



deunyddiau hanfodol
atebion cynaliadwy

essential materials
sustainable solutions

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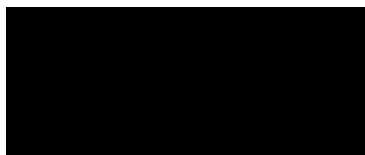
Page/Para/ Policy	Current Wording	MPA Comment	Amendments required
Pages 9 & 10	The final para of Page 9 on to page 10, states” The NDF should be read alongside PPW...”	There is no reference to the Regional Technical Statement (RTS) which is currently undergoing its 2 nd Review. The RTS is critical in ensuring an adequate and steady supply of aggregates are available to meet development aspirations within Wales.	Make reference to the RTS within the text.
Page 12	Natural Resources	Whilst this paragraph refers to Welsh coal, steel and Iron, there is no reference to Welsh slate and the other aggregate and industrial minerals which have been critical to the Welsh economy over the centuries	Widen the scope of minerals referred to within this section.
Page 14	North Wales:- “..Its dramatic landscape includes low-lying coastal plains, mountain ranges and industrial former coal fields”	Again, this section refers to the former coalfields, but makes no reference to the dominant minerals in the area, such as slate.	Amend the text to reflect the minerals landscape.
Page 22	“Co-locating homes, jobs and services means focussing on cities and large towns as main development areas.”	This philosophy is also important in the provision of minerals and mineral products. Whilst recognising that minerals can only be worked where they are found, it is important that in applying the proximity principle as required by PPW(v10), minerals are sourced as close as possible to the end use location.	It is important that the issue of nil apportionments in the RTS is supported by the NDF. The sustainable development of mineral resources should be as close as possible to the end use.
Page 30	“The Welsh Government has published a range of ‘Estimates of housing need in Wales’.....The Central estimate suggests a need for an additional 114,000 homes across Wales up to 2038.”	We feel this figure is less than ambitious and may lead to a serious shortfall in housing provision. Over the ten-year period 2007-2016 average housing completions across Wales exceeded 6,400pa. This of course included a period of recession. We question the housing figures quoted in the NDF which may be short of the mark.	We feel the housing figures proposed may be an under-estimation of actual housing need and these figures need to be carefully examined.

Page 35	National Forest	We support the proposed commitment to the National Forest. However, feel that the WG strategy for promoting timber in construction is somewhat anti-competitive and does not reflect the true carbon footprint of timber building products used in construction	Whilst supporting the principle of the National Forest, the full consequences of timber construction must be considered by WG.
Policy 16	<i>“a co-ordinated framework for minerals extraction...”</i>	We support the principle of a co-ordinated framework for minerals extraction through the Strategic Development Plans, but would seek clarification on how this will align with the LDPs and the RTS	An explanation of how the NDF, SDPs, LDPs and the RTS will align should be provided by WG to allow stakeholders to fully the planning policy setting.
Policy 22	North West Wales	There is no reference to the important wharf and railhead facilities allowing minerals to serve a wider market and the need to safeguard these. Further, Padeswood Cement plant is an important supplier to the region and wider markets as well as being a significant employer. The site is of strategic importance to the regional and national economy	Insert appropriate references to the strategic facilities such as the Padeswood cement works, minerals infrastructure and the importance of these facilities to the regional and national economy.
Policy 22 Page 54	<i>“The quarrying of slate aggregate is largely constrained by National Park and AONB designations”.</i>	Slate is a high-quality building product and not solely used for aggregate. Secondary aggregate production is a consequence of slate production. Further, whilst NPs and AONBs undoubtedly constrain mineral extraction, the PPW recognises the exceptional circumstance test applied to new development within these designations.	Correct the text with respect to slate production and insert reference to the exceptional circumstance test.
Page 60	Swansea Bay Metro	The text immediately following this policy bares no relevance to the policy itself as highlighted above in the introduction to this letter. We are pleased to see the references to the regionally and nationally important mineral resources and notably the provision of high PSV stone from the mid Wales region.	Restructure the document to ensure the pre-amble and text, is associated with the relevant and respective policies.

Page 69	Rivers and the Valleys	Again, we support the references to the mineral resources, but would similarly highlight the diversity of these and the need to refer to Aberthaw cement works, which is, like Padewood, an important, regional and national supplier, together with the important minerals infrastructure.	Widen the scope of the mineral resources. Similarly, insert references to the Aberthaw cement works, minerals infrastructure and the importance of these facilities to the regional and national economy.
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We trust the above comments are helpful, will be taken on board and would welcome the opportunity to further discuss the matters raised.

Yours sincerely



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