

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
by: **Cuesta Consulting Limited.**

(01460) 929 905 / 07952 170 180

alan.thompson@cuesta-consulting.com



Introduction:

This document summarises the responses received to the RTS 2nd 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 1st 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 2nd 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 2nd Review

Question 6: Are you happy with the methodology that has been used for the 2nd 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 2nd 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.