

REGIONAL TECHNICAL STATEMENT FOR THE NORTH
WALES AND SOUTH WALES REGIONAL AGGREGATE
WORKING PARTIES- 2ND REVIEW

STATEMENT OF SUB-REGIONAL COLLABORATION
SOUTH WEST WALES SUB-REGION

POSITION STATEMENT

NOVEMBER 2023

1. Introduction

1.1 Planning Policy Wales (PPW) Ed.11 (paragraph 5.14.10) states that ensuring the sustainable supply of minerals is a strategic issue which plays a fundamental underpinning role in supporting non-minerals development. Each local planning authority (LPA) should ensure that it makes an appropriate contribution to meeting local, regional and UK needs for primary minerals which reflects the nature and extent of resources in the area and their best and most appropriate use, subject to relevant environmental and other planning considerations. For aggregates this should be done under the aegis of the North and South Wales Regional Aggregates Working Parties, whose role is to provide a regional overview of supply and demand and through the framework provided by the Regional Technical Statements for Aggregates.

1.2 The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties– Second Review (RTS2) (September 2020) identifies the necessary apportionments and any necessary allocations at LPA level but also at a sub-regional level. This is to allow sub-regional areas to make adjustments in apportionments within those sub-regions if more detailed investigation by the LPAs indicates that such adjustments are justified.

1.3 To that end, RTS2 requires Statements of Sub-regional Collaboration (SSRCs) to be prepared, collaboratively, by all constituent LPAs within each RTS sub-region (as defined by the RTS 2nd Review) as part of the evidence base needed to support each Local Development Plan (LDP) or Strategic Development Plan (SDP). Once agreed, an SSRC will remain in place until it becomes superseded by the requirements of future reviews of the RTS, or new information comes forward which justifies a change.

1.4 This document is the position statement for the SSRC for the South West Wales Sub-Region in respect of land won sand & gravel. The Sub Region comprises the following local authorities: Carmarthenshire County Council, Pembrokeshire County Council, Pembrokeshire Coast National Park Authority, and Ceredigion County Council.

2. RTS2 apportionments and allocations

2.1 RTS2 states that by default, each SSRC will simply confirm that all constituent LPAs within a particular RTS sub-region accept the individual apportionments for aggregates for their individual Authority areas, as set out in the table below, and that (as a minimum) the RTS requirements for that sub-region as a whole will therefore be met.

2.2 However, RTS2 recognises that in exceptional circumstances, an SSRC may identify an alternative pattern of supply which achieves the RTS requirements for that particular subregion in a different way. Such circumstances may arise either where one or more LPAs within the sub-region are unable to meet the minimum requirements of their apportionments identified in the RTS or where an alternative, achievable and more sustainable pattern of supply is identified through collaboration between the LPAs involved.

2.3 In terms of sand and gravel provision, it must be noted that the First Review of the RTS (RTS1) suggested that there would be merit in developing a combined approach to future apportionments and allocations 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 in RTS2 that these joint working arrangements [suggested in RTS1] should continue, with regard to sand & gravel. Therefore, a joint approach is being pursued by Pembrokeshire, Ceredigion and Carmarthenshire for the provision of the allocation requirement for 3.626 million tonnes over the period up to 2038.

2.4 The table below sets out the individual LPS apportionments and allocations for sand and gravel set out in the RTS2 for LPAs within the South West Wales Sub-Region (inc. Carmarthenshire).

Calculation of Allocations Required for Land-won Sand & Gravel Aggregates – South West Wales Sub Region (from Table 5.5, RTS2)

Local Planning Authority	New Annualised Apportionment for sand and gravel (mt)	Total Apportionment Required over 22 years.	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Ceredigion	0.188	4.136	0.510	3.626	0
Pembrokeshire	0.000	0.000	0.000	0.000	0
Pembrokeshire Coast National Park	0.118	2.600	2.600	0.000	0
Carmarthenshire	0.003	0.058	0.100	See note below	0.35

Note: the sand & gravel allocations needed for Ceredigion could potentially be provided, in part, from resources in neighbouring parts of Carmarthenshire, despite being in a different sub-region.

2.5 The above table reveals that new allocations to meet RTS requirements over the next 22 years will be required within Ceredigion, where the current landbank, expressed in terms of the new annualised apportionments, are already less than the minimum level of 7 years.

2.6 Carmarthenshire is the only LPA in the whole of Wales that currently has a surplus of existing permitted reserves of sand & gravel. The remaining LPAs have neither a surplus nor deficit for sand & gravel provision but, in most cases, this is simply because they currently have no production and no apportionment. An exception to this is the Pembrokeshire Coast National Park which (as a consequence of ensuring that its apportionment will not exceed the current landbank) has just sufficient reserves to cover the 22-year period required. In future years, the requirement which has hitherto fallen on the National Park will need to be supplied by other adjoining areas.

3. Assessment

3.1 RTS2 states that in the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may need to be given to collaborative working with neighbouring LPAs within the same sub-region (or another sub-region as is the case with Carmarthenshire, as set out above), such that some of the required provision (apportionment) is effectively transferred. However, at this stage it is not possible to determine that Ceredigion cannot make allocations to address the shortfall and therefore it is premature to discuss collaborative working in order to transfer required provision from other LPAs.

3.2 In addressing the different types of Mineral Allocations in LDPs, one such allocation set out in RTS2 are 'Areas of Search'. RTS2 defines these as "*broad areas that are believed to contain mineral resources of commercial significance but whose extent is uncertain*".

3.3 Consequently, as an interim measure, the LPAs in the South West Wales Sub Region (including Carmarthenshire) have agreed an approach to identify 2 areas of search for potential sand & gravel reserves within their Revised LDPs. One such area straddles the borders of Carmarthenshire and Pembrokeshire and has been identified within the Deposit Revised Carmarthenshire LDP. No objections were received in respect of this approach during the consultation period of Carmarthenshire's Deposit Plan. The Revised LDPs for both Pembrokeshire and Ceredigion are not at such an advanced stage as Carmarthenshire's and so the areas of search approach has yet to progress through the necessary scrutiny and consultation associated with the statutory reporting and publication of their Deposit Plans.

4. Current Position

4.1 The LPAs within the South West Wales Sub Region have yet to accept their apportionments as set out in the RTS2. In the interim period, before drawing up a Statement of Sub Regional Collaboration, the authorities have agreed to indicate on their proposals maps 'area of search' for sand and gravel. However, given the different stages in preparation of the Revised LDPs of the 3 authorities, this approach has so far only been subject to statutory consultation in respect of Carmarthenshire's Deposit Revised LDP.