

Welsh Government: Regional Technical Statements for the North Wales and South Wales Regional Aggregate Working Parties.

First Review - Public Consultation, October - December 2013

Report on Consultation Responses, with Steering Group Recommendations.

Introduction:

This document summarises the responses received to the RTS First Review Consultation Process, together with recommendations by the project Steering Group (from a meeting held on 15th January 2014) regarding what actions are needed in terms of final revisions of the draft RTS, in order to deal with the points raised. The report deals, in succession, with each of the 23 questions asked in the consultation questionnaire.

A total of 25 responses were received. Two of the responses were from members of the public and related only to site-specific concerns about local quarrying proposals which cannot be dealt with by the RTS. Of the remaining 23 'qualifying' responses, four were from North Wales, fourteen were from South Wales, two were from an 'all Wales' perspective, two were from neighbouring South West England, and one was from Natural England. These responses included fourteen from individual local planning authorities in Wales (and one in England); two responses from consultancies representing individual mineral operators; and six from other organisations including NRW, CPRW, POSW, one AONB, Natural England and the South West RAWP.

Individual responses have been shared with the Client Group (Welsh Government and the Technical Secretaries of the two RAWPs), but otherwise are being treated in confidence. The details below are therefore deliberately not assigned to individual contributors, except where this is necessary in order to appreciate their status (and where permission to do so has been obtained from the contributors in question). A simplified summary of the responses from each of the 23 (anonymised) qualifying responses is provided in the table at the end of this report.

Key Issues Raised:

Whilst the consultation identified a range of issues which need to be considered, as detailed in the main body of this report, a number of key points were raised in response to two or more separate questions and/or by multiple respondents. Principal amongst these were:

- If historical sales figures are to be used as a basis of assessing future demand, this needs to be done carefully, especially at the level of individual local authorities with limited resources. In such cases a sub-regional approach may work better (particularly in the 'former Dyfed' and 'former Gwent' areas;

- The decision to prepare the RTS without the benefit of Strategic Environmental Assessment (SEA) needs to be reconsidered. If SEA is not used, the reasons need to be explained and the implications of not using it need to be addressed - specifically in the case of potential increased reliance on marine aggregates in South West Wales;
- Certain aspects of the draft RTS depart from the guidance set out in MTAN 1. These include dealing with the reserves at dormant sites; calculating landbanks on the basis of 10-years (rather than 3 years) historical sales data; and the general notion of assessing future demand on the basis of historical sales data. These departures were challenged only by a minority of respondents, but they need to be reconsidered and, if they are retained, they need further explanation and justification, including some authoritative statement from WG regarding the relationship between the RTS and MTAN 1;
- The approach to Environmental Capacity - and the issue of considering individual environmental designations;
- The need to consider using Wales / regional GDP data, rather than UK data and household growth figures to complement population statistics;
- The uncertainty of long-term reliance on imports of limestone from Gloucestershire parts of the 'former Gwent' area and the consequential need to consider contingencies in the form of additional output and allocations within that area;
- Different mineral planning authorities are at different stages of the LDP-making process. This makes it difficult for mineral planning authorities wishing to depart from the RTS to reach agreement with other mineral planning authorities with adopted LDPs on how to achieve sub-regional or regional totals. Further guidance on this matter is called for;
- The need to avoid site-specific comments as far as possible, although in some cases (e.g. where there is only a single quarry within a particular local authority's area) it becomes very difficult to separate these from the more generic observations that are needed.

Detailed Responses and Recommended Actions:

General

Question 1: Overall, does the Draft First Review of the RTS help you to understand the issues involved in planning for future aggregates provision in Wales? (If not, please suggest any areas of improvement).

Summary of answers given: Of the 23 qualifying responses, thirteen said 'Yes', nine offered no comment and one said 'generally yes but with some provisos'. These related to departures from the guidance in MTAN 1 and the implications of not carrying out SEA. One respondent further suggested there was repetition in places between the main document and the appendices which could be reduced with more cross-referencing.

Steering Group response and recommendations: Departures from MTAN 1 and issues relating to SEA are considered in greater detail under Questions 4, 5, 10, 20 and 23, below. Repetition has already been kept

to a minimum but is needed, in places, to enable the appendices to be read coherently, without excessive cross-referencing back to the main document.

Executive Summary

Question 2: Are there any key issues or findings from the main document which are missing from the Executive Summary and which need adding?

Summary of answers given: Nine responses said ‘no’ and ten others offered no comments. One respondent questioned the assumption that the historic pattern of supply equates to the historic pattern of demand upon each individual authority. Another noted that a key finding to be included in the Executive Summary is the overall demand for aggregates (stated separately for crushed rock and sand and gravel) within each region over the RTS period. A third respondent asked that, for clarity, there could be a reference in paragraph 3 to the baseline date of December 2010 – being the date when any individual authority shortfalls and subsequent need for new allocations were calculated. He noted that there is reference in paragraph 4 to the identification of historical patterns of demand based on average sales over a 10-year ‘baseline’ period of 2001 to 2010 – but this doesn’t necessarily make clear the above point. A fourth respondent observed that *“the method by which a Mineral Planning Authority can settle its apportionment with other MPAs is not clear in the document. There are no methods which require an MPA to require a neighbouring authority to take on some or part of its apportionment, objections to the neighbouring authority’s LDP can be made or requests sent to take on part or all of the apportionment. However the success of this approach depends on the timing of such requests and it may not be possible for the most appropriate authority to take on part or all of the apportionment until a review of the LDP”*.

Steering Group response and recommendations: The first point is considered further under Questions 4, 5 and 6, below and, depending on what action is agreed, may need to be reflected in the Executive Summary. The second and third points (overall demand figures and baseline date) should be incorporated in the final Executive Summary. In addition, any fundamental changes that are made in other chapters (see below) may need to be reflected in the revised Executive Summary. This includes the issue of collaborative working between neighbouring authorities. The key issue here is that LDPs will always be at different stages and it is incumbent on professional planners to try to resolve problems, using their initiative. There is not a ‘one size fits all’ solution and it would therefore be inappropriate for the RTS to provide guidance on this (see also responses to Q9 and Q12, below).

Chapter 1: The Purpose of the RTS

Question 3: Are there any aspects of the purpose of the RTS which you don’t understand after reading this chapter? Or any aspects with which you disagree? If so, please give details.

Summary of answers given: Ten respondents said ‘no’. One other said ‘yes’ but then gave no details. Two others said ‘see comments’ but those related to details in later chapters and not to understanding the purpose of the RTS. The remaining ten respondents offered no comment.

Steering Group response and recommendations: No changes required to Chapter 1

Chapter 2: Key Principles and Approaches

Question 4: Are you happy with the key principles and approaches set out in this chapter? If not, please explain why and what, if anything, is missing.

Summary of answers given: Seven respondents said 'yes' and nine others offered no comment. The remaining seven respondents were generally happy but identified specific concerns which need to be considered. These are summarised below and [Steering Group responses and recommendations are noted in blue for each observation.](#)

1. One respondent fundamentally disagreed with the use of the Proximity Principle, claiming that it is not enshrined elsewhere in Welsh minerals guidance. He suggests that it places a vague presumption in favour of sites based on their relationship to "centres of population and major infrastructure projects" rather than based on other material planning considerations and therefore suggests that the references to Proximity Principles are removed. **Steering Group response and recommendations:** Whilst the proximity principle may not be referred to 'as such' in MTAN 1, the objective of 'minimising the transportation of aggregates by road' is explicitly stated in paragraph 26 of that document (and is therefore quoted in para 1.4 of the draft RTS). Paragraph 2.7 of the draft RTS then directly equates the proximity principle with that objective. It is therefore both valid and important to retain the concept, although some confusion might arise for those who are familiar with the more specific use of the term in the context of waste management. For this reason, a definition of the term should be added to the glossary.
2. One respondent expressed concern with para 2.15 which notes the economic imperative of industry to locate quarries as close as possible to areas of demand. He noted that this is clearly subject to various constraints and to National Guidance, Minerals Technical Advice and Development Plan policies. He pointed out that these, and particularly the requirements of paragraph 49 of MTAN1 can act to re-enforce and perpetuate historical patterns, so that inequities between authorities can worsen and become entrenched over time. This has important implications for relying on historical sales patterns for the assessment of future demand, particularly in areas where resources are shared across two adjoining MPAs but production is concentrated in only one of these. The respondent noted that *"I do not believe that the existing pattern of historical sales can be safely relied upon as a proxy for estimating future demand within an area. It may be broadly reliable at a national and regional level, but I would regard it as progressively unreliable at the more localised level, where there can be a significant difference between the demand that exists within an area and the demand that has historically been met by an area"*. **Steering Group response and recommendations:** Clarify that quarry locations are subject to constraints, policies etc. and explain that, in cases such as the one described, the RTS needs to consider the bigger picture rather than relying purely on historical sales patterns (this is already implied and has been carried out, but can be spelled out more specifically).
3. Pembrokeshire County Council advised that we should consider the implications of not undertaking SEA, particularly with regard to the balance between terrestrial and marine sand & gravel. Their Cabinet Report notes, at Point 1, that *"The absence of a strategic environmental*

assessment means that the environmental implications of marine dredged versus land won sand and gravel are not fully considered. The Statement assumes that should there be a shortfall, any otherwise unmet demand for sand and gravel could be met by marine dredged material". Similar observations are made at Point 9 of the same report. **Steering Group response and recommendations:** The reasons for not using SEA at this high-level strategic stage should be explained in Chapter 2. Wording to be agreed amongst the Steering Group. Chapter 2 could also usefully point out that SEA needs to be carried out, as required by legislation, by individual MPAs, in preparing their LDPs. Any sub-regional decisions should take into account evidence relating to the role of marine supply and this would be tested through the Local Development Plan process. However, there has been no change in the general national policy position, which remains that, overall, SW Wales should be planning for land based supplies of sand and gravel. (See also point 3 under Question 5, point 8 under Question 6, point 10 under Question 20 and point 11 under Question 23).

4. A number of respondents raised the issue of the position regarding dormant quarries and the relationship to and consistency between the RTS review and MTAN 1: Although these issues are not currently addressed within Chapter 2, one respondent suggested that it would be an appropriate place to do so, and also to discuss the use of the 10 year average sales figure for calculating apportionments. He suggested that the justification for these approaches as departures from the requirements of MTAN1 should also be provided. More specifically, the Pembrokeshire County Council Cabinet Report on the RTS Review noted that:
 - *"The RTS position of basing future requirements on historical patterns of supply is inconsistent with MTAN 1 para 48.*
 - *Using 10 years as the basis for calculation of demand is inconsistent with MTAN 1 para 45, but given the variability of demand over this period, spanning boom and recession, this would be sensible.*
 - *Dormant sites: the draft RTS is inconsistent with MTAN 1; should the RTS not be adjusted as outlined in paragraph 13, the WG should consider revision / clarification of the MTAN to accommodate this inconsistency".* [This refers to item 13 of the Cabinet Report, which is addressed more specifically at point 5 of Question 20, below].

Steering Group response and recommendations: In accordance with earlier Steering Group agreements, these departures from MTAN 1 are to be retained, on the understanding that the Welsh Government will issue an explanation in a formal clarification letter issued to Chief Planning Officers at the same time as the final RTS 1st Review is published. The individual issues relating to dormant quarries and use of 10 years sales data are not overarching key principles but they are key assumptions which are integral to the calculation of apportionments. For this reason they are appropriately dealt with as per the draft and not in chapter 2. (See also comments and responses under Questions 5, 6, 10 and 20, below).

5. The following issues were also raised under question 4 but are not addressed in Chapter 2, and are therefore considered under other questions, below.
 - whether Wales / regional GDP data could be used in place of UK data. (see Question 6)

- whether household growth figures would complement population statistics. (see [Question 6](#))
- the relationship between the RTS review and the various adopted / emerging LDPs in Wales. (see [Question 12](#))

Question 5: Having read the whole document, do you think these key principles have been adequately deployed in carrying out the revision? If not, please explain why.

Summary of answers given: Seven respondents said 'yes' and nine others offered no comment. The remaining seven respondents identified specific concerns relating primarily to issues already raised under Q4. Details are summarised below and [Steering Group responses and recommendations are noted in blue for each observation](#).

1. One respondent said that the proximity principle should not be employed. **Steering Group response and recommendations:** This suggestion is not accepted, and no changes are therefore required (but see also [Q4](#) above).
2. One respondent noted that the RTS should not rely on historical sales data to estimate future demand at the local level, without first considering whether historical inequities might inadvertently be perpetuated. **Steering Group response and recommendations:** The need to consider wider issues rather than just relying on historical sales data at a local level has already been considered carefully where this applies - notably within the former Dyfed and former Gwent areas, but further explanation of this should be added.
3. As noted under Question 4, above, Pembrokeshire County Council advised that we should consider the implications of not undertaking SEA, particularly with regard to the balance between terrestrial and marine sand & gravel. **Steering Group response and recommendations:** See recommendations relating to point 3 of Q4 above. See also point 8 under Question 6, point 10 under Question 20 and point 11 under Question 23.
4. Four respondents drew attention to the exclusion of reserves at Dormant and Suspended sites from landbank calculations being (possibly) in conflict with MTAN1. But only one of these said that this approach was wrong. The others implied, or stated in response to other questions, that the potential conflict needed to be explained and justified. **Steering Group response and recommendations:** See recommendations relating to point 4 under Q4, above. No changes are required to any calculations, although dormant reserves should be identified separately. See also point 6 under Q6 below, and point 5 under Q20.
5. One respondent (Natural Resources Wales) noted that the principle of dealing with Environmental Capacity had not been adequately implemented. In their view: *"any strategic assessment that is intended to be informed by environmental capacity should also consider the locations of statutory nature conservation designations. Failure to consider such designations would represent a failure to give appropriate attention to potential significant constraints to development, and could therefore affect the delivery of apportionment figures and allocations recommended in the RTS. Paragraph 58 of Minerals Technical Advice Note (Wales) 1: Aggregates*

(2004) states that the Assembly “considers that future proposals for aggregate extraction are unlikely to be acceptable where there would be significant adverse impact on a SSSI”. The Countryside and Rights of Way Act 2000 places a duty on all public bodies, including local planning authorities, to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which a SSSI has been notified. We therefore consider that the environmental capacity approach should also consider the location of individual SSSIs. Whilst we recognise that the RTS should not pre-judge issues that may be more appropriately considered as part of the LDP or Development Management processes, we do believe that the RTS should consider the location of SSSIs as part of any environmental capacity approach. This will ensure that any recommendation for allocations included in the RTS are based on knowledge of the locations of such environmental constraints, and also reflect the approach taken in national planning policy to protect SSSIs. Further, appropriate consideration of SSSIs as part of the RTS development process, will ensure that apportionment levels for individual mineral planning authorities are based on a better understanding of the capacity of individual authority areas to accommodate any new development. This should help ensure that mineral policies and allocations included within emerging LDPs (that are largely based on information contained in the RTS) can be realistically delivered within the Plan period. Natural Resources Wales would welcome further discussion of the information it holds on the location of existing quarries which are in close proximity to SSSIs. Future reviews of the RTS should also consider the Welsh Government’s proposals for natural resource management as proposed in Towards the Sustainable Management of Wales’ Natural Resources: Consultation on proposals for an Environment Bill (2013), notably the proposed national Natural Resource Policy and Area Based Natural Resource Management Approach”.

Steering Group response and recommendations: Revising the way in which environmental capacity issues are handled would require a major revision of the RTS and considerable additional work. SSSIs are already incorporated within the IMAECA output, but that is specifically intended not to focus on individual sites. If individual SSSIs were taken into account at the strategic RTS stage, the same would need to apply to all other National and International constraints, including those relating to the historic as well as the natural environment. More fundamentally, and notwithstanding the arguments put forward by NRW, taking account of individual constraints at the RTS stage would begin to prejudice the local planning process and would therefore be inappropriate: none of these constraints is absolute and each one needs to be tested in relation to the LDP if appropriate, and to specific development proposals and corresponding mitigation measures. No changes are therefore required regarding the way in which environmental capacity has been addressed.

However, it was agreed that brief explanation should be added regarding ways in which individual designations can be considered in more detail on a sub-regional basis, through collaborative working between neighbouring authorities in preparing their LDPs. This could tie in with the proposed Area Based Natural Resource Management Approach.

It was also agreed that an explanation should be added as to why more specific account has been taken, in the RTS, of National Parks and AONBs (this being because of more general policy requirements to avoid new mineral permissions in such areas).

6. The following issues were also raised under question 5, although these are not ‘key principles’ and therefore not directly relevant to this question (but are dealt with later):
- whether Wales / regional GDP data could be used in place of UK data. (see Question 6)
 - whether household growth figures would complement population statistics. (see Question 6)
 - the relationship between the RTS review and the various adopted / emerging LDPs in Wales. (see Question 12)

Chapter 3: Assessment of Demand

Question 6: Are you happy with the approach that has been taken to assess the likely future demand for land-based primary aggregates in Wales? If not, please explain why and what improvements might be considered.

Summary of answers given: Eight respondents said ‘yes’ and seven others expressed no comment. The remaining eight respondents identified some specific areas of concern, or suggestions for improvement / clarification, as summarised below. [Steering Group responses and recommendations are noted in blue for each observation.](#)

1. One respondent noted (as in Q5) that the RTS should not rely on historical sales data to estimate future demand at the local level, without first considering whether historical inequities might inadvertently be perpetuated. **Steering Group response and recommendations:** See [recommendations in response to point 2 under Q5, above.](#)
2. Monmouthshire County Council noted that *“the method of assessing demand has changed in the draft First Review to one that utilises historical sales data. While the thinking behind this can be appreciated if the methodology is used to estimate demand on a regional or sub-regional basis, it does not seem to be logical to disaggregate this data to the Minerals Planning Authority level.”* The specific concerns here relate to the fact that Monmouthshire has only one (currently inactive) quarry (Ifton) but that the sales data arise from a different quarry (Livox) which has now closed, and which formerly supplied limestone flux to Llanwern steelworks, which has also now closed. The Council finds it difficult to see how the sales figures for Livox can be used to estimate future ‘demand’ in the county, particularly in view of its rural character, low population density and lack of significant construction activity. It *advocates taking a more ‘sub-regional’ approach to minerals provision rather than being constrained by local authority boundaries in assessing demand/supply.* The Council confirms that the reactivation of the Ifton quarry ‘is entirely in the hands of the quarry operator’ and believes that *further allocations in the County are not considered feasible or appropriate. In addition, the operator’s apparent lack of interest in reactivating Ifton Quarry suggests an absence of demand that makes any further allocation unnecessary.* While the Council is content with the conclusion of the draft Review that no further allocations for crushed rock are required in Monmouthshire, it has *“concerns about how the apportionment has been arrived at and the figure is not considered to be an appropriate basis for future minerals planning in the County”.* **Steering Group response and recommendations:** [No](#)

changes are required, since Monmouthshire is not being asked to make any allocations at this time. However, acknowledgement should be added that this is one of the difficulties created by inactive (mothballed) quarries and a specific example of the issue identified at point 1, above. It would be useful to point out that this highlights the need for sub-regional collaboration in preparing LDPs and for adopting a sub-regional approach to the 'former Gwent' area in the next RTS Review. See also the response to Point 2 under Q10, below, regarding inactive quarries and the response to Point 4 under Q9, regarding sub-regional working and the effects of the Williams Commission.

3. One respondent (from England) noted that using the average of 10 years' sales to assess future demand in Wales is an approach that is comparable to the LAA system in England, but the RTS uses data for the period 2002-2010 when more recent data are available for 2011 and 2012 and could have been used to provide a more up to date picture. **Steering Group response and recommendations:** Such data were not available for Wales when the calculations were made and there would be little to be gained by updating the figures now, particularly since the RTS is reviewed every 5 years anyway.
4. Additionally, in England, industry has supported the consideration in LAAs of the last three years sales to identify trends that might warrant a departure from the use of the 10 year average; the same trade representation is present in Wales. Was this approach promoted/considered in Wales for the same reason? **Steering Group response and recommendations:** No such suggestions were made by Steering Group members when the work was being carried out, although consideration was given by the author to the possibility of any trends within the ten-year baseline period, which might need to be taken into account. None were identified.
5. The same respondent noted that reference is made to forecasts of GDP growth and in para 3.37 it is stated that it would be prudent to allow for growth after 2017, but there is no indication in the RTS that this has been done. **Steering Group response and recommendations:** This has not been done quantitatively, because there is no factual data to support such action, but the allowance is suggested as a crude balance for what otherwise might be seen as a downward trend. Additional explanation to this effect can be added.
6. Although dormant 'reserves' are excluded from landbank calculations, the RTS lists dormant and suspended sites in the Regional Appendices and there is reference to the possibility of these sites being considered by MPAs in meeting apportionments. Consequently it would be useful for the RTS to indicate the reserves at these sites where possible. **Steering Group response and recommendations:** Yes, it would be sensible to quote these figures, if it can be done without causing confidentiality problems. This would address the issue of such reserves being 'counted separately' (as required by MTAN 1), even if they are not used in landbank calculations. It should also be noted that the reserve figures for some dormant sites are no more than best estimates: - in such cases, no detailed reserve data exists. The estimated tonnage of reserves at all dormant sites in S Wales amounts to less than 7% of the overall total landbank for the region.
7. Pembrokeshire County Council suggested that *"the RTS influences on future demand would be better informed by using Wales / regional GDP data, rather than UK data and household growth to complement population statistics"*. **Steering Group response and recommendations:** The Steering Group is not aware of any Wales or Regional GDP data which could be used in place of

the UK data and was not convinced that either this, or household growth data, would significantly add anything to the analysis.

8. Pembrokeshire also noted, at point 3 of their Cabinet Report, that: *“If there is an expectation that marine dredged aggregates will make a bigger contribution than has previously been the case, the RTS could acknowledge this from the outset and reduce the residual element to be found from terrestrial sources. The approach currently proposed is based on the assumption that the contribution from marine sources will reflect recent production, sets the requirement to be met from terrestrial sources accordingly, but then says that if the terrestrial requirement cannot be met in full, then production from marine sources might increase”*. **Steering Group response and recommendations:** The approach suggested by Pembrokeshire would require a deliberate shift in policy to increase the ‘top-sliced’ component of supply from marine sources in order to reduce the dependency of south west Wales on terrestrial sand & gravel. The RTS Review currently retains a focus on maintaining adequate supplies from terrestrial sources, and merely acknowledges that marine supplies might be available as a last resort. Further explanation can be added to the effect that land-based options would need to be thoroughly tested by the Local Plan process before any consideration is given, by individual MPAs, to any shift in local policy. It should also be emphasised marine sand and gravel cannot always substitute for terrestrial materials in specific end uses. See also point 10 under Question 20, and point 11 under Question 23.
9. Another respondent noted that, *“in paragraph 3.7, it’s not entirely clear how some of the average sales figures have been derived. Where MPAs might not currently have any production has it been derived as the sales when a quarry was operational? In addition it’s not clear to what extent productive capacity has been considered in the Table 3.1 figures. In paragraph 3.32 there is reference to 0.172mt crushed rock import from the south west of England. Although the references have been acknowledged this has not been taken into account in the approach to apportionments and allocations of the RTS revision and generally as to how future imports of aggregates will be considered in the approach”*. **Steering Group response and recommendations:** The clarity of paragraph 3.7 can be improved, but the issue of productive capacity is site-specific and cannot be addressed in any detail through the RTS. The secretary of the SWRAWP points out that export/import figures are only produced every 4 years and that historical sales data is used as an estimate of capacity and likely output if the quarry is active. This is not a precise method because it is extremely difficult to gauge the capacity of a quarry given that mobile plant is able to be brought in to deal with peaks in consumer demand.
10. The Planning Officers’ Society (Wales) observed that *“using a 10-year production average does not comply with the guidance contained in MTAN1 which requires a 3-year production average”*. One individual MPA noted that: *“Whilst the logic for using a 10-year production average is understood and supported it does not comply with the guidance contained in MTAN1 for a 3-year production average. There is an opportunity to comply with MTAN1 guidance and provide data to support the use of a 10-year average by including the 3-year average data within the document and clearly showing the danger of under-provision based on 3-year figures”*. **Steering Group response and recommendations:** See point 4 under Q4 regarding departures from MTAN 1. With regard to the more specific point we do not have 3-year figures for each MPA, although this point

could be demonstrated using regional or sub-regional totals instead (whilst still retaining the 10-year figures for the main analysis).

11. One local authority in South Wales noted that:

- Paragraph 3.38 - It may be worthwhile for clarity to note which period such population forecasts are based upon.
- Paragraph 3.40 – It would be worth clarifying here whether such major infrastructure projects have been taken into account in the supply requirements for the region. We understand that it is not, however a note of clarification would be useful.
- Paragraph 3.41 – Clarification is sought as to whether any such changes would result in a review of the RTS?

Steering Group response and recommendations: Clarifications to be added, although it is unlikely that additional RTS reviews would be needed in between the intended regular (5 yearly) reviews. Whilst some circumstances (e.g. a major, unexpected increase in construction activity or the possible abolition of the aggregates levy) will give rise to a marked increase in demand for aggregates, there will generally be sufficient availability of supply to accommodate these changes in the relatively short term, until the next scheduled review of the RTS.

Question 7: Are you happy with the validity of the findings of this assessment, either for individual MPAs or for the Region or Country as a whole? If not, please give details.

Summary of answers given: Seven respondents said ‘yes’; two others said ‘yes but...’, with exceptions relating to points raised elsewhere; Pembrokeshire County Council referred to the various issues raised in its Cabinet Report (all of which are dealt with under other questions); three others referred to their concerns detailed in response to Q6; and the remaining nine respondents offered no comment. **Steering Group response and recommendations:** No changes required beyond those identified under Question 6.

Chapter 4: Analysis of the Existing Supply Pattern

Question 8: Are you happy with the explanation that is given in this chapter of the existing patterns of supply across Wales as a whole? If not, please explain your concerns. *(But please note that any concerns regarding details within your particular Region can be dealt with in response to the additional questions (15 to 20) relating to the two Regional Appendices).*

Summary of answers given: Nine respondents said ‘yes’ and one of these noted that ‘it might have been useful in hindsight to have a separate crushed rock and sand and gravel map in figure 4.3 to emphasise the spatial dimension associated with S&G as well as the impact of marine sand’. **Steering Group response and recommendations:** Figure 4.3 should be replaced by two similar diagrams, separately illustrating the patterns for a) crushed rock and b) sand & gravel - including radii from wharves.

Two other respondents said ‘not entirely’, citing concerns expressed under earlier questions and Pembrokeshire County Council referred again to the various issues raised in its Cabinet Report (all of

which are dealt with under other questions). Nine respondents offered no comment and the remaining two respondents, both from England, raised the following more specific concerns. [Steering Group responses and recommendations are noted in blue for each observation.](#)

1. One of the English respondents suggested that *“it would be useful if Fig 4.1 were to show the distribution of inactive and dormant crushed rock sites as well as active site to be comparable to Fig 4.2 for sand and gravel”*. [Steering Group response and recommendations: This is not necessary as the dormant sites are shown in the more detailed maps in the regional appendices.](#)
2. He also noted that *“Paragraph 4.17 refers to a 20km radius from currently (2013?) active crushed rock and sand and gravel sites but does not indicate why this distance has been chosen. This choice is arbitrary and all the more difficult to understand as the rest of the paragraph indicates that a greater distance of up to 50km for marketing ‘ordinary’ aggregate is typical. The paragraph also states that the 20km radius conforms reasonably well with the proximity principle but no distance is defined for the proximity principle; if a greater radius of say only 30km (say 20 miles) were to be used then the coverage provided by active quarries and pits and shown in Figure 4.3 would accordingly be much greater and vice versa for a shorter distance”*. [Steering Group response and recommendations: Paragraph 4.17 can be clarified to emphasise that 20km is purely illustrative.](#)
3. The same respondent also observed that *“the South West exports little land won aggregate to Wales (and then mainly to S Wales) and on a ‘regional’ basis the call on the South West is unlikely to cause any problem given the extent of permitted reserves of crushed rock in the South West and in most crushed rock MPAs close to S Wales. Provided supplies of marine dredged aggregate are not reduced there should be little call on sand and gravel from the South West where there are limited reserves in nearby Gloucestershire and Wiltshire. Other than perhaps return loads for high PSV aggregates from Wales, exports to Wales are probably mainly crushed rock from Gloucestershire (Forest of Dean) into Monmouthshire where there are no active quarries. This overall supply pattern is likely to continue but supplies from Gloucestershire cannot be assured because of potential supply issues in the FoD and thus this possibility should be accounted for”*. [Steering Group response and recommendations: These points, which are echoed by another respondent \(see below\), can be added to the text. However, the SWaRAWP secretary advises that that Stowfield quarry in the Forest of Dean has recently been granted further planning permission and that, whilst Gloucestershire’s landbank is relatively low, this latest consent improves the situation \(certainly until the next RTS Review\).](#)
4. He further noted that *“Paragraph 4.22 states that limestone from the Forest of Dean ‘needs’ to be imported into the former Gwent area to make up what would otherwise be an overall shortfall in supplies but this does not indicate a need, only that the current operators in the FoD are able to market aggregates there (and probably only the eastern part of the area) because of favourable transport advantage over S Wales quarries though other reasons may also apply. Difficulties in this area of meeting the RTS apportionments will no doubt be addressed by the relevant MPAs at local level”*. [Steering Group response and recommendations: This point, which is amplified by a second respondent \(see below\), can also be reflected in the revised text.](#)
5. The second English respondent noted that *“in figure 4.3 a significant area of South Wales doesn’t benefit from being within the 20km catchment of a local quarry. Paragraphs 4.21 & 4.22 highlight*

that carboniferous limestone from the Forest of Dean needs to be imported to make up for a potential shortfall. Para 4.24 then suggests that reliance on historic patterns will perpetuate supply. Para 4.29 acknowledges that the distribution of quarries is not ideally matched to meet demand. I consider that future reliance on this imported figure cannot be relied upon, or at least the RTS should acknowledge how demand can be met if this supply via Gloucestershire was not forthcoming in the future. The position with regards the Forest of Dean resource area is outlined in the Gloucestershire LAA and base line (see following link <http://www.gloucestershire.gov.uk/extra/article/115911/Local-Aggregates-Assessment>). Key highlights are that Drybrook Quarry is mothballed and that future supply might be constrained for example by the AONB. Therefore the RTS should consider what the options for supply would be should this importation figure decline or cease in the future". **Steering Group response and recommendations:** Again, these are important points of detail which can be reflected in the revised text, and tied in with the consideration of sub-regional issues for Former Gwent as a whole (see point 2 under Question 6, above).

Chapter 5: Future Apportionments and Allocations

Question 9: Are you happy with the apportionments set out in Table 5.1 and the supporting text? If not, please explain your concerns, either for individual MPAs or for Wales as a whole.

Summary of answers given: Nine respondents said 'yes'; nine others offered no comment, other than a request to clarify that the table relates only to land-won primary aggregate; and only one respondent (Monmouthshire) said 'no', for the reasons set out earlier in Point 2 under Question 6. The remaining four respondents identified some specific issues which need to be considered, as summarised below.

Steering Group responses and recommendations are noted in blue for each observation.

1. Items 5 and 6 of the Pembrokeshire Cabinet Report acknowledge that the suggested collaborative approach between Pembrokeshire, PCNP, Carmarthenshire and Ceredigion is already happening and that the suggested re-distribution of the Powys sand & gravel apportionment is considered insignificant to the overall requirement for south west Wales. **Steering Group response and recommendations:** No action required.
2. Item 7 of the same report refers to the observation, in para. 5.7 of the draft RTS, that the commercial viability of sand and gravel resources in Carmarthenshire is compromised by the availability of marine-dredged material landed at Burry Port. It notes that the same issue might also affect other locations proximate to sand and gravel wharves, including parts of Pembrokeshire, and suggests that it would be helpful if the final version could clarify this. **Steering Group response and recommendations:** Agreed - para 5.7 to be updated.
3. Item 8 of the Pembrokeshire report makes further reference to para. 5.7 of the draft RTS, noting that the high-quality glacio-fluvial sand and gravel deposits fall partly within the National Park but are also found in Ceredigion (Cardigan Sand and Gravel) and Pembrokeshire outside the National Park. **Steering Group response and recommendations:** This point of detail can be clarified

4. Natural Resources Wales said ‘yes but...’ noting a preference for a more sub-regional approach: *“We welcome the clarity provided in Table 5.1 that apportionment figures shown for National Parks relate to production from existing reserves in those areas, and not an indication that such areas are expected to provide future allocations. However, we consider that further attention should be given to the opportunity to identify apportionment figures for regions or sub-regions rather than for individual mineral planning authorities. A regional/ sub-regional approach to apportionment would ensure that an individual authority is not set a level of apportionment which it does not have the environmental capacity to deliver. The review of the RTS offers the opportunity for mineral planning authorities to collaborate on a regional/ sub-regional basis to identify apportionment levels that are informed by an understanding of the environmental capacity to accommodate new development. A regional/ sub-regional approach to apportionment would ensure that an individual authority is not set a level of apportionment which it does not have the capacity to deliver because of the presence of significant environmental constraints. Where there is a concern in relation to a potential deficiency in supply, the regional approach to apportionment, would enable consideration to be given to how the deficiency could be sustainably met by reserves within neighbouring authorities within the region/ sub-region. The boundaries of such regions could be based on known consumption figures, which from paragraph 3.43 of the RTS seems to be available at a sub-regional level. This approach would be compatible with the proposals for improving collaboration and Strategic Development Plans set out in the ‘Positive Planning’ consultation document”*. **Steering Group response and recommendations:** This is an important point: clearly there are some parts of Wales where a sub-regional approach may offer the best solution (as discussed under Questions 5 and 6 above), but elsewhere, the clarity of being able to provide specific apportionments for each individual authority has been welcomed by local authorities and by industry. The main point is that ‘one size does not fit all’. Opportunities for MPAs to depart from the apportionments and allocations, subject to agreements with neighbouring authorities, could usefully be emphasised further, but moving to sub-regional apportionments everywhere would be seen by many as a backward step and would partly defeat the purpose of the RTS. In view of the emerging ‘City Regions’ concept in Wales and the outcome of the Williams Commission, which is thought likely to recommend reducing the current 22 councils to 12 or fewer, the notion of sub-regional working will need to be re-examined in the next RTS review. In doing so, however, it should be kept in mind that the groupings of authorities needed to achieve deliverable minerals planning solutions (which have to take account of the fixed distribution of geological resources) may not necessarily be the same as the groupings required for other, administrative purposes.
5. The first respondent from England noted that *“Subject to the concerns above re continued supplies from Gloucestershire, the apportionments which are based on 10 years average sales are considered to be reasonable. However, some contingency should possibly be included for additional provision from Monmouthshire and Caerphilly to address the concerns regarding Gloucestershire”*. This point is also made by the second English respondent who stated that *“there might need to be some contingency for the c.0.17mt importation. This would need to be spread amongst those MPAs who either benefit from that market or have potential resources to meet that supply. This could include the former Gwent MPAs and possibly other associated areas such as Caerphilly”*. **Steering Group response and recommendations:** This point can be addressed in the revised text dealing with apportionments, but there is no need to either increase

apportionments or to make additional allocations as a contingency measure; the figure of 0.17mt for imports into South Wales from Gloucestershire is not large in relation to overall sales but the situation needs to be monitored by the South Wales and South West England RAWPs and any adjustments that are needed in future years can be addressed in future reviews if the RTS.

Question 10: Are you happy with the details relating to surpluses / shortfalls in Tables 5.2 and 5.3 and the supporting text? If not, please explain your concerns, either for individual MPAs or for Wales as a whole.

Summary of answers given: Six respondents said 'yes'; and ten others offered no comment, other than a request to clarify that the tables relate only to land-won primary aggregate. The remaining six respondents raised a number of objections or comments as detailed below. **Steering Group responses and recommendations are noted in blue for each observation.**

1. POSW noted that *"MTAN1 requires reserves at dormant sites to be counted so there is a conflict with Welsh Government Guidance"*. Two local authorities in South Wales amplified this point, **both** stating that: *"MTAN1 requires reserves at dormant sites to be counted otherwise it would not suggest that they be counted separately. The decision to exclude reserves at dormant sites is a clear departure from government guidance and adds unnecessary complexity to the process by suggesting that where apportionments are required dormant sites can then be counted. This introduces a two stage process rather than a simple single stage process if dormant reserves were counted at the outset. In addition, there is nowhere in the document where the reader would find out what impact the counting of dormant reserves would have on any identified allocations. In that context people may be led to believe there were allocations required when in fact they were not due to the impact of dormant reserves with planning permission. It is considered that reserves at dormant and suspended sites should be counted as reserves (possibly separately) but at the very least the potential impact of dormant reserves on identified allocations should be made clear"*. Pembrokeshire County Council also commented on this issue (see point 5 under Question 20, below), believing their existing practice of including dormant sites to be more straightforward than the 'two-stage' process suggested by the draft RTS. **Steering Group response and recommendations:** The departure from MTAN 1 regarding dormant sites is covered under point 4 of Q4, above. Quoting the dormant reserves figures separately (as noted at point 6 under Q6) would address some of the additional concerns raised here. With regard to the issue of the 'two-stage' rather than single stage process, the Steering Group's view is that the two-stage process, as proposed in the RTS review, makes for much better planning, as the dormant sites are then dealt with by local planning officers who are best placed to understand the specific details of each site. The NWaRAWP Secretary further notes that *"the reserves at dormant sites, and in particular dormant IDO sites cannot be fully relied upon, as the determination of conditions process may limit the extent of the reserve subject to any compensation claims (which might be for restriction of working sites, or the site may be subject to prohibition and modification orders, for assorted reasons, including termination/modification where reactivation would harm European designated sites. There is no compensation payable for the lost mineral at IDO sites. Furthermore, if a site affects European protected species or habitats, the requisite wildlife licence may be declined. In North Wales the extent of dormant sites is insignificant, as a programme of prohibition orders has all but eliminated this problem"*.

2. One respondent noted that “Table 5.3 shows a crushed rock surplus for Caerphilly but notes that additional allocations of Carboniferous Lst might be needed if Machen Quarry is not reactivated. A similar situation could occur in Monmouthshire if Ifton Quarry is not reactivated”. **Steering Group response and recommendations:** This point needs to be dealt with (to ensure a consistent approach) alongside the wider concerns about Monmouthshire and the former Gwent area, as raised in item 2 under Q6, above. The key point is that uncertainty over the future reactivation of inactive quarries which have valid planning permission and modern conditions in place (e.g. Machen and Ifton) cannot be used to argue for additional allocations. Such matters cannot therefore be dealt with by the RTS.
3. Another respondent noted that there is potentially sufficient surplus in reserves at Monmouthshire and Caerphilly that could in theory contribute towards 0.17 (imports from the South West) $\times 25 = 4.25$. The other issue to then consider is whether sufficient productive capacity would be in place at the local South Wales quarries. **Steering Group response and recommendations:** This partly relates to the same point as that made above, but the issue of productive capacity is considered by the Steering Group to be beyond the remit of the RTS, as it entails site-specific detail.

Question 11: More specifically, do you agree with the logic of excluding dormant and suspended sites from the basic landbank calculations (subject to the reserves at these sites being available to offset any allocation requirements, where necessary, as explained in paragraph 5.19). If you disagree, please explain why.

Summary of answers given: Seven respondents said ‘yes’; eleven others offered no comment; and three said ‘no’, cross-referring to their answers to Question 10, above. In addition, POSW also referred to its answer to Q10 in terms of the conflict with MTAN 1, but made no comment on the logic of which approach was ‘right’.

One other respondent said “This is logical when considering deliverability issues as dormant/suspended sites in theory could later be re activated to make up any shortfalls in supplies from active quarries. MPAs may consider that some dormant sites may in fact be more deliverable and acceptable for future working to make up shortfalls than ‘greenfield sites’. However, deliverability and the contribution of dormant reserves to future supplies during the plan period will depend to a great extent on company marketing strategies, the timing of any application for the required modern operating conditions and the timing of MLP preparation. MPAs only have control over the latter and to achieve deliverability may have to identify allocations elsewhere even though dormant, possibly large, reserves may be present. The presence of dormant sites will continue to cause problems for MPAs. See also answer to Qu 6 above”.

Steering Group response and recommendations: The basic point is addressed under Questions 4, 5, 6 and 10, above. The additional aspects of deliverability serves to emphasise the need for dormant sites to be dealt with by local planning officers who are best placed to understand the specific details of each site (even if they cannot influence matters which are in the hands of the operators themselves).

Question 12: Are you happy with the details noted in paragraphs 5.20 and 5.21, which give individual MPAs some flexibility to depart from RTS recommendations. If not, please explain why.

Summary of answers given: Eight respondents said ‘yes’; thirteen others offered no comments; and one other respondent suggested an important qualification to an otherwise positive response: *“We believe that it is appropriate to include some flexibility for mineral planning authorities to depart from the apportionment figures or allocation recommended in the RTS where it is justified by new evidence e.g. in relation to environmental capacity. However, different mineral planning authorities are at different stages of the LDP-making process. We therefore have concerns as to how mineral planning authorities wishing to depart from the RTS will be able to reach agreement with other mineral planning authorities with adopted LDPs on how to achieve sub-regional or regional totals. We suggest that further guidance is provided on this matter”*. A further respondent also noted similar concerns.

Steering Group response and recommendations: This is one of a number of issues relating to LDPs being in different stages of gestation at any given time. However, such issues are a matter for more general National policy and implementation thereof by LPAs, and should not be addressed by the RTS (see also Question 22, below).

Chapter 6: Consultation Process

Question 13: Do you think that the consultation process, as explained in this chapter, and including this survey, is adequate and fit for purpose? If not, please explain what improvements you would like to see for this or future reviews.

Summary of answers given: Nine respondents said ‘yes’; ten others offered no comments; and the remaining four respondents gave specific comments as detailed below. **Steering Group responses and recommendations are noted in blue for each observation.**

1. One respondent simply noted that they would like to see specific consultation with individual MPAs. This was subsequently clarified by telephone as meaning earlier involvement in the whole process by neighbouring authorities in England. **Steering Group response and recommendations:** Agreed; this is a lesson to take on board in subsequent RTS reviews.
2. This was echoed by a second respondent, from England, who noted that they only found out about the consultation process via the South West England Aggregates Working Party. They would have preferred direct consultation from WG and noted that there might be other stakeholders who could have benefited by direct consultation. **Steering Group response and recommendations:** WG should revise its list of consultees to include all neighbouring MPAs in England.
3. Pembrokeshire County Council noted that they had *“contacted all Town Councils and Community Councils in Pembrokeshire regarding this consultation. One Community Council representative contacted the Council to complain that the information provided was too technical (even with the Council’s explanatory note). For future consultations, more thought might be given to providing a non-technical leaflet to support the consultation documents. Also, while the need to make rapid*

progress with this RTS Review is understood, a longer consultation period should be considered for future RTS reviews". The point about the RTS being 'too technical' was also made by a local resident in Caerphilly, who's consultation response was otherwise discounted as being too site-specific. **Steering Group response and recommendations:** The Regional Technical Statements are, by their very nature, 'technical' documents. Whilst the First Review has attempted to make these much clearer than before, there is a limit to how far this can go without compromising the parallel requirement for them to be concise. The Steering Group therefore did not see a need for 'non-technical summary' to be provided in addition to the main document.

4. Newport City Council noted that, with regard to the next steps for the RTS review process, the Council cannot delegate a decision for endorsement and will need to seek a decision on endorsement of the document before the Members' Forum meeting in 2014. **Steering Group response and recommendations:** This is a matter for NCC, so no action required.

Glossary of Terms

Question 14: Are the definitions given in this Glossary sufficiently clear and accurate? If not, please provide details of any perceived shortcomings.

Summary of answers given: Six respondents said 'yes'; and thirteen offered no comment. The remaining five respondents offered some qualifications, as detailed below. **Steering Group responses and recommendations** are noted in blue for each observation.

1. Two respondents referred to their answers to Question 10, regarding the issue of dormant sites. **Steering Group response and recommendations:** The Glossary entries regarding dormant reserves and landbanks to be revised in accordance with Steering Group views expressed under Questions 4, 6 and 10, above
2. Another respondent made the following observations:
 - a. **Supply:** *"The definition given seems more of an economics definition in the context of 'demand and supply'. In the context of minerals planning it is simply the volume of a product that is supplied"*. **Steering Group response and recommendations:** Agreed, a simpler definition should be used.
 - b. **Current Landbank:** *"As I understand it the approach taken does not depart from the definition of landbank as defined in the opening sentence to paragraph 45 of MTAN1, as the reference to 3 years only appears in the next sentence which sets out the basis for using landbanks in the context of Development Plans"*. **Steering Group response and recommendations:** Agreed, so no change required.
 - c. **Future Landbank:** *"I would be inclined to restrict the entry to just the opening sentence, as I am not sure a glossary is the right place to comment on whether a term is confusing and inappropriate"*. **Steering Group response and recommendations:** The additional information provided in the glossary under this heading was to reflect the concerns expressed by industry at the first Steering Group meeting. However, those comments could be moved into a footnote rather than being part of the definition itself.

3. One respondent suggested that: *“definitions of ‘Colliery Shale’ and ‘Foundry Sand’ would be useful; noting that the RTS 1st review definition of ‘Secondary Aggregates’ uses the term ‘Colliery Spoil’ - this has caused confusion to the reader with the use of the term ‘Colliery Shale’ in the document (when shale can be considered to be a fissile, layered, sedimentary rock type only really suitable for low grade fill or the production of cement) - Also see answer to question 20”*. **Steering Group response and recommendations:** These definitions and clarifications will be added.
4. Another respondent (representing CPRW) requested that he *“would like to see a full list, in alphabetical order, of every abbreviation used within the document included within the Glossary. Still uncertain as to what the abbreviation ISO, (Page 61, used within the definition of ‘ROMP’), stands for. Number of other abbreviations used resulted in having to search pages to ascertain their meaning. Appreciate that this is a minor issue, but it does contribute to the overall presentation of the document”*. **Steering Group response and recommendations:** A list of abbreviations will be added
5. Another respondent noted that *“a glossary for such a technical document is welcomed”*, and that *“It may be worth adding stronger wording to clarify that a resource is not an acceptance of mineral working”*. **Steering Group response and recommendations:** This clarification will be added

Appendix A: North Wales

Question 15: Do you have any detailed local knowledge which would help to improve or challenge any of the details given within paragraphs A1 to A46 of Appendix A? If so, please provide details.

Summary of answers given: No comments were made by any respondents

Question 16: Do you have any detailed local knowledge which would help to improve the factual information given within Tables A3 to A5? If so, please provide details.

Summary of answers given: No comments were made by any respondents

Question 17: Do you have any detailed local knowledge which would help to improve or challenge any of the information given for individual MPAs on pages 12 to 24 of Appendix A? If so, please provide details.

Summary of answers given: No comments were made by any respondents

Appendix B: South Wales

Question 18: Do you have any detailed local knowledge which would help to improve or challenge any of the details given within paragraphs B1 to B68 of Appendix B? If so, please provide details.

Summary of answers given: comments were made by only five respondents, as detailed below. **Steering Group responses and recommendations are noted in blue for each observation.**

1. *“As stated above (Question 7) the comment in paragraph B14 relating to the quality and quantity of the Tir Pentwys site (which straddles the Torfaen/Blaenau Gwent border) is relevant to the determination of the current planning application (in the case of the Torfaen part of the site) and commentary on it is not appropriate in the RTS. The issues of quality and quantity have not been raised by TCBC as an outstanding matter in the determination process. It should also be noted that the entire Tir Pentwys site is identified in both the respective Torfaen and Blaenau Gwent LDPs as Preferred Sites. If reference is made to the site in the RTS, then these allocations should be acknowledged”.* **Steering Group response and recommendations:** Agreed, site-specific comments will be taken out but the generic point about the uncertain quality of opencast spoil material should remain. Also add footnotes regarding definitions of various secondary aggregates and ‘wastes’, cross-referenced to the Glossary.
2. Pembrokeshire referred to their Cabinet Report, although the points raised there are dealt with under other questions. **Steering Group response and recommendations:** No action required.
3. One local authority noted that *“the Atlantic Array offshore wind farm development should be removed from paragraph B32 as this major infrastructure project has been cancelled due to technical challenges making it uneconomic at this current time”.* **Steering Group response and recommendations:** This should now be deleted from the list.
4. A local authority in England noted that, at paragraph B65: *“it should not be assumed that imports from the Forest of Dean will always continue. Of three quarries previously working one is now inactive (Drybrook), Clearwell may only have sufficient reserves remaining until 2016 - 2018, while Stowfield has reserves sufficient for the foreseeable future”.* **Steering Group response and recommendations:** This is an important issue which ties in with wider issues regarding a possible sub-regional approach to aggregates provision within the ‘former Gwent’ area. However, as noted in response to item 5 under Q9, above, there is no need to either increase apportionments or to make additional allocations as a contingency measure; the situation needs to be monitored by the South Wales and South West England RAWPs and any adjustments that are needed in future years can be addressed in future reviews if the RTS.
5. Another local authority noted that *“Paragraph B14 states “... Planning permissions for the reworking of former tips exist at the former British Colliery (Torfaen) and at Tower Colliery (RCT), but neither of are being actively exploited at present. ...” - This incorrect, as The British does not have a mineral planning permission. Indeed, it is extremely unlikely that any aggregate would be produced from this LDP reclamation scheme; where any materials arising, other than coal, are expected to be used for site restoration. Therefore, reference to The British should be deleted from paragraph B14”.* **Steering Group response and recommendations:** This will be corrected.

6. The same authority pointed out that: *“Paragraph B14 (also see the second paragraph of the ‘Use of alternative aggregates’ sub-section of the Torfaen Section of Appendix B and Question 20 below) also states:- “... Reworking of the spoil from the former opencast workings at Tir Pentwys (straddling the border between Torfaen and Blaenau Gwent) has also been considered but is not currently permitted. There may be opportunities for this material to make up for the very limited existing and potential sources of primary aggregate production in this area, although the quality of the material and the quantities available for anything other than low grade fill, have yet to be demonstrated.” - The two RTS 1st Review references to Tir Pentwys are in relation to the debate on potential sources of secondary aggregate. However, the comments with regards to the potential tonnages available or the quality of the aggregate are not considered appropriate for a “strategic” document which is “not intended to provide site specific information or guidance”; such matters are best left for consideration in LDPs and subsequent planning applications. Indeed, as part of the work on the Blaenau Gwent and Torfaen LDPs, the Councils have been provided information on the quality of the high PSV Sandstone tested and the estimated tonnages from the eastern spoil mound (which at 4.75Mt is considered to be significant) and adjacent land from the site owner’s agent. It is for these reasons that both Council’s have accepted that ‘the quality of the mineral in known’ and have thus been able to allocate the site as a ‘Preferred Area’ in their respective LDPs; which have both been found ‘sound’ following independent examination. Therefore, it is suggested that the RTS 1st Review should: -*

- *only identify the Tir Pentwys site as a potential source of secondary aggregate and recognise that the site has been allocated as a ‘Preferred Area’ in both the Blaenau Gwent and Torfaen LDPs to meet their respective apportionments of the current 2008 RTS;*
- *However, it should be noted that the Blaenau Gwent allocation is dependent on access through Torfaen, part of which is the subject of a current planning application; a decision on which will effectively determine the future of this resource; and*
- *not include site specific comments on the quality or quantity of the aggregate at Tir Pentwys, which have been accepted as ‘known’ by both the Councils and LDP Inspector’s; and are also considered to be detailed development management comments not appropriate for the ‘strategic’ RTS document.*

Steering Group response and recommendations: Mostly agreed: as noted above, site-specific comments will be taken out but the generic point about the uncertain quality of opencast spoil material should remain.

Question 19: Do you have any detailed local knowledge which would help to improve the factual information given within Tables B3 to B5? If so, please provide details.

Summary of answers given: comments were made by only three respondents, as detailed below.

Steering Group responses and recommendations are noted in blue for each observation.

1. Pembrokeshire referred to their Cabinet Report, although the points raised there are dealt with under other questions **Steering Group response and recommendations:** No action required.

2. *“The Merthyr Tydfil section of Table B5 should be amended to include two further dormant quarries, namely Morlais (limestone) and Twyniau (Sandstone), which were permitted under the same planning permission as Bryniau on 26th January 1949. It should however be noted that Merthyr Tydfil CBC made a Prohibition Order in respect of these quarries on 26th November 2013. Publicity has commenced and the Order has been submitted to the Welsh Government for confirmation”.* **Steering Group response and recommendations:** These changes will be made.
3. *“Could you please delete all reference to the three quarries that are classed as inactive quarries in Rhondda Cynon Taf in table B4 on page 16.”* **Steering Group response and recommendations:** These changes will be made

Question 20: Do you have any detailed local knowledge which would help to improve or challenge any of the information given for individual MPAs on pages 19 to 50 of Appendix B? If so, please provide details.

Summary of answers given: comments were made by only six respondents, as detailed below. **Steering Group responses and recommendations are noted in blue for each observation.**

1. One respondent stated: *“Again, the RTS dismisses the quality and quantity of the secondary aggregates at Tir Pentwys (implied). The recent Adoption of the Torfaen LDP confirms the site as a Preferred Area and this should be referenced in the “Use of alternative aggregates” section”.* **Steering Group response and recommendations:** This will be added
2. The Pembrokeshire County Council Cabinet Report notes that *“the draft RTS is factually incorrect in that there is not a joint Development Plan for the PCC and PCNPA planning areas (page 39, first paragraph and last paragraph). This should be revised to note that PCC and PCNPA each has an adopted LDP, but are committed to working collaboratively with other authorities in south west Wales”.* The Cabinet report also notes that the PCC LDP contains a commitment to monitor
 - permissions in relation to requirement,
 - permissions that compromise safeguarded reserves,
 - progress towards fulfilling the commitment to find alternative locations within Pembrokeshire and / or elsewhere in south west Wales [with targets to resume regional discussion by 2014 and significant progress towards identification of new minerals reserves by 2018].

Steering Group response and recommendations: the factual error will be corrected.

3. The Pembrokeshire Cabinet Report also notes that page 39 of the Draft Appendix indicates that to address a shortfall of sand and gravel, new allocations will be required in the Development Plans of one or more of the SW Wales authorities. In this regard it notes that *“Ceredigion has made an allocation, Pembrokeshire is using an Area of Search approach, PCNPA is not required to allocate (and indeed has not done so) and Carmarthenshire CC has not allocated.* **Steering Group response and recommendations:** these details will be added.

4. The Pembrokeshire report also notes that *“the second paragraph of page 40 seems to indicate that allocations could take the form of identification of a specific site or, failing that, a preferred area. However, in general terms an allocation can only be a specific site and the RTS 2 text should be amended to refer to ‘either an allocation or a preferred area (area of search)’”*. **Steering Group response and recommendations:** Disagree - no changes are required as the existing text (including paragraphs 5.17 and 5.18 of the main RTS document) merely follows, and amplifies, what is already said in paragraph 14 of MPPW. However, on a related point, the Steering Group considered that reference should also be made (both in the main document and the regional appendices) to the notion that, in some cases, it may be better (in terms of deliverability) to rely on specific sites in neighbouring authorities (additional to those MPAs’ own requirements), where these have been agreed through collaborative working, in preference to relying upon highly uncertain Areas of Search.
5. Item 13 of the Pembrokeshire Cabinet Report discusses the issue of dormant sites, both generally, and in the specific local context. It notes that the draft RTS (which it refers to as ‘RTS2’) *“highlights an issue over the interpretation of MTAN1, whereby some authorities include dormant sites within landbank calculations and others do not. Pembrokeshire CC includes such sites, on the basis that they have permission and could come back in to use. RTS 2 takes the view that although such sites have planning permission, they cannot be reactivated until they have been through the ROMP process (Review of Minerals Permissions) and modern planning conditions have been agreed. RTS 2 does not include dormant sites (or suspended permissions) in landbank calculations, but in cases where re-activation is considered likely, it wants LPAs to identify them as LDP allocations. The Council’s approach is to include dormant sites in the landbank calculations, but not allocate them and this approach is commended for the RTS, as being more straightforward than that proposed”*. **Steering Group response and recommendations:** The generic issue relating to dormant sites has already been covered under Questions 4, 5, 6 and 10, above. No changes are therefore required in Appendix B other than to note the quantities of reserves at dormant sites in each MPA.
6. Item 14 of the Pembrokeshire report notes that, with reference to the third paragraph of the section on use of alternative aggregates (page 40) the ‘small towns of southern Pembrokeshire’ should more accurately be referred to as the ‘towns of southern and central Pembrokeshire’ **Steering Group response and recommendations:** This minor amendment will be made.
7. Another local authority stated: *“I understand the necessity to have a base-date to work from in preparing the RTS review, however, for the sense of clarity and to have an up-to-date document I would like to propose amendments to Appendix B in relation to Rhondda Cynon Taf. Could we amend the section ‘Allocations required to be identified in the Local Development Plan’ on page 43, to read as follows: ‘On the base date of the RTS 1st Review of December 2010, when the above calculations were made, there was a shortfall in the landbank of crushed rock of 4.25 million tonnes”*. **Steering Group response and recommendations:** This should be a matter for individual MPAs to deal with in advising their members. The RTS already makes it clear that landbanks, shortfalls and allocations, where required, all relate to the baseline date of 31st December 2010.

8. The same respondent observed: *“The Rhondda Cynon Taf Local Development Plan (LDP) was adopted in March 2011. The LDP designated approximately 10 hectares of land to the rear of Craig yr Hesg Quarry, Pontypridd as a Preferred Area of Known Mineral Resource. It is considered that if an appropriate planning application was approved on this site, it could make a significant contribution to meeting, if not exceeding, this shortfall. Additionally, in April 2011, a 4.6 hectare extension to the Forest Wood Quarry, Pontyclun was approved. This extension created a further 3.395 million tonnes of reserves. Accordingly, it is considered that this LDP allocation and permitted extension is sufficient to address the identified shortfall of crushed rock landbank in Rhondda Cynon Taf. At the end of the second paragraph in the following section - ‘Use of Alternative Aggregates’, could we add the comment; ‘The site of the tips is now subject to a substantial opencast operation’. In the section ‘Safeguarding of primary aggregate resources’, could we amend the paragraph to say that all aggregates and S&G are safeguarded not ‘should be’ safeguarded. Similarly could we amend the last Paragraph to say ‘Existing and potential new railheads have been identified for safeguarding....’.* **Steering Group response and recommendations:** for the reasons given in response to point 7, above, these details are not a matter for the RTS, so no action is required.
9. Another respondent noted (re. supplies from Gloucestershire): *“Page 34 – Again do not rely on the current status”.* **Steering Group response and recommendations:** this point has already been addressed under earlier questions - no further action required.
10. One County Council noted, with regard to the Safeguarding of primary aggregate resources, that it *“is undertaking work to consider how best to integrate this objective with others in the plan making process. Candidate sites, not sifted out of the process in the initial filter, have been assessed against the British Geological Survey’s safeguarding maps. The RTS should consider alternative options to this approach. The County Council considers that one option that the RTS should consider is: To rely on National Policy (Minerals Planning Policy Wales & Minerals Technical Advice Note 1: Aggregates) as a material consideration when taking planning decisions, with the British Geological Survey’s safeguarding maps as relevant supporting information. If there is a specific case demonstrating the need for the material, the Local Development Plan could identify:*
• *Specific Sites for safeguarding, • Preferred Areas for safeguarding, or; • Broad Areas of Search for safeguarding (as a last resort offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved). Suggestions of where such areas could exist, subject to needs outweighing other plan objectives, are contained in paragraphs B43 & B45 of appendix B to the consultation.* **Steering Group response and recommendations:** The suggestion that safeguarding is required only where there is ‘a specific case demonstrating need’ is incorrect. It is in conflict with paragraph 13 of MPPW which refers only to “mineral deposits which society may need”. No changes are therefore required. The NWaRAWP Secretary further notes that *“Safeguarding is taken out of context [by the respondent]. Old school safeguarding or mineral consultation areas were areas specifically “protected” as they were the most likely places that future mineral working would take place in. The present definition simply protects any given resource from unnecessary sterilisation”.*
11. With regard to the Safeguarding of railheads, the same County Council noted: *“The appendix suggests that all existing and potential new railheads should be identified for safeguarding within the LDP. However these are not identified in the review and they have not been promoted for*

inclusion within the LDP as candidate sites by the SWRAWP. The County Council is aware of work undertaken by Trafnidiaeth Canolbarth Cymru (TraCC), the Mid Wales Transport Consortium, which has prepared a Rail Utilisation Study (2010/2011) and a Draft Regional Rail Strategy and Actions (January 2013). These will inform preparation of the Powys Local Development Plan and are available to view at: <http://www.tracc.gov.uk/index.php?id=114&L=0>. Section 2.6 (paragraphs 2.6.14 – 2.6.16 and Action 11: Rail Freight) of the draft Regional Rail Study is important. This mentions a site at Moat Lane, Caersws, as a possible multi-modal freight facility which will need to be given consideration for inclusion in the deposit Powys Local Development Plan". **Steering Group response and recommendations:** No changes required, it is for individual MPAs, not the RTS, to identify individual railheads and wharves within their areas.

12. The same County Council also noted, with regard to SEA: "Paragraph 6.12 of the RTS explains that the RTS has not been prepared through the process of Strategic Environmental Assessment. It is suggested that the statement of reasons for this decision be appended to the RTS review for transparency. [The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 Part 2 Regulation 11]. **Steering Group response and recommendations:** Agreed - a statement of reasons will be produced by the Steering Group as a collaborative response.
13. Another MPA noted that: "The first paragraph of the 'Use of alternative aggregates' sub-section of the Torfaen Section of Appendix B (page 47) refers to most of the BGS land-based sand & gravel resources being sterilised by existing built development. However, whilst the BGS Maps show that there is a limited potential for land-based sand and gravel resources within Torfaen, they are not all sterilised by existing built development, as some resources lie within the open countryside. However, the 'Former Gwent - Aggregates Safeguarding Study', May 2009 (paragraphs 2.15-2.18) concluded that only the glacial sand and gravel deposits within Monmouthshire's Usk Valley are considered 'commercially exploitable'. These issues were examined during the Torfaen LDP hearings; and the Council's approach to them in the LDP was found 'sound' in the Inspector's Report. Therefore, it is suggested that this paragraph be amended as follows - "... Limited potential land-based resources within its area are indicated on BGS resource maps, but most of these are sterilised by existing built development or are not considered commercially exploitable." **Steering Group response and recommendations:** The Former Gwent Aggregates Safeguarding study did NOT conclude in the way described above. It made reference to an earlier Symonds Group study for the Welsh Assembly Government (Thompson *et al* 2000), in which the Usk valley sediments were identified as a major focus of investigation. These were therefore recommended for safeguarding in the Former Gwent study, but it is wrong to say that these were considered to be commercially exploitable, or that other deposits in the former Gwent area were definitely not. More detailed investigations are needed in all areas. For these reasons, it is suggested that the amended text should be slightly modified to read: "... Limited potential land-based resources within its area are indicated on BGS resource maps, but most of these are *either sterilised by existing built development and/or are unlikely to be commercially exploitable because of their limited extent.*"
14. The same MPA noted that: "The second paragraph of the 'Use of alternative aggregates' sub-section of the Torfaen Section of Appendix B (page 47) states "As noted in the original RTS, some secondary aggregate sources (foundry sand and colliery shale) may be available for substitution, but the sources are understood to be not significant either in tonnage or quality terms. As noted

for neighbouring Blaenau Gwent, the quality of the material and the quantities available for anything other than low grade fill, have yet to be demonstrated.” *The Council is not aware of a source of ‘foundry sand’ within Torfaen - therefore, this statement will need to be evidenced if it is to remain in the RTS 1st Review; and the term ‘colliery shale’ is confusing. It is presumed that this paragraph is referring the two opencast coal ‘spoil’ mounds at Tir Pentwys; which is considered a better term to use and is consistent with the term ‘spoil’ used in paragraph B14”.* **Steering Group response and recommendations:** Agreed - the references to both foundry sand and colliery spoil are carried-over from the original RTS but, if they cannot be confirmed, they will be deleted. More specific reference to the opencast spoil mounds will be added instead, both in Torfaen and Blaenau Gwent, although any references to the quality of this material will need to be kept generic, rather than site-specific, as noted under earlier questions.

And Finally ...

Question 21: Do you think this first Review of the RTS is likely to be helpful in moving further towards a more sustainable system of quarrying in Wales, in the years ahead? If not, please explain why.

Summary of answers given: Twelve respondents said ‘yes’ (in Pembrokeshire’s case, subject to the provisos in their Cabinet Report); and nine others offered no comment. The remaining two respondents were slightly uncertain, with observations as detailed below. **Steering Group responses and recommendations are noted in blue for each observation.**

1. *“The phrase “sustainable” applies to economic and social considerations as well as environmental. The quarrying industry in Wales has been inherently sustainable in terms of meeting the definition of sustainable development. It has led to a system that is generally self-sustainable without the need to rely on extensive imports. Whether this will improve as a result of the RTS is uncertain: the effective use of the development control system and the need to improve decision making is more likely to have a positive impact on the delivery of sustainable aggregate provision”.* **Steering Group response and recommendations:** Comment noted but no changes to the RTS are required.
2. *“The review of the RTS offers an opportunity to move towards a more sustainable system of quarrying in Wales. In contributing towards a more sustainable quarrying system, we consider that the RTS should help direct development to those locations where there is environmental capacity to accommodate new development. As part of this approach, and to improve the certainty that RTS recommendations can be delivered, we consider that apportionment figures and allocations should be informed by an understanding of where statutory designations are located. Further, we consider that the RTS should promote collaboration between mineral planning authorities in meeting the demand for minerals. Where there is a concern that an individual mineral planning authority is unable to meet its proposed level of apportionment, the RTS review should represent a framework within which mineral authorities can collaborate to deliver a regional/ sub-regional apportionment target”.* **Steering Group response and recommendations:** These points (dealing with specific designations and sub-regional

apportionments) have been addressed under point 5 of Q5 and point 4 of Q9, above). No additional action is required.

Question 22: If you are closely involved with implementing the Local Development Plan process in Wales, do you think the revised RTS is likely to be helpful in guiding and informing that process? If not, please explain what improvements you'd like to see.

Summary of answers given: Nine respondents said 'yes'; twelve offered no comment; and two others offered more qualified responses in terms of synchronisation with the process of LDP preparation, as detailed below.

1. *"With such disparity in the stages reached in LDP preparation by individual Local Planning Authorities, it may be some time before the approach set out in the revised RTS can be fully reflected through the Development Plans system in Wales".*
2. *"This depends on what stage you have reached with your LDP when the revised RTS is agreed. In Cardiff we have currently reached Deposit stage and the minerals section refers to the existing RTS. Clearly in going into the examination in August 2014 we will need to refer to the revised RTS. Fortunately in the case of Cardiff this is unlikely to raise any significant issues as we still have an extensive landbank of mineral reserves and therefore the minerals strategy proposed in the Deposit LDP is still relevant"*

Steering Group response and recommendations: As noted in response to Question 12 above, issues relating to collaboration between adjoining MPAs at different stages of LDP preparation are a matter for more general National policy and implementation thereof by LPAs, and no additional guidance should be provided by the RTS.

Question 23: ... and are there any other comments you would like to make relating to any aspect of the RTS Review?

Summary of answers given: Ten of the respondents offered a range of additional comments, as detailed below. **Steering Group responses and recommendations are noted in blue for each observation.**

1. The City and County of Swansea wished to *"highlight concerns regarding the potential effect of offshore sand dredging and the level of sand on beaches of the Gower Peninsula"*. **Steering Group response and recommendations:** This issue has already been factored in to the Welsh Government's Interim Marine Aggregates Dredging Policy (IMADP). No specific further action is required other than (perhaps) some reference to IMADP and the research which underpinned it and cross referencing to the issue of SEA requirements relating to marine vs terrestrial sand & gravel supplies in South West Wales (see item 3 under Question 4, item 3 under Question 5, item 8 under Question 6, and item 10 under Question 20).
2. A consultant noted that *"the undertaking to review the RTS on a five yearly basis is welcome"*. **Steering Group response and recommendations:** no action required.

3. Denbighshire County Council noted that its Local Development Plan was formally adopted in June this year and that *“the Plan makes provision for the extraction of 1 million tonnes of sand and gravel within the Preferred Areas identified on the LDP Proposals Maps. The Council will be undertaking a review of the LDP in 4 years’ time and will review the provision for sand and gravel at this stage, to take account of the Regional Technical Statement recommendations”*. **Steering Group response and recommendations:** comments noted but no action required.
4. On behalf of an independent quarry operator in South Wales, one consultant noted that: *“Gryphonn’s main concern relates to the apportionment for the future provision of land-won primary aggregates for Blaenau Gwent. Gryphonn agree that there is merit in using the ten year sales average over the 2001 to 2010 period and projecting this forward until 2036. However it does introduce an element of inflexibility and does not allow for changing circumstances and improved economic conditions. Gryphon’s sales over the last two years has been higher than the average annual sales of 0.17 million tonnes over the last ten years and with improved economic conditions and major developments occurring in the locality they consider that their sales will be higher than the assumed 0.17 million tonnes. In the last two years sales have approached 0.20 million tonnes per annum during which the economy has been in the early stages of recovery and there are two major developments are due to start shortly which will ensure sales will continue to increase. These are the nearby Race Circuit which is due to start construction in January 2014 and the completion of the dualling of the Heads of the Valleys Road from Brynmawr to Abergavenny which is also due to commence construction shortly. Both of these nearby projects will have requirements for large quantities of aggregates which Trefil will contribute to provide.* **Steering Group response and recommendations:** No changes are needed in response to these particular circumstances - the assessment of demand within the first Review of the RTS does allow for improving economic circumstances. If localised demand outstrips supply, this will be reflected in the landbank position and, as with all planning authorities, Blaenau Gwent is obliged by MTAN 1 to maintain a minimum landbank of 10 years (for crushed rock), thus encouraging new permissions to be granted when they are needed. Flexibility is provided by virtue of the five-yearly RTS review process which can take such changes into account.
5. The same consultant also stated that: *“Gryphonn would also like to raise a concern about the existing land bank of 3 million tonnes for crushed rock (as at 31st December 2010) which indicates a 17.6 year supply on the basis of the 0.17 million tonnes sales figure. Assuming that a large proportion, if not all, the land bank figure is made up of the stone reserves at Trefil quarry it is considered that it should be revised to take into account the included proportion of wastage (up to 26%). If the landbank is also reduced to allow for production over the period 2010-2013 and assuming the quarry produces 0.2 million tonnes per annum then the current land bank is significantly lower than 17.6 years which means that the need to identify additional sources of crushed rock is a priority”*. **Steering Group response and recommendations:** All quarries inevitably incur ‘wastage’ - as reflected in the extent to which the rate of production exceeds sales. Unfortunately, reliable data exists only for sales and it is those figures which therefore have to be used in landbank calculations. This, in turn, means that wastage factors need to be allowed for in each operator’s calculations of available reserves, otherwise landbanks will appear to be larger than they really are. If the 3 million tonnes landbank figure for Blaenau Gwent has properly allowed for wastage, then it represents a 17.6 year supply (from December 2010), as stated. As this is less than the overall level of provision required over 25 years, further allocations of at least

1.25 million tonnes are indicated in Table 5.3. The urgency for this within the current Plan period will depend on local circumstances, as noted under point 4, above.

6. The secretary of the South West England Aggregates Working Party suggested that *“the RTS review could include consideration of the provisions being made by MPAs in adjoining areas in England which could impact on supply and demand issues in Wales and given the importance of marine dredged sand and gravel to S Wales more information could have been provided on the potential future supply of this aggregate”*. **Steering Group response and recommendations:** It is too late to consider this within the First Review, as it would require further data collection, but the suggestion should be carried forward to the next and subsequent reviews.
7. CPRW observed that the consultation draft of the RTS First Review was: *“An informative and concise document dealing with the review of future quarrying and mineral extraction in Wales”*. **Steering Group response and recommendations:** Comment noted but no action required.
8. Gloucestershire County Council noted that *“the future supply pattern from Gloucestershire will require review through its MLP. This is currently the adopted 2003 Gloucestershire MLP. There is potential consultation on site options in 2014 with formal stages in 2015 and potential adoption in 2016. In light of comments made above the future provision that will be identified through the Gloucestershire MLP will still need to be tested. Therefore to reaffirm it cannot be assumed that historic patterns of supply of importation into South Wales from the Forest of Dean will continue into the future. Therefore the RTS might need to consider a contingency in that respect”*. **Steering Group response and recommendations:** these points are covered in responses to earlier questions; no additional actions are required.
9. A County Council in South Wales provided a detailed justification for its earlier suggestions that it is not always appropriate to rely on historical sales data as a basis for future apportionments, and that a sub-regional approach with joint working between neighbouring authorities might offer a better solution in such cases. The detail is not repeated here as the issues have been covered under earlier questions. **Steering Group response and recommendations:** no additional actions required.
10. The Joint Advisory Committee (JAC) for the Clwydian Range and Dee Valley AONB noted that: *“The JAC notes the guidance set out in the consultation documents for those Mineral Planning Authorities (MPAs) which cover the AONB (Denbighshire, Flintshire and Wrexham) in respect of apportionments and allocations for these authorities. The document’s recognition of the sensitivity of such nationally protected landscapes as AONB’s and the need to protect them from inappropriate development in meeting future demand for aggregates is endorsed by the JAC. The recommendations in Appendix A (North Wales) that MPA’s should collaborate to find solutions which aim to meet identified need outside the AONB, and the specific guidance to the three relevant MPA’s that “No allocations should be identified within the Clwydian Range and Dee Valley AONB unless there are no environmentally acceptable alternatives” is welcomed. However, the JAC would prefer an alternative form of words to this latter statement to better reflect national planning policy and the need to provide the highest level of protection for such areas. A more appropriate wording could be “No allocations should be identified within the Clwydian Range and Dee Valley AONB in line with national planning policy, which dictates that major development of this nature should not take place in AONB’s except in very exceptional*

circumstances where there is an overriding national need for the mineral which cannot be met from elsewhere.” **Steering Group response and recommendations:** National policy does not need to be repeated in the RTS: no changes required.

11. Natural England recommends that: *“the Steering Group considers whether there is a requirement to undertake Strategic Environmental Assessment (SEA) under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and Habitat Regulations Assessment (HRA) under Regulation 102 of the Conservation of Habitats and Species Regulations 2010”*. **Steering Group response and recommendations:** The Steering Group considers that there is no such requirement - see also responses to earlier questions (Item 3 under Question 4, Item 3 under Question 5, item 8 under Question 6, and Item 10 under Question 20).
12. One final respondent observed that clarification as to what circumstances might trigger an early review of the RTS, e.g. licencing of marine dredged aggregates, approval of the M4 Relief Road, cessation of the Aggregates Levy exemptions etc. **Steering Group response and recommendations:** see response to point 11 under Q6, above.
13. The same respondent also observed that the report (specifically the Regional Appendix advice to individual MPAs) notes that each planning authority would be required to monitor the accuracy of the assumptions made in the RTS regarding alternative aggregates, and therefore asks for *“confirmation that such monitoring is not a new requirement but the continuation of current processes. For example, the monitoring of construction and demolition waste is not undertaken by the Council and this comment suggests that it would need to be. It may be more appropriate to note that the Council will monitor the situation using data from relevant data sources e.g. NRW, WG etc.”* **Steering Group response and recommendations:** It will be clarified that such monitoring is not a new requirement and that it would involve using data from other sources, as suggested.

ID	Q1: Overall, does the draft First Review of the RTS help you to understand the issues involved?	Q2: Any key issues or findings missing from the Executive Summary?	Q3: Any aspects of Ch1 (purpose of the RTS) which you don't understand?	Q4: Are you happy with the key principles and approaches set out in Ch2?	Q5: Have these key principles been adequately deployed in carrying out the revision?	Q6: Are you happy with the approach that has been taken to assess the likely future demand in Ch3?	Q7: Are you happy with the validity of the findings of this assessment of demand?	Q8: Are you happy with the explanation of the existing patterns of supply in Ch4?	Q9: Are you happy with the opportunities set out in Table 5.1 and the supporting text?	Q10: Are you happy with the details relating to surpluses / shortfalls in Tables 5.2 and 5.3 and supporting text?	Q11: Do you agree with the logic of excluding dormant and suspended sites from the basic landbank calculations?	Q12: Are you happy with the details in paragraphs 5.20 and 5.21, re flexibility to depart from RTS recommendations?
1	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
2	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment
3	Yes	No	No	NO	see Q4	Generally Yes	Yes, but ...	Not entirely	No comment but...	No comment but ...	Yes	Yes
4	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment
5	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment
6	Yes	No, but...	No	Yes, except ...	Yes, but see Q4	Partly yes ...	Yes, but..	Not entirely	Yes	Yes, but..	NO - see Q10	Yes
7	no comment	no comment	no comment	Yes	Not entirely	Generally, yes	no comment	no comment	Yes but ...	no comment	no comment	Yes but ...
8	no comment	no comment	no comment	no comment	no comment	NO	No, see Q 6 comments	no comment	No, see Q 6 comments	no comment	no comment	no comment
9	Yes	no comment	no comment	no comment	no comment	see comments	no comment	see comments	see comments	see comments	see comments	no comment
10	Yes	Not aware of any	No	Yes	Yes	Yes	Yes	Yes	no comment	no comment	no comment	no comment
11	Generally yes but...	no comment	see comments	see comments	see comments	see comments	see comments	see comments	see comments	see comments	NO - see comments	no comment
12	Yes	None	None	Yes	Yes	Yes	Yes	Yes	Yes	Yes	no comment	Yes
13	Yes	Yes	No	Yes but...	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
14	no comment	see comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment
15	Yes	No but see comment	see Q6	see Q6	see Q6	see comments	See other questions	see comments	see comments	see comments	Yes	no comment
16	Yes	No	No	see comment	see Q4	see comment	see Q6	Yes	no comment	see comment	see Q10	no comment
17	Yes	No	No	Yes, except ...	Yes, except ...	see comment	see Q6	Yes, although ...	Yes	NO	NO - see Q10	Yes
18	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment
19	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment
20	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	Yes (see email)	no comment	no comment	no comment
21	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
22	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
23	Yes	see comments	No	Yes	Yes	see comments	Yes	Yes	Yes	Yes	Yes	Yes

ID	Q13: Do you think that the consultation process is adequate and fit for purpose?	Q14: Are the definitions given in this Glossary sufficiently clear and accurate?	Q15: Do you have any detailed local knowledge which would help to improve paragraphs A1 to A46?	Q16: Do you have any detailed local knowledge which would help to improve Tables A3 to A5?	Q17: Do you have any detailed local knowledge which would help to improve details on pages 12 to 24 of Appendix A?	Q18: Do you have any detailed local knowledge which would help to improve paragraphs B1 to B68?	Q19: Do you have any detailed local knowledge which would help to improve Tables B3 to B5?	Q20: Do you have any detailed local knowledge which would help to improve details on pages 19 to 50 of Appendix B?	Q21: Do you think this First Review of the RTS is likely to be helpful in moving further towards a more sustainable system of quarrying in Wales, in the years ahead?	Q22: Do you think the revised RTS is likely to be helpful in guiding and informing the LDP process?	Q23: ... and are there any other comments you would like to make relating to any aspect of the RTS Review?
1	Yes	Yes	no comment	no comment	no comment	no comment	no comment	no comment	Yes	Yes	see comment
2	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	No
3	Yes	Yes	no comment	no comment	no comment	Yes	No	Yes	Uncertain	no comment	see comment
4	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	see comment
5	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	see comments
6	Yes	Yes broadly, but ...	no comment	no comment	no comment	no comment	no comment	no comment	Yes	Yes	see comments
7	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	Maybe	no comment	no comment
8	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	No
9	see comments	no comment	no comment	no comment	no comment	no comment	no comment	no comment	Yes	no comment	see comments
10	Yes	Not entirely ...	no comment	no comment	no comment	no comment	no comment	no comment	Yes	Yes	see comment
11	see comments	no comment	no comment	no comment	no comment	see comments	see comments	see comments	Overall yes but ...	Yes but ...	No
12	Yes	Yes	no comment	no comment	no comment	no comment	Correct for Cardiff	no comment	Yes	It depends ...	No
13	no comment	no comment	no comment	no comment	no comment	see comments	see comments	no comment	Yes	Yes	No
14	no comment	no comment	no comment	no comment	no comment	no comment	see comment	see comment	no comment	no comment	No
15	see comments	no comment	no comment	no comment	no comment	see comments	no comment	see comments	Yes	no comment	see comments
16	Yes	Yes, but see Q10	no comment	no comment	no comment	no comment	no comment	no comment	Yes	Yes	No
17	Yes	Yes, but see Q10	no comment	no comment	no comment	no comment	no comment	no comment	Yes	Yes	No
18	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	see comments
19	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	no comment	see comments
20	no comment	no comment	no comment	no comment	no comment	no comment	no comment	see comments	no comment	no comment	No
21	Yes	Yes, although ...	no comment	no comment	no comment	see comments	no comment	see comments	Yes	Yes	No
22	Yes	Yes	no comment	no comment	no comment	no comment	no comment	no comment	Yes	Yes	No
23	see comments	Yes	no comment	no comment	no comment	no comment	no comment	no comment	no comment	Yes	see comments