and RIS 2), notably from 2018/19, there has been no complementary strategy to improve the maintenance and quality of local road networks. Survey results consistently highlight local road maintenance backlogs of up to £12 billion and the ability of local authorities to adequately maintain their networks when faced with huge general pressures on resource budgets continues to be severely constrained. The lack of any coherent longer-term strategy to address this persistent infrastructure failure, should be an issue of greater significance in the NIA.

Specific comments relating to consultation text

Pg	Section	Consultation Comment	MPA Comments
2	Foreword	The Foreword by the Chairman of the NIA references the	The Victorian’s recognised the need for an efficient raw material supply

		“Victorian Spirit” being rekindled	chain to ensure projects could be delivered.
3	Foreword	The Foreword indicates the key challenges as being “Congestion, capacity, carbon”.	Until NIC and Government give serious and proper consideration of how, and with what, infrastructure projects are to be constructed and delivered, including key supply chain implications, there will always be a strategic gap in the National Infrastructure Assessment
3	Foreword Capacity	The Foreword references capacity particularly of rail.	The NIA cannot be simply about passenger transport. Continuing and potentially increasing freight movements on rail, particularly for bulk materials such as aggregates and other mineral products are imperative to supply our construction and industrial sectors and deliver economic growth. Similarly, the threats to strategic rail infrastructure such as sidings, from incompatible development must be given serious consideration given their safeguarding is a matter of national policy within the NPPF. Major conurbations rely on rail and waterborne aggregate and other mineral product facilities and transportation hubs. Threats to such facilities from housing and other land uses must be fully considered during the planning processes and safeguarding policies implemented to ensure adequate and sustainable supply chains.
4	Foreword	“Long term plans, which ministers and parliament stick to”	We strongly support the Chairman’s comments on the need for long term planning and commitment by Government. This is necessary to ensure investment commitments by businesses of all sizes will be forthcoming. However, the consultation document itself appears to embrace the fragmented tiering of local authorities and we would suggest a return to regional planning maybe more beneficial.
6	In Brief	“congestion, capacity and carbon”	There is a danger that the whole infrastructure challenge will be hung up on these three words due to convenient alliteration. In reality the scope of the NIA must be much wider than this.
7	Executive Summary	Reference is again made to congestion, capacity and carbon	The NIA and indeed NIC policy must avoid being hung up on a strap line based on a convenient alliteration.
7	Executive Summary	The final paragraph cites the expertise in engineering,	It is notable that a key omission from this list of expertise is resources, be it human or physical. Despite earlier

		economics, politics, technology, finance and design.	representations on NIC consultations, the dots between raw material supply and infrastructure delivery have not yet been joined by the NIC.
8	The NIA	The final paragraph on this page states that the NIA covers all of the key sectors of economic infrastructure.....Transport, energy, water and sewerage, flood risk, digital and waste.	Disappointingly the NIA yet again overlooks the common denominator to the delivery of all these and that is raw materials. From the aggregate material and concrete and other minerals products for construction, (glass, steel, etc) to the industrial minerals for engine castings, to those required for increasing energy storage capacity, these basic raw materials, the foundation of our society are being overlooked. UK mineral resources represent a national asset and a key component of the infrastructure supply chain.
10	Thinking long term	The NIA is looking at infrastructure and society's requirements over the long term.	We strongly support the need for longer-term planning
11	Thinking long term	The consultation references a "National Design Panel" for infrastructure to ensure new projects improve the quality of people's lives and the wider environment.	We are concerned over the remit of such a body. What would be its term of reference, regulatory powers and accountability? There is a danger that such a body would simply become another costly quango. Accountability should be for the NIC and the IPA. Reporting on the benefits and disbenefits should be part of the permitting/consenting process and there is no reason why any consent order could not require a statutory duty on the promoter/ developer of the infrastructure to report back on its success (or otherwise) to Government or the NIC through a formal process, without the need for an Office for Infrastructure (OFFINF).
11	Thinking long term	The NIA proposes to develop better ways of measuring the state of the UK's infrastructure.	This approach is encouraged and considered as part of the permitting process.
11	Thinking long term	The consultation proposes better performance measures and cost benefit analysis of projects	We fail to see how this can be delivered without a full appreciation of raw material assessments and audits and supply chain considerations. This needs to be considered as part of the permitting process, to ensure the project can be delivered on time and on budget.
12	Thinking long term	Reference is made to the "depth of the supply base"	We strongly support supply base considerations being part of the permitting process.
12	Priorities for action	The consultation cites seven priority areas	Unfortunately, the consultation omits the one consideration which underpins the delivery of all these

			priority areas and that is the supply chain, notably the need for mineral products.
13	Building a Digital Society	The consultation places great emphasis on “smart” systems.	The NIC and Government must ensure such systems are secure and immune to hacking.
13	Connected liveable city-regions	The consultation cites cities as “the engine room of the economy”. This is a thread through the consultation.	While recognising the potential growth generated by high performing cities and city regions there needs to be an awareness and acknowledgement that the supply chains enabling such growth are in many cases regional and national. Similarly, rural communities have reasonable expectations for growth and higher living standards and a national infrastructure policy cannot be only urban-focussed.
14	Connected liveable city-regions	The consultation seeks to avoid the “stop start” legacy of many historical infrastructure proposals.	This is welcomed. However, as investments rely upon return on capital, measures to speed up overall delivery of infrastructure from consenting, through implementation and delivery, must be investigated
14	Connected liveable city-regions	Reference is made to transport investments not always being planned with housing or economic development in mind	The focus by the current consultation and Government on cities alone, is in danger of turning our peripheral towns into commuting hubs. The absence of a truly regional connection and strategic approach, beyond city regions alone will be to the detriment of the rest of the country.
15	Infrastructure to support housing	The consultation highlights the historical failures of poor coordination and a lack of responsiveness to the housing market and coordination of infrastructure.	This is correct. However, this will not be resolved whilst there is a lack of strategic overview at the local, regional and indeed national level. Changes to the planning system, particularly from 2004 onwards, have resulted in serious policy fragmentation and the loss of a strategic vision from both a regional level with the withdrawal of the RSS and a more local level with the loss of Structure Plans. Similarly, the Government’s failure to properly understand key strategic considerations such as the MASS, caused largely through a loss of the “corporate memory” within government departments, is amounting to a perfect storm, which has the very real potential to compromise the sustainable supply of essential raw materials to major infrastructure projects
16	Eliminating carbon emissions from	The consultation cites measures which may assist in controlling	Quite rightly the document looks at a variety of measures to eliminate carbon emissions from energy and

	energy and waste	and mitigating carbon emissions.	<p>waste. Many of the measures mentioned are also applicable to energy intensive industries such as cement and lime manufacture. Any infrastructure relating to these measures should broaden out from energy to include these vital manufacturing activities. Further, mineral products are essential materials in the production of bases for wind turbines, tidal lagoons and nuclear power stations. It is therefore vital to ensure a continued secure domestic supply of these essential materials in the UK, which includes supporting the low-cost decarbonisation of these activities. Carbon Capture and Storage (CCS) is a critical technology, not just to reduce emissions in energy production, but also for several Energy Intensive Industries such as cement and lime manufacture, as set out in the UK cement decarbonisation and energy efficiency roadmap published in 2015. Any CCS infrastructure must look to enable the deployment in these industries as well as in power generation. To date the approach of Government to CCS has been inconsistent and lacking in conviction. The improvement to the aged housing stock is recognised as presenting an opportunity to minimising domestic carbon emissions. Whilst opportunities to incentivise improvements to the existing housing stock are limited, changes to taxation (removal of VAT) on building products could be delivered as a result of Brexit. A key issue in relation to both new and refurbished housing and other buildings is to focus on whole life energy performance. The use of high thermal mass concrete can significantly reduce the energy required for heating and cooling a building so much so that the increased embodied carbon compared to a lighter weight timber frame building can be paid off within just 11 years¹. The storage of energy by heavy weight buildings can also offer ‘demand side flexibility’ that could provide a key solution to the growing imbalance between energy</p>
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¹ The Concrete Centre “Thermal Mass for Housing”, 2006

			demand and renewable energy generation ² .
17	Eliminating carbon emissions from energy and waste	The consultation cites energy from waste as being more sustainable.	Energy from waste is highlighted as serving two purposes; production of a lower carbon form of energy (compared to coal fired power generation) and a method of waste disposal. However, the use of waste derived fuels in cement manufacture offers a third benefit for using the waste; the recycling of mineral and metal content into useful cement product. As such this use of waste should be prioritised when considering energy from waste infrastructure. The benefits of ‘co-processing’ waste in this way where there is a dual energy and material recycling benefit was recently highlighted a as an exemplar case study in the Government Office for Science report on Waste to Productivity.
19	Reducing the risks of drought and flooding	The consultation highlights the amount of water wastage, flooding measures being installed after the event and tradition measures to manage and control flood waters	Former quarries provide opportunities for water storage both in terms of the provision of a potable water source and in presenting flood alleviation opportunities.
20	Where next?	The consultation commits to continued engagement.	Previous comments submitted by the MPA on the various consultations have been overlooked. We welcome the opportunity for clear and focussed engagement by the NIC.
22	Introduction	The introduction outlines the make-up of the commission and the five-year review mechanism.	Of note is the reference to NIC Member Kate Barker and her review of housing supply and the land use planning system. It is unfortunate many of the conclusions of these respective reviews were ignored by Government. Further, we would reiterate our previous comments that a 5-yearly review limits the accountability of the NIA and suggest an interim review, every two and a half years.
26	The NIA	The failings of the infrastructure strategy over recent decades is recognised in the report, with policy uncertainty, reversals and prevarication driving up costs and hindering delivery.	The lessons of the past must clearly be taken on board. Failure to do so and to properly plan for the raw materials and supply chain considerations will also drive up costs and hinder delivery.
27	The NIA	The consultation cites the commission’s work which has underpinned this assessment	It is disappointing that previous comments submitted by the MPA highlighting the need for a more

² 3E Report for CEMBUREAU (The European Cement Association), “Structural thermal energy storage in heavy weight buildings- analysis and recommendations to provide flexibility to the electricity grid”, October 2016

			integrated consideration of key supply chain issues and infrastructure development have not been acknowledged or addressed by the NIC.
28	The NIA	This section outlines the case for an independent NIA but introduces a new interpretation of “sustainable” in policy terms. This states “the Commission intends to interpret the term ‘sustainable’ in its objectives as meaning environmentally, economically and fiscally sustainable”	Whilst we strongly support an independent NIA, we must raise our concerns over a reinterpretation of the meaning of “sustainable”. In development terms the principle of sustainable development is long established. Crucially, NIC’s new interpretation excludes the social aspects of sustainability. Surely fiscal sustainability is an aspect of economic sustainability? A reinterpretation of sustainable also provides a green light to other agencies to generate alternative and potentially inconsistent definitions of their own.
31	The Fiscal Remit	The consultation cites the broadest range of evidence which will be drawn upon by the commissioners.	This process must be clear, concise and accountable.
32	Considering the demand for infrastructure over thirty years	The section highlights a range of key considerations to infrastructure delivery.	Unfortunately, the need for raw materials availability and a robust supply chain is overlooked. Over a thirty-year period, the potential demand for aggregates to build and maintain infrastructure is three billion tonnes, highlighting the need for more engagement in supply chain issues
34	Scenario analysis	The consultation highlights the support it has received from the Infrastructure Transitions Research Consortium and Government analysts	We must highlight our concerns that the failure of Central Government to invest time and resources in to MASS challenges its understanding of the need to match infrastructure delivery to raw material availability and supply. Predictions based upon past sales, if applied to housing, would show a projected decline in housing requirements rather than the current and demonstrable need for more housing. Yet this approach is applied to the delivery of mineral products to meet the needs of society. This does not take in to consideration the raw material demands of the NIC objectives. Failing to make the link between raw material supply and infrastructure delivery would be a significant oversight.
49	Digital Infrastructure to enable the UK’s smart future	The consultation highlights the benefits of digitally connected appliances and infrastructure.	As referenced above, it is imperative that “Smart technology” is appropriately safeguarded.

76	Urban freight is too often overlooked	The consultation highlights the need for freight capacity in urban areas.	National policy in NPPF seeks to ensure rail-sidings and wharves are safeguarded within the urban areas. However, the pressure for housing on “brownfield sites” is undermining businesses ability to ensure raw materials and products are delivered to urban centres. Freight on rail and water is critical to economic activity and a strategic overview is imperative.
83	Long-distance Freight	The aspirations of the consultation would appear to promote a shift for freight from rail to road, utilising “smart” technology	The dismissive approach to rail freight conflicts with Government policy set out in its Rail Freight Strategy and the Clean Growth Strategy. The RFS has taken many years to put together and our members have invested significant resources in its delivery. Rail freight of aggregates and other mineral products is critical to construction supply chains, notably in cities such as London and Manchester and is an important element of sustainable supply chains for infrastructure and construction developments.
84	The Commission’s priorities	The focus is on city growth to secure economic growth and quality of life	It is imperative that the NIA should look beyond the boundaries of a handful of major cities to deliver economic growth and quality of life. Managing congestion, capacity and carbon cannot be achieved by city growth alone. Such a policy objective would be short-sighted and counter-productive. A balanced overview is needed by the NIC and a structured review of delivery at a regional, not just city, scale.
94	The need for action	The consultation highlights housing population growth as a major infrastructure challenge.	Unfortunately, Central Government’s failure to continue to embrace MASS highlights the clear disconnect between the delivery of aspirations and the raw materials required to meet these. The NIA is in danger of treading the same path, as despite the concerns being raised within previous consultation responses, the NIC has similarly failed to “make the link”. Aggregates are the core building material in all our homes, offices, social buildings and infrastructure: Every new home typically requires up to 400 tonnes of aggregates; Every new school typically requires some 3,000 tonnes of aggregates; Every new 1km of roadway requires up to 30,000 tonnes of aggregates; Every new 1km of high-speed railway typically requires

			9,000 tonnes of aggregates. This does not take in to consideration the non-aggregate industrial minerals delivering glass, bricks, insulation, and basic utilities, etc.
95	How things stand	The consultation references the development plan system and the process of ensuring the deliverability of sites. It cites the need for a coordinated and integrated approach to infrastructure housing and the workplace	We would agree that Central Government needs to have a more structured approach to planning at the local, regional and national scale. The current fragmentation of the planning system serves only to exacerbate the already fragmented delivery of development.
97	Coordination	The consultation cites the coherent approach to infrastructure and housing taken in Greater Manchester and Kent. In particular it recognises the need to align various sectors and authorities.	Whilst we would agree there is a need for a better level of coordination and structure, there is strong criticism of the examples cited. It is understood the Greater Manchester Strategic Framework was withdrawn by the newly appointed City Mayor. Our own concerns raised during the respective consultation processes are that the GMSF failed to properly consider matters such as mineral resource and infrastructure safeguarding. Nor did it provide a resource assessment of the aspirations of housing and economic growth or give thought to supply chain requirements. In other words, there were significant shortfalls in the “coordination”.
98	Coordination	The consultation highlights the more strategic visions developing in certain parts of the country. Through the emergence of combined authorities and city regions. The NIC seeks to encourage other areas to follow these models.	This highlights the inadequacies of the current structure of local government which has arisen out of the constant tinkering by Central Government. This fragmentation will be difficult to overcome unless a clear structure to local government is established. Unfortunately, an area where regional coordination still exists, but which is being grossly undermined by the failure of Central Government to fully appreciate its significance, is MASS and the Aggregate Working Parties. These have existed for over 40 years and yet are under serious threat because Central Government, routinely fails to make the connection between raw material supply, economic growth and societal well-being.
118	The Commission’s Priorities	The consultation highlights the need for battery storage technology	We would highlight the importance of the raw materials required to produce the batteries to facilitate electricity storage.
119	The Commission’s Priorities	The consultation references the Hendry report looking at the development of Tidal Lagoons.	We must express frustration that a year on since its production, the Government has failed to give any

			indication of its direction on Tidal energy. However, the Government and the NIC must ensure that the raw materials and supply chain considerations required to deliver such projects are properly planned for.
160	Population growth and environmental factors	This section of the consultation looks at the issue of flood risk associated with an increasing population.	Sand and gravel extraction on river flood plains allows for increased storage capacity within the flood plain. This can be complemented by increasing flood storage capacity upstream through the use of former quarries.
164	Water Supply	The consultation recognises a need for a strategic approach to water supply	We would highlight the largely untapped potential of current and former quarries as sites for potable water sources.

In conclusion, we remain largely supportive of many of the aspirations of the NIC in its consultation.

We have however sought to again highlight the limitations of the consultation from a constructive and informed position in the hope that the matters raised are given full and proper consideration. We have done this through specific reference to the text in the consultation as the questions identified in the consultation do not fully address the concerns we have flagged.

It is therefore important that National Infrastructure Projects are not considered in their own ‘bubble’, as appears to be the case at present. Currently, there appears to be a fundamental disconnect between infrastructure policy and the supporting policies for those activities (such as minerals and construction products) needed to support and enable the delivery of projects. To ensure that National Infrastructure Projects can be delivered effectively, the supporting activities required to ensure delivery have to be clearly identified. These activities then need to be given proper consideration so that the potential needs and opportunities can be considered in advance, along with any risks or gaps that may have to be addressed.

There remains an unwritten assumption that if you create the demand for construction materials this demand will be met. While the UK undoubtedly has a rich and varied resource of indigenous construction minerals, in order for these to be realised in practice both the mineral products industry and the wider mineral planning system require greater visibility around what scale of demand is likely to be required by infrastructure projects to allow suitable provisions to be made alongside the existing base demands in the market. This will ensure the right resources are provided in the right place and at the right time, thus supporting the most cost effective and sustainable supply solutions to support delivery.

It is important to recognise that mineral product resources are not evenly distributed around the country and that a considerable amount of inter-regional trade in materials already occurs to meet the base load demand for construction aggregates in the market. Consequently, it is likely that many areas of primary mineral supply will be required to support the demands from multiple National Infrastructure Projects. The timings of prospective individual infrastructure projects therefore need to be understood, so that both the anticipated total cumulative and annual peak demands

can be determined in order for sufficient production capacity and associated transport/delivery infrastructure to be put in place.

The National Infrastructure process must be aligned with the mineral planning system, the Clean Growth Strategy and vice versa. The full and proper consideration or resource requirements for National Infrastructure Projects should form an inherent part of Mineral Local Plans and the Local Aggregates Assessment to ensure the timely delivery of the raw materials necessary. This will allow the aspiration for infrastructure to be designed, planned and delivered to create better places to live and work, to be fully considered from a spatial and time perspective at the earliest opportunity. It will also ensure that the planning system and infrastructure governance arrangements can be dovetailed to ensure infrastructure is delivered as efficiently as possible and on time.

It is widely recognised that quarries offer significant opportunities for biodiversity “net gain”. This would allow infrastructure projects to effectively offset positively contributing to the natural environment. Quarry restoration schemes may also present opportunities for water storage and flood management allowing integration for certain National Infrastructure Projects identified within the consultation document.

We would welcome the opportunity to discuss the above matters with you further and look forward to hearing from you in due course.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', written over a light blue horizontal line.

Mr Nick Horsley
Director of Planning, Industrial Minerals, SAMSA and MPA Wales