

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD

1. Introduction

These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.

The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.

The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that *"this requirement is not met"* at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that *"The site currently has planning permission for a quarry"* and that, absent relinquishment, *"the permission to quarry remains valid"*.

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site.

It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that *"It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working"* and adds that, where sites have been inactive and *"there is no prospect of future working"*, authorities should consider the use of prohibition orders.

That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.

PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that *"Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable"* and that policies and proposals should cover mineral resources *"which are currently used or which may need to be used in the foreseeable future"*. It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.

The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.

5. National policy context – MTAN1

MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as *"dormant reserves"* to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that *"A more realistic landbank assessment is the aim of this process"* so that a more

accurate picture is obtained of permitted reserves *“that are likely to have real potential for future working”*.

That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple “no allocation required” conclusion.

MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.

6. Apportionment and Plan Period

The regional and sub-regional evidence does not undermine the respondent’s case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.

BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City sub-region. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council’s current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.

Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance. The respondent’s case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.

7. BP25 – the Council’s own minerals evidence

BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an *“important supplier of Carboniferous limestone for general aggregate use”*. It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide

certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: *"While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required."* It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: *"While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."*

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that *"Caution must be exercised in using these landbank figures"* because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event *"dormant reserves must be counted separately"*.

That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because *"the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP"*. That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not

need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect *“real possibilities for future mineral working”* and that prohibition orders are appropriate where there is *“no prospect of future working”*. MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve *“A more realistic landbank assessment”*. SWRAWP says that *“Caution must be exercised”* in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that *“Caution must be exercised in using these landbank figures”* because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as co-existing with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an *“important supplier of Carboniferous limestone for general aggregate use”*. In practical terms, continued extraction at Argoed Isha would accord with the proximity principle

by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.

Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.

The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.

There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect *"real possibilities for future mineral working"*. Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain

The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.

PPW contemplates restoration and aftercare proposals for inactive sites, including natural re-vegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.

Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.

13. Overall conclusion

The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.

PPW says that landbanks should reflect *"real possibilities for future mineral working"* and that prohibition orders are appropriate where there is *"no prospect of future working"*. MTAN1 requires a separate assessment of *"dormant reserves"* and seeks *"A more realistic landbank assessment"*. SWRAWP states that *"Caution must be exercised in using these landbank figures"*. BP25 records that *"useable reserves remain at the site and could be extracted if required"* and that they *"have the potential to be reworked"*. The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.

Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.

14. Summary

These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.

- **Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.** The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.
- **Policy** **MIN1** **–** **Mineral** **Safeguarding** **Areas:** **Support.**
This policy is supported because it reflects national policy by safeguarding limestone

resources from permanent development that would sterilise them or hinder future extraction. That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.

- **Policy MIN2 – Quarry Buffer Zones: Support.**
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
- **Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.**
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
- **Policy MIN4 – Sustainable Mineral Working: Support in principle.**
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
- **Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.**
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
- **Plan Period: Object.**
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
- **Candidate Site 411 – Argoed Isha Quarry: Object.**
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
- **Minerals Background Paper BP25: Support in part / Object in part.**
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
- **Temporary training use: Clarificatory comment in support of the representation.**
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
- **Benefits of continued extraction at Argoed Isha: Positive material consideration.**
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
- **Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.**
In overall terms, the respondent supports the Deposit RLDP's general minerals framework. The objection is a precise and limited one: the Plan should more clearly and positively

recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.