



deunyddiau hanfodel  
atebion cynaliadwy

**M19.03**

essential materials  
sustainable solutions

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**Flintshire Local Development Plan 2015 - 2030**

**Examination Schedule of Matters, Issues and Questions**

**Matter 19 - Minerals**

**Additional comments submitted by the Mineral Products Association**

***EN25: Sustainable Minerals Development Key Issue: Do the policies and proposals on this matter achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy? Are they based on robust and credible evidence?***

In response to the Inspectors' Matters, Issues and Questions, the Minerals Planning team at Flintshire County Council (FCC) are instrumental in delivering the broader and professional minerals planning service across much of the North Wales Region and we must emphasise the significance of Flintshire as a supplier of minerals across the region and beyond. FCC also hold the Chairmanship and Secretariat for the North Wales Regional Aggregate Working Party (NWRAP).

The MPA responded to the consultation on the Flintshire Local Development Plan initially on 17<sup>th</sup> December 2017 and following further consultation, on 11<sup>th</sup> November 2019.

Our representations highlighted the need for appropriate reference to the Regional Technical Statement (RTS), Mineral Technical Advice Note 1 (MTAN1) and the NWRAP Annual Report. Such documents are important to a robust evidence base upon which policies are developed.

The minerals topic paper upon which the policies and proposals was originally produced in February 2015. A subsequent background paper was produced in September 2019 the contents of which are based upon the RTS 1<sup>st</sup> Review. The NWRAP website has no Annual Report since 2010 and references the RTS 1<sup>st</sup> Review from 2014. We are aware, through attendance at the NWRAP that subsequent Annual Reports have been prepared since 2010, however, we have no documented evidence of a formal report since 2015. The NWRAP website should also refer to the 2<sup>nd</sup> Review of the RTS as this is fundamental to the evidence base. Whilst we do not doubt that the policies and proposals are based upon robust and credible evidence, documenting and maintaining this evidence is crucial for a sound plan and ensuring an adequate supply of minerals. Minerals supply cannot be assumed, particularly with the significant lead in times necessary to secure planning permission.

MPA Wales/Cymru is part of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries

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***Are the policies and requirements clear, reasonable and justified?***

***a) Are the minerals policies locally specific and consistent with national policy?***

Our representations of 11<sup>th</sup> November 2019 highlighted the need for clarification on the identification of minerals safeguarding and minerals infrastructure safeguarding. We welcome clear identification of these within the adopted plan.

***b) Is the work with regard to the RTS 2nd Review now completed? Will the LPA be able to meet the higher apportioned need?***

We understand that the RTS has now been endorsed by Welsh Ministers and by the FCC.

The North Wales Annex (Annex A) to the RTS from indicated that Minimum Allocation needed to meet Required Provision for Flintshire required new allocations totalling at least 3.543 million tonnes of sand & gravel and at least 35.928 million tonnes of crushed rock, to be identified within the LDP.

This is an increase on the allocations prescribed in Policy STR16 subsection iii) of “1.4 million tonnes of sand and gravel and 3.84 million tonnes of crushed rock through the extension to existing quarries”. We welcome clarification of how these minimum allocations are to be delivered.

Policy EN25, identifies sites potentially delivering a further 24mt of crushed rock (Limestone) comprising Hendre Quarry (11mt) and Pant y Pwll Dwr Quarry (14mt). We believe, this would appear to leave a potential shortfall of “at least” 10.9mt on the minimum allocation needed to meet the required provisions identified in the RTS 2nd Review. We understand from the Council that additional reserves are available within existing operational areas, (site not known), however, this would still leave a shortfall on the minimum allocation needed to meet the required provisions.

For Sand and Gravel, Policy EN25 identifies potential allocation for 2.3mt, from Ddol Uchaf Quarry (1.4mt) and Fron Haul Quarry (0.9mt). There again remains a shortfall.

The RTS requires that each authority “is to be able to demonstrate that adequate provision has been made for suppling at least the minimum quantity identified for the authority in the RTS”. It is understood the FCC is to pursue collaborative working with neighbouring authorities (Denbighshire and Wrexham). However, at the time of writing, it is not clear if this approach to collaborative working can deliver the minimum allocations needed to meet the required provisions identified in the RTS for the neighbouring authorities as well as Flintshire. We therefore seek greater clarity and evidence that the minimum allocations for FCC can be achieved.

***c) Is the proposed extension to Ddol Uchaf proportionate and appropriate?***

We note the question and highlight the need for FCC to deliver on the Minimum Allocation needed to meet Required Provision for Flintshire indicated in the RTS 2<sup>nd</sup> Review.