



deunyddiau hanfodel
atebion cynaliadwy

essential materials
sustainable solutions

MPA Wales/Cymru

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27th March 2020

Carmarthenshire Council
Forward Planning Manager,
Planning Division,
Environment Department,
3 Spilman Street,
Carmarthen,
SA31 1LE.

Email: forward.planning@carmarthenshire.gov.uk

Dear Sir/Madam

**CARMARTHENSHIRE REVISED LOCAL DEVELOPMENT PLAN 2018 - 2033
DEPOSIT REVISED LDP REPRESENTATION FORM**

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, MPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of over 530 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. In 2016, the industry supplied £18 billion worth of materials and services to the Economy. It is the largest supplier to the construction industry, which had annual output valued at £169 billion in 2018. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Our comments are appended to this letter. For ease of reference where we have proposed amendments to the text, we have struck through text (~~xxxxxx~~) to be deleted and used bold underlined text (**xxxxxx**) for proposed insertions.

If you require clarification on any of the points made, please do not hesitate to contact us. We welcome future engagement on this matter. We should be grateful if you could forward future correspondence to the email below.

Yours faithfully

Nick Horsley
Director of Planning, MPA Wales

Email: nick.horsley@mineralproducts.org
Tel: 07568 427720

MPA Wales/Cymru is part of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries

Registered in England as Mineral Products Association Limited No. 1634996
Registered Office: Gillingham House
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Cynllun Datblygu Lleol Diwygiedig Sir Gaerfyrddin 2018 - 2033
Carmarthenshire Revised Local Development Plan 2018 - 2033

Ffurflen Sylwadau Cynllun Datblygu Lleol Diwygiedig Adneuo

Deposit Revised LDP Representation Form

Hoffem gael eich barn am y Cynllun Datblygu Lleol Diwygiedig Adneuo (Cynllun Datblygu Lleol) ac ar ddogfennau sy'n ceFnogi'r Cynllun Datblygu Lleol.

Dylid defnyddio'r ffurflen hon ar gyfer pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o www.sirgar.llyw.cymru. Os ydych yn cyflwyno copi papur, atodwch dudalennau ychwanegol lle bod angen.

Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.

Mae'n rhaid derbyn eich sylwadau erbyn 4:30pm ar y 27 o Fawrth 2020.

Dychwelwch ffurflenni at:

Rheolwr Blaen-gynllunio, Isadran Cynllunio, Adran Y Amgylchedd, 3 Heol Spilman, Caerfyrddin, SA31 1LE

We would like your views on the Revised Deposit Carmarthenshire Local Development Plan (LDP) and also on documents which support the LDP.

This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at www.carmarthenshire.gov.wales. If you are submitting a paper copy, attach additional sheets as necessary.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received by 4:30pm on the 27th March 2020.

Please return forms to:

Forward Planning Manager, Planning Division, Environment Department, 3 Spilman Street, Carmarthen, SA31 1LE.

| RHAN A: Manylion cysylltu | | | |
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| PART A: Contact details | | | |
| Eich manylion/manylion eich cleient Your details / your client's details | | Manylion yr asiant (os ydynt yn berthnasol) Agent's details (if relevant) | |
| <i>Enw</i> Name | PETER NICHOLAS HORSLEY | | |
| <i>Teitl swydd (lle y bo'n berthnasol)</i> Job title (where relevant) | DIRECTOR - MPA WALES | | |
| <i>Sefydliad (lle y bo'n berthnasol)</i> Organisation (where relevant) | MINERAL PRODUCTS ASSOCIATION | | |
| <i>Cyfeiriad</i> Address | MPA Wales Penyfron Fron, Garthmyl Powys SY15 6SA | | |
| <i>Rhif ffôn</i> Telephone no | 07568 427720 | | |
| <i>E-bost</i> Email address | nick.horsley@mineralproducts.org | | |
| <i>Llofnodwyd</i> Signed |  | | |
| <i>Dyddiad</i> Date | 27th March 2020 | | |
| RHAN B: Eich sylw | | | |
| PART B: Your representation | | | |
| Paragraph/ Policy/Page Number | Current wording | Comment | Suggested amendment |
| General Comment | Formatting of the document. | We do not feel that the landscape orientation of the document and the splitting of each page into two columns has been conducive to deliver an "easy read". Some policies have ended up on two pages in three columns. We would | Consider reformatting the document |

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| | | suggest that the document is reformatted into a portrait orientation without the columns. | |
| General Comment | Policy wording | We welcome the fact that the majority of policies are positively worded, i.e. development will be permitted where it..... | We support the positive wording. |
| Paragraph 7.6 | SO5 | The formatting of the document appears to have caused confusion in that SO5 appears before SO3 and SO4 | Amend the formatting of the document and ensure SO3, SO4 and SO5 appear in the correct order. |
| Paragraph 7.6 | Strategic Objectives | It is not clear why the provision of an adequate supply of minerals is not identified as a Strategic Objective. This is a fundamental requirement of PPW and the need for minerals is the thread which stiches together many of the strategic objective identified, providing raw materials to deliver the employment, housing, climate change, infrastructure, transport and environmental aspirations. | Include a further Strategic Objective to reflect the need for an adequate supply of minerals. |
| Paragraph 9.20 | Rural Economy | We support the need for a strong rural economy and believe the minerals industry will continue to contribute to this | Support |
| Policy BHE1: Listed Buildings and Conservation Areas | Subsections 2. & 3. State: <i>“2. Developments within or adjacent to a conservation area will be permitted, where it would preserve or enhance the character or appearance of the conservation area, or its setting.</i> <i>3. New developments in conservation areas should be of a high standard of design which responds to</i> | It is not clear how the requirements of these subsections will be achieved. Maintaining the characteristic fabric of these buildings and conservation areas routinely requires an indigenous supply of local stone and materials, sympathetic to the character of the area and its buildings. There are no policies within the plan supporting the development of indigenous sources of building stone/materials. | Clarify within the plan how the characteristics of conservation areas and listed buildings will be maintained using materials sympathetic to the area. Sources of indigenous building materials will be needed and reflected within the policies in the plan. |

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| | <i>the area's special characteristics and features."</i> | | |
| Strategic Policy SP 18: Mineral Resources | Subsection a) states: <i>"Ensuring supply by maintaining an adequate landbank of permitted aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;"</i> | The structure of this subsection is misleading. PPW requires LPAs to maintain and adequate supply of <u>all</u> minerals. Also rather than being and adequate landbank of primary aggregates, the policy should consider non-aggregate minerals, such as agricultural lime, as well as the landbank requirements as stated. At present we consider this is unsound. As such, we suggest the following amendments are incorporated. | Amend the text to read: <i>"Ensuring <u>an adequate supply of minerals, including maintaining an adequate landbank of permitted aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;"</u></i> |
| Strategic Policy SP 18: Mineral Resources | Subsection c) states: <i>"Safeguarding areas underlain by minerals of economic importance where they could be worked in the future to ensure that such resources are not unnecessarily sterilised by other forms of development;"</i> | PPW requires LPAs to safeguard Mineral Resources <u>and Minerals Infrastructure</u> . (Our underlining). At present we consider this omission is unsound. The text should be amended to reflect the omission. | Amend the text to read: <i>"Safeguarding <u>minerals infrastructure and areas underlain by minerals of economic importance where they could be worked in the future to ensure that such resources and infrastructure are not unnecessarily sterilised by other forms of development;"</u></i> |
| Paragraph 11.555 | This paragraph states: <i>"The LDP will seek to ensure that the County provides mineral resources to meet society's needs and that such resources, are safeguarded from sterilisation."</i> | This paragraph should also reflect the need to safeguard minerals infrastructure. At present we consider this omission is unsound. The text should be amended to reflect the omission. Further, it is not within the County's gift to "provide mineral resources". The County can identify mineral resources and facilitate their delivery by granting planning permission. Such resources could then be considered as "mineral reserves". | Amend the text to read: <i>"The LDP will seek to ensure that the County provides <u>identifies</u> mineral resources <u>and through the grant of planning permission facilitates the delivery of mineral reserves to meet society's needs and that such resources and minerals infrastructure, are safeguarded from sterilisation."</u></i> |

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| <p>Paragraph 11.557</p> | <p>This paragraph states: “<i>The South Wales Regional Technical Statement (RTS) 2014 sets out the contribution that each constituent local authority should make towards meeting the regional demand for aggregates (both hard crushed rock, and sand and gravel)</i>”.</p> | <p>This paragraph should reflect the status of the RTS 2nd Review which is a material consideration.</p> | <p>Insert appropriate reference to the RTS 2nd Review.</p> |
| <p>Paragraph 11.557</p> | <p>This paragraph also states: “<i>The County’s landbank figures for crushed rock is notably in excess of the minimum requirements set out in Minerals Technical Advice Note (MTAN) 1: Aggregates, and consequently there is no requirement to allocate new sites for mineral development.</i>”</p> | <p>As stated above, the RTS 2nd Review process is currently in progress. Statements of Sub-Regional Collaboration (SSRCs) will be required to support the local plan evidence base to ensure each mineral planning authority makes an appropriate contribution to meeting local, regional and national needs. Such factors may be influenced by the availability of high specification aggregates, proximity principle and production capacity. Accordingly it cannot be ruled out that subsequent allocations will be needed.</p> | <p>Amend the text to read: “<i>The County’s landbank figures for crushed rock is notably in excess of the minimum requirements set out in Minerals Technical Advice Note (MTAN) 1: Aggregates, and consequently there is currently no requirement to allocate new sites for mineral development. However, this may need to be reviewed as part of the RTS 2nd Review process and any subsequent Statements of Sub-Regional Collaboration</i>”.</p> |
| <p>Paragraph 11.558</p> | <p>This paragraph states: “<i>Both Carmarthenshire and Pembrokeshire County Councils have sought to address the shortfall in sand and gravel reserves later in the Revised Plan period and are working together to achieve this through the potential allocation of a site(s).</i>”</p> | <p>It would be helpful to clarify in the text the measures the respective County Councils have taken to address the shortfall. It is assumed that the plan will include site specific allocations, preferred areas or Areas of Search in order to deliver the recognised shortfall.</p> | <p>Provide clarification on the matter.</p> |
| <p>Paragraph 11.560</p> | <p>This paragraph states: “<i>The purpose of the policy is to</i></p> | <p>Policy MR1: refers to a “<i>national, regional and local</i>” need for the</p> | <p>Amend the text to read: “<i>The purpose of the policy is to</i></p> |

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| | <i>maintain a balance between meeting national demand for minerals.....”.</i> | mineral. We suggest that this paragraph should align more with the policy. | <i>maintain a balance between meeting national, regional and local demand for minerals.....”.</i> |
| Policy MR2: Mineral Buffer Zones | This Policy states: <i>“Provision has been made for Buffer Zones around all sites with extant planning permission for mineral working.”</i> | <p>PPW requires that Buffer Zones are provided as <i>“areas of protection around permitted <u>and proposed mineral workings”</u> also <u>“buffer zones should be identified in development plans around existing or proposed minerals sites”</u></i> (Our underlining).</p> <p>As indicated above at paragraph 11.558 both Carmarthenshire and Pembrokeshire County Councils have sought to address the shortfall in sand and gravel reserves. It is assumed that this will be through site allocations. As required by PPW, site allocations should also be protected by Buffer Zones.</p> <p>At present we consider this omission is unsound. The text should be amended to reflect the omission.</p> | Amend the text to read: <i>“Provision has been made for Buffer Zones around all sites with extant planning permission for mineral working and proposed mineral workings.”</i> |
| Paragraph 11.562 | This paragraph states: <i>“Buffer zones are used to provide areas of protection around permitted mineral workings...”</i> | As stated above, PPW requires that Buffer Zones are provided as <i>“areas of protection around permitted <u>and proposed mineral workings”</u> also <u>“buffer zones should be identified in development plans around existing or proposed minerals sites”</u>.</i> | Amend the text to read: <i>“Buffer zones are used to provide areas of protection around permitted mineral workings and proposed mineral workings”.</i> |
| Paragraph 11.562 | This paragraph continues: <i>“.....that the potential impact of mineral workings is recognised and planned for in the area around the mineral operations”.</i> | As stated above, PPW requires that Buffer Zones are provided as <i>“areas of protection around permitted <u>and proposed mineral workings</u> also <u>“buffer zones should be identified in development plans around existing or proposed minerals sites”</u></i> | Amend the text to read: <i>“.....that the potential impact of mineral workings is recognised and planned for in the area around the mineral operations and proposed mineral workings”.</i> |

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| <p>Policy MR3: Mineral Safeguarding</p> | <p>This Policy states: <i>“Planning permission will not be granted for development proposals where they would permanently sterilise resources of aggregate identified within the mineral safeguarding areas (areas of search) on the proposals map unless....”</i></p> | <p>This policy is confusing and is not a true reflection of PPW on a number of grounds.</p> <p>We recognise that Areas of Search should be safeguarded, but as written, the Policy would appear to suggest that only Areas of Search (AoS) should be safeguarded.</p> <p>AoS are a hierarchical tool along with site specific allocations and preferred areas to be identified within development plans, the aim being to deliver an adequate supply of minerals within a development plan period. Minerals safeguarding is a means of ensuring that mineral resources which may be needed in the future are safeguarded over the long term.</p> <p>Further, minerals safeguarding is not solely about safeguarding aggregate resources. This should include a wider minerals base and minerals infrastructure.</p> <p>At present we consider this is unsound. The text should be amended to reflect PPW.</p> | <p>Amend the text to read: <i>“Planning permission will not be granted for development proposals where they would permanently sterilise resources of <u>minerals aggregate and minerals infrastructure</u> identified within the mineral safeguarding areas (areas of search) on the proposals map¹ unless....”</i></p> <p>¹: The proposals map should make a clear distinction between AoS and MSAs</p> |
| <p>Paragraph 11.564</p> | <p>This paragraph states: “PPW stresses the importance of safeguarding mineral resources that meet society’s needs now and in the future.”</p> | <p>This statement needs to be broadened to cover minerals infrastructure.</p> | <p>Amend the text to read: “PPW stresses the importance of safeguarding mineral resources <u>and minerals infrastructure</u> that meet society’s needs now and in the future.”</p> |
| <p>Appendix 1</p> | <p>Omission</p> | <p>There does not appear to be any reference to the Regional Technical Statement</p> | <p>Include reference to RTS.</p> |
| <p>Appendix 6</p> | <p>Strategic Objectives</p> | <p>Whilst we recognise Policy SP18 can make a marked contribution to reducing the effects of climate</p> | <p>Amend the text accordingly.</p> |

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| | | change, we feel the Strategic Objectives should reflect the need for an adequate supply of minerals as required by PPW | |
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6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?

Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

Yes

Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Primaril Minerals

7. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.

7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

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| <p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.</p> | |
| <p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> I wish to be heard in English.</p> | Yes |

Nodiadau cyfarwyddyd

Guidance notes

*Caiff Cynllun Datblygu Lleol Sir Gaerfyrddin ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:

- 1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)*

Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.

Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa

The Carmarthenshire Revised Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you

brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.

Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.

believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.