

Background Paper for Local Development Plan 2:

Minerals

July 2024 Addendum to take account of the publication of the Regional
Technical Statement for Aggregates 2nd Revision

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1 Introduction

- 1.1 The Council prepared a LDP 2 Background Paper on Minerals in May 2019. This was set in the context provided by Welsh Government’s Planning Policy Wales Edition 10 and a related series of Minerals Technical Advice Notes. It also reflected the regional position on minerals planning set out in the Regional Technical Statement for Aggregates for South Wales, 1st Review and various Annual Reports prepared by the South Wales Regional Aggregates Working Party (SWRAWP).
- 1.2 Since the Background Paper was prepared, successor editions of Planning Policy Wales have been published (the current edition is 12, where the main advice on non-energy minerals is in section 5.14) and the Regional Technical Statement for Aggregates for South Wales, 2nd Review has been completed. The SWRAWP has also published further Annual Reports, the most recent of which was for 2021 (published February 2024).
- 1.3 The purpose of this Addendum to the original Background Paper is primarily to take account of the publication of the Regional Technical Statement for Aggregates for South Wales, 2nd Review (RTS 2nd Review) in 2020.

2 Background

- 2.1 The original Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties (RTS) was issued in October 2008. It provided a sustainable approach to mineral development in Wales. LDPs have benefited from the clear direction that the RTS provides. Safeguarding of mineral resources is now an integral part of LDPs and new allocations, defined areas of search and preferred areas have been incorporated into some LDPs.

- 2.2 The first review of the RTS was completed in 2014. The second review was published in September 2020 – and hence its content was not referenced in the LDP 2 Background Paper on Minerals published in May 2019.
- 2.3 The RTS 2nd Review was prepared on behalf of the North Wales and South Wales Regional Aggregates Working Parties by Cuesta Consulting Ltd, with advice from a steering group that included representatives from both RAWPs, the Mineral Products Association, the Minerals Industry, Natural Resources Wales, officers from Welsh Local Government and the Welsh Government. It is the element of the RTS 2nd Review for South Wales that contains information of direct relevance to Pembrokeshire.
- 2.4 The RTS 2nd Review covers a 25-year period to 2041, but there will be further reviews, initiated every 5 years, in accordance with the requirements of Minerals Technical Advice Note 1 (MTAN1).
- 2.5 The RTS 2nd Review is a strategic document for the purposes of Development Plan preparation and may be a material consideration when considering planning applications. It provides a strong and improved statement of the desire to ensure that sustainability is at the heart of future mineral planning in Wales.
- 2.6 Following its endorsement by the two RAWPs and by Welsh Government, each Local Planning Authority in Wales was asked to approve the RTS 2nd Review documentation. PCC Cabinet approved the Plan at their meeting on the 30th November 2020. Details of the decision are reproduced below:

(a) That the Regional Technical Statements (RTS) for the North Wales and South Wales Regional Aggregate Working Parties – Second Review, September 2020 be endorsed.

(b) That the next steps in meeting the apportionment set out in the RTS Second Review, through preparation of a Statement of Sub-Regional Collaboration for the West Wales Sub-Region, in partnership with Ceredigion County Council, Carmarthenshire County Council and the Pembrokeshire Coast National Park Authority, be agreed.

(c) That the Cabinet Member for Planning be granted delegated powers to approve the Statement of Sub-Regional Collaboration for the West Wales Sub-Region.

3 Details

- 3.1 MTAN 1 on Aggregates requires the preparation of Regional Technical Statements for areas covered by the South Wales and North Wales Regional Aggregate Working Parties.
- 3.2 MTAN 1 develops national policy originally included in Minerals Planning Policy Wales and now incorporated into Planning Policy Wales. The RTS provides the supporting detail that allows this to be implemented.
- 3.3 The RTS has avoided any attempt to make detailed forecasts of future demand based on econometric modelling. The methodology used in the RTS 1st Review in 2014 was based primarily on historical sales averages, combined with an assessment of the various drivers of potential future change. For the RTS 2nd Review, this has been combined with an attempt to reflect planned future requirements for housing construction activity. It tries to avoid perpetuation of historical supply patterns in areas where there is scope to encourage more sustainable patterns of supply. The data used for this purpose has been derived from adopted LDPs. The intention is to link the planned provision of aggregates with that for housing, to ensure that housing plans are not thwarted by an under provision of aggregates.
- 3.4 At a National scale, there is a very high correlation between housing completions and aggregate sales.
- 3.5 The RTS 2nd Review Steering Group concluded that the provision required for aggregates should be guided by a 30% uplift on historical sales figures. It also considered that, for the 2nd Review, the historical sales figures should reflect not just the 10-year average (as used for the 1st Review) but also the highest of the 10-year and 3-year averages for each individual Local Planning Authority area. This is to reflect the fact that in some parts of Wales (particularly the Cardiff City Region) there has been a marked upsurge in construction activity in recent years and a corresponding growth in aggregate sales.

3.6 The process for preparing the RTS 2nd Review was based on four stages, details of which are summarised below:

Stage 1 – a 30% uplift was applied to the composite historical sales figure to obtain an overall national guideline figure for future aggregate production.

Stage 2 – the national figure was broken down into two regional guideline figures (based on the historical split of total land-won primary aggregates sales between North Wales and South Wales, which has remained fairly consistent over many years).

Stage 3 – the regional figures were apportioned between seven sub-regions and, provided it was feasible to do so, between each of the constituent Local Planning Authorities. The sub-regions were created at Welsh Government's suggestion, to facilitate strategic minerals planning and collaborative approaches between Local Planning Authorities. Usually, the distribution of apportionments within each sub-region is achieved through a combination of quantitative and qualitative judgements, based on the Steering Group's collective understanding of market requirements (reflecting historical sales and the distribution of planned housing activity), together with considerations of existing landbanks, the proximity principle and environmental capacity. Pembrokeshire County Council's planning area is within the West Wales Sub-Region, along with the Pembrokeshire Coast National Park and Ceredigion.

Stage 4 – the total apportionments for each Local Planning Authority area are separated into figures for a) sand and gravel and b) crushed rock production (based on historical sales proportions in each Local Planning Authority area). Those figures are then multiplied by the number of years required (22 years for sand and gravel and 25 years for crushed rock) to obtain the total provision required, in millions of tonnes. Comparison of those figures with existing landbanks and existing unworked allocations then determines the extent to which any new permissions and / or allocations for future working are required within each authority's area.

- 3.7 The RTS 2nd Review document introduces a requirement for all Local Planning Authorities within each sub-region to produce Statements of Sub-Regional Collaboration (SSRC), in consultation with the industry, through the RAWPs, prior to Examination of any individual Local Development Plan within that area. Annex A to the main report provides guidelines on the preparation of SSRCs, including details of the circumstances under which alternative patterns of supply may be justified. *A SSRC for the West Wales Sub-Region will need to be in place before the Council's LDP 2 is submitted to Welsh Government and examined by the Planning Inspectorate.*
- 3.8 The RTS 2nd Review recommendations are intended to be of a strategic nature. They do not provide site-specific information or guidance. Local Planning Authorities will determine how the strategic requirements identified in the RTS 2nd Review should be met within their areas. This will include identifying the size and location of new allocations (where required by the RTS or by local factors) and setting out policies within their LDPs to guide the Development Management process for future mineral extraction.
- 3.9 Where justified by new evidence, individual Local Planning Authorities can depart from the apportionment and allocation figures recommended by the RTS 2nd Review when preparing their LDP policies. In so doing, a Local Planning Authority would have to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS. This would be likely to require joint working with other Local Planning Authorities within the same sub-region to ensure that the sub-regional and regional totals are still achieved. It would need to be reflected in the SSRC agreed with all other constituent Local Planning Authorities within that sub-region, prior to LDP examination.
- 3.10 Where the local authorities involved are unable to reach agreement, or if individual local authorities do not accept the RTS 2nd Review, the Welsh Government will, as a last resort, consider its default powers to intervene in the Development Plan process (paragraph A3 of MTAN 1).
- 3.11 In considering the RTS 2nd Review documentation, it is important to be aware that:
- In Pembrokeshire, the long-term aspiration to cease minerals production in National Park areas remains, although it is acknowledged that there is current and will be future production under extant consents.

- Pembrokeshire is within the South Wales RAWP area.
- Pembrokeshire is within the West Wales sub-regional grouping of Local Planning Authorities in Wales, as determined for the purposes of land-won primary aggregate apportionment.
- Availability of alternative aggregates is considered in section 3 of the RTS 2nd Review main document. These include secondary aggregates, recycled aggregates and marine-dredged aggregates. There are wharves for the landing of marine-dredged aggregate from the Bristol Channel and Severn Estuary, for instance at Burry Port (Swansea Sub-Region) and at Pembroke Dock (West Wales Sub-Region). The requirement for land-won primary aggregates is a residual requirement taking account of what is expected to be produced from secondary, recycled and marine-dredged sources.
- The Guidance Note on Sub-Regional Collaboration is set out in Annex A of the main report. SSRs will form part of the evidence base for LDPs and SDPs within the areas concerned.

3.12 Appendix B to the RTS 2nd Review relates specifically to the South Wales Regional Aggregates Working Party (SWRAWP) area. This Appendix provides additional explanation, specific to the SWRAWP Region, on existing supply patterns, the detailed breakdown of sub-regional apportionments and requirements for new allocations. There are specific recommendations and guidance for each Local Planning Authority, including Pembrokeshire County Council.

3.13 For sand and gravel production, the West Wales sub-region is less reliant on marine aggregates than South Wales and there are a number of active, land-based, sites, primarily in the Pembrokeshire Coast National Park and Ceredigion. For crushed rock, Pembrokeshire contributes to production from its various limestone, igneous, slate and shale quarries.

3.14 The RTS 1st Review suggested that there would be merit in developing a combined approach to future apportionments and allocations for terrestrial sand and gravel between Pembrokeshire, Ceredigion and Carmarthenshire. Although Carmarthenshire is in a separate sub-region (primarily because of the market for crushed rock in the Swansea area), it is recommended by the RTS 2nd Review that these joint working arrangements should continue with regard to sand and gravel.

4 Main Issues

4.1 Appendix B to the RTS 2nd Review relates to the SWRAWP area and contains specific advice to Pembrokeshire County Council with regard to future provision for aggregates. The key elements of this advice are that:

- A) The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:
- Land-won sand & gravel provision: Nil.
 - Crushed rock aggregates provision: 0.677 million tonnes per year until the end of the Plan period and for 10 years thereafter.
- B) The total apportionments for Pembrokeshire, as calculated in Tables 5.5 and 5.7 of the main document, over the 22-year horizon required for sand & gravel and the 25-year timescale required for crushed rock are zero for land-won sand & gravel and 16.932 million tonnes for crushed rock. These figures compare with existing landbanks (excluding dormant sites) of zero for sand & gravel and 16.72 million tonnes for crushed rock (as at 31st December 2016).
- C) Given that Pembrokeshire currently has no sand & gravel operations, and that its permitted reserves of crushed rock are very close to the total apportionment required, no allocations for either are specifically required to be identified within the LDP at this time. However, consideration should be given to whether any of the factors set out in paragraph B84 of the main RTS 2nd Review document give rise to any other requirements for resource allocations.

- D) Given the close proximity of Pembrokeshire County Council’s planning area to the Pembrokeshire Coast National Park, as well as to Ceredigion, and the need to find new sources of sand & gravel outside the National Park, Pembrokeshire County Council is advised that it should continue to work in collaboration with those authorities in order to support the wider objective of maintaining adequate supplies within the West Wales sub-region as a whole. Subject to the circumstances and considerations set out in Annex A of the RTS Main Document, it may also need to collaborate with neighbouring Carmarthenshire. If necessary, the authority may need to increase its share of the combined sub-regional apportionment for sand and gravel, compared with the figures given above and in those circumstances might well need to identify new allocations. This does not apply to the apportionment for crushed rock. If such arrangements were made, they would need to be confirmed within a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A to the main RTS 2nd Review document, before any of the constituent LDPs are submitted for Examination.
- E) Where allocations are required, these should, as far as possible, be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.
- F) Given the availability of unworked crushed rock and sand & gravel resources in Pembrokeshire County Council’s planning area, and the longer-term ambition to reduce quarrying activity within the National Park, there would be merit in identifying new Areas of Search (even if specific allocations are not required) in order to encourage future interest from mineral operators.
- G) One dormant igneous rock quarry exists within Pembrokeshire. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment.

- H) Much of Pembrokeshire lies within a 30-mile radius of Pembroke Dock, where marine aggregates are landed from dredging in the outer Bristol Channel. The northern part of the area is in closer proximity to land-based sand and gravel sites within the National Park, located to the south-west of Cardigan. The possibility might need to be considered that, as the current permitted reserves at those sites are depleted, marine aggregates may need to provide a greater contribution in future years. However, for the time being Pembrokeshire County Council is advised to retain a focus on maintaining adequate supplies from terrestrial sources, and all land-based options would need to be thoroughly tested by the Local Plan process before any consideration is given to such a shift in local policy.

- I) Slate waste is produced in very small quantities in the northern part of the National Park although the extent to which this has hitherto been utilised as aggregate is understood to be minimal, and the prospects for future utilisation would seem to be equally limited.

- J) Recycled aggregate production from construction, demolition and excavation wastes is likely to be concentrated within the various towns of southern and central Pembrokeshire, outside the National Park.

- K) The residual requirements for primary land-won aggregates assume that all alternative sources of aggregates (marine, secondary and recycled materials) will continue to be utilised and the authority should continue to encourage this.

- L) Resources of both crushed rock aggregates and land-based sand and gravel should be safeguarded within the LDP in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

- M) All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).

- 4.2 For information, advice specific to the Pembrokeshire Coast National Park Authority (PCNPA) is also included in Appendix B to the RTS 2nd Review. The long-term aspiration is to take minerals production outside National Park Authorities in Wales, but in the interim there is production of sand and gravel and crushed rock under extant consents. PCNPA is not required to make allocations for minerals.
- 4.3 Under the RTS 2nd Review, the Council is not formally required to make sand and gravel allocations, but there is an expectation that collaborative working will continue and an opportunity to vary the requirements of the RTS 2nd Review exists, subject to a jointly prepared SSRC for the West Wales sub-region being agreed. Hence PCC may decide to allocate land for sand and gravel quarrying in LDP 2, which would be subject to public consultation and independent scrutiny at examination as part of the LDP 2 plan preparation process.
- 4.4 PCC is currently preparing a SSRC on minerals with its West Wales sub-region partners at Ceredigion and Carmarthenshire County Councils and the Pembrokeshire Coast National Park Authority, in line with the advice in the RTS 2nd Review. To note that the involvement of Carmarthenshire County Council is a reflection of the advice in the RTS 2nd Review, although technically Carmarthenshire is not a part of the West Wales sub-region.

5 Conclusions

- 5.1 The provisions of the RTS 2nd Review in general and specifically in relation to the Council's area of land use planning responsibility are set out above. Welsh Government has asked all Local Planning Authorities in Wales to approve the RTS 2nd Review documentation and accordingly, Pembrokeshire County Council's Cabinet did so on the 30th November 2020.
- 5.2 Since then, officers have worked with colleagues in neighbouring Local Planning Authorities to prepare a Statement of Sub-Regional Collaboration on Minerals (SSRC) for the West Wales Sub-Region. This will be based on the provisions of the RTS 2nd Review, but can diverge from the detail of its provisions for individual authorities if suitable justification is provided. The SSRC for the West Wales Sub-Region will need to be agreed by all Local Planning Authorities involved in its preparation and then by the SWRAWP. The work on this is not yet concluded.

- 5.3 It is anticipated that the SSRC will provide evidence to inform LDPs currently being reviewed, including Pembrokeshire County Council's. It is anticipated that the SSRC will be one of the documents that PCC submits to Welsh Government prior to the examination of its replacement LDP (LDP 2).