



deunyddiau hanfodol
atebion cynaliadwy

essential materials
sustainable solutions

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7th February 2019

Carmarthenshire County Council
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Dear Sir/Madam

**CARMARTHENSHIRE REVISED LDP PREFERRED STRATEGY 2018-2033
DRAFT PRE-DEPOSIT PREFERRED STRATEGY (DEC 2018)**

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, QPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of 500 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. Each year the industry supplies £20 billion worth of materials and services to the Economy and is the largest supplier to the construction industry, which had annual output valued at £151 billion in 2016. 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.

We thank the Council for allowing us the opportunity to respond to the consultation and for making pdf versions of the documents available which makes the documents more accessible. We have the following comments to make.

In general, we are supportive of the approach to the revised preferred strategy, however, we have the following comments to make. These are detailed in the table below.

Page/Para	Current Wording	MPA Comment	Required amendment
Section 4	Influence on the Plan	We believe the Regional Technical Statement and the Welsh Marine Plan should be added to the list of documents referred to	Amend the text to include the Welsh Marine Plan & the Regional Technical Statement.

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

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Page/Para	Current Wording	MPA Comment	Required amendment
Strategic Policy SP18: Mineral Resources	This policy states “The County’s identified mineral resources will be sustainably managed by:”	Reference is made to mineral resources; however, the policy appears only to address aggregates. The SWRAWP annual monitoring report refers to non-aggregate mineral resources in Carmarthenshire. These should be reflected in the policy.	Amend accordingly.
Strategic Policy SP18: Mineral Resources	Point a) states “Ensuring supply by maintaining an adequate landbank of permitted aggregate reserves (hard rock and sand and gravel) throughout the Plan period”	In order to provide consistency with PPW and MTAN1 and for greater clarity we suggest modifying the wording of a) by changing “hard rock” to “crushed rock”. Further it would be prudent to clarify the landbank requirements by adding the following wording to point a) A minimum ten-year landbank of crushed rock and minimum seven-year landbank for sand and gravel should therefore be maintained during the entire plan period.	The amended text would read:- “Ensuring supply by maintaining an adequate landbank of permitted aggregate reserves (hard crushed rock and sand and gravel) throughout the Plan period. <u>A minimum ten-year landbank of crushed rock and minimum seven-year landbank for sand and gravel should therefore be maintained during the entire plan period</u> ”.
Strategic Policy SP18: Mineral Resources	Point c) states “Safeguarding areas underlain by minerals of economic importance where they could be worked in future to ensure that such resources are not unnecessarily sterilized by other forms of development”	It should be made clear that sterilisation of a mineral resource may be as a result of the proximity of development not just by development directly upon a resource. The policy is not clear as to how the safeguarding areas will be identified within the LDP, it is assumed by the use of mineral safeguarding maps. We would be happy to discuss the resources to be safeguarded with the Council.	Amend the text to read “Safeguarding areas underlain by minerals of economic importance where they could be worked in future to ensure that such resources are not unnecessarily sterilized by other forms of development <u>either directly or within close proximity to the safeguarded resource. Minerals safeguarding maps will be included within the LDP</u> ”.
Strategic Policy SP18:	Point d) states “The use of Buffer	It would be helpful to clarify how the buffer zones will be	Amend the text to read “The use of

Mineral Resources	Zones to reduce the conflict between mineral development and sensitive development.”	applied. Buffer zones provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals and schools, should be resisted.	Buffer Zones to reduce the conflict between mineral development and sensitive development. <u>These Buffer Zones will provide areas of protection around permitted and proposed mineral workings where new development which would be sensitive to adverse impact, including residential areas, hospitals and schools, should be resisted.”</u>
Para 11.153	The paragraph states “The LDP should ensure that the County provides mineral resources to meet society’s needs....”	We would suggest use of the word “reserves” rather than “resources” as reserves are resources with planning permission which can readily be worked	Amend the text to read “The LDP should ensure that the County provides mineral resources <u>reserves</u> to meet society’s needs....”
11.155	“The South Wales RTS 2014 sets out the contribution that each constituent local authority should make towards meeting the regional demand for aggregates (both hard rock and sand and gravel). He LDP’s second Annual Monitoring Report (AMR 2016/17) establishes that the County’s landbank figures, for both hard rock and sand and gravel, is notably in excess of the minimum requirements set out in MTAN1: Aggregates, and consequently there is no requirement to allocate new	As mentioned above, reference to “hard rock” should be amended to “crushed rock” for consistency. As also referred to above the RTS is a document of influence to the plan. The RTS is currently under formal review by Welsh Government with the 2 nd review anticipated for completion by Q1, 2020. This review will run in parallel to the revised Preferred Strategy for the LDP and is therefore a material consideration. It is also notable that Carmarthenshire has the third highest housing projection in adopted LDPs. Whilst housing numbers may well be amended under the revised LDP, there is a recognition that historic sales of aggregates may not be the appropriate methodology to predict future aggregate requirements, in light of growth aspirations. Low production tonnages coupled with healthy reserves create long landbanks. The SWRAWP	The text should be amended to read “The South Wales RTS 2014 sets out the contribution that each constituent local authority should make towards meeting the regional demand for aggregates (both hard <u>crushed</u> rock and sand and gravel). He LDP’s second Annual Monitoring Report (AMR 2016/17) establishes that the County’s landbank figures, for both hard <u>crushed</u> rock and sand and gravel, is notably in excess of the minimum requirements set out in MTAN1: Aggregates, and consequently there is no requirement

	sites for minerals development.”	AMR states that “care must be exercised in relying on the landbank figures for Carmarthenshire as these are based on very small annual sales from relatively small sites.” Sales alone may not represent a true reflection of aggregate usage within an area. Further, the current consultation is coupled with a call for candidate Sand and Gravel Sites. The final sentence should therefore be amended.	<u>the need to allocate new sites for minerals development will be considered in line with the requirements of the developing RTS and the current call for sites.”</u>
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We trust the above comments are helpful and would welcome the opportunity to discuss with you, the points raised.

Yours faithfully



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