

Cardiff City Sub-Region – Statement of Sub Regional Collaboration Position Statement

Cardiff Council, Caerphilly County Borough Council, Vale of Glamorgan Council, Rhondda Cynon Taff County Borough Council, Bridgend County Borough Council, Merthyr Tydfil County Borough Council and Brecon Beacons National Park Authority

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1. Introduction

- 1.1 PPW11 (paragraph 5.14.10) states that ensuring the sustainable supply of minerals is a strategic issue which plays a fundamental underpinning role in supporting non-minerals development. Each local planning authority (LPA) should ensure that it makes an appropriate contribution to meeting local, regional and UK needs for primary minerals which reflects the nature and extent of resources in the area and their best and most appropriate use, subject to relevant environmental and other planning considerations. For aggregates this should be done under the aegis of the North and South Wales Regional Aggregates Working Parties, whose role is to provide a regional overview of supply and demand and through the framework provided by the Regional Technical Statements for Aggregates.
- 1.2 The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties– Second Review (RTS2) (September 2020) identifies the necessary apportionments and any necessary allocations at LPA level but also at a sub-regional level. This is to allow sub-regional areas to make adjustments in apportionments within those sub-regions if more detailed investigation by the LPAs indicates that such adjustments are justified.
- 1.3 To that end, RTS2 requires Statements of Sub-regional Collaboration (SSRCs) to be prepared, collaboratively, by all constituent LPAs within each RTS sub-region (as defined by the RTS 2nd Review) as part of the evidence base needed to support each Local Development Plan (LDP) or Strategic Development Plan (SDP). Once agreed, an SSRC will remain in place until it becomes superseded by the requirements of future reviews of the RTS, or new information comes forward which justifies a change.
- 1.4 This document is the position statement for the SSRC for the Cardiff City Sub-region which comprises Cardiff, Caerphilly, Vale of Glamorgan, RCT, Bridgend, Merthyr Tydfil and Brecon Beacons National Park local authority areas.

2. RTS2 apportionments and allocations

2.1 The table below sets out the individual LPA apportionments and allocations for crushed rock as set out in the RTS2 for LPAs within the Cardiff City Sub-region (as amended by the RTS2 Clarification Letter).

Local Planning Authority	New Annualised Apportionment for crushed rock (mt)	Total Apportionment Required over 25 years.	Existing permitted reserves at end of 2016 in mt	Minimum Allocation needed to meet Required Provision (mt)	Additional reserves at Dormant sites, 2016 (mt)
Brecon Beacons NP	0.368	9.2	120.1	0	0.36
Merthyr Tydfil	0.204	5.1			
Bridgend	0.711	17.775	27.27	0	0.15
RCT	0.765	19.125	9.83	9.295	0
Vale of Glamorgan	0.682	17.05	18.73	0	13
Caerphilly	0.546	13.65	31.28	0	5.21
Cardiff	1.411	35.275	27.8	7.475	0

2.2 On this basis BBNPA, Merthyr Tydfil, Bridgend, Vale of Glamorgan and Caerphilly have sufficient permitted reserves at existing sites to meet their apportionment, so no further allocations are necessary within their LDP's. RCT has a requirement for an additional 9.295 million tonnes and Cardiff has a requirement for an additional 7.475 million tonnes to meet its apportionment up to 2041.

2.3 RTS2 states that by default, each SSRC will simply confirm that all constituent LPAs within a particular RTS sub-region accept the individual apportionments for aggregates for their individual Authority areas, as set out in the table above, and that (as a minimum) the RTS requirements for that sub-region as a whole will therefore be met.

2.4 However, RTS2 recognises that in exceptional circumstances, an SSRC may identify an alternative pattern of supply which achieves the RTS requirements for that particular sub-region in a different way. Such circumstances may arise *either* where one or more LPAs within the sub-region are unable to meet the minimum requirements of their apportionments identified in the RTS *or* where an alternative, achievable and more sustainable pattern of supply is identified through collaboration between the LPAs involved.

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

1. ***Inability to meet RTS apportionments:*** In order to demonstrate an inability to meet RTS apportionments, an LPA would need to show either that it has no (or insufficient) workable aggregate resources of the type required by the RTS and/or that there is no interest from the minerals industry in developing such resources within the area. It will *not* be sufficient simply to demonstrate that the area has no existing quarries or no recent production, or that alternative resources and/or permitted reserves exist within another LPA.

2. ***An alternative pattern of supply:*** Where an alternative pattern of supply is proposed this will entail transferring some or all of the RTS apportionment from one LPA to one or more other LPAs within the same sub-region, so as to make corresponding increases in provision within those authorities, as required by MTAN 1. The receiving authorities will need to increase their apportionments (and, where necessary, allocations), to ensure that *as a minimum*, the overall requirements for ongoing supply within that sub-region, as set out in the RTS, are met (both numerically and in terms of aggregate type22). It will not normally be appropriate to merely transfer apportionments to an LPA with sufficient existing reserves to arithmetically absorb the apportionment, without reference to the additional consideration of productive capacity.

3. Assessment

3.1 Crushed rock resources in this sub-region fall into just two, very clearly distinguished groups:

- Carboniferous HSA sandstone resources within the coalfield area which, like those to the west, are highly sought-after as sources of premium, skid-resistant road surfacing aggregates. They are exploited by a number of specialist quarries – Craigyr-Hesg, Gelligaer and Bryn which supply much of their output to England; and

- Carboniferous Limestone resources, to the north and south of the coalfield, which are host to a large number of active and inactive quarries, focused primarily on the supply of general-purpose construction aggregates into Cardiff and other centres of demand within the area.

3.2 RTS2 notes that Pennant Sandstone resources are widespread within the sub-region, where they coincide, to some extent, with areas of relatively high environmental capacity - particularly within parts of Bridgend, Rhondda Cynon Taf and Caerphilly.

3.3 The Carboniferous Limestone resources within this sub-region occur in two distinct areas: the north crop (to the north of the South Wales coalfield); the south crop (to the south of the coalfield). Within the north crop, the limestones occur almost entirely within the Brecon Beacons National Park, with only a small area within the north of Merthyr Tydfil. The 'south crop' extends from Bridgend in the west, through the Vale of Glamorgan and Cardiff to Caerphilly in the east.

Individual LPA Assessment

3.4 On the basis of the RTS2 apportionment figures, Bridgend, Caerphilly, Merthyr, BBNPA and Vale of Glamorgan do not require any allocations for future working for crushed rock to be identified in the LDP.

3.5 However, RTS2 states that consideration should also be given to whether any of the factors set out in paragraph B84 above give rise to any other requirements for resource allocations.

3.6 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.

3.7 As the majority of the production/reserves in each of these areas is limestone none of the factors set out in paragraph B84 suggest that there should be additional resources released in any of these LPA areas.

3.8 Allocations are required in Cardiff (7.475 million tonnes of carboniferous limestone) and RCT (9.295 million tonnes). Cardiff have endorsed the RTS2 and accept the need for sufficient allocation in their LDP Review to meet their RTS2 requirements. The Council are minded to approve a 4 million tonne extension to Taffs Well Quarry (subject to the completion of a S106 Agreement) which if approved would reduce the required allocation to 3.475 million tonnes. Sufficient interest has been shown by operators to provide confidence that applications will be forthcoming which will meet the apportionment shortfall.

3.9 RCT however, have not endorsed the RTS2. A preferred area for the extension of Craig-yr-hesg Quarry, amounting to some 10 million tonnes of HAS sandstone, was identified in the current LDP. However, the planning application to develop that site has been refused. The applicants have appealed that decision and a Public Inquiry has been held. An application to renew the conditions for the extraction of existing reserves at Craig yr Hesg has also been refused in recent years; which would result in no more extraction there after 2022. These reserves make up a significant part of the landbank identified in RTS2 (minus the extraction at the quarry since 2016). This was also subject to an Appeal that was considered at the same Public Inquiry. The decision on both Appeals is awaited. The decisions will determine the approach of RCT going forward. If the Appeals are allowed, then the apportionment figures will be met. However, if either or both of the Appeals are dismissed further work will be required in order to establish whether there are alternative resources within the County capable of being worked. This work would need to progress in earnest in advance of the decisions in any case, due to the ongoing preparation of the Revised LDP in RCT.

3.10 RTS2 states that in the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, subject to the circumstances and considerations set out in Annex A of the RTS Main Document, need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. However, at this stage it is not possible to determine that RCT cannot make allocations to address the shortfall and therefore it is premature to discuss collaborative working in order to transfer required provision to other LPA's.

4. Current Position

- 4.1 The LPA's within the Cardiff City Region accept their apportionments as set out in the RTS2, except for RCT who wish to undertake further work in relation to available resources within the County alongside awaiting the outcome of the Appeal decisions.