

STATEMENT OF SUB-REGIONAL COLLABORATION FOR SWANSEA CITY SUB-REGION

Introduction

PPW11 (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.

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.

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 Once agreed, an SSRC will remain in place until it becomes superseded by the requirements of future reviews of the RTS, or new information comes forward which justifies a change.

This document is the SSRC for the Swansea City Sub-region which comprises the City and County of Swansea, Neath Port Talbot and Carmarthenshire (for crushed rock) local authority areas.

RTS2 apportionments and allocations

The table below sets out the individual LPA apportionments and allocations for <u>crushed rock</u> as set out in the RTS2 for LPAs within the Swansea City Sub-region.

Local Planning Authority	New Annualised Apportionment for crushed rock (mt)	Total Apportionment Required over 25 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)
Carmarthenshire	1.102	27.556	59.900	0.000	13.82
Swansea	0.305	7.636	0.000	7.636	0
Neath Port Talbot	0.305	7.636	16.480	0.000	0

On this basis Carmarthenshire and Neath Port Talbot have sufficient permitted reserves at existing sites to meet their apportionment so no further allocations are necessary within their LDP's. Swansea has no existing reserves and is therefore identified as requiring an allocation of a minimum of 7.636 million tonnes to meet its apportionment up to 2041.

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 above, and that (as a minimum) the RTS requirements for that sub-region as a whole will therefore be met.

However, RTS2 recognises that in exceptional circumstances, an SSRC may identify an alternative pattern of supply which achieves the RTS requirements for that particular sub-region 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.

RTS2 sets out the considerations that will need to apply, in such circumstances, as follows:

- 1. *Inability to meet RTS apportionments*: In order to demonstrate an inability to meet RTS apportionments, an LPA would need to show either that it has no (or insufficient) workable aggregate resources of the type required by the RTS and/or that there is no interest from the minerals industry in developing such resources within the area. It will *not* be sufficient simply to demonstrate that the area has no existing quarries or no recent production, or that alternative resources and/or permitted reserves exist within another LPA.
- 2. **An alternative pattern of supply:** Where an alternative pattern of supply is proposed this will entail transferring some or all of the RTS apportionment from one LPA to one or more other LPAs within the same sub-region, so as to make corresponding increases in provision within those authorities, as required by MTAN 1. The receiving authorities will need to increase their apportionments (and, where necessary, allocations), to ensure that *as a minimum*, the overall requirements for ongoing supply within that sub-region, as set out in the RTS, are met (both numerically and in terms of aggregate type₂₂). It will not normally be appropriate to merely transfer apportionments to an LPA with sufficient existing reserves to arithmetically absorb the apportionment, without reference to the additional consideration of productive capacity.

There is no requirement for Swansea or Neath Port Talbot to make any provision for land won sand and gravel. Carmarthenshire is required by RTS2 to work with the West Wales Sub-region in relation to land won sand and gravel.

Assessment

RTS2 recognises that Swansea has a high population density but no active quarries or pits, relying instead on neighbouring Carmarthenshire for most of its limestone supplies, on Neath Port Talbot for supplies of road surfacing aggregate, and on marine dredged sources landed at Swansea Wharf for building sand.

Swansea does have indigenous resources of Carboniferous Limestone but these are almost entirely within an AONB designation – that of the Gower Peninsula. Therefore realistic opportunities for resource development in Swansea relate only to high PSV sandstone which, at present, is supplied primarily from NPT. The Mineral Safeguarding Map of Wales indicates the areas of high PSV sandstone within each LPA.

Limestone is supplied only from Carmarthenshire, which the RTS2 argues needs to retain its apportionment in full, with the balance of apportionments (for sandstone) being shared between Swansea and NPT. The figures shown in the RTS2 for those two LPAs assume an equal split between them. If a different balance is preferred, this would need to be agreed by those LPAs as part of their Statement of Sub-Regional Collaboration.

Conclusion

Carmarthenshire provides the only realistic source of limestone aggregate within the sub-region and therefore a continuation of the historic supply is appropriate, recognising that the sites in Carmarthenshire are already the source of supply for the sub-region.

The RTS2 seeks to split the HSA apportionment equally between Neath Port Talbot and Swansea in order to provide a more equitable balance of reserves in closer proximity to the major source of the demand. RTS2 allows for a different balance provided the considerations set out in the RTS2 are applied.

In order to demonstrate an inability to meet RTS apportionments, an LPA would need to show either that it has no (or insufficient) workable aggregate resources of the type required by the RTS and/or that there is no interest from the minerals industry in developing such resources within the area.

At present Swansea is unable to demonstrate that is the case and the appropriate test for that will be the LDP review due to commence from September 2022 and be completed by late 2025/early 2026. There are more than sufficient reserves within NPT to take up the joint apportionment within this period without resulting in under provision and moving away from the overall 25-year apportionment for NPT. It is envisaged that NPT would take on the majority of the supply in the first part of the 25-year period of RTS2 and Swansea will seek to take on the supply load for the second part of the 25-year period of the RTS2 following the LDP Review. In addition, Policy RP12 of the Swansea Local Development Plan allows mineral development to be permitted subject to a number of criteria being satisfied. Therefore, if the industry has any proposals to bring forward sites within Swansea to meet the RTS2 allocation it can do so in the period up until the LDP is reviewed.

Therefore, the LPA's within the Swansea City Region agree to accept their apportionments as set out in the RTS2.