

# Complete Agenda

# CABINET

## GWYNEDD COUNCIL

<b>DATE</b>	Tuesday, 19th May, 2020
<b>TIME</b>	1.00 pm
<b>LOCATION</b>	Virtual Meeting
<b>CONTACT POINT</b>	Annes Siôn 01286 679490 cabinet@gwynedd.llyw.cymru

### GWYNEDD COUNCIL CABINET MEMBERS

<b>Members</b>	
Dyfrig L. Siencyn	Leader
Dafydd Meurig	Deputy Leader, Cabinet Member for Adults, Health and Wellbeing
Craig ab Iago	Cabinet Member for Housing
Gareth Wyn Griffith	Cabinet Member for Environment
Nia Wyn Jeffreys	Cabinet Member for Corporate Support
Dilwyn Morgan	Cabinet Member for Children and Young People
Gareth Thomas	Cabinet Member for Economic Development and Community
Ioan Thomas	Cabinet Member for Finance
Catrin Elen Wager	Cabinet Member for Highways and Municipal
Cemlyn Rees Williams	Cabinet Member for Education

## AGENDA

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2	DECLARATION OF PERSONAL INTEREST			
3	URGENT ITEMS			
4	MATTERS ARISING FROM OVERVIEW AND SCRUTINY			
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6	YSGOL LLANAELHAEARN	Cyng / Cllr Cemlyn Williams	Gwern ap Rhisiart	7 - 32
7	THE EFFECTS OF COVID-19 ON THE 2020/21 BUDGET	Cyng. / Cllr Ioan Thomas	Dafydd L Edwards and Ffion Madog Evans	33 - 36
8	REGIONAL TECHNICAL STATEMENT ON AGGREGATES: SECOND REVIEW DRAFT	Cyng / Cllr Gareth Griffith	Gareth Jones	37 - 91
9	HOUSING SERVICE STRUCTURE	Cyng / Cllr Craig ab Iago	Dafydd Gibbard	92 - 102

**THE CABINET 28/04/20**

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**Present-**

Councillors: Dyfrig L. Siencyn, Dafydd Meurig, Craig ab Iago, Gareth Wyn Griffith, Nia Wyn Jeffreys, Dilwyn Morgan, Ioan Thomas, Gareth Thomas, Catrin Wager and Cemlyn Williams.

**Also present-**

Dilwyn Williams (Chief Executive), Iwan Evans (Head of Legal Services), Dafydd Edwards (Head of Finance Department), Ffion Madog Evans (Senior Finance Manager) and Annes Sion (Democracy Team Leader).

Item 6: Garem Jackson (Head of Education Department).

**1. APOLOGIES**

The Cabinet Members and Officers were welcomed to the meeting.  
No apologies were received.

**2. DECORATION OF PERSONAL INTEREST**

No declarations of personal interest were received.

**3. URGENT MATTERS**

There were no urgent items.

**4. MATTERS ARISING FROM OVERVIEW AND SCRUTINY**

There were no matters arising from overview and scrutiny.

**5. MINUTES OF THE MEETING HELD ON 10 MARCH 2020**

The Chair signed the minutes of the meeting held on 10 March 2020, as a true record.

**6. APPLICATION FOR RESOURCES BY THE EDUCATION DEPARTMENT**

Submitted by Cllr Cemlyn Williams

## **DECISION**

Resolved to commit £180,000 of one-off funding from the Council's transformation fund up to the end of March 2022 to enable the Education Department to have additional capacity on secondment terms for a period of two years to target, support and offer an appropriate and timely challenge for secondary schools realising one of the commitments in the Council Plan so as to improve outcomes for children and young people.

## **DISCUSSION**

The report was presented, noting that this was a bid for funding for a secondment post for a period of two years. It was added that there were two parts to the post, the first to give support to the county's secondary schools to respond to the problems arising within the secondary sector and secondly to release resources for the Education Modernisation - Twenty First Century Schools service.

The Head of Education Department noted that the department had acknowledged that there were some situations in the Secondary sector that required additional support and assistance in order to improve schools' outcomes. It was noted that this scheme was linked with one of the Council's strategic priorities, namely to develop leadership. It was added that challenges existed in the Secondary sector, specifically in Meirionnydd, with low numbers applying for leadership jobs within schools. As a result of this, it was added, discussions were being held with all head teachers to review recruitment processes. It was noted that there was a lack of resources in the Education Modernisation field at present, and the funding would ensure this resource. Additionally, it was noted that the resource was available to assist with new challenges of ensuring that children, and specifically vulnerable children, remained in education during this crisis period.

Observations arising from the discussion

— A question was asked about the situation in relation to the Transformation Fund, and it was noted that it was healthy and was available currently but that it depended on what the need would be following the Covid-19 crisis

## **7. UPDATE ON THE RESPONSE TO THE COVID-19 PANDEMIC**

The report was submitted by Dilwyn Williams

### **DECISION**

To note the information and thank staff for their work during the crisis period.

### **DISCUSSION**

The Chief Executive noted that he would provide an update which would outline what the Council was doing to respond to the Covid-19 crisis. It was noted that elected members would be receiving an update before the end of the week.

A snapshot of the staffing situation was given, noting that 137 were in the Government's shielding category, 175 staff were ill with 46 of those as a result of covid-19 symptoms. It was added that over 1800 staff were now working from home and that only 132 members of staff were now working in an office. It was noted that, currently, the care field was coping fairly well but that cases had arisen in three older people's homes, but that the situations were now under control.

It was reported that statistics showed Gwynedd as being fairly successful and that the cases were at the bottom end of the range highlighted in the potential scenarios. It was added that, once the restrictions would be relaxed, we would need to plan for the next period. It was noted that there was much talk about PPE but it was stressed that the level of PPE in Gwynedd was fine but that the level of masks was a cause for concern. It was stated that supplies were coming from the Government and it was also noted that work was being undertaken to investigate the level of additional costs facing the private sector.

It was stressed that the volunteer system was working well, with an army of people in Gwynedd ready and willing to assist. It was explained that education continued to look after the children of key workers and vulnerable children. It was emphasised that the bins service had continued throughout the period but that the Recycling Centres would remain closed for now.

#### Observations arising from the discussion

- The Chief Executive and the Chief Officers were thanked for leading the work throughout this period. It was added that the Cabinet members had been meeting informally regularly.
- The Cabinet Member for Finance expressed his gratitude to the department's staff for their work during this period, specifically the Information Technology staff for ensuring that all staff could work from home. It was also stressed that no council tax would be recovered until the end of June and it was outlined that work was being done in order to measure the financial effect of this period on the Council.
- It was stressed that this was a crisis period and that it struck everyone compared to the crises the county had faced in the past, where specific communities had been struck. In relation to the Adults field, it was explained that staff were working hard and they were thanked for this work under challenging conditions.
- The Cabinet Member for Highways and Municipal thanked the staff for being willing to work and for ensuring that the people of Gwynedd received a service. It was expressed that fly-tipping had been raised as a cause of concern but that the level of cases occurring had not been much higher than usual.
- It was noted that homeless individuals had now been housed during the crisis period. It was added that the Property department had secured ten extra beds in the Bryn Blodau home for the period.
- The Cabinet Member for the Environment noted that alternative arrangements for the planning field had been introduced by Welsh Government. It was added that the Public Protection service had been busy leading on the work of reducing scamming which had been

highlighted during the period.

- The Corporate Support department was thanked for their willingness to change their working methods. It was stressed that Siop Gwynedd were now closed and that Galw Gwynedd staff continued to work from home.
- It was stressed that direct payments were being made to the parents of free school meals children and it was added that work was being undertaken to prepare an educational provision. It was explained that 2000 devices were needed for pupils in order to facilitate that educational provision, and it was added that these would come from the schools directly. The staff and teachers were thanked for their work during this period.
- The Cabinet Member for Economy noted that the department had been working very differently compared to usual and the staff were thanked for that. It was explained that supporting businesses was the main priority and ensuring that there would not be a long-term effect on the area's businesses. It was added that work had been undertaken to ensure community resilience and that 23 members were part of a team to ensure that vulnerable people could get in touch to seek support.
- The Cabinet Member for Children and Supporting People stressed that the department had been working hard and that there were many positive stories within the department. It was explained that staff had received PPE and understood how to use it and had found a different way of working and supporting young people and children.
- It was explained that the care fields - children and adults - were open to vulnerable people. All Council staff, as well as residents, were thanked for their willingness to assist in the care field.

The meeting commenced at 13:00 and concluded at 14:20

**CHAIRMAN**

# Agenda Item 6

<b>MEETING</b>	<b>Gwynedd Council Cabinet</b>
<b>DATE</b>	<b>19 May 2020</b>
<b>CABINET MEMBER</b>	<b>Councillor Cemlyn Rees Williams</b>
<b>OFFICER</b>	<b>Gwern ap Rhisiart</b>
<b>TITLE OF ITEM</b>	<b>Ysgol Llanaelhaearn</b>

## 1. DECISION SOUGHT

The Cabinet is asked to confirm the final proposal given by statutory notice, to close Ysgol Llanaelhaearn on 31 August 2020 and provide a place for pupils at Ysgol Bro Plenydd, Y Ffôr from 1 September 2020, in accordance with Section 53 of the School Standards and Organisation (Wales) Act 2013 and the requirements of the School Organisation Code 11/2018.

## 2. REASON WHY DECISION IS NEEDED

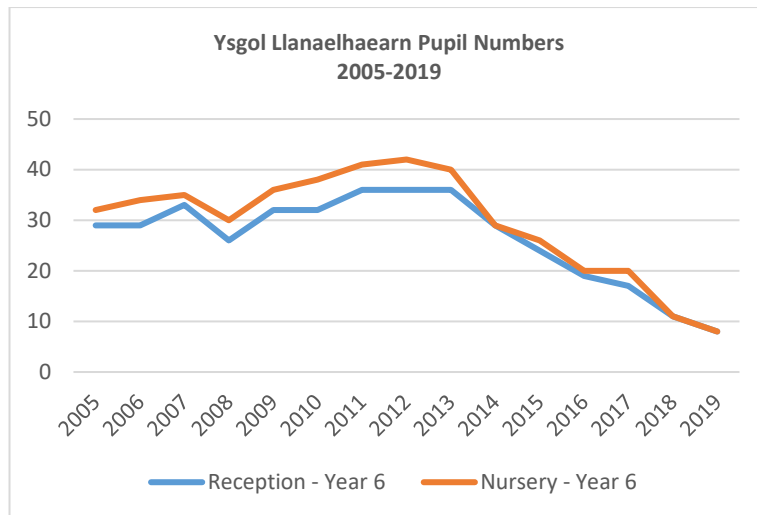
2.1 The purpose of this report is to report to the Cabinet following the objection period for the proposal to close Ysgol Llanaelhaearn on 31 August 2020 and provide a place for pupils at Ysgol Bro Plenydd, Y Ffôr from 1 September 2020. The Statutory Notice was published on the 5<sup>th</sup> March 2020, commencing a 28 day objection period. The objection period ended on 3<sup>rd</sup> April 2020, and no objections were received.

## 3. INTRODUCTION AND BACKGROUND

3.1 A report was submitted to the Cabinet meeting on 4 June 2019, where it was resolved to, *'grant permission to the Education Department to hold formal meetings with the governing body and other relevant stakeholders to discuss a range of potential options for the school's future'*, as a result of concern over a significant drop in numbers attending school.

3.2 Following these meetings, a report was submitted to a Cabinet meeting on 5 November 2019 where the decision was approved to *'begin a period of statutory consultation, in accordance with Section 48 of the School Standards and Organisation 2 (Wales) Act 2013, on the proposed proposal to close Ysgol Llanaelhaearn on 31 August 2020 and to provide places for pupils at Ysgol Bro Plenydd, Y Ffôr, on 1 September 2020'*.

3.3 This report outlined the main challenges facing the school, namely that there has been a recent substantial drop in numbers attending the school which has led to a critical situation with 8 pupils on the register in the September 2019 census (see below). These 8 pupils are taught in two classes. In addition, projections show a further fall over the next 5 years.



**3.4** As a result of the low numbers, it is acknowledged that the school is in a vulnerable position and under increasing budgetary pressures. The latest official data demonstrates that:

- a. school numbers are of concern. In September 2019, eight pupils were registered at the school.
- b. classroom sizes are small - with one class of 3 pupils and one class of 5.
- c. projections indicate seven pupils in 2020, five pupils in 2021, and five pupils in 2022.
- d. 42 primary age children live in the Llanaelhaearn catchment area, 34 of whom attend other schools.
- e. Ysgol Llanaelhaearn receives an additional sum to the usual allocation via the minimum staffing protection policy. For the 2020/21 financial year this additional sum amounts to £55,055. At present, the School shares a Headteacher with two other schools, and employs a full-time teacher and assistant. The current budget does not allow for this arrangement to continue.
- f. per pupil cost for Ysgol Llanaelhaearn during the 2020/21 financial year is £17,051, compared with the county-wide average per pupil cost of £4,198 for the same period.
- g. there are 83% surplus places (39 Reception to Year 6, and six surplus places in Nursery).

### **3.5 Statutory Consultation**

The consultation was held between 16 December 2019 and 29 January 2020 and 8 responses were received. One of the recurring issues raised during the consultation was transport arrangements following the closure of Ysgol Llanaelhaearn. Due to the school's current arrangement of sharing a headteacher with Ysgol Chwilog, pupils from Ysgol Llanaelhaearn have been attending Ysgol Chwilog on two afternoons a week for some time, and are already familiar with the teachers and other pupils. It emerged from the consultation responses that parents were likely to request that their children transfer to Ysgol Chwilog rather than attend the alternative school, Ysgol Bro Plenydd. As a result, special transport arrangements to specific schools will be considered during the transition period in order to minimise its effect on the existing pupils at Ysgol Llanaelhaearn.

**3.6** Following the consultation, a report was prepared for Cabinet on 18 February 2020, and the Cabinet considered the consultation report and resolved to *accept the observations received during the statutory consultation period as well as agreeing to:*



- i. *Approve the proposal to close Ysgol Llanaelhaearn on 31 August 2020, and provide a place for the pupils at Ysgol Bro Plenydd, Y Ffôr from 1 September 2020.*
- ii. *Approve the publication of statutory notices on the proposal in (i) above in accordance with the requirements of Section 48 of the Schools Standards and Organisation (Wales) Act 2013.*
- iii. *Approve the transport arrangements for the transition period only, when free transport will be available for those pupils enrolled at Ysgol Llanaelhaearn currently, to Ysgol Bro Plenydd, Y Ffôr or Ysgol Chwilog specifically, if they live over two miles from the chosen school, or that they receive free transport because of the nature of the roads in accordance with Gwynedd Council's current transport policy.*

### **3.7 Objection Period**

The Statutory Notice was published on 5 March 2020, commencing a 28 day objection period. Hard copies were placed on the doors and gates of Llanaelhaearn and Bro Plenydd schools. Stakeholders received an email informing them that the objection period had begun and hard copies were distributed to parents of pupils. The objection period ended on 3<sup>rd</sup> April 2020, and no objections were received. This report is presented for the Cabinet to consider the situation before reaching a final decision whether to confirm the proposal.

## **4. REASON AND JUSTIFICATION FOR RECOMMENDING THE 'DECISION SOUGHT'**

- 4.1** In line with the '*Excellent Primary Education for Children in Gwynedd*' Strategy a number of factors were considered in developing and evaluating options for the situation.
- 4.2** These issues were covered in detail in the report presented to Cabinet on 5<sup>th</sup> November 2019, and in the statutory consultation document thereafter. A summary of the impact of the proposal on these factors is demonstrated in Appendix 1, using the latest official data.
- 4.3** Having held the objection period through the issue of a statutory notice, and the fact that no objections were received, the Authority is of the view that implementing this proposal is the most appropriate response to the reason for formulating the proposal, which are noted in Section 3.3, as none of the other options considered during the process would address the key issues facing the school. In line with the School Organisation Code 11/2018, the following factors were considered in reaching this conclusion:

### **4.3.1 Quality and Standards in Education**

According to the most recent Estyn reports, Ysgol Bro Plenydd would offer education of equal if not better quality than Ysgol Llanaelhaearn.

The alternative school offers education of at least equal standard, and provides pupils with more opportunities for collaborating and socialising with their peers, and enables the pupils to gain a range of curricular and extracurricular experiences.

Due to the existing low pupil to teacher ratio at Ysgol Llanaelhaearn, the children are making good progress. Delivering this proposal would give pupils opportunities to be educated in peer groups with a far smaller age range and would provide daily opportunities to improve the pupils' educational and social experience.

The needs of any vulnerable groups, including children with additional learning needs, would be assessed and implemented in line with the Authority's policy and procedures.

#### **4.3.2 The need for places and the impact on accessibility of schools**

Pupils will be educated in classes which are more appropriate in size in comparison to the current situation. Implementing the proposal would lead to better consistency in class sizes and reduce the age range within primary school classes in the area. With 23 surplus places (and seven surplus places for Nursery), Ysgol Bro Plenydd has sufficient capacity for the number of pupils from both schools currently and for the next three years.

Ysgol Bro Plenydd is a community, Welsh medium school, as is Ysgol Llanaelhaearn.

#### **4.3.3 Resourcing of Education and other financial implications**

Implementing the proposal would rationalise the per pupil cost in schools which would reduce the range in the per pupil cost for all Gwynedd children. It is estimated that realising the proposal would lead to a cost of £4,296 per pupil at Ysgol Bro Plenydd compared to the current £17,051 per pupil cost at Ysgol Llanaelhaearn. The county-wide average for the same period is £4,198 per pupil.

It is estimated that realising the proposal would lead to revenue savings of between £92,213 and £105,813 per annum having considered additional transport arrangements. The estimate of £105,813 in revenue savings is based on factoring in the transport costs for existing pupils at Ysgol Llanaelhaearn to their new school, whether that be Ysgol Chwilog or Ysgol Bro Plenydd. Similarly, the estimated revenue saving of £92,213 is based on a future scenario, where all primary age children in the Llanaelhaearn catchment would attend their new catchment school, Ysgol Bro Plenydd, and would be eligible for transport in accordance with the Authority's current transport policy.

Pupils would be educated at a school where the numbers and projections are more robust and sustainable for the future, reducing the rate of surplus places in the area's schools from 35% to 27% once the proposal has been implemented.

#### **4.3.4 Specific factors when considering school closures**

During the process of engaging and meeting with the school's relevant stakeholders, a number of possible options were considered for the school's future. All options were evaluated against the factors of the '*Excellent Primary Education for Children in Gwynedd*' Strategy. A full evaluation of these options was provided as an appendix to the report presented to Cabinet on 18 February 2020 and a summary of the comparison of the current situation with the likely situation should the proposal be implemented is included in Appendix 1 of this report.

#### **4.3.5 Presumption against the closure of rural schools**

A number of impact assessments have been undertaken in accordance with the requirements of the School Organisation Code 011/2018 including:

- *Assessment of likely Impact on different travel arrangements*
- *Assessment of likely impact on the community*
- *Assessment of likely impact on quality and standards of education*

These assessments were reviewed following the statutory consultation and these assessments are included as an annex to the report presented to Cabinet on 18 February 2020.

The assessment of the likely effect on different transport arrangements concludes that the option to close the school would mean that pupils from Ysgol Llanaelhaearn would need to travel further to school every day. As the alternative school is more than two miles from their homes, they would be entitled to free transport to the alternative school. Ysgol Bro Plenydd is located 3.6 miles from Ysgol Llanaelhaearn, and it is anticipated that the journey would take approximately 5 minutes each way in a car or by bus, which is within the reasonable distance expected for primary children to travel to their school in accordance with the expectation of the '*Excellent Primary Education for Children in Gwynedd Strategy*' of 30 minutes each way. Transport to the alternative school would be offered in line with Gwynedd Council transport policy.

In addition, the assessment of the likely impact on the community states that there would be some negative impact from closing the school. However, it notes that seven pupils who live in the Llanaelhaearn catchment area currently attend Ysgol Bro Plenydd. Therefore, a link between the school and the wider area already exists. The community assessment notes that the school is involved with the Llanaelhaearn community, even though the community does not currently use the school building. Discussions will be held about the potential of including the community of Llanaelhaearn in the community activities of Ysgol Bro Plenydd.

The conclusion of the assessment of the likely impact on the quality and standards of education is summarised in section 4.3.1 of this report.

Following the objection period, the Education Department continues to be of the opinion that no other option would address the key challenges facing the school, namely:

- low pupil numbers
- projections indicating a further fall in numbers over the next five years
- existing pupils are educated in classes which are small in numbers – with one class of three pupils and one class of five.

## **5. RELEVANT CONSIDERATIONS**

In addition to the impact assessments carried out in accordance with specific 'presumption against closure of a rural school' guidelines a number of other impact assessments were undertaken and updated during the process. These assessments are included as an appendix to the report presented to Cabinet on 18 February 2020 and their conclusions are summarised below.

### **5.1 Equality Assessment**

An equality assessment was held on the options, which focused on different equality elements such as race, sex, disability, language, religion or creed, and age. The equality assessment stated the importance of positively promoting equal opportunities in light of the proposal, and that measures should be in place to ensure unlawful discrimination and harassment does not occur. Arrangements are also in place to monitor and review the situation.

## **5.2 Language Impact Assessment**

The Language Impact Assessment does not anticipate a negative impact on the Welsh language from the proposal, mainly because:

- i. The alternative school provides a Welsh medium education, also provided for pupils at Ysgol Llanaelhaearn.
- ii. Statistics from the 2011 census for the Llanaelhaearn ward indicates that 74% of the population is Welsh speaking, and 80% of the population of the Abererch ward speaks Welsh. Ysgol Bro Plenydd's catchment area is within the Abererch ward (Office for National Statistics).
- iii. PLASC January 2019 statistics show that 54% of pupils at Ysgol Llanaelhaearn speak Welsh fluently at home compared to 83% of pupils at Ysgol Bro Plenydd.

## **5.3 Well-being Assessment (Well-being of Future Generations Act 2015)**

The Education Department has a role in promoting the well-being objectives of the Act amongst pupils in the county through its activities and projects. The Act sets a duty on public bodies in Wales to improve economic, social, environmental and cultural well-being. As part of the duty, the Council has published well-being objectives which outline the way it will improve well-being in the "2018-2023 Gwynedd Plan".

Following consideration and an assessment in line with the requirements of the Well-being Act, it is concluded that the proposal meets the seven well-being objectives within the Act, together with the Council's well-being objectives. This proposal will allow us to respond to and address the children's needs today, and strengthen their future well-being. The proposal will ensure that the children of the area are educated on a site that is suitable and in a naturally Welsh-speaking community, thus increasing the opportunities to socialise and collaborate with others, and to give them an equal opportunity to thrive amongst their peers

## **6. RECOMMENDATION**

- 6.1** This recommendation follows consideration of a range of options. These options were fully evaluated when comparing main advantages and disadvantages against specific factors. The *'Excellent Primary Education for Children in Gwynedd' strategy*, the School Organisation Code, the conclusions of the impact assessments and other relevant factors were used in evaluating the options.
- 6.2** As no objections were received during the objection period, and the fact that no alternative option was identified which would address the main challenges facing the school, it is recommended that Cabinet approves the decision sought which is to confirm the proposal given by statutory notice to close Ysgol Llanaelhaearn on 31 August 2020, in accordance with Section 53 of the School Standards and Organisation (Wales) Act 2013 and the requirements of the School Organisation Code 11/2018.

## 7. NEXT STEPS AND TIMETABLE

7.1 Subject to the Cabinet’s decision, these are the next steps in the process together with an outline timetable;

<b>June 2020</b>	<b>Decision referred to Welsh Ministers:</b> In accordance with section 54 of the 2013 Act, within 28 days of the Cabinet's decision, the following bodies can refer the proposal to Welsh Ministers for a decision: <ul style="list-style-type: none"><li>i. Another Local Authority affected by the proposals;</li><li>ii. The appropriate religious body for any school affected;</li><li>iii. The governing body of a voluntary or established school subject to proposals;</li><li>iv. A trust holding property on behalf of a voluntary or established school subject to proposals;</li><li>v. A further education establishment affected by the proposals.</li></ul>
<b>31 August 2020</b>	<b>Implementation of the proposal:</b> Ysgol Llanaelhaearn officially closes, subject to the Cabinet's decision.

## 8. VIEWS OF THE STATUTORY OFFICERS

### **The Monitoring Officer:**

The report describes the steps followed in the process and in particular the implementation of the statutory objection period the report notes that no objections to the proposal were received following publication. This follows publication of the notice on the site, website as well as directly contacting the stakeholders listed in the School Organisation Code which represent a wide range including parents, governors and statutory bodies at a local and National level. I’m satisfied that the recommendation is appropriate.

### **Head of Finance:**

I confirm that the financial figures in part 3.4 (d) and (e) and part 4.3.3 of the report, together with the financial figures contained in the 'Financial Resources' section of Appendix 1, are both true and correct costs, or are fair estimates (where appropriate) having considered the cost of transport.

There are clear reasons to support the proposal to close Ysgol Llanaelhaearn on 31 August 2020, including financial reasons such as an annual saving of between £92,213 and £105,813 in revenue costs, and the current cost of Ysgol Llanaelhaearn at £17,051 per pupil, compared with county’s average £4,198. Therefore, I support the recommendation.

### **Local Member:**

The Local Member did not wish to comment.

**Appendices:**

**Appendix 1:** Summary of the impact of the proposal on the factors of the '*Excellent Primary Education for Children in Gwynedd*' Strategy

**Appendix 2:** Equality Impact and the Well-being of Future Generations Act Assessments

**Appendix 3:** [Copy of Statutory Notice](#)

**Appendix 4:** [Consultation Document](#)

**Appendix 5:** [Cabinet Report 18 February 2020](#)

**Appendix 6:** [Cabinet Report 5 November 2019](#)

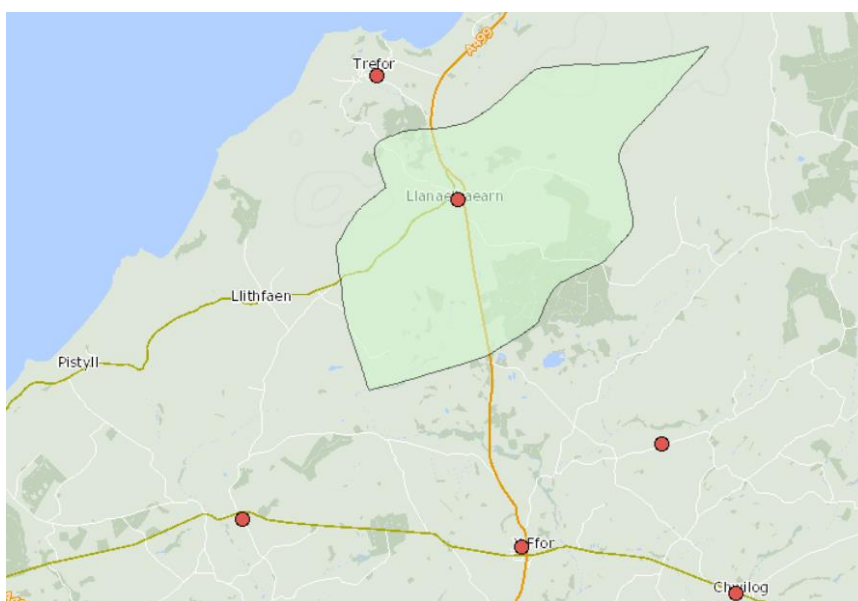
**Appendix 7:** [Excellent Primary Education for Children in Gwynedd Strategy](#)

## Appendix 1:

### Ysgol Llanaelhaearn

Comparison of the current situation, and the situation if the proposal is implemented with the factors of the Strategy 'Excellent Primary Education for Children in Gwynedd'		
	The current situation	The situation after the proposal is implemented
<b>Class sizes</b>	One class of 3 pupils and one class of 5 pupils.	Average class sizes of 25 pupils at the alternative school.
<b>Pupil numbers</b>	8 pupils. Projections show that there will be 5 pupils by 2022.	Current alternative school numbers are 68 pupils (and 6 Nursery). Projections show 65 (+ 9 Nursery) pupils by 2022.
<b>Leadership and staffing</b>	Share a Headteacher with two other schools. The Headteacher spends 1 day a week leading Ysgol Llanaelhaearn.  Full time teacher and full time assistant.	As well as a full-time headteacher, the alternative school has three teachers and four assistants.
<b>The Community</b>	Pupils educated in a school that is the focus of community activities and enriching experiences and opportunities for pupils.	Pupils to be educated in a school that is the focus of community activities, enriching experiences and opportunities for pupils, as is the current situation.
<b>Financial Resources</b>	Costs of £17,051 per pupil at Ysgol Llanaelhaearn. The county average for the same period is £4,198 per pupil.	Costs of £ 4,296 per pupil at Ysgol Bro Plenydd and therefore rationalising cost per pupil in schools which would reduce the range in cost per pupil for all Gwynedd children.  Proposed net savings of between £92,213 and £105,813 subject to the numbers receiving free transport to their new school.
<b>The Welsh Language</b>	Pupils educated in a Welsh-medium school	Pupils to be educated in a Welsh-medium school, as at present, and in a school where social use of Welsh is strong
<b>Geographical Factors</b>	Pupils are educated at a school within a reasonable distance of their homes.	Pupils would continue to receive their education in a school within a reasonable distance of their homes and receive transport in accordance with the Council's policy.  Ysgol Bro Plenydd's catchment area would include Ysgol Llanaelhaearn's catchment for the future.

Sources: September 2019 Schools Census  
Gwynedd Schools Budget Allocation 2020/21



# **Well-being Assessment Report Ysgol Llanaelhaearn**

- May 2020



- 1. INTRODUCTION**
- 2. HOW DOES THE PROPOSAL MEET GWYNEDD COUNCIL'S WELL-BEING OBJECTIVES?**
- 3. DOES THE PROPOSAL MEET THE GOALS OF THE WELL-BEING ACT?**
- 4. SUSTAINABLE DEVELOPMENT PRINCIPLES**
- 5. CONCLUSION**

## 1. INTRODUCTION

As a Council we are committed to the principles within the Well-being of Future Generations Act (2015) in order to improve the economic, social, environmental and cultural well-being of Gwynedd's communities.

The Council's vision is:

*Our vision as a Council is to support all the people of Gwynedd to thrive and live full lives in their community, in a county which is one of the best counties to live in.*

The Council has adopted well-being objectives that complement the national well-being goals and ensure that Gwynedd residents:

- Enjoy a happy, healthy and safe life
- Have access to quality homes within their communities
- Earn enough wages to support themselves and their families
- Receive a first class education that will allow them to do what they want to do
- To live with dignity and independence for as long as possible
- Being able to live in a naturally Welsh speaking Society
- Enjoy the beauty of the County's natural environment.

The table below outlines the link between our well-being objectives and the national well-being goals.

<b>We will ensure that the residents of Gwynedd can:</b>	<b>Prosperous</b>	<b>Resilient</b>	<b>Healthier</b>	<b>Equal</b>	<b>Cohesive Communities</b>	<b>A vibrant culture where the Welsh language is thriving</b>	<b>Globally responsible</b>
Enjoy happy, healthy and safe lives							
Live in quality homes within their communities							
Earn a sufficient salary to be able to support themselves and their families							
Receive education of the highest quality which will enable them to do what they want to do							
Live with dignity and independently for as long as possible							
Live in a natural Welsh society							
Take advantage of the beauty of the County's natural environment.							

The Education Department has a role to promote the Act's well-being goals to the county's pupils through its activities and projects. The Act places a duty on public bodies in Wales to improve economic, social, environmental and cultural well-being. As part of the duty the Council has published well-being objectives that outline how it will improve well-being in the "Gwynedd Council Plan 2018-2023".

# 1. INTRODUCTION

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## 1.1 Ysgol Llanaelhaearn Context

On 4th June 2019, Gwynedd Council's Cabinet allowed the Education Department to hold formal meetings with the Governing Body of Ysgol Llanaelhaearn, and other relevant stakeholders, to discuss a range of possible options for the future of the school.

Ysgol Llanaelhaearn is located in the centre of the village of Llanaelhaearn which is between Pwllheli and Caernarfon. The school has a capacity of 53 from Nursery to Year 6, with 8 pupils aged 3-11 attending the school (September 2019). All pupils live in the Llanaelhaearn catchment area. The 8 pupils now attending the school are taught in two classes with 3 in the foundation phase and 5 in key stage 2.

Between June and September 2019, a series of meetings were held to review the school's situation, at which a number of options were proposed and assessed for the future.

Having considered and evaluated the 8 options, the Education Department considered in more detail two options, which would offer advantages over the current situation, which are to federalise with another school or schools, or closing the school and pupils to be educated at an alternative school. Those models, in addition to doing nothing and continuing the status quo, are detailed below.

- *Do nothing - continue with existing school structure.*

Maintaining the current system would mean that Ysgol Llanaelhaearn would continue in the same way, with the same staffing structure. There would be a Strategic Head at Ysgol Llanaelhaearn, Garndolbenmaen and Chwilog who would spend 1 day a week leading Ysgol Llanaelhaearn.

The pupils would continue to be taught by a full-time teacher and a senior assistant.

- *To federalise with other school (s)*

Ysgol Llanaelhaearn would form a formal, legal federal model with a neighbouring school or other schools. Geographically, the schools that would be reasonable to consider would be one or more of the following; Yr Eifl, Llangybi, Bro Plenydd, Chwilog, or Pentreuchaf.

This means that the schools remain separate but the Governing Bodies are abolished, and a single Governing Body is elected for the Federation. Schools budgets would remain as they are.

Forming a formal federation with another school or schools would strengthen the school's leadership and increase opportunities for pupils to collaborate and socialise with peers.

- *Close Ysgol Llanaelhaearn and pupils to be educated at an alternative school*

This means that Ysgol Llanaelhaearn is closing, and current pupils transfer to Ysgol Bro Plenydd (the alternative school).

Following detailed consideration of those options, a recommendation was presented to Gwynedd Council's Cabinet on the 5th of November 2019, and they agreed to begin a statutory consultation period in accordance with section 48 of the Schools Standards and Organisation Act (Wales) 2013 on the proposal to close Ysgol Llanaelhaearn on 31 August 2020 and offer a place for pupils to Ysgol Bro Plenydd, Y Ffôr from 1 September 2020.

A statutory consultation period was held between 16 December 2019 and 29 January 2020. Eight responses to the consultation were received. Gwynedd Council's Cabinet considered the consultation report at its meeting on 18 February 2020 and resolved to issue a statutory notice on the proposal. The statutory notice was issued on 5 March 2020 with a 28 day objection period. No objections to the proposal were received.

## 2. HOW DOES THE PROPOSAL MEET GWYNEDD COUNCIL'S WELL-BEING OBJECTIVES?

Gwynedd Council's well-being objectives were considered when evaluating the options.

<b>Do nothing - continue with the status quo.</b>	
<b>Objectives</b>	<b>Details:</b>
<b>Enjoy a happy, healthy and safe life</b>	No effect
<b>Live in quality homes within their communities</b>	No effect
<b>Earn a sufficient wage to support themselves and their families</b>	No effect
<b>Receive education of the highest quality that will allow them to do what they want to do</b>	No effect
<b>To live with dignity and independently for as long as possible</b>	No effect
<b>Live in a naturally Welsh society</b>	No effect
<b>Take advantage beauty of the County's natural environment</b>	No effect

<b>Federation with other School (s)</b>	
<b>Objectives</b>	<b>Details:</b>
<b>Enjoy a happy, healthy and safe life</b>	No effect
<b>Live in quality homes within their communities</b>	No effect
<b>Earn a sufficient wage to support themselves and their families</b>	No effect
<b>Receive education of the highest quality that will allow them to do what they want to do</b>	No effect. Federalisation would be a process of formalising the current arrangement of collaboration, and although there will be minor changes such as a single Governing Body, and reducing the administrative burden on the Headteacher, it is presumed that the school would continue with the arrangement of collaborating with Ysgol Chwilog and Garndolbenmaen, or another school if they formed a federation with them.
<b>To live with dignity and independently for as long as possible</b>	No effect
<b>Live in a naturally Welsh society</b>	No effect
<b>Take advantage beauty of the County's natural environment</b>	No effect

<b>Close Ysgol Llanaelhaearn and pupils to be educated at an alternative school</b>	
<b>Objectives</b>	<b>Details:</b>
<b>Enjoy a happy, healthy and safe life</b>	No effect
<b>Live in quality homes within their communities</b>	No effect
<b>Earn a sufficient wage to support themselves and their families</b>	Introducing this option could result in staff redundancy. A detailed staffing policy has been developed by Gwynedd Council in conjunction with Trade Unions and head teachers. The policy will form the basis of any redundancies arising from any proposal. Clear and open communication will be essential to the successful implementation of any proposals.
<b>Receive education of the highest quality that will allow them to do what they want to do</b>	Ensuring that the pupils receive a first class education will be at the heart of the proposal, ensuring that they receive at least the same quality and standard in the alternative school.
<b>To live with dignity and independently for as long as possible</b>	No effect

<p><b>Live in a naturally Welsh society</b></p>	<p>A language impact assessment has been undertaken. Pupils at Ysgol Llanaelhaearn live in a Welsh community and are educated through the medium of Welsh, as Ysgol Bro Plenydd. The linguistic impact assessment notes that the position of the alternative school is very strong, with 83% of pupils coming from Welsh-speaking homes. By comparison, 54% of Ysgol Llanaelhaearn's pupils come from Welsh-speaking homes.</p>
<p><b>Take advantage beauty of the County's natural environment</b></p>	<p>No effect</p>

### 3. DOES THE PROPOSAL MEET THE GOALS OF THE WELL-BEING ACT?

Aim	Does the proposal contribute to this aim?	Measures to mitigate negative impacts on this aim:
<p><b>A prosperous Wales</b> An innovative society using resources efficiently and proportionately, educated people, creating wealth and work.</p>	<p>Implementing the proposal to close Ysgol Llanaelhaearn and educate the children at Ysgol Bro Plenydd means that the pupils develop experiences through socialising with other children and will receive a quality education using resources efficiently.</p> <p>This proposal could result in staff losing their jobs.</p>	<p>Staff and Union representatives will be consulted specifically as part of the statutory consultation period. Gwynedd Council has developed a detailed staffing policy, in conjunction with Trade Unions and head teachers. Any redundancies as a result of this proposal will have to be in line with that policy. Clear and open communication will play a central role in implementing any proposals.</p>
<p><b>A resilient Wales</b> A nation that maintains and enhances biodiversity and healthy ecosystems that support resilience and the ability to adapt to change (for example climate change).</p>	<p>The proposal is unlikely to have an impact on this aim.</p>	<p>No effect</p>
<p><b>A healthier Wales</b> A society where people's physical and mental well-being is as good as possible and people understand what affects their health.</p>	<p>The proposal is unlikely to have an impact on this aim.</p>	<p>No effect</p>
<p><b>A more equal Wales</b> A society that enables people to fulfil their potential irrespective of background or circumstances (including their socio-economic background and circumstances).</p>	<p>The education and experiences of the catchment area pupils are at the forefront of the proposal. Our aim is to ensure that pupils achieve their potential regardless of their background.</p>	<p>An equality assessment has been undertaken and it is concluded that implementation of the proposal would not impact on equality, and that all pupils and families have equal opportunity irrespective of their background or socio-economic circumstances. The alternative school operates a robust equality and anti-bullying policy.</p>
<p><b>A Wales of cohesive communities</b> Attractive, viable and safe communities with good connections</p>	<p>The community of Llanaelhaearn is strong and active and it is recognised that closing the school would have some negative impact on the community.</p>	<p>An assessment of the likely impact on the community has been undertaken where it is noted that although there is some negative impact on the community, but 7 pupils living in the Llanaelhaearn catchment area already attend Ysgol Bro Plenydd, and therefore there is already contact between the school and the wider area. The assessment also notes that discussions would be held to discuss the possibility that Ysgol Bro Plenydd's community activities includes the community of Llanaelhaearn.</p>

<p><b>A vibrant Wales and culture where the Welsh language thrives</b> A society that promotes and protects culture, heritage and the Welsh language and encourages people to participate in the arts, sports and leisure activities.</p>	<p>Implementing this proposal will mean that pupils at Ysgol Llanaelhaearn will continue to be educated in a Welsh medium school.</p>	<p>The language impact assessment notes that there would be no change to this aim by realising the proposal as a result of the Welshness of the Llanaelhaearn area and other nearby areas.</p>
<p><b>Wales is globally responsible.</b> A nation that, in doing anything to improve the economic, social, environmental and cultural well-being of Wales, is considering whether doing such a thing could contribute positively to global well-being.</p>	<p>The proposal is unlikely to have an impact on this aim.</p>	<p>No effect</p>

## 4. SUSTAINABLE DEVELOPMENT PRINCIPLES

Sustainable Development Principles	Does the proposal consider the principle?
<p><b>Long term</b> The importance of balancing short-term needs with the need to safeguard the ability to meet long-term needs is also important.</p>	<p>There has been a pattern of declining numbers since 2012, with projections showing that numbers will reduce further, and so it shows that the current challenging situation facing the school will be long-term and need to be reviewed as soon as possible.</p>
<p><b>Suspension</b> How action to prevent problems from occurring or escalating can help public bodies achieve their objectives.</p>	<p>Pupils' needs will be prioritised at all stages of the process.</p>
<p><b>Integration</b> Consider how the public body's well-being objectives may affect each of the well-being goals, all of its other objectives, or the objectives of other public bodies.</p>	<p>A critical situation of low numbers at Ysgol Llanaelhaearn has led to a review of the school's position for the future.</p>
<p><b>Collaboration</b> Collaboration with any other person (or different departments within the organisation itself) could help the organization meet its well-being goals.</p>	<p>A number of other departments have had input during the process and whilst evaluating the possible options. In addition, relevant stakeholders of the school have been involved in the process.</p>
<p><b>Contents</b> The importance of involving people with an interest in achieving the well-being goals, and ensuring that those people reflect the diversity of the area they serve.</p>	<p>The proposal has been subject to public consultation, and consultation for children. The process to date has included local review meetings to engage with the relevant stakeholders of the school. These meetings have involved the Governing Body, staff, and parents of Ysgol Llanaelhaearn.</p>

## 5. CONCLUSION

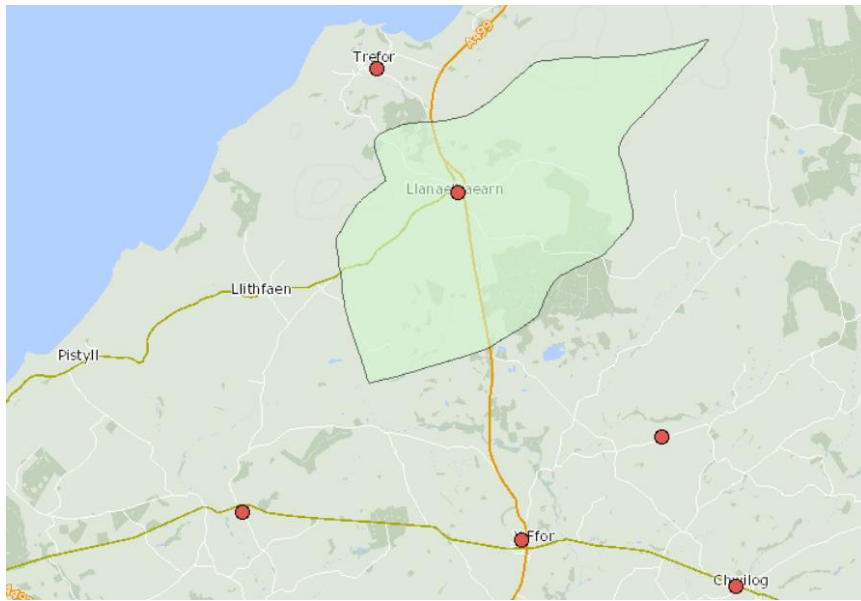
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Following consideration and assessment in accordance with the requirements of the well-being act, the 7 well-being goals of the Act, together with the Council's well-being objectives were considered and it was concluded that the proposal meets the requirements. This proposal will allow us to respond to and meet the needs of the children today, and also strengthen their future well-being.

It is acknowledged that this proposal leads to the loss of a school in the Llanaelhaearn community, however a large number of the children living within the school catchment area already attend other schools, including the alternative school and therefore some engagement between both communities already exists. Every effort will be made to mitigate the effects on the community by encouraging engagement between the communities. Should the proposal be approved, discussions will be facilitated to discuss the possibility for Ysgol Bro Plenydd's community activities extend to the community of Llanaelhaearn, where appropriate.

The proposal will ensure that the children of the area are educated on a suitable site and in a naturally Welsh society, increasing opportunities for socialising and working with others and giving them a fair chance to flourish among their peers.





# Equality Assessment Report Ysgol Llanaelhaearn

- May 2020

## Contents

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1. INTRODUCTION
2. OPTIONS
3. IMPACT OF ANY CHANGE
4. ANALYSIS OF RESULTS
5. CONCLUSION

## 1. INTRODUCTION

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### 1.1 Ysgol Llanaelhaearn Context

On 4th June 2019, Gwynedd Council's Cabinet allowed the Education Department to hold formal meetings with the Governing Body of Ysgol Llanaelhaearn, and other relevant stakeholders, to discuss a range of possible options for the future of the school.

Ysgol Llanaelhaearn is located in the centre of the village of Llanaelhaearn which is between Pwllheli and Caernarfon. The school has a capacity from Nursery to Year 6 of 53, with 8 pupils aged 3-11 attending the school (September 2019). All pupils live in the Llanaelhaearn catchment area. The 8 pupils attending the school are taught in two classes with 3 in the foundation phase and 5 in key stage 2.

Between June and September 2019, meetings were held with the Governing Body and other relevant stakeholders to review the school's position, where a number of options were put forward to consider the future of the school.

On November 5<sup>th</sup> 2019, Gwynedd Council's Cabinet agreed to begin a period of statutory consultation in accordance with the requirements of section 48 of the School Standards and Organisation (Wales) Act 2013 on the proposed proposal to close Ysgol Llanaelhaearn on 31 August 2020 and to provide places for pupils at Ysgol Bro Plenydd, Y Ffôr, on 1 September 2020.

The statutory consultation was held between 16 December 2019 and 29 January 2020. Eight responses received during the consultation. Gwynedd Council's Cabinet considered the consultation report at its meeting on 18 February 2020 and resolved to issue a statutory notice on the proposal. The statutory notice was issued on 5 March 2020 with a 28 day objection period. No objections to the proposal were received.

## 2. OPTIONS

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### 2.1 Options

During the local meetings, a range of options were presented and evaluated for the future of the school.

Following a detailed assessment of 8 options, it was concluded that two options offered advantages compared to the school's current situation.

Those models in addition to doing nothing and continuing the status quo, are detailed below:

- *Do nothing - continue with the current structure of the school.*

Retaining the current system would mean that Ysgol Llanaelhaearn would continue in the same way, with the same staffing structure. There would be a Strategic Head at Ysgol Llanaelhaearn, Garndolbenmaen and Chwilog who would spend one day a week leading Ysgol Llanaelhaearn.

The pupils would continue to be taught by a full-time teacher and a senior assistant.

- *To federalise with other School(s)*

Ysgol Llanaelhaearn would form a formal, legal Federation with one or more neighbouring Schools. This means that the schools remain separate but the Governing Bodies are abolished, and a single Governing Body is elected for the Federation. Geographically, the schools that would be reasonable to consider would be one or more of Yr Eifl, Llangybi, Bro Plenydd, Chwilog and Pentreuchaf schools. The schools budgets would remain separate. Forming a formal federation with another school or schools would strengthen the school's leadership and increase opportunities for pupils to collaborate and socialise with peers.

By introducing a federal model with another school to Ysgol Llanaelhaearn, it is not envisaged that the change would have an impact on equality characteristics, mainly as the school would remain in Llanaelhaearn, implementing the same equality and anti-bullying policies.

- *Close Ysgol Llanaelhaearn and pupils to be educated at an alternative school*

This means that Ysgol Llanaelhaearn is closing, and current pupils transfer to Ysgol Bro Plenydd (the alternative school).

Following a more detailed assessment of these options, it is concluded that the proposal to close Ysgol Llanaelhaearn and transfer the pupils to Ysgol Bro Plenydd responded to the main challenges facing the school, namely low numbers of pupils and small classes.

## 2.2 Statutory Consultation

Eight responses were received during the consultation period, including Estyn's comments. In their response, they noted:

*"The proposer notes that Ysgol Bro Plenydd has similar facilities to Ysgol Llanaelhaearn to provide specialist provision that is suitable for pupils with additional learning needs. However, it does not identify clearly enough the effect on SEN pupils and the proposal does not consider accessibility arrangements for disabled pupils."*

*"On the whole, the proposer has given sufficient consideration to the effect and cost of the proposals on pupils' travel arrangements, but not to the accessibility of transport provision for pupils with special needs."*

The Authority notes, in response to the observation about lack of consideration for accessibility arrangements for disabled pupils, that as is currently the case, the School would be required to review the plans of pupils with ALN and then map the needs on the school provision map. The Moderation Panel would consider the provision of pupils with a Statement or Individual Development Plan to ensure suitable provision in the new school. The forum would discuss the ILAs of children open to the forum, ensuring continuity of service from the Integrated Team.

Both sites fall into the same category in terms of accessibility, but should an individual with disabilities make an application for admission or to transfer to Ysgol Bro Plenydd in the future, the Authority would deal with the application as would any school other in Gwynedd.

In response to the comment about the consideration of travel provision for pupils with special needs, the Authority notes that any additional transport would be discussed by the Moderation Panel on an individual basis (ie if a pupil was unable to use normal transport).

In considering the equality impact of the proposal, Estyn notes:

*"The proposer has conducted an equality impact assessment and asserts reasonably that the proposal should not have a detrimental effect on any particular group. However, the proposer has not given appropriate consideration to the possible disruption for existing pupils."*

In response to the above comment, the Education Department supports a request for transport to Ysgol Chwilog, which would reduce the potential disruption to the current pupils of Ysgol Llanaelhaearn.

### 3. IMPACT OF ANY CHANGE

The Council must have due regard to the impact any changes will have on people with equality characteristics below. What impact will the new policy / service or proposed changes have on these features?

Features	What kind of impact? *	In what way? What is the evidence?
<b>Race (including nationality)</b>	None	It is anticipated that implementing the proposal would not affect people on racial grounds. Implementing the option will mean that everyone of any race is treated according to their need. Ysgol Llanaelhaearn, and its neighbouring schools operate an equalities policy which states that they:  <i>"...opposes to all types of prejudice and discrimination and acknowledges that pupils have different needs, requirements and objectives."</i>
<b>The Welsh language</b>	None	The children of Ysgol Llanaelhaearn are educated through the medium of Welsh, and this would not change by implementing the proposed option.  A Welsh Language impact assessment has been conducted on the proposal.
<b>Disability</b>	None	Change is not anticipated for disabled people.  Should the proposal to close Llanaelhaearn school and educate the pupils at Ysgol Bro Plenydd be approved, the number of disabled pupils attending the schools will need to be monitored. Depending on the disability the schools will have to adapt their plans for giving access to pupils with specific disabilities. As a result, the authority will also need to ensure that relevant departments are aware of changes and obtain the necessary input. An assessment of the accessibility of the proposed site would be undertaken in accordance with specific situations.  Both sites fall into the same category in terms of accessibility, but should an individual with disabilities make an application for admission or transfer to Ysgol Bro Plenydd in the future, the Authority would deal with the application as would any school other in Gwynedd.
<b>Gender</b>	None	It is anticipated that implementing the proposal would not affect people on the grounds of gender. Ysgol Llanaelhaearn and its neighbouring schools operate an equalities policy which states that the school:  <i>"...opposes to all types of prejudice and discrimination and acknowledges that pupils have different needs, requirements and objectives."</i>
<b>Age</b>	Any effect would be minimal (positive or negative)	It is anticipated that implementing the proposal would not affect people on the basis of age. Implementing the option would mean that everyone of any age is treated the same. Ysgol Llanaelhaearn and its neighbouring schools operate an equalities policy which states that the school:  <i>"...opposes to all types of prejudice and discrimination and acknowledges that pupils have different needs, requirements and objectives."</i>

<b>Sexual orientation</b>	None	It is anticipated that implementing the proposal would not affect people on the grounds of sexual orientation. Implementing the option would mean that everyone of any sexual orientation is treated according to their need. Ysgol Llanaelhaearn and its neighbouring schools operate an equalities policy which states that the school:  <i>"...opposes to all types of prejudice and discrimination and acknowledges that pupils have different needs, requirements and objectives."</i>
<b>Religion or belief (or lack of belief)</b>	None	It is anticipated that implementing the proposal would not affect people on the grounds of religion or belief. Implementing the option would mean that everyone of any religion or belief is treated according to their need. Ysgol Llanaelhaearn and its neighbouring schools operate an equalities policy which states that the school:  <i>"...opposes to all types of prejudice and discrimination and acknowledges that pupils have different needs, requirements and objectives."</i>  Ysgol Llanaelhaearn and all surrounding schools (Yr Eifl, Llangybi, Pentreuchaf, Bro Plenydd, Chwilog) are community schools, and there is no intention to change this.
<b>Gender Reassignment</b>	None	It is anticipated that implementing the proposal would not affect people on the grounds of gender reassignment. Implementing the option would mean that everyone is treated fairly. Ysgol Llanaelhaearn and its neighbouring schools operate an equalities policy which states that the school:  <i>"...opposes to all types of prejudice and discrimination and acknowledges that pupils have different needs, requirements and objectives."</i>
<b>Pregnancy and maternity</b>	None	Implementing the proposal would not affect any pregnant person, whether staff or parent, as both schools implement the same policy.
<b>Marriage and civil partnership</b>	None	The implementation of the proposal would not affect anyone married or in a civil partnership, as both schools implement the same policy.

The Council has a duty under the Equality Act 2010 to make a positive contribution to a fairer society by promoting equality and good relations in its activities in the areas of age, gender, sexual orientation, religion, race, transgender, disability and pregnancy and maternity.

General Duties of the Equality Act	Does it make an impact? *	In what way? What is the evidence?
<b>Remove illegal discrimination, harassment and victimisation</b>	No	Implement the alternative school's equality and anti-bullying policies to eliminate unlawful discrimination and harassment. The Education Department's standard policies are implemented by both schools.
<b>Promote equal opportunities</b>	No	The aim is to promote equal opportunities and promote the alternative school to continue to follow equality policies and procedures.
<b>Encouraging good relationships</b>	Yes	The aim is to promote equal opportunities and promote the alternative school to continue to follow equality policies and procedures.  As some children living in the Llanaelhaearn catchment area already attend Ysgol Bro Plenydd, a link between the school and the Llanaelhaearn community already exists. However, opportunities are promoted for the school to build on links with the Llanaelhaearn community.

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## 4. ANALYSING THE RESULTS

4.1 Is the proposal therefore likely to have a significant, positive impact on any of the equality characteristics or the General Duty? What is the reason for this?

The proposal is unlikely to have a significant impact on any of the equality characteristics or the General Duty. The alternative school has equalities and anti-bullying policies, as Ysgol Llanaelhaearn currently has.

4.2 Is the proposal therefore likely to have a significant, negative impact on any of the equality characteristics or the General Duty? What is the reason for this?

The proposal is unlikely to have a significant impact on any of the equality characteristics or the General Duty. The alternative school has equalities and anti-bullying policies, as Ysgol Llanaelhaearn currently has.

4.3 What should be done?

**Choose one of the following:**

Continue with policy / service as it is sound	✓
Adjust the policy to remove any barriers	
Prevent and remove the policy as the adverse effects are too great	
Continue with policy as any adverse impact can be justified	

4.4 If continuing with the plan, what steps will you take to reduce or mitigate any negative impacts?

Although the loss of a local school could have a negative impact on community cohesion, this will need to be mitigated by encouraging links between the alternative school and the local community of Llanaelhaearn.

4.5 Monitoring - what action will you take to monitor the impact and effectiveness of the policy or service (action plan)?

The school (and their Governing Body) is responsible for implementing its equality policy and the Authority, through its usual support and monitoring procedures, will ensure compliance.

## 5. CONCLUSION

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It is concluded that implementing the proposal to close Ysgol Llanaelhaearn and transfer the pupils to Ysgol Bro Plenydd would not affect equality, whether as a characteristic or a general duty. Robust equality and anti-bullying policies are implemented by the alternative school which would extend to Llanaelhaearn pupils and parents. Should some be identified in the future, then the Council will consider the necessary actions.



## REPORT TO THE CABINET

19 MAY 2020

**Cabinet Member:** Councillor Ioan Thomas, Cabinet Member for Finance

**Subject:** The Effects of COVID19 on the 2020/21 Budget

**Contact Officer:** Ffion Madog Evans, Senior Finance Manager  
Dafydd L. Edwards, Head of Finance

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### 1 The decision sought

The Cabinet is asked to note the possible funding gap in the 2020/21 budget and to support the efforts of the Leader and officials to ensure appropriate funding options from the Welsh Government.

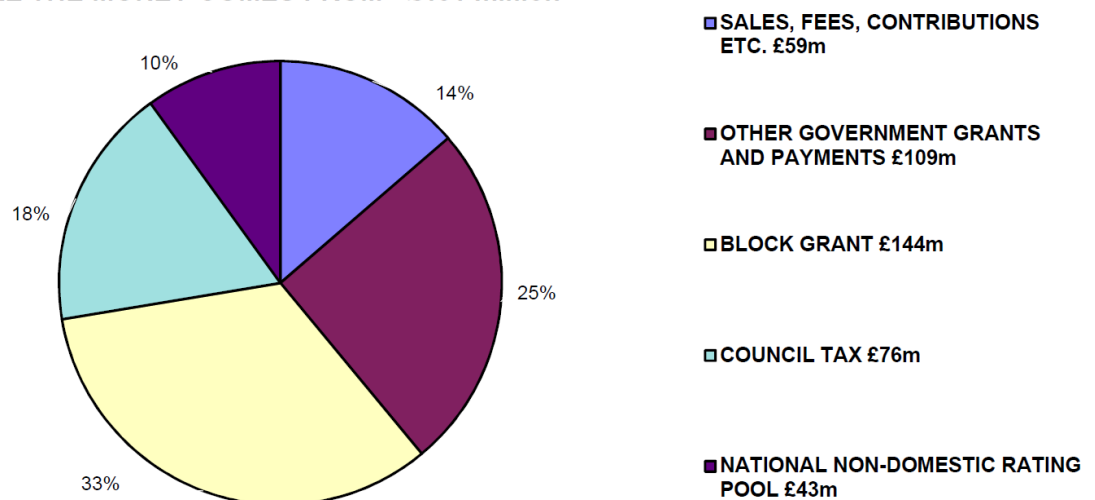
### 2 Purpose of the Report

To inform the Cabinet of the financial effects of COVID19 on the Council's 2020/21 budget, which is a combination of additional costs as well as a significant loss in income.

### 3 Background

At the full Council meeting dated 5 March 2020 a net budget of £262 million was approved for 2020/21, with the gross budget for the year being £431 million. The diagram below shows that 14% of the Council's income comes from sales, fees, contributions etc.

WHERE THE MONEY COMES FROM - £431 million



#### 4 Effects of COVID19 on the Income and Expenditure until the end of June

A net increase of £1.2 million in Council expenditure is anticipated for the quarter to the end of June as a result of the COVID19 impact, with additional expenditure of £1.8 million for the period up to the end of June, alongside a decrease in expenditure of £640k over the same period.

There is a more dramatic impact on the Council's income, with income losses of £6.8 million forecast for the same period, the largest impact of £1.1 million on Byw'n Iach, £1 million school meals, £600k Parking, £600k Highways Agreements and £500k Gwynedd Consultancy.

The expectation is that we will receive funding from the Welsh Government to fund the additional expenditure, but there is no promise in terms of funding the loss of income.

The Welsh Local Government Association (WLGA) has submitted information to the Finance sub Group 30/04/2020, in order to influence the Welsh Government. This is under consideration by the Ministers who will be coming back to the WLGA soon.

#### 5 Impact on the Period beyond the end of June

According to our latest forecast, if the lockdown is to be extended further, our estimates forecasts possible income losses as follows:

	Current Assumptions 2020/21 - 100% income losses for :-		
	3 months	6 months	12 months
	£ millions	£ millions	£ millions
Cyngor Gwynedd	4	8	12
Byw'n Iach	1	2	4
<b>Total</b>	<b>5</b>	<b>10</b>	<b>16</b>

The income loss per department is detailed in **Appendix A**.

## **6 Funding Deficit**

There is no certainty at present if the Welsh Government will contribute towards the loss of income so we will need to consider how to cope with Gwynedd Council's budgetary gap. The loss of income is forecast to be between a range of £5 million - £16 million, which will be dependent on the duration of the crisis. The current value of our general balances is £7.5 million. There is therefore an obvious need for the Government to compensate authorities for the lost income, especially as the expected income is unlikely to recover for many years possibly.

## **7 Recommendation**

The Cabinet is asked to consider the expenditure and income forecast for Gwynedd, noting the budgetary gap that could derive from the crisis in 2020/21 and to support the efforts of the Leader and officials to ensure appropriate funding options from the Welsh Government.

### **Local Member's View**

Not relevant

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### **Opinion of the Statutory Officers**

#### **Monitoring Officers:**

It is appropriate that the Cabinet is provided with an update in relation to the impacts of the crisis on the Councils financial position. Although the figures are inevitably estimates, they convey the scale of the situation and the case for support from the Government.

#### **Head of Finance:**

I have collaborated with the Cabinet Member in the preparation of this report and I confirm the content.

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## **APPENDICES**

APPENDIX A - Analysis of the Impact of Covid19 on Departmental Income Budgets 2020/21

## APPENDIX A

<b>Analysis of the Impact of Covid19 on Departmental Income Budgets 2020/21</b>			
	Current Assumptions 2020/21 - 100% income lossess for :-		
	3 months	6 months	12 months
	£'000	£'000	£'000
<b>Departments</b>			
Adults, Health and Wellbeing	258	713	1,622
Children and Supporting Families	39	65	65
Education	1,008	1,261	1,261
Economy and Community	775	1,565	2,787
Highways and Municipal	704	1,311	2,408
Environment	1,078	2,010	2,583
Gwynedd Consultancy	450	900	1,800
Housing and Property	141	250	500
Corporate Management Team and Legal	16	21	100
Corporate Support	117	177	329
Finance and Corporate	40	80	160
<b>Total (Excluding Byw'n lach)</b>	<b>4,368</b>	<b>7,640</b>	<b>11,993</b>
Byw'n lach	1,173	1,982	4,006
<b>Total (Including Byw'n lach)</b>	<b>5,541</b>	<b>9,622</b>	<b>15,999</b>

\* The above are estimates based on the input and views of Managers / Head of Departments, they are fair estimates in terms of the information received but less reliable than the Finance Department's usual estimates.

\*\* Byw'n lach – Planning with Byw'n lach after a better understanding of Furlough's impact on their spending.

## GWYNEDD COUNCIL CABINET



**Meeting Date:** 21 April 2020  
**Cabinet Member:** Councillor Gareth Griffith  
**Contact Officer:** Gareth Jones, Assistant Head of Environment Department  
**Contact Number:** 34092  
**Item Title:** Regional Technical Statement on Aggregates, Second Review Draft

### Report to the Cabinet

#### 1. DECISION SOUGHT

- 1.1 To endorse the Regional Technical Statement on Aggregates, Second Review in Appendix 1 to this Report.
- 1.2 Subject to 1.1 above, to authorise the Assistant Head of Environment Department to submit confirmation of the Cabinet's endorsement to Welsh Government.

#### 2. REASON WHY DECISION IS NEEDED

- 2.1 Planning Policy Wales & the Minerals Technical Advice Note MTAN 1 (Aggregates), requires the preparation of Regional Technical Statements (RTS) for both the North and South Wales regions to provide a strategy for the future supply of construction aggregates.
- 2.2. The original RTS documents for both regions were approved by The Welsh Government in 2008 and are required by MTAN 1 to be reviewed every five years. The First Review was undertaken and approved in 2013/2014 and this, the Second Review, commenced in 2018. The second review of the RTS requires endorsement by all of the respective Councils that make up the North Wales region, to allow it to be published and used for preparation of minerals aggregate policy within local development plans and reviews or the preparation of supplementary planning guidance as appropriate.
- 2.3 The Gwynedd and Anglesey Joint Local Development Plan was adopted in July 2017, with the First Review of the RTS (2013/14) informing the minerals and aggregates policies of the plan.

#### 3. INTRODUCTION

- 3.1 Aggregates are used in large volumes and are vital to the construction industry for infrastructure projects such as roads, schools, housing and other buildings. They include sand & gravel, crushed rock, slate and other recycled materials. The varied geology of North Wales means that there are large resources of aggregates materials which have been quarried for centuries but in addition, there is a developing market for secondary

aggregates produced from demolition works, the manufacture of roofing slate and the working of slate waste tips.

- 3.2 The RTS takes account of the latest available information regarding the balance of supply and demand to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (*and beyond, in the case of materials that are exported*), in accordance with the key objectives of sustainable supply outlined in MTAN 1. The RTS provides specific recommendations to Local Planning Authorities regarding the quantities of aggregate which need to be supplied from each area (apportionments) and the nature and size of any allocations which may need to be made in any Local Development Plan (LDP) to ensure that adequate provision is maintained throughout the relevant Plan Period. This is to ensure that an adequate supply of minerals necessary for the construction industry is maintained which in turn, gives greater certainty that future demands for housing, employment and infrastructure development can be fulfilled to promote economic growth.
- 3.3 Whereas MTAN1 develops the national policy set out originally in Minerals Planning Policy Wales (*now part of Planning Policy Wales – PPW 10*), the RTS provides the supporting detail which allows this to be implemented.
- 3.4 The main document of the Second Review of the RTS in Appendix 1 of this report is supported by a detailed Appendix 'A' which provides additional explanation, specific to the North Wales Regional Aggregate Working Party (RAWP) Region, relating to the consideration of existing supply patterns, the detailed breakdown of sub-regional apportionments and requirements for new allocations. This Appendix incorporates that information into specific recommendations and guidance for each individual Local Planning Authority (LPA).

#### **4. REASON AND JUSTIFICATION BEHIND THE DECISION**

- 4.1 North Wales has extensive deposits of a variety of materials suitable for aggregates, particularly igneous rock and limestone. They are to be found in most areas of the region. Deposits of sand and gravel are more limited and are mainly located in parts of Gwynedd, Flintshire and in particular, Wrexham.
- 4.2 It is essential to maintain an adequate supply of such minerals to ensure that these materials are sourced in a sustainable manner. Where required, the planning system must make provision to ensure supply in the form of allocations, which can be site specific allocations, preferred areas, or areas of search, within local development plans to enable applications for new reserves of aggregates to come forward to satisfy demand. The 5 yearly review enables the level of permitted reserves and trends to be analysed, and sets out projections for future demand.
- 4.3 It is a requirement, where possible, for local development plans to make provision to ensure a minimum land-bank of 7 years sand & gravel and 10 years crushed rock aggregates for the duration of the plan period. This means that on the final date of any given local development plan, this minimum requirement will remain and when added to the duration of a local development plan of 15 years it should make provision for 22 years sand & gravel and 25 years crushed rock aggregate. In the context of the Gwynedd Local Planning Authority area, the Gwynedd and Anglesey Joint Local Development Plan covers the periods from 2011 to 2026.

- 4.4. In previous RTS documents, the predictions for future demand for aggregates have been based on an average of the previous 3 and 10 years sales tonnage and the resulting apportionments are derived from land-banks which were calculated by dividing the permitted reserves (minerals reserves that have extant planning permission) by the average sales tonnage. However, such a methodology is not always reliable, as economic conditions, construction practice, housing growth, and infrastructure projects uptake are subject to change.
- 4.5 A new approach is being taken for the prediction of future demand in the Second Review RTS, which is based on housing growth and completions within development plans. There is a very close correlation between housing completions and demand for construction aggregates, and this may be used as a proxy to indicate total aggregates demand. It is accepted that demand for construction aggregates is not restricted to housing, which is modest at around 30 % of total aggregates consumption, but it is the wider demand for the infrastructure indicated by housing growth, (*new roads, commercial and business development, schools, hospitals, power plants, maintenance works*) which accounts for the total demand for aggregates.
- 4.6 The logic therefore is that any given Local Development Plan (LDP) should make sufficient provision for aggregates to enable the construction industry to have security of supply and access to raw materials to meet these housing growth objectives, and by proxy, the wider growth which creates a demand for aggregates.
- 4.7 Since the first Review RTS was published, the overall level of permitted aggregates reserves in North Wales has diminished. In Gwynedd, approximately 600,000 tonnes of sand and gravel was granted planning permission in Llecheiddior Uchaf, Bryncir, 380,000 tonnes of sand and gravel from an extension to Cefn Graianog, Llanllyfni and 320,000 tonnes of sand and gravel released via a determination of new conditions for the Cae Efa Lwyd Review of Minerals Permissions ROMP site in Penygroes.
- 4.8 The apportionment for crushed rock aggregates following the Second Review RTS, in the context of the Gwynedd Local Planning Authority has been calculated to at 23.867 million tonnes and the sand and gravel apportionment at 3,834 million tonnes. The permitted reserves of crushed rock aggregate of 28.54 million tonnes are sufficient as not to require a new allocation. However, the reserves of sand and gravel are currently 1.175 million tonnes and are insufficient to provide the full 7 years landbank at the end of the plan period. The minimum allocation required to meet this shortfall is 2.659 million tonnes to meet the 0.174 million tonnes per annum sand and gravel annual apportionment.
- 4.9 With respect to the requirements of the Joint Local Development Plan (JLDP), Policy MWYN 2 designates preferred areas for sand and gravel in Gwynedd, which are the most commercially viable resources identified in the National Assembly for Wales commissioned report, The Sand and Gravel Resources of North Wales produced by the University of Liverpool and Enviro in 2003. However, the preferred areas identified in the (JLDP) are in excess of 21 million tonnes and provide the potential for the release of new reserves which are far greater than the recommended minimum allocation of 2.659 million tonnes in the Second Review of the RTS in order to allow for uncertainties involved, to provide choice to the minerals industry and to encourage local supply to minimise transport distances.

- 4.10 Therefore there appears to be no immediate need to change the local development plan requirements with respect to the identification of sand and gravel allocations, given the potential of reserves that could be provided from preferred areas identified in the LDP. However, whilst the preferred areas identified in the JLDP maintain sufficient provision for future supplies of sand and gravel, the revised RTS will be a material consideration in the first review of the JLDP in 2021, should the authority decide to include mineral allocations in a statutory 'call for sites' consultation.
- 4.11 In addition, the RTS has identified sub-regions based on a broad assessment of the market area, distribution and mineral types with Conwy, Gwynedd, Anglesey and Snowdonia National Park grouped together as the North West Wales sub-region. If Gwynedd Council is unable to provide a new allocation for sand and gravel, it would look to neighbouring authorities within the sub-region to assist in making such a provision. However, none of the other authorities have a significant sand and gravel resources which are economically viable or free from planning constraints.
- 4.12 The situation may be different for crushed rock aggregate, and although Gwynedd has sufficient reserves of crushed rock, there is a question about the quality of materials available and therefore their end use. A significant proportion of the permitted reserves in Gwynedd are secondary slate "waste" materials which are freshly dug or extracted from active slate "waste" stockpiles and treated as being a primary aggregate for the purposes of the RTS, as they are able to substitute as crushed rock aggregates. In respect of slate as a source of aggregate, the RTS review states; *"In North Wales, crushed slate, derived either from slate waste (as a by-product of roofing material production) or quarried specifically for use as primary aggregate, features significantly in the overall pattern of supply, especially in Gwynedd. In consideration of regional requirements, the RTS confirms that; "most slate aggregate is used locally within north west Wales and there is little to suggest that the existing pattern of supply either needs to change or is capable of doing so"..... "*. With the introduction of the aggregates levy in 2002, there has been an increased use of slate waste to substitute primary hard rock reserves.
- 4.13 However, crushed slate may not be suitable for all categories of aggregate use where demanding physical quality characteristics are required, such as high end concrete or skid resistance material for road surfacing. It is possible that if demand for crushed rock with higher quality exceeds anticipated demand, new crushed rock reserves may need to be secured in the sub-region, and it is possible that a Statement of Common Ground or Statement of Sub-Regional Collaboration between the JLDP authorities of Gwynedd & Anglesey in collaboration with Conwy would be required if such a scenario were to arise. Minerals can only be worked where they occur and Gwynedd may nevertheless consider new applications for crushed rock aggregates in the context of a wider sub-regional or regional market and should assess that a need arises for new reserves to be permitted in accordance with criteria-based policies where there is a shortfall of higher quality crushed rock reserves.

## **5. NEXT STEPS & TIMETABLE**

- 5.1 The Welsh Government requires all local authorities to endorse the RTS before it is approved by the Welsh Government, at which point the RTS will have material weight, and its recommendations should be incorporated into local development plans.
- 5.2 It is anticipated that the RTS will be endorsed by all of the Welsh Authorities together with obtaining Ministerial approval by summer 2020.



5.3 In the case of Gwynedd, the Joint LDP (Gwynedd and Isle of Anglesey) was adopted in July 2017, and the first Annual Monitoring Report covering the period up to 31<sup>st</sup> March 2019 has been published. The timetable for the RTS and the Joint LDP means that the recommendations of the RTS are unlikely to be fully considered and incorporated until the first review of the Joint LDP takes place in 2021.

## **6. ANY CONSULTATIONS UNDERTAKEN PRIOR TO MAKING THE DECISION**

6.1 The RTS has been distributed to key stakeholders including the constituent Local Authorities, the Aggregates Industry and Environmental Organisations such as Natural Resources Wales during the eight-week consultation period which commenced in October 2019 and ended in November 2019. Gwynedd is a consultee to the RTS Process and no objections have been received in response to publicity on the authority's web page or the consultation event held in Llandudno Junction on the 15th November.

6.2 Cuesta Consultants have produced a consultation report on behalf of Welsh Government and the Regional Aggregates Working Parties (Appendix 2) which summarises the comments to specific questions on the RTS Main Document and respective technical appendices for the North and South Wales regions including; the purpose of the RTS, key principles and approaches, methodology for the 2nd review, analysis of the existing supply pattern, assessment of apportionments and allocations, the consultation process and any points arising from the respective North and South Wales appendices. A total of 23 consultation responses were received and the key issues raised are summarised as follows;

### **Housing Figures**

6.3 Despite reservations by some Local Authorities concerning the use of housing figures in the RTS, the steering group concluded that the use of these figures provided the best available source data to draft a robust and consistent methodology to guide future aggregate apportionments and the use thereof do not amount to the rolling forward of housing policies beyond any respective LDP end date (see paragraph 4.5 of this report).

6.4 In future Reviews of the RTS, there may well be some logic in linking future aggregates provision to housing requirements in the adopted version of the National Development Framework. In respect of sub-regional apportionment in Stage 3 of the RTS, the methodology should be amended to take account of actual housing completions (over the baseline period) as well as future requirements to reflect the changing pattern of supply.

### **Definition of Sub-Regions**

6.5 Whilst there may be issues concerning the definition of sub-regions in South East Wales to promote a fairer and more sustainable pattern of supply, the situation for Gwynedd and the North West Wales sub-region remains largely unchanged with the exception of the inclusion of Conwy for the purposes of addressing sub-regional apportionment and any future requirement to draft a statement of sub-regional collaboration (see paragraph 4.11 of this report).

### **Apportionments to LPAs or sub-regions**

6.6 Until the requirements set out in MTAN 1 are changed, apportionments must be made to individual LPAs. However, where the recommended apportionments for individual LPAs cannot be met, Statements of Sub-regional Collaboration as suggested in this report could be used to develop alternative (more achievable and more sustainable) ways of meeting the overall apportionment figure for that sub-region.

## **Statements of Sub-Regional Collaboration (SSRCs) / Statements of Common Ground**

- 6.7 Statements of Common Ground or Statements of Sub-Regional Collaboration, (SSRC), have been addressed in paragraph 4.13 of this report in order to develop alternative (more achievable and more sustainable) ways of meeting the overall apportionment figure for that sub-region. SSRCs appear to have been generally well-received, with no objections other than a commonly cited need for clearer explanation regarding the mechanisms involved (including timescale for implementation and dealing with staggered timescales of component LDPs).
- 6.8 The current situation concerning Welsh Government guidance on SSRCs is that unless complete agreement can be reached with the industry regarding certain details of the SSRC process, the guidelines on that process may need to be issued separately by Welsh Government, rather than being included within the RTS itself.

### **Sales Data**

- 6.9 The RTS uses the highest of 3-year and 10-year sales averages, up to 2016. In response to concerns about over-provision and the use of more up to date 2018 data, the Steering Group confirmed that over-provision is not generally something to worry about (it does not result in over-supply, but it guards against the much more serious risk of under-provision). Secondly, whilst the use of more recent sales data may now be possible, this would necessitate a complete reworking of all the figures and corresponding text, requiring significant extra work and delaying publication of the RTS. It was therefore agreed that the sales data should remain unchanged.

### **Other Matters**

- 6.10 General comments on the review process, the requirements of contemporary planning legislation/guidance or issues specific to the respective North and South Wales regions do not raise any significant issues on the RTS adoption process.

### **Matters Arising from the RTS Consultation Process**

- 6.11 As far as Gwynedd is concerned, there is little arising from the RTS review consultation that changes the aggregate supply situation locally or in the sub-region. No major objections or comments were received in response to consultation and the main issue arising from the RTS 2nd review is to address local and sub-regional apportionment requirements for the South Wales authorities. Statements of sub-regional collaboration will need to be agreed with the constituent authorities of North West Wales in accordance with the Welsh Government guidelines but the situation concerning aggregates supply in the RTS 2nd Review does not identify any significant changes to the Gwynedd and Anglesey Local Development Plan.

## **Appendices**

- Appendix 1: Regional Technical Statement on Aggregates, Second Review
- Appendix 2: Regional Technical Statement Consultation Report

## **OPINION OF THE STATUTORY OFFICERS**

### **Chief Finance Officer:**

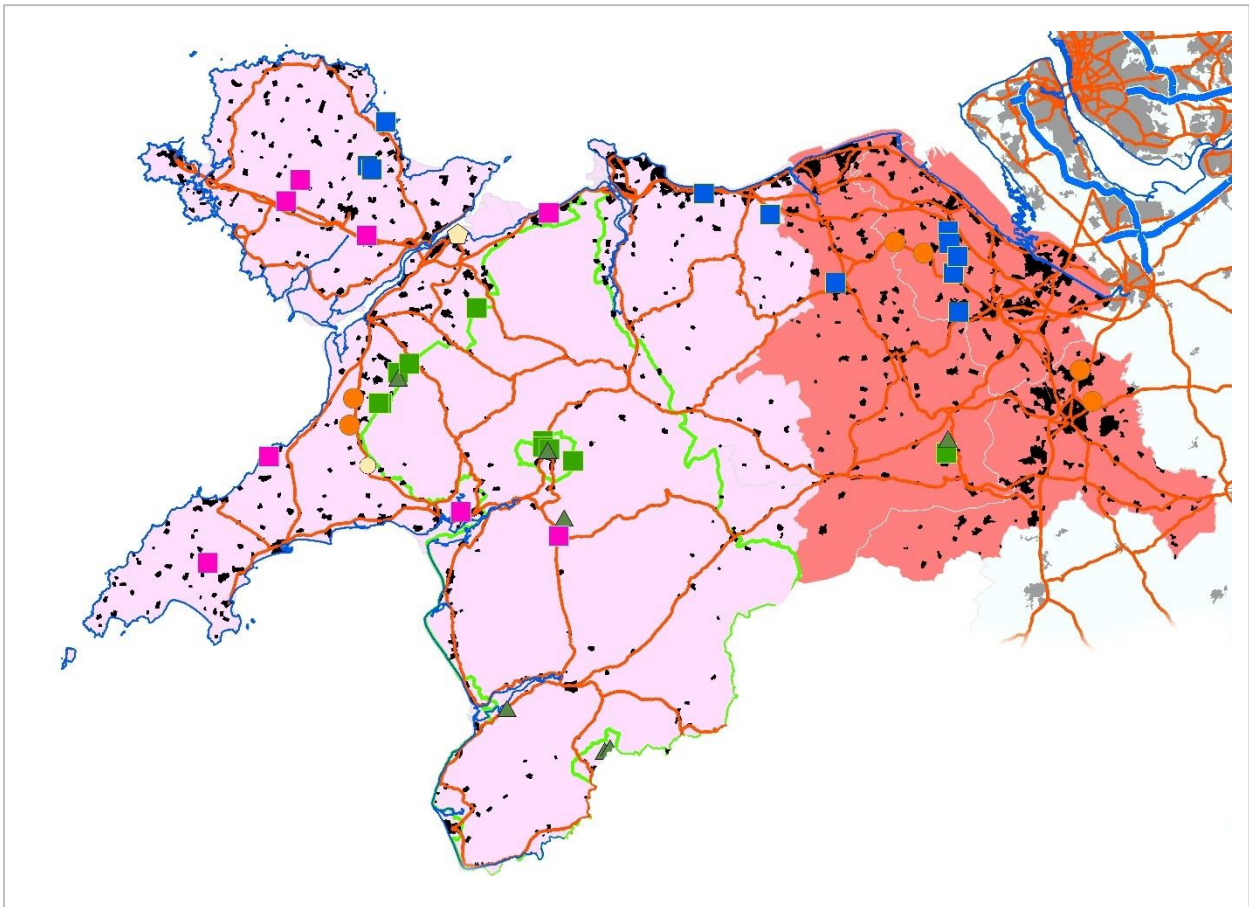
The author has confirmed that there are unlikely to be any additional financial implications for the Council in approving this document. That is, no implications beyond the costs associated with the carrying out a review of the Local Development Plan in 2021 (which is a statutory requirement). I understand that the review of the Plan will need to look at the sections relevant to aggregates, and incorporate elements of the statement that apply to Gwynedd.

### **Monitoring Officer**

The report provides comprehensive information about the process followed to reach this point. Detailed information is provided about the consultation process and how the responses have been treated which will allow the Cabinet to come to an appropriate conclusion. No further observations to add in relation to propriety.

# Regional Technical Statement (2<sup>nd</sup> Review)

## Appendix A (North Wales)



*Consultation Draft - September 2019*

North Wales  
Regional  
Aggregates  
Working Party



Llywodraeth Cymru  
Welsh Government  
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## Appendix A: North Wales Region - Detailed Analysis & Recommendations

### *Introduction*

- A1. This appendix is intended to complement, and should be read in conjunction with, the main document of the Second Review of the RTS. It provides additional explanation, specific to the North Wales Regional Aggregate Working Party (RAWP) Region, relating to the consideration of existing supply patterns, the detailed breakdown of sub-regional apportionments and requirements for new allocations. The final part of the Appendix, from paragraph A52 onwards, incorporates that information into specific recommendations and guidance for each individual Local Planning Authority (LPA).

### *Existing Supply Patterns in North Wales – Regional Overview*

- A2. As explained in Chapter 3 of the main document, historical sales figures have been used in this review as a starting point for calculating the overall National requirement for land-won primary aggregate production in Wales, over the period covered by the revised RTS (i.e. 2020-2045). After applying a 30% uplift to reflect the planned increase in housing construction, this enhanced total has then been apportioned between North Wales and South Wales on the basis of their recent historical share of sales. The sub-regional apportionment of those regional figures has then been determined by looking carefully at the patterns of supply within each of seven sub-regions, created specifically for this purpose. That examination is briefly outlined in the main report and described more fully here.
- A3. Figure A1 shows how the North Wales RAWP area is divided into two sub-regions. The sub-regions were created, at Welsh Government's suggestion, for the specific purpose of facilitating strategic minerals planning and collaborative approaches between LPAs. They each represent distinctive 'market areas' between which there is relatively little movement of aggregates, except for exports to England, and within which detailed, strategic consideration can be given as to the most appropriate patterns of supply. Looking carefully at the balance of supply between the LPAs within each sub-region is an important aspect of this. It should be noted that Conwy, though previously forming part of the North-East Wales group of LPAs in the North Wales RAWP reports, is now included in the North-West Wales sub-region of the RTS. The decision to make this change was made following extensive discussion amongst the RTS Steering Group and was agreed by the RAWP.
- A4. For some LPAs, where the existing supply pattern already seems to provide a sensible balance between the spatial distributions of demand, resource availability and other factors, the new apportionments simply reflect the pattern of historical sales (i.e. the regional figures have been divided between the LPAs in proportion to their share of recent historical sales). In other areas, the new apportionments have been adjusted – primarily to take account of the distribution of planned housing activity, as indicated by the housing requirement figures in adopted LDPs - so that they reflect an improved (more equitable, more sustainable) spatial balance between supply and demand. In all cases, consideration has also been given, at least qualitatively, to factors such as environmental capacity, proximity and transport networks. The later sections of this document provide more detailed observations regarding these various factors within each of the North Wales sub-regions.
- A5. It should be noted that the historical sales figures and apportionments relate only to land-won primary aggregates. These materials are needed to satisfy the residual levels of demand, once allowance has been made for the 'top-sliced' proportion of supply which is obtained from secondary and recycled sources and from marine-dredged aggregates. These materials contributed to the overall market throughout the baseline period and will continue to do so, leaving only the residual demand to be supplied from primary land-won sources.

**Figure A1: Sub-Regional Areas and their constituent Local Planning Authorities in North Wales**

- A6. No reliable monitoring data on recycled and secondary aggregate production is currently available for any part of the UK. The recently updated Mineral Planning Factsheet on aggregates produced by the British Geological Survey (BGS, 2019)<sup>1</sup> estimates that these materials now constitute approximately 30% of overall supply (based on data provided by the Mineral Products Association), and that most of the material that is suitable for aggregates use (primarily construction, demolition and excavation waste – CD&EW) is already being recovered and utilised. This has been the case since around 2005<sup>2</sup> and the proportion is thought unlikely to change in the foreseeable future. Being closely dependent upon the rate of construction activity, the actual tonnages can therefore be expected to rise and fall in line with variations in the overall rates of economic growth and will have a neutral impact on the demand for primary aggregates, compared to that seen during the baseline period (2007 to 2016). Moreover, in the case of recycled aggregates, since the arisings of CD&EW are (by definition) very closely associated with the occurrence of new construction work, their availability is unlikely to have any significant influence on spatial patterns of demand.
- A7. That might not be the case for secondary aggregates, which have a more varied spatial distribution, with different types and different quantities being available within each LPA. Again, there are no up-to-date data sources to provide further details, but there are indications that some of these sources may be declining in availability, which would potentially increase the demand on primary aggregates within those areas. Further observations on this are noted, where appropriate, in the later sections on individual sub-regional areas.

#### Land-won Primary Aggregate Production

- A8. The historical sales figures for all land-won primary aggregates within each LPA in North Wales (including both crushed rock and natural sand & gravel) are shown in Table A1, below. The

<sup>1</sup> <https://www.bgs.ac.uk/downloads/start.cfm?id=1355>

<sup>2</sup> [https://mineralproducts.org/documents/Contribution\\_of\\_Recycled\\_and\\_Secondary\\_Materials\\_to\\_Total\\_Aggs\\_Supply\\_in\\_GB.pdf](https://mineralproducts.org/documents/Contribution_of_Recycled_and_Secondary_Materials_to_Total_Aggs_Supply_in_GB.pdf)

proportion supplied from crushed rock sources (averaged over 10 years) is shown in the right-hand column – the balance being sourced from land-won sand & gravel sites. The LPAs are grouped according to the sub-regions shown in Figure A1. The origin of the data is explained fully in Chapter 3 of the main text.

**Table A1: 10-year and 3-year Total Land-Won Primary Aggregates Sales Averages (to 2016) for each LPA in North Wales.**

Local Planning Authority	10-yr Average Aggregate Sales (total) (mtpa)	3-yr Average Aggregate Sales (total) (mtpa)	Highest of 3-yr and 10-yr ave. sales in each LPA (mtpa)	Proportion from crushed rock sources
Denbighshire	0.329	0.043	0.329	100%
Flintshire	2.663	3.204	3.204	93.77%
Wrexham	0.435	0.514	0.514	0%
Conwy + Snowdonia NP	0.955	0.813	0.955	100%
Gwynedd	0.868	0.898	0.898	84.56%
Isle of Anglesey	0.236	0.255	0.255	100%
<b>TOTAL, North Wales</b>			<b>6.155</b>	<b>86.6%</b>

SOURCE: Collated by the North Wales RAWP secretary from confidential industry data.

- A9. The figures show that the supply of land-won sand & gravel has been dominated by Wrexham and Flintshire, this being largely a reflection of their proximity and good access to the main market areas in both North East Wales and adjoining parts of North West England. It also reflects the existence of substantial glacio-fluvial sand & gravel resources in those areas - particularly to the east of Wrexham. Whilst similar deposits exist in North West Wales, particularly in Gwynedd, these are less well-placed to serve the main markets, and production there is therefore more limited.
- A10. In the case of crushed rock aggregates, historical demand has again been focused primarily on North East Wales, and for the same reasons, but in this case the materials have overwhelmingly been supplied from Flintshire. This reflects the extensive resources of high quality Carboniferous Limestone within relatively unconstrained areas to the east of the Clwyddian Hills AONB, in contrast to the situation in Wrexham, where the continuation of these resources falls almost entirely within the AONB. Significant quantities of limestone from Flintshire, including high purity limestone for industrial uses, are exported into England, and some are used for cement manufacture at Padeswood near Mold. Limestone produced for non-aggregate uses, however, is excluded from the statistics given in this report. Limestone production also takes place elsewhere in North Wales, together with igneous rock and slate production, particularly in Gwynedd. In the case of Conwy, the output figures incorporate sales from one small igneous rock quarry within the Snowdonia National Park, in order to maintain confidentiality.
- A11. Further observations on the relationships between production, resources, markets and environmental capacity within each of the sub-regions are given in paragraphs A26 *et seq.*, below.

#### Marine-dredged Aggregates

- A12. In North Wales, very little marine-dredged sand & gravel is used. The figures for marine aggregates are combined, in the annual RAWP reports, with those for land-won sand & gravel, but are shown, in the latest AM Survey report (for 2014) to be in the order of 30,000 tonnes per annum (tpa) (a figure which has gradually declined from 48,000 tpa in 1997). Dredging licences within the coastal waters of North Wales are primarily used to supply Merseyside, with substantial quantities being landed in Liverpool. This, in turn, offsets the pressure for exports to NW England from land-based resources in North-East Wales.
- A13. For the time being, it seems reasonable to suppose that marine-dredged aggregates will continue to supply a similar (very small) proportion of overall demand as they have done over at



least the last twenty years, so the demand for land-won aggregates in any of the LPAs in North Wales is not likely to be affected.

### Secondary Aggregate Production

- A14. Secondary aggregates comprise the by-products of various industrial processes, including metallurgical slags and power station arisings, but also the by-products from certain types of non-aggregate mineral extraction, such as colliery spoil and slate waste, and from the recycling of glass, ceramics, asphalt plantings and rail ballast<sup>3</sup>.
- A15. Aggregate production from metallurgical slags and from coal-fired power station arisings, no longer occurs in North Wales. Small amounts of aggregate minerals (sandstone and occasionally sand) arise adventitiously from the reworking of former colliery spoil tips or from the working of opencast coal. In North Wales, almost all former colliery waste tips (mainly in Flintshire/Wrexham) have been either landscaped as part of reclamation schemes or utilised for base fill material. Volumes still available have not been assessed recently but are understood to be small or insignificant.
- A16. In North Wales, crushed slate, derived either from slate waste (as a by-product of roofing slate production) or quarried specifically for use as primary aggregate, features significantly in the overall pattern of supply, especially in Gwynedd. Depending upon the quality and characteristics of the material involved, it is used not only in bulk fill applications, but also as an uncoated road stone and, increasingly, as an aggregate in the production of concrete building blocks.
- A17. Both slate waste and quarried slate have been included in the overall figures for crushed rock production within the North Wales RAWP reports since 2008 and, over the 10-year baseline period (up to 2016), have accounted for an average of 9.7% of total crushed rock sales. The proportion fell abruptly after 2009, from a peak of more than 16% in 2007. Although sales volumes fell sharply, to less than half of the levels seen in 2007, the reduction in proportional share was less dramatic and this had recovered to more than 11% by 2016. However, given that slate production is already included in the crushed rock statistics, this trend has no implications for the overall level of future demand, only for the balance between slate and other types of crushed rock.
- A18. In August 2019, Gwynedd Council published a draft management plan for the slate areas of north west Wales, relating to their identification as a UK candidate for potential UNESCO World Heritage status. The proposals include bans on quarrying in some areas alongside the revocation of all extant mineral working permissions. Depending on details, if implemented, this could have a significant effect on the future demand for other sources of primary crushed rock aggregates in the region.
- A19. The various sources of secondary aggregate noted above, together with recycled aggregates, as discussed below, are currently exempt from the Aggregates Levy, in a deliberate attempt to minimise the use of primary aggregates. At the time of writing, the Aggregates Levy itself was in the process of being comprehensively reviewed by HMRC (... update to be added in due course...)

### Recycled Aggregates

- A20. Aggregates produced from construction, demolition and excavation wastes (CD&EW) form an important contribution to the overall consumption of construction aggregates. The 2008 RTSs noted a total output for the whole of Wales of 3.97mt, based on 2005 survey data, and suggested a roughly 3 to 1 split between South Wales and North Wales, based on earlier surveys and population ratios. They also noted that, despite the lack of quantitative detail, it is inevitable that the greatest volumes of CD&EW arisings and usage are in the urban areas. The RTS documents emphasised, however, that all statistics for this sector need to be used with a high degree of caution, because of the low rate of response to the surveys.
- A21. The situation, in terms of available data, has not improved since the original RTSs were published. No new survey data is available, so any observations on recent or future trends can

<sup>3</sup> it might appear more logical to group these substances with other recycled materials from construction, demolition and excavation wastes (CD&EW). However, the coverage of CD&EW is already well defined in terms of survey returns, so those items are included here as secondary aggregates.

only be regarded as broad approximations. If anything, the efficiency of recycling is likely to have increased, and the introduction of WRAP's (2005) 'Quality Protocol' for the production of aggregates from inert waste may have increased the proportion and usage of higher value products derived from the various recycled sources. Such improvements, however, represent only small increments on the progress which had previously been made - primarily as a consequence of the price advantages resulting from the landfill tax and, to a lesser extent, the aggregates levy. The view of the Mineral Products Association (MPA), which is not disputed by the NRW, remains that there is little opportunity for significant further increase in the proportion of construction aggregate likely to be derived from this sector. As noted earlier, the future availability of recycled aggregates seems likely to be inextricably linked to the overall rates of construction activity and economic growth, so the safest assumption is that it will rise and fall in a very similar way to overall demand, and will thus have a neutral impact on the demand for primary aggregates, compared to the baseline period (2007 to 2016).

### Imports and Exports

- A22. Wales has always been a net exporter of land-won aggregates. Data on both exports and imports is recorded in the periodic Aggregate Minerals (AM) Surveys, and data for exports in the last four surveys is summarised in Table A2, below.

**Table A2: Summary of key export statistics for North Wales from recent AM surveys**

<i>Note: all figures exclude sales for non-aggregate use</i>	<b>AM2001</b> (mt)	<b>AM2005</b> (mt)	<b>AM2009</b> (mt)	<b>AM2014</b> (mt)
(data from Table 4k of the AM reports)				
Land won Sand & Gravel Sales	1.342	1.192	0.589	0.897
S&G Exports*	0.544	0.508	0.128	0.158
<b>Exports as % of S&amp;G total</b>	<b>41%</b>	<b>43%</b>	<b>22%</b>	<b>18%</b>
Limestone Sales	6.062	4.641	2.636	3.508
Limestone Exports*	3.344	2.973	1.116	2.226
<b>Exports as % of Limestone total</b>	<b>55%</b>	<b>64%</b>	<b>42%</b>	<b>64%</b>
Igneous Sales	1.136	1.022	0.610	0.660
Igneous Exports*	0.091	0.277	0.064	0.054
<b>Exports as % of Igneous total</b>	<b>8%</b>	<b>27%</b>	<b>10%</b>	<b>8%</b>
Sandstone Sales	0	0	0	0
Sandstone Exports*	0	0	0	0
<b>Exports as % of Sandstone total</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>
Total Crushed Rock Sales**	7.198	5.663	3.245	4.168
Total CR Exports*	3.436	3.251	1.178	2.280
<b>North Wales CR Exports as % of CR total</b>	<b>48%</b>	<b>57%</b>	<b>36%</b>	<b>55%</b>

\* 'exports' are primarily to England but include some movement between South Wales and North Wales.

\*\* Unlike the figures used elsewhere in this Review, crushed rock sales in the AM reports exclude slate

- A23. In North Wales, the main aggregate exports, by far, are those of Carboniferous Limestone which are supplied mainly to North West England. These exports, in turn, are sourced primarily from the NE Wales sub-region (mostly from Flintshire) with smaller quantities from NW Wales (especially Conwy). The AM Survey figures generally show that, as limestone (and overall) sales fell during the recent recession, the proportion (as well as the totals) of exports also fell, but that both have since recovered substantially. This implies that, during periods of recession, for general-purpose limestone aggregates, there is a reduced dependence by importing regions on supplies from more distant sources, as would be expected. But the reverse is also true: as the economy rebounds from the recession, the demand for exports from North Wales has begun to increase once again, and more quickly than the overall rate of economic growth. However, whether or not this will eventually reach or exceed the levels of demand experienced prior to the recession is uncertain: it will depend, to a large extent, on the future level of economic growth and construction activity within North West England.

- A24. Imports of land-based aggregates are very minor, by comparison with exports. In North Wales in 2014 (from Table 5k of the AM 2014 survey report), land-based imports amounted to 0.023mt of sand & gravel (mostly from NW England) and 0.128mt of crushed rock, primarily igneous rock from South Wales. These compare with imports of 0.03mt of land-won sand & gravel and 0.653mt of crushed rock in the previous (AM 2009) survey. The reduction in crushed rock imports from South Wales has been quite significant.
- A25. Imports and exports of marine-dredged sand and gravel between England and Wales are only relevant to the RTS apportionment exercise if they affect the continuity of supply of these materials to Wales and thus give rise to increased demand on land-based resources. This is potentially an issue in South East Wales (see Appendix B) but not in North Wales, where the quantities involved are relatively minor. In Liverpool Bay, the only licence area in Welsh waters remains a net exporter to north west English markets.

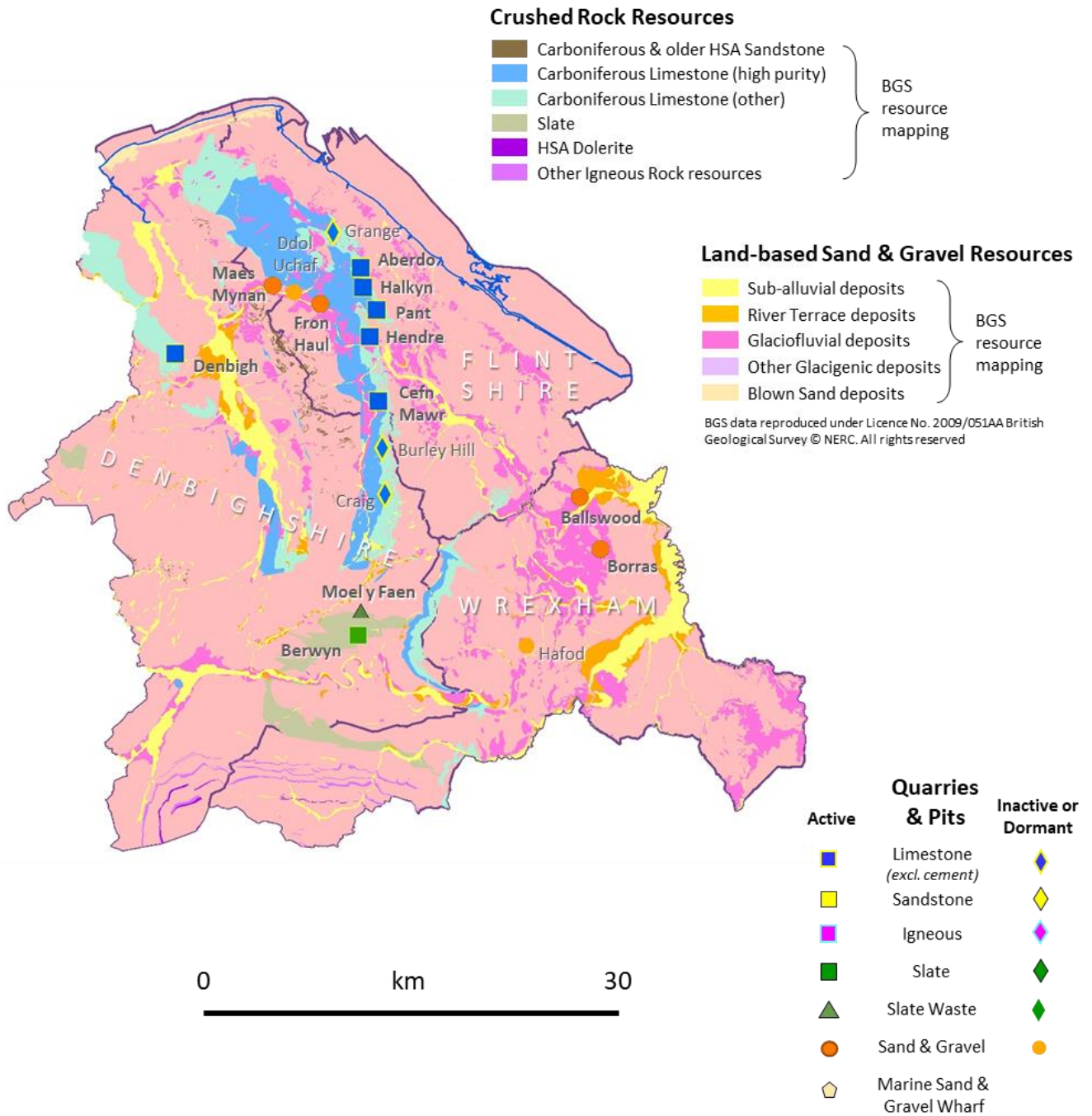
### ***Sub-Regional Analysis***

- A26. In the First Review, the analysis of patterns supply and demand for North Wales was carried out for the region as a whole. In this review, as explained earlier and as illustrated in Figure A1, above, it is based on two separate sub-regions, each one being intended to approximate a relatively 'self-contained' market area for aggregate production and sales, with little movement of aggregate taking place between adjoining areas, other than exports to England.
- A27. Maps corresponding to each of these areas are presented in Figures A2 to A5, below. For each sub-region there are three maps. The first one shows the distribution of aggregate resources and existing quarries. The second map, at a smaller scale, deals with 'proximity' issues (i.e. the relationships between resources, quarry locations, major roads and the distribution of both planned housing requirements in each LPA and existing urban areas). Planned housing requirements are used in preference to the population density maps that were used in the First Review, although both distributions are shown, for comparison, in Figures 4.7 and 4.8 of the main document. The third map for each sub-region then deals with environmental capacity issues, utilising output from the earlier IMAECA analysis (Enviros, 2005). The maps are presented at slightly different scales (as indicated in each case by the 30km scale bar).
- A28. It must be emphasised that these maps show only resources and not permitted reserves. **Resources** are geological materials, including rocks and naturally occurring sand & gravel, which have the potential to be used for a particular purpose (in this case as construction aggregates). **Permitted Reserves** are those parts of a resource which are known to be suitable for this purpose (usually as a result of detailed ground investigations and laboratory testing) and which have valid planning permission for the winning and working of the materials in question. The outlines of permitted reserves are not shown on the maps.
- A29. The resources are illustrated in several main categories. Natural **sand & gravel resources**, as mapped by the British Geological Survey (BGS) may be associated with five different types of 'superficial' deposits, as shown on the key to each map, though the extent of workable mineral within these deposits is highly variable. The maps for NW Wales show an additional category of sand & gravel resource blocks (shown by the deep red shading) that were identified in more detailed study for the Welsh Assembly by the University of Liverpool and Enviros (2003).
- A30. **Crushed rock resources** within the area comprise Carboniferous Limestones (which are subdivided, on the larger maps, into high purity (>97% CaCO<sub>3</sub>) and other limestones); Igneous Rocks (including HSA dolerites, which are differentiated on the larger maps); and Slates. Numerous small outcrops of HSA Sandstone are also shown, though none of these have been worked in recent decades.
- A31. The quarries shown on the maps are categorised in the same way as the resources. They include both active and inactive units (as of 2018), the latter including a small number of dormant sites. Separate listings of all active, inactive and dormant sites in North Wales are given in Tables A3, A4 and A5, respectively.

North East Wales Sub-Region

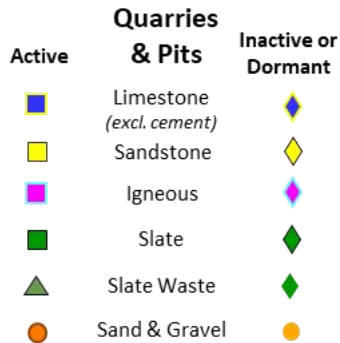
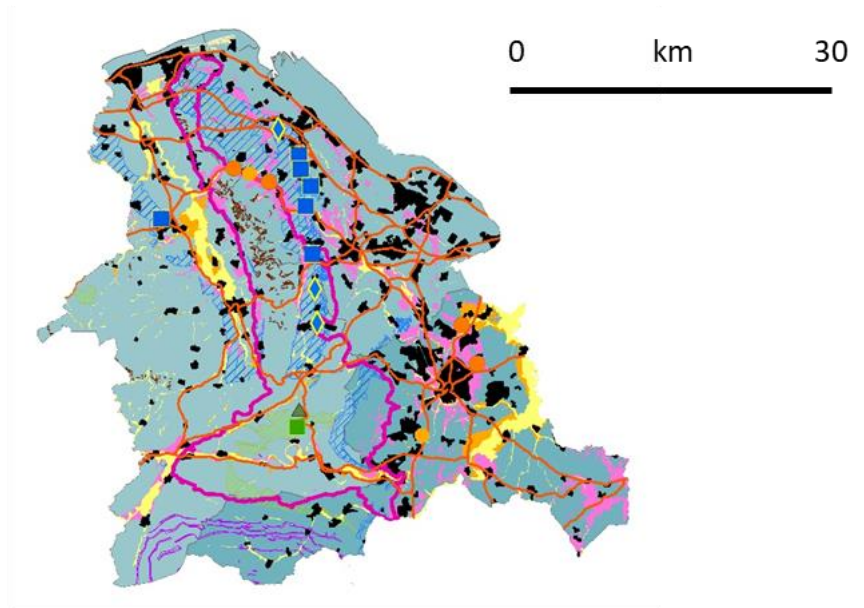
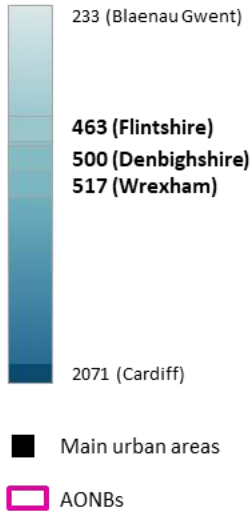
- A32. Figure A2, below illustrates the distribution of quarries and land-based aggregate resources within North-East Wales, incorporating Denbighshire, Flintshire and Wrexham. The crushed rock resources here comprise:
- **Carboniferous Limestone**, currently worked at Aberdo, Halkyn, Pant, Hendre and Cefn Mawr quarries in Flintshire, and at Denbigh Quarry in Denbighshire;
  - **Silurian slates**, currently worked, on a small scale, at the Berwyn Slate Quarry and from slate waste tips at Moel-y-Faen Quarry – both in Denbighshire; and
  - **Ordovician igneous rocks**, predominantly volcanic tuffs in southern Denbighshire and adjoining parts of Wrexham. None of these is currently worked;
- A33. In addition, there are extensive **glaciofluvial sand & gravel** deposits, primarily in Wrexham (where they are worked at Borrás and, intermittently, at Ballswood) but also in Flintshire (where they are currently worked, on a smaller scale, at the Maes Mynan and Fron Haul gravel pits) and in parts of Denbighshire. There are also quite extensive mapped deposits of **Sub-Alluvial** and **River Terrace sand & gravel**, though these are not commercially exploited.
- A34. Figure A3 illustrates the relationships of these quarries and resources to issues relating to the likely pattern of demand (as indicated by proximity to existing urban areas, planned housing requirements and the primary road network); and issues relating to environmental capacity.
- A35. Carboniferous Limestone is by far the main source of crushed rock production within the sub-region. The resources are widespread but are primarily worked in Flintshire since, in this area, they are very well placed in terms of proximity to the main centres of demand, including exports to Chester, Merseyside and other parts of north west England. In this respect, proximity to the A55 North Wales coast road is a major factor. Unworked resources close to these quarries are characterised by generally low environmental capacity, whereas some of the resources further north, in Flintshire, and in parts of Denbighshire, are better-placed in that respect. Whilst those areas are less ideal in terms of proximity to major markets and transport routes, they could have an important role to play in supplementing future supplies from the main quarrying areas, as well as supplying urban areas and infrastructure projects along the North Wales coast. The southern part of the Carboniferous Limestone outcrop in Flintshire, and almost all of the outcrop within Wrexham, are heavily constrained by their location within the Bryniau Clwyd AONB.
- A36. The only two operational slate workings in the sub-region are also located within the southern part of that area but are understood to produce little or no aggregate material other than decorative chippings.
- A37. Overall, there is limited justification for changing the existing pattern of supply of crushed rock within the sub-region, other than to encourage an increase in the proportion supplied from Denbighshire. This is in recognition of the surplus of existing permitted reserves within that county, which can be used to offset some of the very large projected shortfall of reserves in neighbouring Flintshire. This has been accomplished through an adjustment of the apportionments given to each LPA as explained in Table 5.2 of the main report. Even with that adjustment, Flintshire is facing the need to make new allocations for Carboniferous Limestone production, totalling at least 35.928 million tonnes (Table 5.6 of the main document).
- A38. In the previous (First) review of the RTS, the crushed rock apportionment for Flintshire had been increased, with a corresponding reduction in those for Gwynedd and Anglesey, in order to encourage an eastward shift in future crushed rock production. This was intended to better reflect the anticipated distribution of demand. In practice, although the level of production in Anglesey in subsequent years has been close to (less than) the previous apportionment, sales in Gwynedd have been much higher, suggesting that there is a corresponding demand in north-west Wales for which supplies need to be maintained. The notion of shifting production from Gwynedd to Flintshire has therefore been discontinued.

**Figure A2: Aggregate Resources and Quarries in the North East Wales Sub-Region**

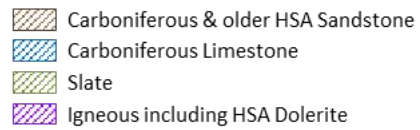


**Figure A3: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the North East Wales Sub-Region**

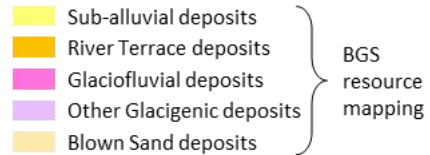
**Annualised Housing Requirements in Adopted LDPs (houses per year)**



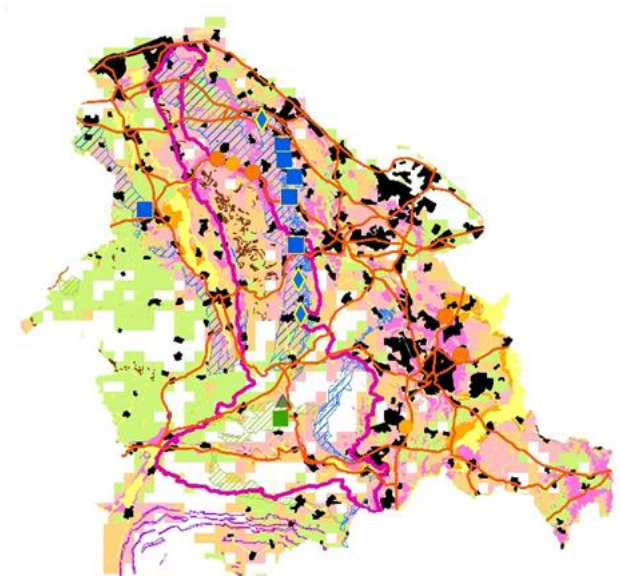
**Crushed Rock Resources**



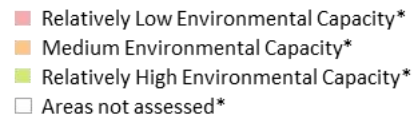
**Land-based Sand & Gravel**



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**Environmental Capacity \***



\* Assessed as part of the 'IMAECA' project, (Implementing the Methodology for Assessing the Environmental Capacity for Primary Aggregates - Enviro, 2005).

A39. In the case of land-based sand and gravel extraction in North-East Wales, the current supply pattern is dominated by one site within Wrexham, although smaller contributions are also made by three other active (or intermittently active) pits: one other in Wrexham, and two in Flintshire. Whilst the Wrexham sites are ideally placed in relation to the markets of Flintshire, Wrexham and adjoining parts of NW England, they are much further away from the smaller but important local markets along the North Wales coast (both in Denbighshire and neighbouring Conwy). From a proximity point of view there is therefore a need to maintain adequate supplies to those areas from the sites and resources in both Flintshire and Denbighshire. Although some mapped resources do exist in Conwy, the nearest other working gravel pits are much further west in Gwynedd. As shown in Table 5.4 of the main document, there is a significant shortfall of existing permitted reserves of sand & gravel within Flintshire, and a landbank (at the end of 2016) of only 6.1 years. This is below the minimum requirement of 7 years stipulated in MTAN 1 and points to an urgent need for the release of further permitted reserves. There is also a shortfall in Wrexham, though in that case the landbank (in 2016) stood at 19.6 years. Nevertheless, there is a need for further allocation within that area, in order to meet RTS requirements.

#### North West Wales Sub Region

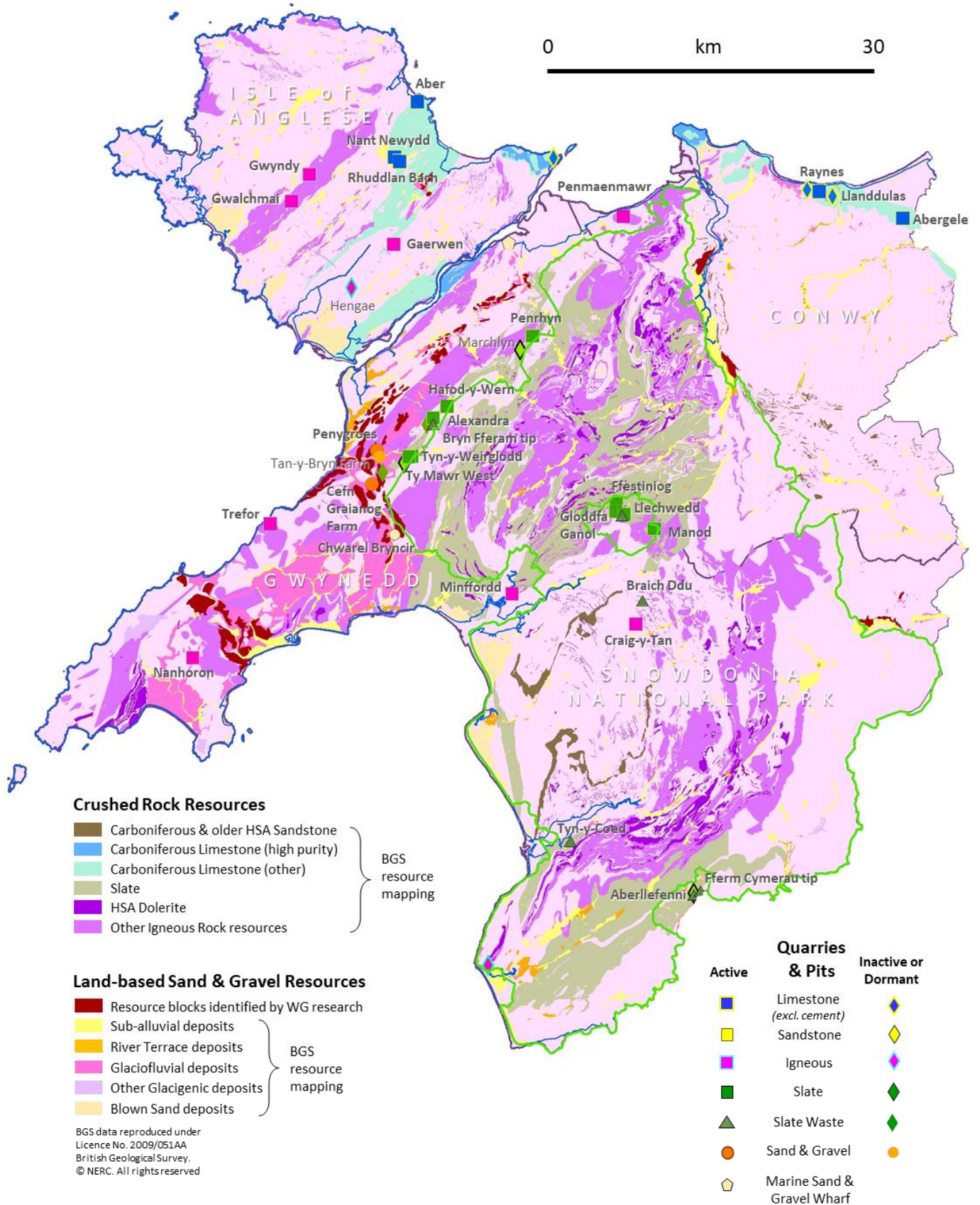
A40. Figure A4 illustrates the distribution of quarries and land-based aggregate resources within the North West Wales sub-region, incorporating Gwynedd, the Isle of Anglesey, Conwy and the Snowdonia National Park. In these areas, the crushed rock resources comprise:

- **Carboniferous Limestone**, currently worked at two quarries northern Conwy (Raynes and Abergele), and three units on Anglesey (Aber, Nant Newydd and Rhuddlan Bach);
- A wide range of **igneous rock resources**, including the Precambrian Coedana Granite of Anglesey (worked at Gwalchmai, Gwyndy and Gaerwen quarries); Granite of unknown age (currently worked at Trefor Quarry on the north coast of the Llŷn Peninsula); Ordovician diorite (worked at Penmaenmawr quarry the Conwy coast); Ordovician HSA dolerite (worked at Minffordd in Gwynedd); and other Ordovician igneous rocks at Nanhoron Quarry on the Llŷn Peninsula; and
- **Cambrian and Ordovician slates**, currently worked either as virgin aggregate or from previously discarded slate waste at numerous sites within Gwynedd and at two sites within the Snowdonia National Park.

A41. In addition, there are **glaciofluvial sand & gravel** deposits primarily in northern Gwynedd and, especially, across the Llŷn Peninsula. In addition to the deposits mapped by the BGS, these include a number of potential resource blocks identified in more detail by the University of Liverpool and Enviro (2003) in a study for the Welsh Assembly. At present, sand & gravel is worked only at two sites in Gwynedd (Penygroes and Cefn Grainog Farm), whilst sand (only) is worked at Chwarel Bryncir. Additional, but relatively minor sand & gravel deposits are mapped by the BGS as glacial, sub-alluvial, river terrace and blown sand deposits, though none of these is currently worked.

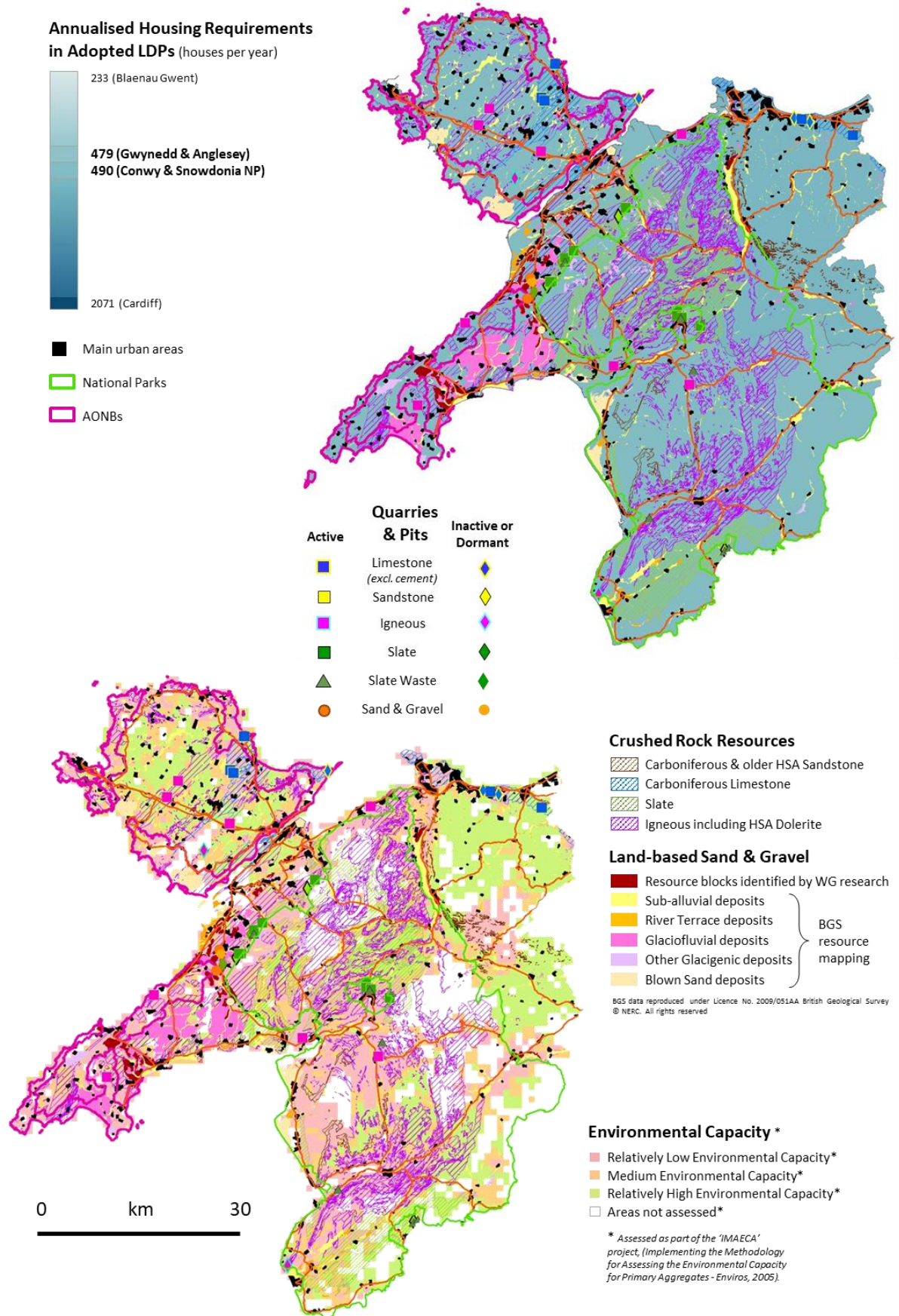
A42. Figure A5 illustrates the relationships of the various resources and quarries to issues relating to the likely pattern of demand (as indicated by proximity to existing urban areas, planned housing requirements and the primary road network); and issues relating to environmental capacity. Each of these factors is discussed below in relation to each type of resource.

Figure A4: Aggregate Resources and Quarries in the North West Wales Sub-Region





**Figure A5: Aggregate Resources, Quarries, Planned Housing Requirements and Environmental Capacity in the North West Wales Sub-Region**



- A43. Carboniferous Limestone resources within North West Wales are restricted to the northern part of Conwy, Anglesey and one (currently unworked) area on the Gwynedd side of the Menai Straits, to the south-west of Bangor. Whilst some of these outcrops coincide with areas of relatively low environmental capacity, or are constrained by Areas of Outstanding Natural Beauty, others (including those surrounding Abergele Quarry and smaller areas within Anglesey) are characterised by relatively high environmental capacity and may therefore offer scope for future resource development. The two quarries in Conwy are both operated by major aggregate producers and serve wide market areas along the north Wales coast. In terms of proximity to both urban areas and transport links, they are both well-placed, though they are close to the limits of viability for exports by road into England. Raynes Quarry also exports significant quantities of limestone to North West England, and elsewhere, via a dedicated jetty. The three limestone quarries in Anglesey, by comparison, are all operated by small local firms and are presumed to serve only local markets.
- A44. The 'igneous rock' resources, as shown on the BGS maps, which encompass both igneous and metamorphic rock types, all have similar suitability for use as general purpose hard rock aggregates. This includes being used as a substitute for limestone in most construction applications. However, in almost all parts of the sub-region, the igneous rock resources are either subject to National landscape constraints (National Park or AONBs) or fall within areas of relatively low environmental capacity. The main exceptions are much of the Coedana Granite outcrop in central Anglesey and some of the igneous outcrops in the eastern side of the Llŷn Peninsula. In some areas, (shown on the maps as 'HSA Dolerite'), the rocks are potentially suitable for use as High Specification Aggregate for road surfacing materials (as defined in Chapter 4 of the main document) and are worked as such at Minffordd near Porthmadog in Gwynedd. This is currently the only unit in this group which exports aggregate to England. Penmaenmawr diorite quarry on the north coast of Conwy was formerly an exporter of rail ballast to England, by rail, but ballast production here has been greatly reduced since 2008, when the contract to supply Network Rail was lost. Both of these units fall outside the National Park but are within areas of low environmental capacity. All other igneous quarries in the sub-region tend to supply only local markets although, in the recent past, these have included major contracts such as upgrading the A55 North Wales Coast road and the A5 across Anglesey.
- A45. Slate resources, including both virgin material quarried specifically for the purpose, and material derived from the processing of previously discarded slate waste, are an important source of construction aggregate within North West Wales. Although materials from slate waste are technically classed as secondary aggregate, and although all types of slate are currently exempt from the Aggregates Levy, slate that is used as a construction aggregate has traditionally been counted as primary aggregate within the North Wales RAWP reports. Virtually all of the slate resources within the sub-region are located within the Snowdonia National Park, though only two operational sites, working former waste tips, lie within the Park. The majority of ongoing slate aggregate production is from sites located immediately outside the National Park boundaries although most (but not all) of these are within areas mapped as being of relatively low environmental capacity.
- A46. Given that most slate aggregate is used locally within NW Wales, and that most of the resources are constrained by the National Park, there is little to suggest that the existing supply pattern either needs to change or is capable of doing so. There is scope for the output from established sites in Gwynedd to increase, in response to any future rise in demand in the NW Wales sub-region, but there is limited (if any) likelihood of this material displacing sales of limestone aggregate to the main markets in North East Wales and North West England. This could potentially happen to some extent, if there were to be a significant increase in the Aggregates Levy, giving slate aggregates a further price advantage, but the reverse could be true if the Aggregates Levy were to be abolished, in line with the recent legal challenge by the British Aggregates Association. Moreover, any potential sustainability benefits associated with increased use of slate waste would need to be balanced against the increased radius of transportation from sites within Gwynedd, which would be contrary to the proximity principle. Slate would not be able to substitute, however, for all other types of crushed rock aggregate, particularly road surfacing materials, and applications where high crushing strength is required.
- A47. Overall, there appear to be few opportunities and little, if any, justification for the spatial pattern of crushed rock production in North West Wales to be altered. Both the markets and the

available resources are widely dispersed and, at the present time, there are adequate permitted reserves to provide for the RTS requirements over the next 25 years.

- A48. In the case of land-based sand and gravel extraction, the current supply pattern is limited to just three sites in Gwynedd (two sand & gravel operations and one supplying just sand). As shown in Table 5.4 of the main document, Gwynedd (and therefore North West Wales as a whole) is now facing a shortfall of permitted reserves, compared with the RTS 2<sup>nd</sup> Review requirements, with an existing (2016) landbank of only 6.7 years. This is below the minimum level required by MTAN 1 and points to an urgent requirement for further planning permissions to be granted. As noted earlier, there are extensive areas of potential sand & gravel resources within Gwynedd, both to the east and south of Caernarfon, and to the west of Pwllheli, within resource blocks identified by the Liverpool University (2003) study. An important requirement, however, is to ensure that the resources provide an appropriate balance between fine aggregate (sand) and coarse aggregate (gravel).

### **Summary of Current Sources of Supply in North Wales**

- A49. Tables A3 to A5, below, list the currently active, inactive and dormant aggregate quarries (respectively) in each of the sub-regions of North Wales, updated to August 2018. The lists exclude quarries devoted to the manufacture of cement, building stone, silica sand, shale or other non-aggregate products.

**Table A3: Active Aggregate Quarries in North Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>DENBIGHSHIRE</b>				
Berwyn	Berwyn Slate Quarry Ltd	Slate	318500	346300
Denbigh	Breedon Southern	Limestone	305090	367050
Moel y Faen	Jones Bros Ruthin	Slate	318700	348100
<b>FLINTSHIRE</b>				
Aberdo	CCP Building Products Ltd	Limestone	318700	373300
Fron Haul	Breedon Southern	Sand & Gravel	315700	370600
Halkyn	CEMEX UK	Limestone	319000	372000
Hendre	Tarmac	Limestone	319400	368000
Maes Mynan	Breedon Southern	Sand & Gravel	311500	372100
Pant	Tarmac	Limestone	319800	370200
<b>WREXHAM</b>				
Ballswood	DP Williams Ltd	Sand & Gravel	335200	356600
Borras	Breedon Group	Sand & Gravel	336300	352500
<b>CONWY</b>				
Abergele	Hanson Aggregates	Limestone	296700	375800
Penmaenmawr	Hanson Aggregates	Igneous	270135	375515
Raynes	CEMEX UK	Limestone	289000	378190
<b>SNOWDONIA</b>				
Braich Ddu	John Roberts	Slate Waste	271985	338460
Craig y Tan	G E Williams	Igneous	271349	336224
Ty'n-y-Coed	R. Meredith, Arthog Slate Co	Slate Waste	265030	315275
<b>GWYNEDD</b>				
Aberllefenni Slate Tip	R. Meredith, Arthog Slate Co	Slate Waste	276920	310290
Alexandra	Caernarfon Crown Slate	Slate + Slate Waste	251800	356105
Bryn-Fferam	Wynne's Transport Ltd	Slate Waste	251810	355495
Cefn Graianog	Tudor Griffiths Group	Sand & Gravel	246000	349500
Chwarel Bryncir	JC Evans Ltd	Sand	248100	344855
Fferm Cymerau tip	?	Slate Waste	277572	310485
Ffestiniog	Welsh Slate (Breedon Group)	Slate + Slate Waste	269206	347186
Gloddfa Ganol quarry + tip	Welsh Slate (Breedon Group)	Slate Waste	269325	347590

Hafod-Y-Wern	Gwilym Elias Owen	Slate Waste	253135	357215
Llechweidd Slate Mine	Northern Welsh Quarries Ltd	Slate	270200	346800
Llechweidd tip	Northern Welsh Quarries Ltd	Slate Waste	270000	346680
Manod	Welsh Slate (Breedon Group)	Slate	273100	345400
Minffordd (HSA)	Breedon Group	Igneous	259400	339100
Nanhoron	E Thomas, Nanhoron Quarry	Igneous	228650	332980
Penrhyn Slate Quarry + tip	Welsh Slate (Breedon Group)	Slate + Slate Waste	261375	364000
Penygroes	Tudor Griffiths	Sand & Gravel	246370	352985
Trefor	R T Davies	Igneous	236100	345900
Ty Mawr West Quarry + tip	Ellis Jones	Slate + Slate Waste	249650	352450
Tyn-y-Weirglodd	Welsh Slate (Breedon Group)	Slate Waste	249450	352195
<b>ISLE OF ANGLESEY</b>				
Aber	Anglesey Masonry Ltd	Limestone	250300	386650
Gaerwen	Anglesey Aggregates Ltd	Igneous	248000	372830
Gwalchmai	Hogan Aggregates	Igneous	238175	376990
Gwynndy	Hogan Aggregates	Igneous	239955	379665
Nant Newydd	Clive Hurt Plant Hire (Anglesey)	Limestone	248100	381100
Rhuddlan Bach	Clive Hurt Plant Hire (Anglesey)	Limestone	248600	380700

**Table A4: Inactive Aggregate Quarries in North Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>DENBIGHSHIRE</b>				
Burley Hill	Tarmac	Limestone	320280	360075
Graig	Tarmac	Limestone	320500	356500
<b>FLINTSHIRE</b>				
Ddol Uchaf	Breedon Southern	Sand & Gravel	313800	371500
Pen-yr-Henblas	Grosvenor Estate	Limestone	319100	372900
<b>WREXHAM</b>				
Hafod	Cory Environmental Ltd	Sand & Gravel	330800	345600
<b>CONWY</b>				
Llanddulas	Waste Recycling Group	Limestone	290300	377460
Plas Gwilym	Plas Gwilym Environmental	Limestone	287850	378100
<b>GWYNEDD</b>				
Aberllefenni Mine	Wincillate Ltd	Slate	276920	310290
Crown New	Caernarfon Crown Slate	Slate Waste	251205	355465
Greenarfon	Mulcair Ltd	Slate Waste	246950	350840
Twll Llwyd	W Humphries	Slate	249000	351800
<b>ISLE OF ANGLESEY</b>				
Dinmoor	Buckley Estate, Beaumaris	Limestone	263405	381173
Hengae	Hogan Aggregates	Igneous	244000	368600
Penmon	Jones Bros Ruthin	Limestone	263555	381290

**Table A5: Dormant Aggregate Quarries in North Wales (2018)**

Quarry Name	Operator	Commodity	Easting	Northing
<b>FLINTSHIRE</b>				
Grange	Mr. D. Priestley ? or Tarmac ?	Limestone	316660	375935
<b>SNOWDONIA NATIONAL PARK</b>				
Tonfannau	Spencer Industrial (N. Wales)	Igneous	257105	303345
<b>GWYNEDD</b>				
Marchlyn	First Hydro	Slate	260200	362675
Tan y Bryn Farm	G & G L Bowness	Sand & Gravel	246640	352350
Twll Coed	Welsh Slate (Breedon Group)	Slate	249165	351945

- A50. Whilst any of the sites listed in these tables may be able to contribute to future supply (subject to the dormant sites obtaining new development consents through the ROMP process<sup>4</sup>), it is only the active and remaining inactive sites which contributed to the reserves figures presented in Table 5.4 and 5.6 of the main document. Reserves at dormant sites are noted separately in those tables. The active sites and some of the currently inactive ones, together with a small number of other sites which have since closed, contributed to the historical sales over the baseline period (2007 to 2016).
- A51. Full lists of active, inactive and dormant sites for individual years prior to 2018 are given in the relevant annual RAWP reports.

### ***Apportionments, Allocations and Guidance to LPAs in North Wales***

- A52. Tables A6 and A7, below, summarise the apportionments, permitted reserves and allocations for land-won sand & gravel and for crushed rock (respectively) which have been assigned to each Local Planning Authority in North Wales.
- A53. The pages which follow set out in more detail the recommendations and guidance for each individual LPA in the Region, drawing upon the figures set out in these tables. The LPAs are dealt with in alphabetical order. In each case, reference to the 'Plan period' relates to the end date of the Local Development Plan which has been adopted or is in preparation (whichever is later) for that particular planning authority.
- A54. As explained more fully in the main document, the figures for each authority are based on the assumptions that future aggregate requirements will increase in future years to reflect the increased planned requirements for house construction, and that supplies of alternative aggregates, from marine, secondary and recycled sources, will continue to be maintained in proportions comparable to those experienced during the baseline period (2007 to 2016).
- A55. The accuracy of these assumptions will continue to need to be monitored by the planning authorities, using information from various data sources and new surveys (e.g. by Welsh Government, NRW, and the Mineral Products Association) and that data will be used to inform a revision of the apportionment requirements, if this is needed, as part of the next review of the RTS.
- A56. It should be emphasised that the annualised apportionment figures are given only as a guide to the calculation of the total apportionment required over the duration of the LDP. In practice, sales will vary from year to year and there is no requirement for an LPA to maintain or limit those sales in line with the annualised apportionments.

<sup>4</sup> ROMP is the acronym for the Review of Old Mineral Permissions, under the Environment Act 1995. Further details are given in the Glossary at the end of the main report.

**Table A6: Apportionments, Reserves and Allocations for Sand & Gravel in North Wales**

Local Planning Authority	New Annualised Apportionment for sand & gravel (mt)	Total Apportionment Required over 22 years	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Denbighshire	0.000	0.000	0.000	0.000	0
Flintshire	0.223	4.912	1.369	3.543	0.5
Wrexham	0.646	14.217	12.652	1.565	0
Conwy + Snowdonia NP	0.000	0.000	0.000	0.000	0
Gwynedd	0.174	3.834	1.175	2.659	0
Isle of Anglesey	0.000	0.000	0.000	0.000	0
<b>Sub-totals, North Wales</b>	<b>1.044</b>	<b>22.963</b>	<b>15.196</b>	<b>7.767</b>	<b>0.5</b>
<b>TOTALS Wales</b>	<b>1.352</b>	<b>29.750</b>	<b>18.406</b>	<b>11.618</b>	<b>0.85</b>

SOURCE: Table 5.4 of the main document

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. See following text for details

**Table A7: Apportionments, Reserves and Allocations for Crushed Rock in North Wales**

Local Planning Authority	New Annualised Apportionment for crushed rock (mt)	Total Apportionment Required over 25 years (30 years in Cardiff)	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Denbighshire	0.860	21.500	21.710	0.000	0
Flintshire	3.359	83.968	48.040	35.928	1.41
Wrexham	0.000	0.000	0.000	0.000	0
Conwy + Snowdonia NP	1.201	30.016	62.500	0.000	0.25
Gwynedd	0.955	23.867	28.540	0.000	0
Isle of Anglesey	0.321	8.015	14.400	0.000	0
<b>Sub-totals, North Wales</b>	<b>6.695</b>	<b>167.366</b>	<b>175.19</b>	<b>35.928</b>	<b>1.66</b>
<b>TOTALS Wales</b>	<b>18.872</b>	<b>479.816</b>	<b>670.850</b>	<b>94.101</b>	<b>34.20</b>

SOURCE: Table 5.6 of the main document

Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2016, or by allocations that have already been identified in LDPs. See following text for details.

- A57. The need for provision to extend beyond the Plan period is based on the requirement in MTAN1 for maintaining landbanks of 7 years for sand & gravel and 10 years for crushed rock, throughout the full duration of the LDP. Subject to this requirement being met, the overall provision at any given time may comprise both landbanks of permitted reserves and allocations for future working, where these are required.
- A58. In all cases, the recommendations are based on currently available information regarding reserves, production, proximity and environmental capacity. As noted in 'Box 1' of the original RTS documents, the suggested apportionments and allocations may not take fully into account all factors that may be material to the ensuring an adequate supply of aggregates obtained from appropriately located sources. Such factors may include such things as:
- The technical capability of one type of aggregate to interchange for another;
  - The relative environmental cost of substitution of one type of aggregate by another;
  - The relative environmental effects of changing patterns of supply; and
  - Whether adequate production capacity can be maintained to meet the required level of supply.
- A59. For such reasons, and as already noted in Chapter 1 of the main document, where it is justified by new (e.g. more up to date, more detailed or more precise) evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS when preparing their LDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall strategy provided by the RTS itself (e.g. by working together with other LPAs within the same sub-region to ensure that sub-regional and regional totals are still achieved). To reinforce that concept, this Review of the RTS introduces a new requirement for all LPAs within each sub-region to agree a Sub-Regional Statement of Collaboration, and for this to be approved by the RAWP, prior to the Examination of any individual LDP within that area.
- A60. As noted in MTAN 1, paragraph A3: If the local authorities reach no agreement or if individual local authorities do not accept the Regional Technical Statement, the Welsh Assembly Government will consider its default powers to intervene in the planning process as a last resort.

## ANGLESEY

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.321 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Anglesey, as calculated in Tables 5.4 and 5.6 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are zero for land-won sand & gravel and 8.015 million tonnes for crushed rock. These figures compare with existing landbanks of zero for sand & gravel and 14.4 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In view of the lack of any sand & gravel apportionment being required for Anglesey (which itself is a reflection of the very limited availability of potential resources on the island, by comparison with those available in neighbouring Gwynedd), there is no specific requirement for land-based sand & gravel allocations to be identified within the LDP. This represents no change from the First Review of the RTS but contrasts with the recommendations given in the original RTS which, purely on the basis of average regional proportions of total consumption, required Anglesey to make an allocation of 1.5 million tonnes of sand & gravel within its LDP.

Given that existing permitted reserves of crushed rock on Anglesey are now significantly greater than the RTS requirement, with a landbank of almost 45 years, there is no necessity for any further crushed rock allocations to be made within the LDP. However, consideration should be given to whether any of the factors set out in paragraph A58 above give rise to any other requirements for new resource allocations. If any adjustments are made, they would need to be confirmed within a Sub-regional Statement of Collaboration, and agreed with the North Wales RAWP, before any of the constituent LDPs within North West Wales are submitted for Examination.

As far as possible, any allocations that are needed should be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

In accordance with MTAN 1 (para. 49), no allocations should be identified within the Ynys Môn Area of Outstanding Natural Beauty, unless there are no environmentally acceptable alternatives.

### **Use of alternative aggregates**

Little or no marine-dredged aggregates are thought to be utilised within Anglesey. As noted in the original RTS, the use of secondary aggregates is confined to occasionally processing locomotive ash at Trywyn Trewan and recycled glass is mixed with stone for asphalt at one quarry. There may be some additional potential for recycling construction, demolition and excavation wastes as aggregates in the event that MOD or industrial land is released for redevelopment but, otherwise, this source of alternative aggregate is also likely to be very limited.



Nevertheless, the residual requirements for primary land-won aggregates assume that these alternative materials will continue to be utilised to a level comparable to that seen in previous years, and the authority should continue to encourage this.

**Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

**Safeguarding of wharves and railheads**

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

**CONWY AND THE SNOWDONIA NATIONAL PARK****Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **1.201 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

The majority if not all of this provision is expected to be supplied from Conwy.

**Comparison with existing landbanks**

The total apportionments for Conwy and the Snowdonia National Park (combined), as calculated in Tables 5.4 and 5.6 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are zero for land-won sand & gravel and 30.016 million tonnes for crushed rock. These figures compare with existing (combined) landbanks of zero for sand & gravel and 62.5 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

**Allocations required to be identified in the Local Development Plan**

In view of the surplus of existing permitted crushed rock reserves, no further allocations for crushed rock are required to be identified within either of the LDPs. However, consideration should be given to whether any of the factors set out in paragraph A58 above give rise to any further requirements for resource allocations within Conwy. If any adjustments are made, they would need to be confirmed within a Sub-regional Statement of Collaboration, and agreed with the North Wales RAWP, before any of the constituent LDPs within North West Wales are submitted for Examination.

As far as possible, any allocations should be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks or Areas of Outstanding Natural Beauty. For this reason, no allocations should be identified within the National Park, unless there are no environmentally acceptable alternatives, and efforts should continue to be made to gradually transfer the very small amount of production which currently takes place within the National Park to Conwy and/or to other neighbouring authorities.

**Treatment of Dormant sites**

A single dormant quarry permission (Tonfannau) still exists within the Snowdonia National Park. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 14 of Minerals Planning Policy Wales, the extant permitted reserves may be offset against any requirements that may otherwise be identified for allocations for future working.

### **Use of alternative aggregates**

Small quantities of marine sand are landed at Port Penrhyn in neighbouring Gwynedd, some of which may be utilised within the coastal towns in north east Conwy.

As noted in the original RTS, no significant sources of secondary or recycled aggregates have been identified in Conwy, with the possible exception of relatively small slate waste tips. Two small-scale slate waste tips are also active within the Snowdonia National Park

There is also likely to be continued recycled aggregate production, albeit at a modest level, from construction, demolition and excavation wastes, primarily within the towns along the Conwy coast.

Nevertheless, the residual requirements for primary land-won aggregates assume that these alternative materials will continue to be utilised to a level comparable to that seen in previous years, and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

### **Safeguarding of wharves and railheads**

All existing and potential new wharves, jetties and railheads within Conwy should be identified for safeguarding, in order to provide a full range of sustainable transport options (whether or not they are currently utilised). This should include facilities for the transfer of slate waste from neighbouring areas, through Conwy.

## DENBIGHSHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: Nil
- Crushed rock aggregates provision: **0.860 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Denbighshire, as calculated in Tables 5.4 and 5.6 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are zero for land-won sand & gravel and 21.5 million tonnes for crushed rock. These figures compare with existing landbanks of zero for sand & gravel and 21.71 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

Although Denbighshire has a zero apportionment for natural sand & gravel, and no existing permitted reserves, it does have potential resources – particularly within the Clwyd Valley, between Denbigh and Ruthin. Some of these fall within the Bryniau Clwyd AONB, but others do not. It may be possible for these areas to be worked, in future, as alternatives to the deposits in adjoining parts of Flintshire, should that be come necessary. It would therefore be useful for the two authorities to work collaboratively on this and, if necessary, for the allocation requirements for Flintshire to be shared.

In view of the surplus of existing permitted crushed rock reserves within Denbighshire, no further allocations for crushed rock are required to be identified within the LDP. In the longer term, however, it may become necessary for Denbighshire to take on a greater share of crushed rock production within the sub-region than is presently the case and, again, there would be merits in collaborative working on this between all three LPAs within the NE Wales sub-region.

Consideration should also be given to whether any of the factors set out in paragraph A58 above give rise to any further requirements for resource allocations within the area.

If any adjustments to the suggested apportionments and allocations are made, they would need to be confirmed within a Sub-regional Statement of Collaboration, and agreed with the North Wales RAWP, before any of the constituent LDPs within North East Wales are submitted for Examination.

As far as possible, any allocations that are made should be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks or Areas of Outstanding Natural Beauty. For this reason, no allocations should be identified within the Bryniau Clwyd AONB, unless there are no environmentally acceptable alternatives.

### **Use of alternative aggregates**

Little or no marine-dredged aggregates are thought to be utilised within Denbighshire.

Slate waste is processed at one remaining active site within the southern part of the Bryniau Clwyd AONB, but the material is believed to be used only as decorative chippings and low grade fill. Other than this, there are no other known sources of secondary aggregate within the county.

There is likely to be some recycled aggregate production from construction, demolition and excavation wastes, primarily within the main coastal towns, but also within some of the quarries.

Despite the limited availability of alternative materials within Denbighshire, the residual requirements for primary land-won aggregates assume that these will continue to form part of the overall supply pattern and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

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

## FLINTSHIRE

### **Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.223 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **3.359 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Flintshire, as calculated in Tables 5.4 and 5.6 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are 4.912 million tonnes for land-won sand & gravel and 83.968 million tonnes for crushed rock. These figures compare with existing landbanks of 1.369 million tonnes for sand & gravel and 48.04 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016). The figures exclude limestone reserves which are allocated for non-aggregate use.

### **Allocations required to be identified in the Local Development Plan**

In order to address the resulting shortfalls, new allocations totalling at least 3.543 million tonnes of sand & gravel and at least 35.928 million tonnes of crushed rock will need to be identified within the LDP. These are substantial increases compared with the requirements set out in the First Review and, amongst other things, they reflect the resurgent importance of Flintshire in exporting limestone aggregate to North West England. This is clearly demonstrated by the data in Table A2, above. The total allocations required for Flintshire have been minimised by increasing the sub-regional contributions from neighbouring Denbighshire, so as to utilise the existing permitted reserves in that area (see Table 5.2 and associated commentary in the main document). Further collaborative working, with both Denbighshire and Wrexham may be needed to provide optimal solutions.

Any shared arrangements would need to offer advantages, in terms of the proximity principle, environmental capacity and other sustainability criteria, compared with the option of developing new reserves within Flintshire itself. They would also need to be reflected in a Sub-regional Statement of Collaboration, and agreed with the North Wales RAWP, before any of the constituent LDPs within the North East Wales sub-region are submitted for Examination.

Consideration should also be given to whether any of the factors set out in paragraph A58 above give rise to any further requirements for resource allocations.

As far as possible, allocations should be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks or Areas of Outstanding Natural Beauty. For this reason, no allocations should be identified within the Bryniau Clwyd AONB, unless there are no environmentally acceptable alternatives.

### **Treatment of Dormant sites**

A single dormant limestone quarry (Grange) still exists within Flintshire. The planning authority should assess the likelihood of this site being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site is considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 14 of Minerals Planning Policy Wales, it may be offset against any requirements that may otherwise be identified as allocations for future working. Subject to such assessment, this may help to address part of the requirement for new crushed rock allocations noted above.

### **Use of alternative aggregates**

Unknown quantities of navigational dredgings from the Dee Estuary are landed at Mostyn Dock, some of which are understood to have been deployed for low specification construction fill. Other than this, no marine-dredged aggregates are thought to be used within Flintshire.

Colliery spoil would once have been available for use as a secondary aggregate within the coalfield area but, in most instances, the area has been redeveloped for use by new, high-tech industries, leaving little further opportunity for generating secondary aggregates on a regular basis.

The relatively high levels of industrial and commercial development and redevelopment (compared with most other parts of North Wales) generate significant quantities of construction, demolition and excavation wastes, from which (currently unknown quantities of) recycled aggregates are derived. Whilst redevelopment has already taken place in many areas, there may be some further opportunities in the south of the county.

The residual requirements for primary land-won aggregates assume that these varying quantities of alternative materials will continue to form part of the overall supply pattern and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

### **Safeguarding of wharves and railheads**

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

## GWYNEDD

### **Apportionment for the future provision of land-won primary aggregates**

For planning purposes, Gwynedd excludes the Snowdonia National Park, which is a separate Mineral Planning Authority (and is dealt with in combination with neighbouring Conwy, above). Gwynedd is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: **0.174 million tonnes per year** until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: **0.995 million tonnes per year** until the end of the Plan period and for 10 years thereafter.

### **Comparison with existing landbanks**

The total apportionments for Gwynedd, as calculated in Tables 5.4 and 5.6 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are 3.834 million tonnes for land-won sand & gravel and 23.867 million tonnes for crushed rock. These figures compare with existing landbanks of 1.175 million tonnes for sand & gravel and 28.54 million tonnes for crushed rock (as at 31<sup>st</sup> December 2016).

### **Allocations required to be identified in the Local Development Plan**

In order to address the resulting shortfall for sand & gravel, new allocations totalling at least 2.659 million tonnes will need to be identified within the LDP. In view of the small surplus of existing crushed rock reserves, no crushed rock allocations are specifically required. However, consideration should also be given to whether any of the factors set out in paragraph A58 above give rise to any other requirements for resource allocations.

In particular, a sizeable part of the existing crushed rock landbank in Gwynedd is made up of permissions at slate quarries and slate waste tips and, whilst slate aggregate is able to substitute for other rock types in many situations, it is not suitable for all applications. Additional allocations for other types of crushed rock might therefore be required and the situation will need to be kept under close review by the planning authority. Particular attention will need to be given to the continuation (or otherwise) of the exemption of slate from the Aggregates Levy (see para. A19 above). If the exemption is removed there could well be an increased demand for other types of crushed rock aggregate.

As noted in the original RTS, any future crushed rock permissions in Gwynedd may need to be specifically dependent upon justification for material of a particular quality (e.g. rail ballast or road surfacing aggregate) which cannot be met from processed slate waste.

As far as possible, any allocations should be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks or Areas of Outstanding Natural Beauty. For this reason, no allocations should be identified within the Llŷn Peninsula AONB, unless there are no environmentally acceptable alternatives.

If any adjustments to the suggested apportionments and allocations are made, they would need to be confirmed within a Sub-regional Statement of Collaboration, and agreed with the North Wales RAWP, before any of the constituent LDPs within North West Wales are submitted for Examination.



### **Treatment of Dormant sites**

A total of three dormant quarry permissions still exist within Gwynedd, as detailed in Table A5, above. Two of these are slate quarries and one is a sand & gravel site. The planning authority should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 14 of Minerals Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working. Subject to such assessment, the dormant sand & gravel unit may offer prospects for addressing part of the requirement for new allocations noted above.

### **Use of alternative aggregates**

Small quantities of marine sand are landed at Port Penrhyn near Bangor. These are probably utilised within a radius of 20 to 30 miles within northern Gwynedd and (perhaps) neighbouring Conwy.

As noted earlier in this Appendix, crushed slate, derived either from slate waste or quarried specifically for use as primary aggregate, features significantly in the overall pattern of supply within Gwynedd. Together, over the 10-year baseline period (up to 2016), these products have accounted for an average of 9.7% of total crushed rock sales within North Wales as a whole, falling abruptly since 2009, from a peak of more than 16% in 2007, but recovering to more than 11% by 2016. However, given that slate production is already included in the crushed rock statistics for North Wales, this trend has no implications for the overall level of future demand, only for the balance between slate and other types of crushed rock.

Recycled aggregate production from construction, demolition and excavation wastes within Gwynedd is likely to be limited to small quantities within the main towns and utilised only for local projects.

The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised, particularly but not only in the case of crushed slate, and the authority should continue to encourage this.

### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

### **Safeguarding of wharves and railheads**

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

**WREXHAM****Apportionment for the future provision of land-won primary aggregates**

The planning authority is required to make future provision for land-won primary aggregates within its Local Development Plan on the basis of the following annualised apportionments:

- Land-won sand & gravel provision: 0.646 million tonnes per year until the end of the Plan period and for 7 years thereafter.
- Crushed rock aggregates provision: nil.

**Comparison with existing landbanks**

The total apportionments for Wrexham, as calculated in Tables 5.4 and 5.6 of the main document, over the 22-year horizon required for sand & gravel, and the 25-year timescale required for crushed rock, are 14.217 million tonnes for land-won sand & gravel and zero for crushed rock. These figures compare with existing landbanks of 12.652 million tonnes for sand & gravel and zero for crushed rock (as at 31<sup>st</sup> December 2016).

**Allocations required to be identified in the Local Development Plan**

In order to address the sand & gravel shortfall, new allocations totalling at least 1.565 million tonnes will need to be identified within the Wrexham area.

In recognition of the constraints imposed by the Bryniau Clwyd AONB on the working of crushed rock resources within most of the Wrexham area, the level of crushed rock provision (and thus the requirement for identifying allocations for future crushed rock working) has been set at zero. Small areas of crushed rock resources (both limestone and igneous rock) do exist, however, just outside the AONB in the south-western part of the area, and the possibility remains of identifying prospects for future extraction in those areas. If any such opportunities do arise, it may be possible for Wrexham to share part of the crushed rock allocation currently assigned to neighbouring Flintshire.

Any such shared arrangements would need to offer advantages, in terms of the proximity principle, environmental capacity and other sustainability criteria, compared with the option of developing new reserves within Flintshire. They would also need to be reflected in a Sub-regional Statement of Collaboration, and agreed with the North Wales RAWP, before any of the constituent LDPs within the North East Wales sub-region are submitted for Examination.

Consideration should also be given to whether any of the factors set out in paragraph A58 above give rise to any further requirements for resource allocations.

As far as possible, any allocations should be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of reserves, in order to reflect the uncertainties involved.

Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks or Areas of Outstanding Natural Beauty. For this reason, no allocations should be identified within the Bryniau Clwyd AONB, unless there are no environmentally acceptable alternatives.

**Use of alternative aggregates**

Little or no marine-dredged aggregate is thought to be utilised within Wrexham, not least because of the extensive and accessible reserves of land-based sand & gravel within the area.

As noted in the original RTS, slag banks were periodically processed at the former Brymbo Steelworks for construction fill and colliery spoil heaps were utilised as embankment fill, but neither of these sources of secondary aggregate are now available. Similarly, a substantial amount of derelict land and buildings associated with the former mining and clay products industries, e.g. around Ruabon, has been cleared and other tips have been reprofiled leaving little scope for generating further material from such sources.

As in Flintshire, relatively high levels of industrial and commercial development and redevelopment (compared with other parts of North Wales) generate significant quantities of construction, demolition and excavation wastes, from which (currently unknown quantities of) recycled aggregates are derived. Significant further redevelopment is anticipated in the years ahead and this source of alternative aggregates is therefore likely to continue.

The residual requirements for primary land-won aggregates assume that all available alternative materials will continue to be utilised and the authority should continue to encourage this.

#### **Safeguarding of primary aggregate resources**

Relevant resources of both crushed rock aggregates and land-based sand & gravel have been safeguarded within the LDP, in accordance with detailed advice based on the use of British Geological Survey mapping, prior to the publication of the BGS safeguarding maps.

#### **Safeguarding of wharves and railheads**

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

North Wales  
Regional  
Aggregates  
Working Party



South Wales  
Regional  
Aggregates  
Working Party

## Regional Technical Statements for the North Wales and South Wales Regional Aggregate Working Parties.

- 2nd Review -

# Report on Consultation Responses With Steering Group Recommendations

*(final, April 2020)*

Prepared, on behalf of the Welsh Government and the North Wales and South Wales Regional Aggregate Working Parties  
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## Introduction:

This document summarises the responses received to the RTS 2<sup>nd</sup> Review Consultation Process, undertaken between September and November 2019, together with recommendations made by the project Steering Group regarding changes that are needed to the draft RTS, in order to deal with each of the points raised. The report firstly highlights five key issues that were raised by several consultees and then deals, in succession, with each of the 20 questions asked in the consultation questionnaire.

A total of 23 responses were received. Seven of these were from Local Planning Authorities (LPAs) in North Wales; and twelve were from LPAs in South Wales. The remaining four responses were from the Mineral Products Association (MPA), Natural Resources Wales (NRW), one independent mineral operator in North Wales and one consultancy firm, representing an operator in South Wales. In contrast with the 1<sup>st</sup> review, no responses were received from other organisations or local authorities in England.

Individual responses 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).

## 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. These are set out below, along with Steering Group responses and agreed actions ([shown in blue text](#)):

1. **Housing figures** in adopted LDPs theoretically provide a robust and consistent method for guiding future apportionments BUT:
  - a. Many of the LDPs are nearing their statutory end dates and one LPA suggests that it would be inappropriate to effectively 'roll-forward' the housing policy from such LDPs beyond the end-date by using them in the RTS. [The Steering Group disagreed with this argument, noting that use of the figures from these LDPs, which were seen as the best available source of data \(see below\), did not amount to rolling forward of the policies. In addition, the base date of the RTS2 was 2016 so at the base date the vast majority of LDP's had 5 years or more to run at that point.](#)
  - b. Whether or not this is the case, the figures contained in at least some of the adopted LDPs have since been found to be flawed, for one reason or another, so should not be used. [The Steering Group acknowledged that, in many cases, there had been strong disagreements over the housing requirement figures when the LDPs were first adopted, and that, in most cases, the actual completions have been significantly less than those requirements. It also noted, however, that neither of these things necessarily meant that the requirements were wrong; only that levels of construction have been depressed, due in part to the recession. Moreover, the Steering Group felt that it would not be practical to re-examine those arguments and agree alternative figures for each authority now. Also, any new figures would just be a snapshot in time and would not have been tested at an LDP Examination.](#)

- c. More up to date housing requirement figures could, if required, be obtained from other sources, including AMRs, LDP Review Reports or LDP 2 Preferred Strategies. The Steering Group observed that, whilst all of these provide alternative sources of data, they do not do so consistently, and there would be a danger in ‘picking and choosing’ data sources for each LPA, unless this were based on a clear procedural logic that is found to be sound at LDP Examination and is repeatable in future Reviews.
  - d. The housing figures in the draft NDF should also be taken into account. The Steering Group acknowledged that the draft NDF provides a new, up to date and consistent source of data on housing requirements and that, in future Reviews of the RTS, there may well be some logic in linking future aggregates provision to housing requirements in the latest available *adopted* version of the NDF. For the time being, however, the draft NDF figures provide only an initial estimate which may well change once scrutinised by individual LPAs in the light of other policy objectives – e.g. for growth. Moreover, the draft NDF figures were generally below recent figures for actual housing completions, during a period which included a major recession. Such figures are not compatible with Welsh Government’s aspirations for economic growth. For these reasons, the Steering Group concluded that the housing figures stated in adopted LDPs, which have been subject to detailed scrutiny at Examination, remain the best available source of information for use in Stage 1 of the RTS methodology. [but see also the response to Item 2 under Question 6, below, where the Steering Group agreed that data on housing completions (as well as forecast requirements) should be used in Stage 3 of the methodology].
2. **Definition of Sub-Regions.** The only issue of concern here, but one that was raised by several authorities across SE Wales, is that the ‘Former Gwent’ sub-region should be combined with Cardiff City sub-region, thereby equating directly with the Cardiff Capital City Region. The Steering Group disagreed with this suggestion, on the grounds that it would undermine the deliberate efforts that have been made in the 2<sup>nd</sup> Review, to promote a fairer and more sustainable pattern of supply across the whole of SE Wales. They noted that the two sub-regions were effectively already merged, for the purpose of calculating LPA apportionments (as seen in Table 5.3), but that separation was necessary for the effective implementation of sub-regional collaboration. Such collaboration across the whole of the combined Cardiff / Former-Gwent area would become logistically far more difficult and would potentially enable shortfalls within Former Gwent to be accommodated by surplus permitted reserves in the Cardiff City area, including the Brecon Beacons National Park. This was regarded as being inappropriate, partly because the travel distances involved would in some cases clearly be uneconomic and unsustainable but also because it would be against National policy to place any increased reliance upon supply from National Parks. The latter point, more generally, will need to be reflected in the guidelines on collaboration (see Item 43, below). Whilst there might be circumstances where collaboration might be needed between the two sub-regions, that would not be the norm, and this again would need to be justified in accordance with the guidelines.
3. **Apportionments to LPAs or sub-regions.** The MPA has voiced strong reasons (linked to clear statements in MTAN 1) why apportionments must be made to individual LPAs, and *most authorities do not seem to have a problem with this*. The exceptions are those in West Wales and Carmarthenshire (which, in the First Review, received a combined apportionment for sand & gravel – but not for crushed rock), together with Rhondda Cynon Taf, Newport and Monmouthshire. MTAN1 (Para. 49) requires landbanks to be held in each LPA (other than

National Parks and AONBs) and that requirement has not changed. The Steering Group noted that one solution could be to make an exception for the West Wales sand & gravel situation, as before, but that a more elegant solution, which would not undermine the overall approach, would simply be to reinforce the suggestions for collaboration between those LPAs, which have already been made. For SE Wales, it was noted that the situation is far more problematic: if apportionments were made only to that combined sub-region (i.e. Cardiff + Former Gwent), there would be no justification for new allocations anywhere, because of the surplus reserves in Merthyr/BBNP. This would reverse, rather than enhance, the desire for a more sustainable pattern of supply. For these reasons, the Steering Group unanimously agreed that, unless and until the requirements set out in MTAN 1 are changed, apportionments must be made to individual LPAs. It also noted, however, that where the recommended apportionments for individual LPAs cannot be met, Statements of Sub-regional Collaboration (see below) could be used to develop alternative (more achievable and more sustainable) ways of meeting the overall figure for that sub-region

4. **Statements of Sub-Regional Collaboration (SSRCs).** These appear to have been generally well-received, with no objections other than a commonly cited need for clearer explanation regarding the mechanisms involved (including timescale for implementation and dealing with staggered timescales of component LDPs). The need for guidelines was agreed by the Steering Group and their content was discussed at length. Once finalised, these will be added to the final version of the revised RTS.
5. **Sales Data.** Only one authority objected to the use of the highest of 3-year and 10-year averages, because of the alleged '*presumption of over-provision*' that this implies. One other respondent (a mineral operator) requested the use of sales data up to 2018, not 2016 (though this is because of a very specific local issue relating to change of ownership of one quarry). The Steering Group observed, firstly, that over-provision is not generally something to worry about (it does not result in over-supply, but it guards against the much more serious risk of under-provision). Secondly, whilst the use of more recent sales data may now be possible, this would necessitate a complete reworking of all the figures and corresponding text, requiring significant extra work and delaying publication of the RTS. It was therefore agreed that the sales data should remain unchanged.

## Detailed Responses and Recommended Actions:

### General

**Question 1:** Overall, does the Draft Second 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 responses, **thirteen** said 'Yes' and the remaining **ten** offered no comment on this specific question.

**Steering Group response:** No changes required in response to this question, although several respondents noted the need for clarity regarding the more specific issue of Statements of Sub-Regional Collaboration (see **Q10** below)

## 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:** **Ten** responses said ‘no’ and **eleven** others offered no comments. **One** respondent suggested that additional detail could be given in the Stage 4 section regarding what the RTS2 strategy provides. **One** other suggested that the Executive Summary should explain more about the relevance of the housing data (once finalised) and should caveat the limitations involved.

**Steering Group response:** These additions should be incorporated, based on the responses to [Q6](#) and [Q8](#) (see below).

## Chapter 1: The Purpose and Objectives 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:** **Nine** respondents said ‘no’ and another **ten** offered no comment. **One** respondent (the MPA) highlighted the need for clarity regarding SSRCs and the role of the RAWPs in those. **One** LPA said ‘yes’ although their concern was actually about the effects of the RTS rather than its purpose; and **two** others (Cardiff and RCT) said ‘yes’ but only with respect to specific queries about the length of their LDPs, which need to be addressed. Monmouthshire also raised the issue about LDP length.

**Steering Group response:** Agreed that guidance on SSRCs will be produced. Also agreed that Cardiff’s LDP ‘Plan Period’ should be 15 years as for others and that the total apportionment and related calculations for Cardiff should therefore be reduced accordingly. *(Cardiff had noted that, although the plan period for their adopted LDP is 2006 to 2026, work on the plan actually commenced in 2011 following withdrawal of the previous LDP (which covered the period 2006 to 2021) and the reason the start date remained at 2006 was because much of the evidence base for the withdrawn plan was used to inform the new plan in order to avoid unnecessary expenditure in preparing new evidence where it was not required. This effectively means the plan is a 15-year plan and expires in 2026).* The Steering Group also agreed that in the two cases where operational plan periods of only 10 years had been noted (RCT and Monmouthshire), the actual plan periods, in policy terms, were still 15 years. No changes should therefore be made to the calculations for those authorities

## 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:** **Fifteen** of the respondents said ‘yes’ (or ‘generally yes’ in one case) and **six** others offered no comment. Only **one** respondent said that they were not happy, although their



concerns related to the implementation of the principles, rather than the principles themselves. **One** final respondent (NRW), whilst being broadly supportive, noted a number of constructive suggestions for ways in which the key principles could be enhanced, particularly through the use of new datasets, held by NRW, which could be used to improve, or possibly replace, the 'IMAECA' dataset on Environmental Capacity. *At the Steering Group Meeting it was agreed, with NRW's representative, that these were all suggestions to be considered at the outset of the next Review, rather than this one, or during the intervening period, through discussions between NRW and WG.*

**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:** **ten** respondents said 'yes' (with minor provisos in three cases, including the need (observed by the MPA) for the RTS to state more clearly that key principles have been implemented) and **four** others, whilst broadly in agreement, alluded to more serious concerns – mostly reflected in their answers to **Q6** and **Q8** (see below). **Six** others offered no comment. **Three** respondents disagreed, one citing more serious concerns about the use of out-dated housing figures and the need for sub-regional, rather than LPA apportionments, and another noting concerns about how the principles of Changing the Pattern of Supply and the Proximity Principle are implemented. All of these issues are discussed under **Q6**, below. The third disagreement (from NRW) provided further constructive suggestions for ways in which the key principles could be more effectively implemented and improved. *Again, these were discussed at the Steering Group Meeting where it was agreed, with NRW's representative, that these were all suggestions to be considered at the outset of the next Review, rather than this one, or during the intervening period, through discussions between NRW and WG. The MPA point about needing to state that the key principles have been implemented is noted, although that needs to be caveated by the difficulties of doing so in a small number of cases, where collaboration may well be required to create a more achievable and sustainable solution.*

### Chapter 3: Methodology for the 2<sup>nd</sup> Review

**Question 6:** Are you happy with the methodology that has been used for the 2<sup>nd</sup> Review? If not, please explain why and what improvements might be considered.

**Summary of answers given:** **Five** respondents said 'yes' and another **four** agreed subject to minor reservations regarding the need for clearer explanation about the way in which housing data was being used. **Three** others generally agreed except for concerns about specific points of detail – different in each case (and all covered by the points set out below). Only **two** respondents declined to comment on this question. The remaining **nine** respondents all had more serious concerns. These are summarised below, and *Steering Group responses are noted in blue for each observation.*

1. Concerns regarding the use of housing requirements from adopted LDPs, as an indicator of future aggregate requirements, were expressed by ten separate respondents (nine of the 18 LPAs in South Wales and one additional LPA in North Wales). Most of these observed that the adopted figures were now being superseded by distinctly lower housing forecasts which would provide a more 'credible' evidence base. Some suggested that the figures should be adjusted downward to

reflect more recent population and household projections and information in LDP2 Preferred Strategies and Deposit Plans or in the 2019 JHLA Surveys. Several respondents also noted the much lower housing figures that have been indicated within the emerging National Development Framework (NDF) and suggested that these should take priority. However, the MPA highlighted that the NDF figures are lower than the actual completions achieved during the recent period of deep recession and that they conflict with the Welsh Government's more general growth aspirations. **Steering Group response:** Whilst this is clearly a very major area of concern, shared by no less than half of the LPAs in South Wales (though only by one LPA in North Wales), there are also strong counter-arguments (noted in only one written response but voiced by others at the consultation events). See response to **KEY ISSUE 1**, above.

2. One respondent (an LPA within the Cardiff sub-region) specifically suggested that Option B in the Stage 3 methodology should be amended to take account of actual housing completions (over the baseline period) *as well as* future requirements. This was suggested because some LPAs are being required to deliver a higher proportion of housing within their sub-region than they have delivered over the baseline period, whilst others are being required to deliver proportionally less than they have achieved. The respondent suggests that this amendment would improve the deployment of the 'Changing the Pattern of Supply' principle referred to in chapter 2. **Steering Group response:** This is a good suggestion and should be adopted. Corresponding amendments will need to be made to the details in Tables 5.2 and 5.3, with consequential changes being carried forwards into Tables 5.4 to 5.7 and related text (including the Regional Appendices).
3. The same LPA further suggested that the RTS should refrain from identifying actual apportionments but should simply provide a methodology which allows the latest available housing data to be inserted into an agreed formula, in order to calculate the requirements for each LPA at the time of LDP preparation. **Steering Group response:** This suggestion was rejected for two reasons: firstly, a purely formulaic approach would take away the opportunity for the RTS process to exercise any qualitative ('common sense') adjustments; secondly, whilst using the 'latest available' housing data would be a positive step in keeping all LDPs as up-to-date as possible, it could result in overall national and regional totals, as determined by the RTS, failing to be met, especially if individual LPAs argue for the lowest possible housing figures from a range of alternatives. The Steering Group's strong preference was to use a single, consistent source of housing data.
4. Five respondents - including all four of the LPAs within the 'Former Gwent' sub-region and one in the neighbouring 'Cardiff City' sub-region - considered that those two areas should be combined into a single sub-region. **Steering Group response:** See response to **KEY ISSUE 2**, above.
5. One other LPA expressed more general concern that the sub-regional boundaries had been drawn-up without the benefit of Strategic Environmental Assessment (SEA). **Steering Group response:** The RTS documents primarily represent a collaboratively prepared evidence base and are therefore neither required nor constitute a plan or programme for the purposes of the SEA Directive. As with the original RTS and the First Review, at this broad level and given the further detailed analysis and Plan-making that will be required to implement the RTS through Local Development Plans (where SEA is a formal requirement), it was not considered appropriate or

required that SEA should be conducted as part of the Review. A statement to this effect should be added to the final documents.

6. One respondent (an LPA within the Cardiff sub-region) suggested that the RTS should instigate true collaborative and sub-regional methods of working through a combined sub-regional apportionment, rather than apportionments to individual LPAs. The latter point was also noted by two of the LPAs in Former Gwent and by four other LPAs (those in West Wales and neighbouring Carmarthenshire, where a combined sub-regional apportionment approach was introduced in the First Review, for the specific issue of sand & gravel provision). **Steering Group response:** This suggestion, whilst clearly having certain merits, would potentially undermine the role of the RTS in providing independent, strategic, technical advice. In recognition of its importance, this is dealt with under **KEY ISSUE 3**, above.
7. One further respondent expressed the view that the historical sales figures (up to the end of 2016) also needed to be updated (to the end of 2018) to reflect the recent change of ownership and resulting increased output of one particular sand & gravel pit in North Wales. **Steering Group response:** This issue was identified in relation to just one, very specific quarry location, but it raises a more general question which ought to be considered more widely. It has therefore been considered under **KEY ISSUE 5**, above.
8. Finally, three LPAs noted that adjustments were needed to reflect the different durations of their LDPs (15 rather than 20 years in Cardiff, and 10 rather than 15 years in both Monmouthshire and RCT). **Steering Group response:** See comments under **Q3**, above.

#### Chapter 4: Analysis of the Existing Supply Pattern

Question 7: 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 (11 to 16) relating to the two Regional Appendices).*

**Summary of answers given:** **Eleven** respondents said 'yes' although one of these noted that the pattern in North Wales is heavily influenced by permissions with large reserves and will therefore not change for decades. A second noted that, once the more sustainable reserves are consumed then production will move to slightly less sustainable locations unless new reserves are permitted in more optimal locations. **One** separate response noted that the distribution maps of housing data were in need of revision if newer housing data is to be used, and **one** further respondent repeated their concerns (from **Q6**) about excessive housing figures. The remaining **ten** respondents offered no comment. **Steering Group response:** Given that the housing data is NOT going to change, no changes are required to the maps.

## Chapter 5: Assessment of Apportionments and Allocations

**Question 8:** Are you happy with the 'Preferred Annualised Apportionments' set out in Tables 5.2 to 5.3 and the supporting text? If not, please explain your concerns, either for individual LPAs or Sub-Regions, or for Wales as a whole.

**Summary of answers given:** **Eight** respondents said 'yes' and one of these emphasised that departures from these figures should be allowed only in exceptional circumstances. They suggested that guidance on this should be strengthened within the RTS. **Five** others offered no comment. The majority of respondents (**ten** in total) said that they were not happy with the apportionments – primarily because their preference was for sub-regional rather than LPA apportionments, but also because of the 'uplifted' requirement based on excessive and out-dated housing figures. The latter was explicitly cited in only three cases, but such concerns had already been expressed by most of these respondents under Q6 (see above). One of the respondents who disagreed (Cardiff City) cited the more specific problem in their case of using a 20-year (rather than 15-year) Plan Period which had generated an excessive (51%) increase in aggregate requirements. **Steering Group response:** The Plan Period issue is discussed under [Q3](#), above, whilst housing data and sub-regional apportionments are discussed in relation to [Q6](#) and the **KEY ISSUES** section, above.

**Question 9:** Are you happy with the details relating to surpluses / shortfalls and minimum allocations required in Tables 5.4 to 5.7 and the supporting text? If not, please explain your concerns, either for individual LPAs or Sub-Regions, or for Wales as a whole.

**Summary of answers given:** **Ten** respondents said 'yes' and **nine** others offered no comment. The remaining **four** respondents were not happy, citing the same concerns as expressed under [Q6](#) and [Q8](#), above. **Steering Group response:** see discussions in relation to [Q6](#), above.

**Question 10:** Are you happy with the details noted in paragraphs 5.39 to 5.41, which give individual LPAs some flexibility to depart from RTS recommendations? If not, please explain why.

**Summary of answers given:** **Ten** respondents said 'yes' and **three** others said 'yes' with certain provisos. These included concerns over collaboration between LPAs that are working to very different timescales; concern that collaboration should not undermine the ability of an individual LPA to bring forward its own LDP; and the more general need for clarification on the precise 'rules' of collaboration under various scenarios (e.g. whether all LPAs in the affected area needed to be involved, or just bilateral arrangements etc.). One of these respondents suggested that departures from the RTS recommendations should be allowed only in exceptional circumstances and that Welsh Government should exercise its powers of intervention where alternative (collaborative) solutions are proposed in circumstances which are not 'exceptional'. Another suggested that Collaborative Statements should be required within 6 months of the RTS Review being published and that speculating as to the potential outcomes of collaboration should be avoided (e.g. paragraphs 5.31, 5.32 and 5.33 of the main document). **Six** further respondents offered no comment on this matter. The remaining **four** respondents said that they were not happy with the details in these paragraphs. In one case, the objection was only to the notion of the statements being

subject to RAWP approval (which others have also noted and which has now been dropped). In another case, it was felt that the LPA requirements were too prescriptive and that, again, there was a need for more clarification regarding 'rules' (e.g. how an authority that has not commenced its LDP review can agree to take on the apportionment figures from other authorities or sub-regions). In the other two cases the concern was more fundamentally about the concept of LPA rather than sub-regional apportionments, as expressed in relation to Q6 and/or Q8. **Steering Group response:** There is clearly a need for additional text in the Main Document, to which the Appendices can refer, to explain precisely how the collaboration process would work in a variety of different circumstances (see **KEY ISSUE 4**, above).

## Appendix A: North Wales

**Question 11:** Do you have any detailed local knowledge which would help to improve or challenge any of the details given within paragraphs A1 to A60 of Appendix A? If so, please provide details.

**Summary of answers given:** This question was applicable to only eleven of the 23 respondents (the other twelve being LPAs in South Wales). Of those eleven only **two** respondents offered any comments:

- Denbighshire LPA noted that the limestone resources to the east of the Vale of Clwyd fall within the AONB.
- The Mineral Products Association suggested that the following text (amended slightly from that currently included in the details on page 25 of Appendix A) should apply to all LPAs and should therefore be included within the introductory text to both Appendices and in the Main RTS document:

*“Any shared arrangements would need to offer advantages, in terms of the proximity principles, environmental capacity and other sustainable criteria, compared with the options of developing new reserves. Where required, they would also need to be reflected in a Statement of sub-regional Collaboration, and agreed with Welsh Government, before any of the constituent LDPs within the sub region are submitted for examination”.*

*“As far as possible, any allocations should be identified as Specific Sites or, failing that, as Preferred Areas. If, as a last resort, it is only possible to identify broad Areas of Search, these should be sufficient to offer the potential of much greater quantities of resources, in order to reflect the uncertainties involved”.*

**Steering Group response:** The first of these paragraphs – slightly amended to read “and discussed with the RAWP” rather than “and agreed with Welsh Government” should be incorporated in the general guidance for Statements of sub-regional Collaboration (see **KEY ISSUE 4**, above) and should be cross-referenced, where appropriate, in the text for each LPA in the Regional Appendices. The second paragraph is already in the main document but should be repeated in the introductory text to each of the regional appendices.

**Question 12:** 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:** This question was applicable to only eleven of the 23 respondents (the other twelve being LPAs in South Wales). **No comments** were made by any respondents. **No actions required.**

**Question 13:** Do you have any detailed local knowledge which would help to improve or challenge any of the information given for individual LPAs on pages 19 to 30 of Appendix A? If so, please provide details.

**Summary of answers given:** This question was applicable to only eleven of the 23 respondents (the other twelve being LPAs in South Wales). **No comments** were made by any respondents. **No actions required.**

## Appendix B: South Wales

**Question 14:** Do you have any detailed local knowledge which would help to improve or challenge any of the details given within paragraphs B1 to A86 of Appendix B? If so, please provide details.

**Summary of answers given:** This question was applicable to only fifteen of the 23 respondents (the other eight being either LPAs or operators in North Wales). Of those fifteen, only **seven** respondents offered any comments that were relevant to this question:

- Two LPAs reiterated their concerns about housing figures, referring back to their responses to **Q6** (see above) **Steering Group response:** see responses under **Q6** and **KEY ISSUE 1**, above.
- Two other respondents noted corrections that were needed to the text referring to the Tir Pentwys site (Blaenau Gwent pages 32 and 33, and Torfaen page 62). Essentially, the reserves at Tir Pentwys are not sterilised based upon the recent appeal decision. The reserves remain available for extraction subject to a development scheme with an alternative means of access being brought forward. **Steering Group response:** amend text as suggested
- Monmouthshire requested clarification regarding the hexagon symbols in Figures 4.2, 4.6, 4.7 and 4.8 and clarification regarding the definitions of MSAs and the need or otherwise for buffer zones. **Steering Group response:** amend maps as suggested
- Powys offered corrections regarding the text in paragraph B9 about the headwaters of the River Usk, and noted discrepancies regarding the depiction of the area around Ystradgynlais, south of the BBNPA area, which is part of the Powys sub-regional area, but not shown as such on Figures B4, B5, B6 and B7. **Steering Group response:** amend maps as appropriate
- One other respondent requested that para B23 should refer to 'limited' rather than 'little opportunity' **Steering Group response:** amend as suggested

**Question 15:** 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:** This question was applicable to only fifteen of the 23 respondents (the other eight being either LPAs or operators in North Wales). Of those fifteen, only **two** respondents offered any comments that were relevant to this question:

- Both the MPA and SLR Consulting advised of changes needed to the operator name for two of the sites in the tables.

**Steering Group response:** Factual amendments to be made as requested.

**Question 16:** Do you have any detailed local knowledge which would help to improve or challenge any of the information given for individual LPAs on pages 32 to 65 of Appendix B? If so, please provide details.

**Summary of answers given:** This question was applicable to only fifteen of the 23 respondents (the other eight being either LPAs or operators in North Wales). Of those fifteen, only **seven** respondents offered any comments that were relevant to this question:

- Two LPAs reiterated their concerns about housing figures and/or Plan Periods, referring back to their responses to **Q6** (see above)
- Two other respondents again noted corrections that were needed to the text referring to the Tir Pentwys site in Torfaen and Blaenau Gwent (see **Q14**, above).
- Monmouthshire noted that its limestone resources are within areas of ‘relatively low environmental capacity’ to accommodate further quarrying and therefore suggested that *“This mismatch of objectives warrants further discussion in Appendix B, to provide a clearer and realistic indication of Monmouthshire’s ability to meet the combined requirements of the sub-region”*. **Steering Group response:** add some additional text as suggested
- Powys noted the comments on safeguarding of existing and potential future railheads and wharves through LDPs and would welcome additional information if any such sites have been identified for the longer term through the RTS preparation process in relation to Powys. **Steering Group response:** no such sites exist within Powys
- Rhondda Cynon Taf provided further details regarding the planning application for extending Craig-yr-Hesg quarry. **Steering Group response:** The application has since been refused, against officer advice, but may be appealed. Update text with advice from RAWP Secretary

## Consultation Process

Question 17: Do you think that the consultation process, 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:** **Ten** respondents said 'yes' and **twelve** others offered no comment. There was only **one** negative response, from an LPA in South Wales who complained that earlier concerns about housing data, as expressed at the previous RAWP meeting, had been disregarded. (*In practice those concerns had been considered and a response had been made to the LPA explaining why, at the time, the methodology had not been changed*). **Steering Group response:** Given that reasonable steps had been taken, at the time, to address the concerns of this individual LPA, and that opportunities for all parties subsequently to express their views through the main consultation exercise, it is not considered that any changes to the consultation process are needed.

## And Finally ...

Question 18: Do you think this second 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:** **Nine** respondents said 'yes', although in three cases this was subject to qualifications, including a preference for sub-regional apportionments, direct links to the NDF and the need for "*flexibility in adapting to current and future market needs*". In **two** other cases, the respondents expressed more significant qualifications, with their agreement being subject to the concerns relating to **Q6** and **Q8** being addressed to their satisfaction. **One** other LPA explicitly disagreed, because of their concerns under **Q6**. The remaining **ten** respondents offered no comment. **Steering Group response:** The amendments required here are those already identified in relation to **Q6** and **Q8**, above. Additional meetings were held during February 2020 between Welsh Government, the SWRAWP Secretary, the Consultant and each of the three sub-regional groups of LPAs where these concerns had been expressed. This enabled the issues to be discussed and resolved.

Question 19: 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', although in one case this was again subject to the concerns relating to **Q6** and **Q8** being addressed to their satisfaction. **Three** others said 'no', again citing their concerns under **Q6** as the reason for their dissatisfaction. The remaining **eleven** respondents offered no comment. **Steering Group response:** Again, the amendments required here are those already discussed in relation to **Q6**, above.



**Question 20:** ... and are there any other comments you would like to make relating to any aspect of the RTS Review?

**Summary of answers given:** Observations in response to this question were made by **fifteen** of the 23 respondents (the remaining **eight** respondents offering no suggestions). In several cases the remarks were simply restating concerns which had already been expressed under **Q6** and **Q8**, but a variety of additional comments were made. These are summarised below and **suggested responses are noted in blue for each observation**.

1. The Mineral Products Association observed that it may be possible to update the RTS with 2018 sales figures. **Steering Group response:** See response to **KEY ISSUE 5**, above.
2. Since WG growth aspirations are not reflected in the draft NDF housing figures, more attention should be given to demand from other types of construction, not just housing. **Steering Group response:** In light of the agreed response to **KEY ISSUE 1**, which does not require reliance on the draft NDF figures, the use of housing figures was agreed, for the purposes of the 2<sup>nd</sup> Review, as an appropriate *indicator* of wider economic activity, including other forms of construction.
3. Table 3.3 should be amended to show separate entries for Pembrokeshire County Council and the PCNPA. **Steering Group response:** Agreed.
4. RTS2 provides a massive opportunity to apply the Sustainable Management of Natural Resources principles as set out in the Environment (Wales) Act 2016 and plan for minerals in a more sustainable way and in the most sustainable locations within sub-regional market areas rather than within arbitrary local authority boundaries. **Steering Group response:** Additional text should be added regarding the link with the 2016 Act, but see **Q6** and **KEY ISSUE 3**, above, for discussion of sub-regional vs LPA apportionments.
5. Commentary in para 3.17 of the draft could be picked up and used as evidence by other service providers, undermining the plan-led system. **Steering Group response:** The text in para 3.17 is qualified by the immediately following paragraph, 3.18.
6. Paragraph B79 of Appendix B notes that reference to 'Plan Period' relates to the end date of the LDP which has been adopted or is in preparation (whichever is later) for that particular planning authority. Monmouthshire CC has already sought clarification on the 'plan period' applicable to it and was informed that as a replacement plan is in preparation the date in Monmouthshire's case would be 2033 plus 10 years, so 2043. **Steering Group response:** The issue of Plan Periods is covered under **Q3**, above.
7. The RTS should set out how LPAs who meet the apportionments of neighbouring authorities within their sub-region are compensated by those authorities for doing so. It should also consider the implications of modular housing on the demand for aggregates and assess whether or not this would affect future aggregate provision. **Steering Group response:** The need to provide clarifications on matters relating to collaboration between LPAs is covered under **Q10**, and **KEY ISSUE 4**, above, although the issue of compensation does not arise. The issue of modular housing cannot be considered without relevant evidence on the matter.

8. Emphasise that the reserves and allocations are a minimum requirement and that in order to achieve some relatively modest new reserves, applications to meet the minimum requirement may be for significantly higher reserves. **Steering Group response:** Agree that this emphasis can be added.
9. The role of “Statements of Common Ground” and the mechanisms involved in their preparation needs to be set out in a clear manner. **Steering Group response:** For RTS purposes, these are the proposed Statements of Sub-Regional Collaboration”, as discussed under **Q10** and **KEY ISSUE 4**, above.
10. The draft NDF has more or less halved housing growth projections, but other measures may influence the means of predicting aggregates demand. **Steering Group response:** This is no longer a concern - see Item 2 above.
11. Given the timing of the stage at which the Flintshire LDP has reached, the Council has already endorsed the approach of the RTS recommended for Flintshire and the North East Wales Sub-region. **Steering Group response:** Noted.
12. Table 3.3 correctly states that Torfaen’s housing requirement and annualised housing requirement is 4,700 and 313 respectively. However, table 5.3 states that Torfaen’s annualised housing requirement is 383. **Steering Group response:** Agreed, this factual correction needs to be made, along with corresponding changes to percentages and apportionments, which then need to be carried through to Appendix B.
13. Bridgend’s housing requirement is 9,690, or 646 annually, rather than 8,153 or 544 annually as quoted in tables 3.3 and 5.3. The 8,153 figure is Bridgend’s residual requirement as they built 1537 houses in the space of time between when plan preparations began (2006) and the moment the plan was adopted (2009). However, the housing requirement for the overall plan period of 2006 – 2021, as quoted in table 3.3, should be 9,690. The 9,690 housing requirement is also consistently quoted in their annual JHLA studies. **Steering Group response:** This new information needs to be used, subject to checking with Bridgend. If agreed, corresponding changes to percentages and apportionments will be needed in Table 5.3, which then need to be carried through to Appendix B.
14. The housing requirement of BBNP’s LDP is 1,990, or 133 per year. Merthyr Tydfil’s adopted LDP housing requirement is 2,250, or 150 per year. The combined ‘annualised future housing requirement from Local Plans’ for these local authorities is therefore 283 per year (as already stated). **Steering Group response:** no change required.
15. The housing requirement of Conwy + Snowdonia NP is 7,320 (6,520 in Conwy, 770 in Snowdonia NP) or 488 per year, rather than 7,350 or 490 per year as quoted in table 3.3 and 5.3. **Steering Group response:** This very minor correction needs to be made, along with corresponding changes to percentages and apportionments in Table 5.2, which then need to be carried through to Appendix A.
16. Gwynedd has significant resources of slate as well as secondary slate waste used to substitute for primary aggregate and such material has gained increased acceptability for many construction uses in recent years. However, despite the availability of slate there remains

specialist applications that require high specification aggregates, such as high PSV roadstone. Whilst there is no requirement for Hard Rock allocations in the Gwynedd and Mon LDP, such a situation should not preclude applications for specialist hard rock reserves from coming forward. **Steering Group response:** Agreed, this needs to be emphasised in Appendix A, but also need to note the proposed WHS designation which may constrain access to resource of slate for secondary aggregate purposes.

17. The report needs to provide a fuller explanation of why housing has been used as an indicator - maybe as a FAQ section? **Steering Group response:** Agreed that a Frequently Asked Questions page would be useful, but probably as a separate web page, hosted by Welsh Government, rather than within the RTS. This is because most people using the RTS will already be familiar with the technical issues.
18. Wrexham's LDP is currently at Examination. **Steering Group response:** Noted.

# Agenda Item 9

## GWYNEDD COUNCIL CABINET



<b>Date of meeting:</b>	<b>May 19, 2020</b>
<b>Relevant Cabinet Member:</b>	<b>Councillor Craig ab Iago</b>
<b>Contact Officer:</b>	<b>Dafydd Gibbard - Head of Housing and Property Department</b>
<b>Title of Item:</b>	<b>Housing Service Structure</b>

### **Decision sought**

The Cabinet is asked to:

- a) Approve the funding of the additional net cost of £150,500 in order to realise the changes to the staffing structure of the Housing Service recommended in paragraph 3.4 and 3.7 of this report, and if in agreement, to
- b) Approve a suitable source to fund the additional net cost of the changes to the structure, either by
  - i. making use of savings already realised by the Department, as outlined in paragraph 3 of this report, or by
  - ii. making use of the income generated from the Council Tax Premium on second homes and empty homes.

### **1. Background**

- 1.1 At the Cabinet meeting on 7 May last year, following the managerial review of the Chief Executive, it was resolved to create a new Housing and Property Department in order to be able to meet our aspiration to give a higher priority to get to grips with the substantial challenge that we face in the housing field. The introduction of second home premium gives the Council an opportunity to try to find new answers that will increase opportunities for Gwynedd residents to be able to secure suitable homes within their communities.
- 1.2 A new Head of Department was also appointed and he commenced in his post in September. As well as starting work to establish what type of plans are likely to maximise the benefit we can realise by using the second home premium, I also asked the Head of Department to prioritise the task of undertaking a review of the current staffing structure within the Department to ensure that it is suitable for the challenge we face.
- 1.3 This work had effectively been completed before the Covid-19 crisis struck us. Although we are currently continuing to prioritise all of our efforts to try to ensure that the

Department can continue to deliver its priority 1 functions during the crisis, we also know that there is a need to prepare to return to our usual priorities in due course. In addition, some of the experiences we have had during the crisis itself, especially in terms of homelessness matters, have confirmed the need for us to ensure that our arrangements are robust in order to face the next phase.

- 1.4 Therefore, the purpose of this report is to highlight the conclusions of the report by the Head of Department and to propose a new structure that will enable us to achieve more and meet our strategic aspirations in the Housing field.

## 2. Services of the Housing and Property Department

- 2.1 The current unit structure of the Department can be seen in Appendix A.

- 2.2 There are 213 staff members in the Department which is a mix of office staff and workforce, divided as follows:

	Housing Service	Property Service	Department Total
<b>Officers</b>	52	41	90
<b>Workforce in the field</b>	9	114	123
<b>Total</b>	61	155	213

- 2.3 The Property Service fulfils the following functions:

- Arranging building maintenance work
- Telecare service for vulnerable individuals
- Procurement and management of energy supplies
- Reducing carbon emissions
- Maintenance workforce
- Managing Council offices
- Workforce that cleans various buildings
- Twenty First Century Schools buildings programme
- Development and renovation capital schemes for other buildings
- Statutory safety issues (Asbestos, Legionella etc.)
- Investment programme to improve condition of buildings
- Pest Control
- Buying and selling property
- Tenant management
- Industrial units and enterprise centres
- Property valuation

- 2.4 There are five work units within the Property Service with many of the managers responsible for a combination of more than one field of work. There are Team Leaders in

place to assist the Manager in units where the number of staff is high or there are completely different specialities.

2.5 The Housing Service fulfils the following functions:

- Applications for support from the homeless
- Re-house the homeless in private housing and social housing
- Support the tenancies of vulnerable individuals
- Prevent homelessness
- Homelessness hostels
- Rehabilitate prisoners
- Syria Refugees Scheme and the Global Refugees scheme
- Assess applications for social housing on behalf of the Housing Associations (waiting list)
- Travellers' support and management
- Llandegai gypsy site
- Empty housing restoration schemes
- Improving housing condition grants
- First time buyers' grants
- Accessibility adjustments in private homes (DFG)
- Housing Enforcement
- Licensing and managing multi-occupancy properties (HMO)
- Energy grants
- Gwynedd Housing Partnership
- Housing Strategy
- Social Housing Fund
- Affordable Housing
- Strategic projects

2.6 The above functions have been divided between two work units, and two specialist work teams/fields that are currently not part of a work unit. Both managers take responsibility for many different work fields. There are team leaders for some specific work fields but there are a number of officers who are not part of a formal team.

### **3. Achieving more in the field of Housing**

3.1 The work of changing our Housing Strategy to become a Housing Implementation Scheme is nearly complete. All Housing Service staff have had an input into the process of challenging different potential schemes which would increase the housing options available for local people. We have consulted extensively with local organisations in the field of Housing and have received input from our partners in the local Housing Associations. The response has been positive and enthusiastic from all directions with a sense that there is an opportunity for us to achieve much more in this field.

3.2 We have held early discussions with the Care Scrutiny Committee and have had great benefit in receiving detailed input from members of a Task Group established by the

Scrutiny Committee to help us. Members of the Scrutiny Committee were very supportive of the type of schemes being considered and they welcomed the higher priority that is now given by the Council to this field. The final step before being able to submit the Housing Implementation Scheme to the Cabinet, namely establishing the practicality and financial viability of the individual schemes, has had to be delayed temporarily during the current crisis but it will be possible to complete this step as soon as we can return to address day to day matters.

- 3.3 Having reviewed the established staffing structure to fulfil current functions in the Department, and knowing that the Housing Implementation Scheme means that we will grasp the opportunity to achieve much more in the field of Housing, the Head of Department believes that a series of amendments is required to the structure of the Housing Service. Not adapting the structure would substantially impair our ability to deliver the Council's aspirations in this field.
- 3.4 See the new structure recommended by the Head of Department in Appendix B. Briefly, it leads to the following changes in the Housing Service:
- a) Combine the vast majority of the day to day executive functions under the new Housing Unit under the guidance of the Senior Housing Manager. This would lead to abolishing the two current managerial posts in the Service.
  - b) Establish specific work teams in the Homelessness field with Team Leaders/Field Leaders assisting the new Senior Manager to lead the individual teams. This will enable homelessness activity to be shared between three teams that will be able to support the Senior Housing Manager to give more focus and resources to face the increasing challenges in this field.
  - c) Homelessness Project Manager (temporary post to be funded by diverting one-off finance that is already under the Department's control) to concentrate on realising the Regional Homelessness Strategy and to give detailed attention to substantial over-expenditure on temporary accommodation.
  - ch) Adapt the post of the Project and Grants Team Leader to include a responsibility for a wider range of new schemes and projects that will derive from the Housing Implementation Scheme in order to maximise the benefit from the second home premium.
  - d) Join the Housing Technical Officers and the Housing Enforcement Officers under the responsibility of one team leader.
  - e) In order to be able to deliver our new Housing Implementation Scheme, the Head of Department recommends establishing a Housing Supply Manager post, and thereby, establishing a new Unit that will lead to the delivery of the Housing Implementation Scheme and maximising the benefit from the second home premium. The Housing Supply Manager will also lead on strategic housing matters, the Housing Options Team (dealing with applications for social housing) and the new Housing Support Grant (previously known as the Supporting People Grant)

- dd) Adapt the post of the Housing Options Team Leader to include leading the work of establishing a new triage service to deal with the entire range of housing needs enquiries, i.e. creating a new 'one-stop shop' for those who have housing related problems.
  - e) Upgrading an administrative post as a result of receiving additional responsibilities.
  - f) Create the post of a Housing and Property Executive Officer to assist the Head of Department with cross-departmental matters including the management of transformation projects and regeneration schemes in the field of housing.
  - g) A part time post to manage and develop the Department's information and technology systems and to support Managers and Team Leaders to identify opportunities to improve systems' efficiency.
  - ng) Abolish the empty posts of the Travellers' Liaison Officer, Landlord and Tenant Liaison Officer and Administrative Assistant (TOT).
- 3.5 The Head of Department is not recommending substantial changes to the structure of the Property Service. As the Head of Department has been responsible for this field of work for some time, he has good knowledge of services' performance and many of them have already been the subject of detailed Ffordd Gwynedd exercises. There have been many changes to the structure in recent years and the Head of Department believes that the current managerial structure is robust and effective.
- 3.6 Following the establishment of our Housing Implementation Scheme, it is possible that we will ask Managers within the Property Service to use their expertise to assist with some new schemes and fields of work. If that is the case, there will be a need at the time to consider whether it leads to a change in the responsibilities and functions of those individuals in question.
- 3.7 We already know that an increase in new build schemes will derive from the Housing Implementation Scheme and the Property Development Unit has already started to invest time and resources on feasibility studies, assessing housing development sites and familiarising themselves with the latest grant/statutory requirements in the field of housing to ensure that there will be no unnecessary delay when the Housing Implementation Scheme is in place. We are fortunate that we have a Development Unit that is very experienced in terms of managing new multi-million pound building developments (e.g. Twenty First Century Schools programme) and therefore, the Head of Department recommends adding this field of work to the responsibilities of the Property Development Manager.
- 3.8 The managerial review of the Chief Executive clearly established the different functions that exist within the Council to be able to realise our aspirations to operate from day to day in accordance with the principles of Ffordd Gwynedd. Changes to the structure of the Housing Service that are recommended by the Head of Department in this report correspond to these functions.



#### **4. Financial implications**

- 4.1 The recommendations of the Head of Department modernise the staffing structure in the Housing Service and provide the staffing resources required to give more priority and improve our ability to overcome the substantial challenges that we face in the housing field in Gwynedd.
- 4.2 The net cost of realising these changes is £149,000
- 4.3 Following the empowerment of staff to follow the principles of Ffordd Gwynedd, the Department has been able to achieve new savings that have not been allocated as part of the Council's Savings Plan. In partnership with national energy procurement specialists, the Energy Conservation Team has identified a new method to purchase our gas supplies. Traditionally, we have been procuring gas on a joint basis with a number of other public authorities. Following the effort by the Team's officers to hold an auction to procure a gas supplier, we have come to an agreement that will cost £235,000 less per year than the current cost.
- 4.4 In addition, we established a framework to purchase gas after the auction, which is now available for other public authorities to use. The Council will receive a 1% payment from any savings that are realised by another authority if they wish to take advantage of using the 'Gwynedd Framework'.
- 4.5 We also intend to use the same technique to procure our electricity supply soon and this could lead to further savings again.
- 4.6 It would be possible to use the benefit realised by officers' efforts to follow Ffordd Gwynedd principles to fund the additional requirements needed to accomplish the Housing Action plan. Having used the gas procurement savings to fund the changes to the structure of the Housing Service, this would leave £86,000 remaining as annual revenue savings.

#### **5. Next steps and timetable**

- 5.1 If the new structure receives the Cabinet's seal of approval, we would move forward immediately with the appointment process. We would also complete the work of drawing up the Housing Implementation Scheme at the earliest opportunity once we could be able to release the resource that is naturally being prioritised at the minute to respond to the crisis.

**Views of the Local Member:** Not a local matter

**Views of the Statutory Officers:**

**The Monitoring Officer:**

I'm satisfied that the recommendation seeking resources for the proposed re-structuring is appropriate. It offers a means of allowing the Housing and Property Department to realise their plans for a new structure.

**Statutory Finance Officer**

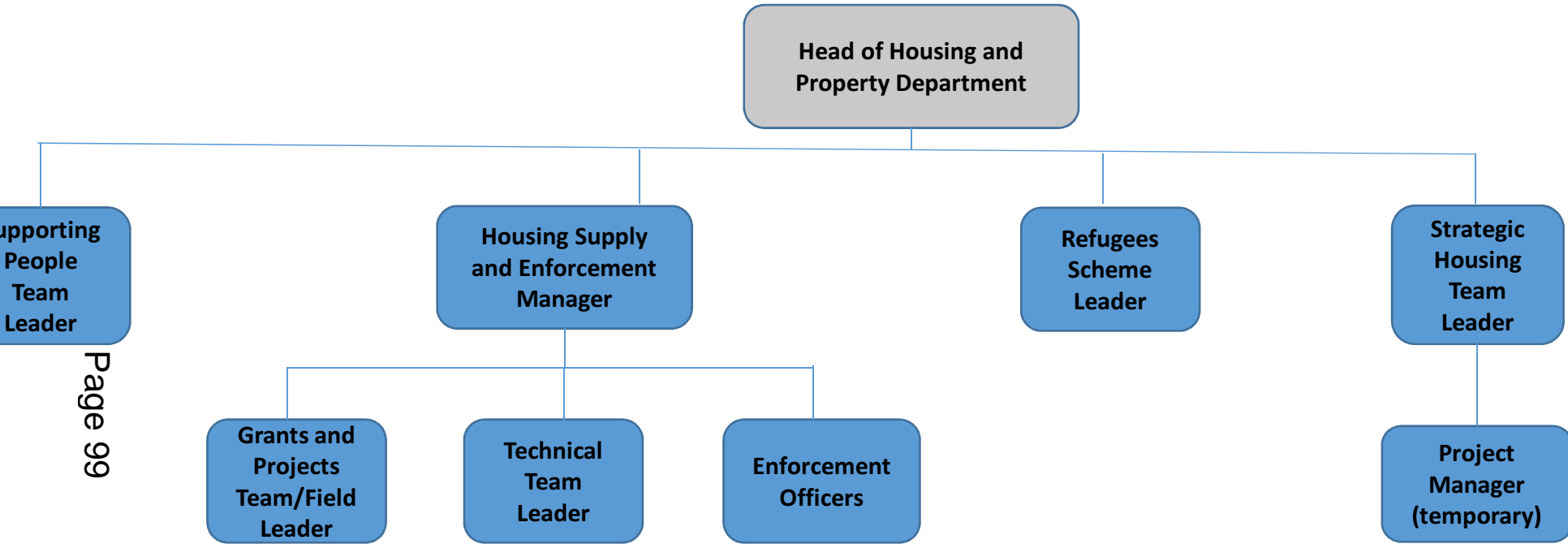
I can confirm that the sum of £150,500 is a correct estimate of the additional net cost of introducing the staffing structure recommended for the Housing Service. The Cabinet does not interfere with staffing matters, but approving financing the cost of £150,500 would enable the Head of Housing and Property to move ahead to implement the new Housing Service's staffing structure (appendix B).

There is sufficient annual energy savings which could be allocated to fund the additional staffing costs, but in the financial climate resulting from the effects of Covid 19, it would be beneficial to have the majority of these energy savings in order to help alleviate the Council's corporate financial situation. There is also sufficient resources from the income from the tax revenue generated from the yearly premium which has been allocated for housing projects. Therefore, the Cabinet will need to weigh up the use of either of the funding sources, or a combination of both.

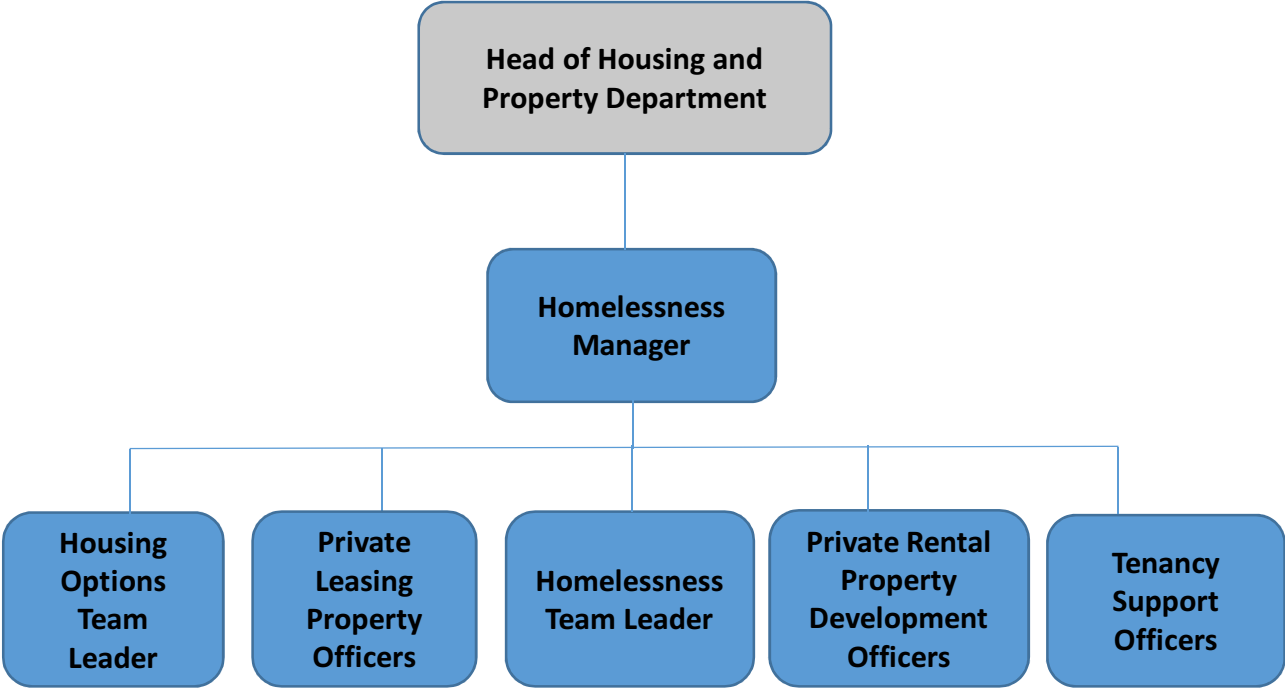
**Appendices**

Appendix A and B - Current and proposed structure of the Housing Service

# Appendix A – Current Structure (1)



Appendix A – Current Structure (2)



**Appendix B – Proposed Structure (1)**

**Head of Housing and  
Property Department**

**Senior Housing  
Manager**

Page  
109  
101  
**Homelessness  
Team Leader -  
Housing  
Solutions**

**Homelessness  
Team Leader –  
Accommodation/  
Strategic Projects**

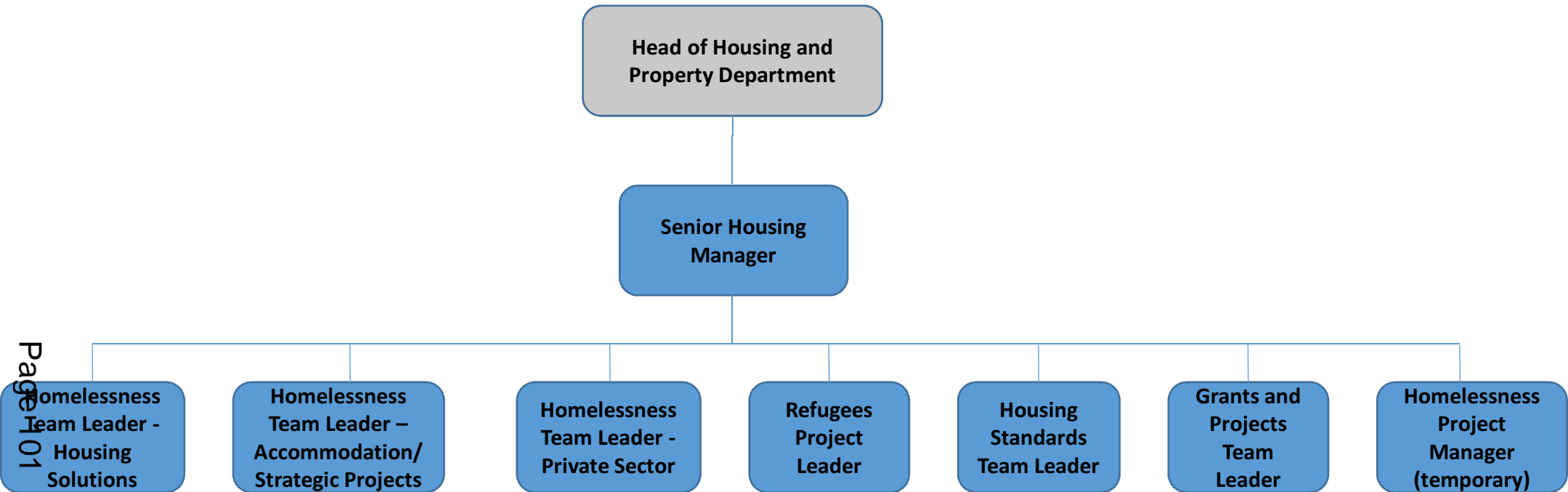
**Homelessness  
Team Leader -  
Private Sector**

**Refugees  
Project  
Leader**

**Housing  
Standards  
Team Leader**

**Grants and  
Projects  
Team  
Leader**

**Homelessness  
Project  
Manager  
(temporary)**



**Appendix B – Proposed Structure (2)**

