
Pembrokeshire Coast National Park

Management Plan (2015-2019)

Local Development Plan

(2015 to 2031)

Background Paper No *: Minerals

March 2018

**PEMBROKESHIRE COAST NATIONAL PARK
AUTHORITY**

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National, Regional and Local

National

Planning Policy Wales (Edition 9) Chapter 14 Minerals, November 2016

1. This chapter sets out the land use planning policy guidance in relation to mineral extraction and related development. It includes all minerals and substances in, on or under land extracted whether by underground or surface working. It does not include marine aggregates.

2. It identifies National Parks as mineral planning authorities, but states that

“Minerals development should not take place in National Parks, Areas of Outstanding Natural Beauty (AONBs), Sites of Special Scientific Interest and National Nature Reserves save in exceptional circumstances. All mineral applications must therefore be subject to the most rigorous examination and all major mineral developments demonstrated to be in the public interest before being allowed to proceed. Consideration will include an assessment of:

- the need for the development in terms of UK considerations of mineral supply;
- the impact on the local economy of permitting the development or refusing it;
- whether alternative supplies can be made available at reasonable cost, and the scope for meeting the need in some other way;
- the detrimental effect of the proposals on the environment and landscape and the extent to which it can be moderated, and/or the detrimental effect of the proposals on the nature conservation interest of the site in terms of habitat, protected species, bio-diversity; and,
- in the case of extensions to existing quarries and other mineral extraction sites, the extent to which the proposal would achieve an enhancement to the local landscape and provide for nature conservation and biodiversity.

- Development adjacent or close to these areas may have significant detrimental effect on their special qualities. Minerals development, proposed adjacent or close to a National Park or AONB that might affect the setting of these areas should be assessed carefully to determine whether the environmental and amenity impact is acceptable or not, or whether suitable, satisfactory conditions can be imposed to mitigate the impact.” (Planning Policy Wales 2016, para 14.3.2-3)
3. It also advocates minerals as an appropriate subject for consideration as a regional approach through the framework provided by the Regional Technical Statement for Aggregates in each area. The regional consideration of demand and supply is carried out by the South Wales Regional Aggregates Working party. (Planning Policy Wales 2016, para 14.2.2).
 4. Planning Policy Wales (2016) also identifies that one of the main aims of mineral planning is to safeguard mineral resources for future generations, with a key principle to safeguard mineral resources from sterilisation.

“It is important that access to mineral deposits which society may need is safeguarded. This does not necessarily indicate an acceptance of working, but that the location and quality of the mineral is known, and that the environmental constraints associated with extraction have been considered” (Planning Policy Wales 2016, para 14.2.1)

“Areas to be safeguarded should be identified on proposals maps and policies should protect potential mineral resources from other types of permanent development which would either sterilise them or hinder extraction, or may hinder extraction in the future as technology changes.” (Planning Policy Wales 2016, para 14.7.3)

“Although new road building has declined, authorities should identify potential high specification aggregate resources and consider whether there is a need to protect these resources and potential rail connections to the resources from sterilisation” (Planning Policy Wales 2016, para 14.7.6).
 5. Please note that these resources are not necessarily found within the National Park.
 6. Further information about the approach to mineral working in National Parks is set out in both National Guidance and the Regional Technical Statement for the area covered by the South Wales Aggregates Working Party (July 2014). In general, working in such areas should only be undertaken in exceptional circumstances

Minerals Technical Advice Note (MTAN) Wales 1: Aggregates

7. This document sets out detailed advice on the mechanisms for delivering the policy for aggregates extraction by mineral planning authorities and the aggregates industry.
8. It references Mineral Planning Policy Wales 2000 which states that mineral development should not take place in National parks save in exceptional circumstances. Most of the terrestrial sand and gravel extraction currently undertaken in South Wales is obtained from the Pembrokeshire Coast National Park. In view of the extent of potential aggregate resources that is available geologically in Wales, and the need to minimize primary extraction, there is no need to permit proposals for the extraction of general aggregates from such areas in Wales save in exceptional circumstances. To justify allocations in development plans for new sites, or extensions to existing sites, for the extraction of aggregates of a particular specification in National parks, it must be demonstrated that: - alternative resources, that would be environmentally acceptable for extraction are not available; the scope for meeting the need some other way have been assessed and rejected; and that the detrimental effects of the proposal can be mitigated or compensated for. The Welsh Assembly Government wishes to be notified of such exceptions to give the opportunity to consider whether it is necessary to call in the determination of the proposal. The Regional Aggregate Working Parties should take into account the need to protect these areas from extraction and the agreement of other areas to meet the regional contribution that the National Parks are unable to meet should be discussed and recorded in the Regional Technical Statement. (Minerals Technical Advice Note 1: Aggregates, 2004, para 51-53)
9. Section C of Minerals Technical Advice Note 1: Aggregates (para 71) identifies the objectives of buffer zones around mineral workings and provides minimum distances for such zones as

Mineral Extraction

| Type | Minimum distance |
|--|------------------|
| Sand and gravel (and others where no blasting is required) | 100 metres |
| Hard rock quarries | 200 metres |

(Minerals Technical Advice Note 2: Coal has subsequently introduced a buffer of 500 metres around coal workings).

Minerals Technical Advice Note Wales 2: Coal

10. The Coal Minerals Technical Advice Note provides guidance on how the policy statements in Minerals Planning Policy Wales should be applied in development plans and development control with respect to coal.
11. The guidance re-affirms that major development should not take place in National Parks save in exceptional circumstances:

“Minerals development within National Parks and Areas of Outstanding Natural Beauty (MPPW, 2000) requires rigorous examination and all major minerals developments must be demonstrated to be in the public interest before being allowed to proceed. For this purpose, major coal developments are defined as those in the opinion of the MPA requiring Environmental Impact Assessment. The tests of rigorous examination are set out in MPPW, but decisions must be compatible with the pursuit of their (National Park and AONB) purposes, the public interest tests are of preserving public health or public safety; or that they proposed development is needed at this time and there is no satisfactory alternative. There is no national statement of need for indigenous coal.
12. Coal development that might affect the settings of National Park or AONBs should have regard to the purposes for which they are designated. In such cases a rigorous examination should be undertaken to determine whether the impacts on the purposes are acceptable or not and whether they can be avoided or adequately controlled through conditions.” (Minerals Technical Advice Note 2: Coal, 2009, paras 78 - 79)
13. The Technical Advice Note also requires that coal resource zones are identified and form the basis for coal safeguarding areas to be shown on the Local Development Plan Proposals Map. Paragraph 37 confirms however that Minerals Planning Authorities should exclude areas of International and National Designations of environmental and cultural importance from the Coal Resource Zones. There is therefore no requirement to safeguard coal resources within the National Park. In addition, as there are no active or proposed coal workings, buffer zones around coal workings are not required within the National Park.
14. Paragraph 228 of the Minerals Technical Advice Note 2 requires that mineral planning authorities should show areas of past, present or possible future workings in the development plan. This information is available from The Coal Authority in the form of identified ‘High Risk Areas’. The Coal Authority has confirmed by letter of the 10th September 2014 that it would not object to the replacement Local Development Plan if these areas were not shown in the proposals maps. Areas designated as Coal High Risk Areas will be shown on on the Constraints Map in accordance with the LDP Manual Edition 2 section 2.4.1. This is a spatial delineation that is not determined by the Local Development Plan and is subject to updates from The Coal Authority.

Minerals Planning Policy Guidance

15. There are many Minerals Planning Guidance Notes (MPGs) which continue to remain in force in Wales until superseded by relevant Minerals Technical Advice Notes (Wales). These are MPG2; MPG4; MPG5; MPG7; MPG8; MPG9; MPG10; MPG11; MPG12 and ; MPG14 although sections of these documents have been cancelled in Wales.

Regional

South Wales Regional Aggregates Working Party

16. Currently responsible for:

- Aggregates Monitoring Surveys
- A 5 yearly Regional Technical Statement to set out the results of the regional assessment of the environmental capacity of each Minerals Planning Authority to contribute to an adequate supply of primary aggregates;
- To provide a strategy for the provision of aggregates in the region in accord with that regional assessment, with allocations of future aggregates provision for each mineral planning authority area to provide a strategic basis for future development plans;
- To assess current and future imports and exports of aggregates;
- To assess the current and future contribution of marine aggregates;
- To advise the Assembly on the potential in each region in Wales for increasing the use of alternative materials to replace primary aggregates.
- Assessment of aggregates demand and supply
- Administer the arrangements for establishing joint voluntary arrangements of local authorities to assess the Regional Technical Statement for Aggregates

The Regional Technical Statement (July 2014) (1st Review)

17. The Aggregates Working Parties for North and South Wales are required to produce Regional Technical Statements for Aggregates at 5-yearly intervals. This is a requirement of Minerals Technical Advice Note 1 (Minerals Technical Advice Note 1). The Regional Technical Statement provides recommendations which guide the future levels of provision for construction aggregates required from each Mineral Planning Authority in Wales.

18. “This First Review of the original RTS documents comprise a main document and the Regional Appendices for North Wales and South Wales, which are issued separately. The two components of the new RTS for each Region (i.e. the main document and the relevant Appendix) are intended to provide a strategy for the future supply of construction aggregates within that Region, taking account of the latest available information regarding the balance of supply and demand, and current notions of sustainability (see below). Together, the two revised RTSs aim to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported), taking into account the key objectives of sustainable supply outlined in MTAN 1.” (Regional Technical Statement, 2014, para 1.2)
19. Two key notions of sustainability are applied. The proximity principle relates to the objective of minimising unnecessary transportation of bulk materials, such as construction aggregates, by ensuring that sources of supply (e.g. aggregate quarries) are located as close as possible to the main centres of demand (primarily centres of population).
20. The environmental capacity principle is that quarrying should be focussed, as far as possible, on areas which have the greatest capacity to ‘absorb’ the environmental impacts that are (or may be) associated with quarrying activity.
21. The two main outputs of the Regional Technical Statement process are required to be the identification of apportionments for each Mineral Planning Authority in Wales for the 22 or 25 year period concerned (to maintain a land bank of 7 years for sand and gravel and 10 years for hard rock over a 15 year plan period); and the identification of any allocations that may need to be designated within individual LDPs in order to secure this level of provision. (RTS, 2014, para 5.1)
22. Apportionments are based on historical sales, the revised Regional Technical Statement has used a 10 year average, rather than the 3 year average required by Minerals Technical Advice Note 1, so that the periods before and after the recent recession can be included to prevent a skewed assessment. These averages form the basis for predicting future demand for each MPA.

“The apportionments and allocations for land-based sand & gravel within Pembrokeshire, the Pembrokeshire Coast National Park, Ceredigion, and Carmarthenshire have been combined. This is primarily in order to encourage cooperation between these authorities in finding a longer-term solution to the aspiration of reducing future production within the National Park, once existing permitted reserves in that area have been exhausted. The present supply pattern in this part of Wales is (quite understandably) focused on the areas which have the main concentrations of high quality glacio-fluvial sand & gravel deposits, to the east and south west of Cardigan. A large proportion of these deposits fall within the National Park but some of them extend into adjoining parts of Pembrokeshire and Ceredigion. Other potential resources do exist, however, although the commercial viability of some of those, particularly in Carmarthenshire and parts of Pembrokeshire, is compromised by the availability of marine-dredged material landed at Burry Port and Pembroke Dock. The apportionment for Powys has also been transferred to this group of authorities in recognition of the fact that the current reserves and output from the one site in Powys are extremely small, and unlikely to be sustained in future years” (RTS, 2014, para 5.7).

23. The following tables are taken from the revised Regional Technical Statement; Table 5.1 provides a breakdown of the apportionments for sand and gravel and crushed rock for each Minerals Planning Authority. Tables 5.2 and 5.3 compare these apportionments with the current landbanks for each MPA. They show a deficit of 2.94 million tonnes of sand and gravel for the South West Wales region and a surplus of 14 million tonnes of crushed rock aggregates for Pembrokeshire (including the National Park).

Table 5.1: Suggested Apportionments for Future Aggregates Provision in Wales, 2011 to 2033 (sand & gravel) or 2036 (crushed rock)

| Mineral Planning Authority | Land-won Sand & Gravel | | | Crushed Rock | | |
|-----------------------------|--|---------------------------------|---|--|---------------------------------|---|
| | Total Apportionment (Provision) over 22 years (mt) | Annualised Apportionment (mtpa) | Historical 10yr Sales Average from Table 3.1 (mtpa) | Total Apportionment (Provision) over 25 years (mt) | Annualised Apportionment (mtpa) | Historical 10yr Sales Average from Table 3.1 (mtpa) |
| Wrexham | 12.76 | 0.58 | 0.58 | 78.25 | 3.13 | 0 |
| Flintshire | 4.4 | 0.2 | 0.31 | | | 2.94 |
| Denbighshire | 2.2 | 0.1 | 0.02 | 22.25 | 0.89 | 0.89 |
| Conwy | 0 | 0 | 0 | 30.75 | 1.23 | 1.23 |
| Snowdonia NPA* | | | | | | |
| Anglesey | 0 | 0 | 0 | 7.0 | 0.28 | 0.38 |
| Gwynedd | 4.4 | 0.2 | 0.17 | 6.75 | 0.27 | 0.37 |
| Sub-totals, N. Wales | 23.76 | 1.08 | 1.08 | 145.0 | 5.80 | 5.80 |
| Ceredigion | 7.26 | 0.33 | 0.14 | 5.0 | 0.20 | 0.20 |
| Pembrokeshire | | | 0 | 21.0 | 0.84 | 0.55 |
| Pembs Coast NPA* | | | 0.16 | | | 0.29 |
| Carmarthenshire | | | 0 | 26.75 | 1.07 | 1.07 |
| Swansea | 0 | 0 | 0 | 0 | 0 | 0 |
| Neath Port Talbot | 0 | 0 | 0.03 | 14.75 | 0.59 | 0.59 |
| Powys | 0 | 0 | | 62.75 | 2.51 | 2.51 |
| Bridgend | 0 | 0 | 0 | 18.75 | 0.75 | 0.75 |
| Brecon Beacons NPA* | 0 | 0 | 0 | 20.5 | 0.82 | 0.55 |
| Merthyr Tydfil | 0 | 0 | 0 | | | 0.27 |
| Vale of Glamorgan | 0 | 0 | 0 | 27.25 | 1.09 | 1.09 |
| Rhondda Cynon Taf | 0 | 0 | 0 | 17.25 | 0.69 | 0.69 |
| Cardiff | 0 | 0 | 0 | 21.5 | 0.86 | 0.86 |
| Caerphilly | 0 | 0 | 0 | 19 | 0.76 | 0.76 |
| Blaenau Gwent | 0 | 0 | 0 | 4.25 | 0.17 | 0.17 |
| Torfaen | 0 | 0 | 0 | 0 | 0 | 0 |
| Newport | 0 | 0 | 0 | 0 | 0 | 0 |
| Monmouthshire | 0 | 0 | 0 | 3.0 | 0.12 | 0.12 |
| Sub-totals, S. Wales | 7.26 | 0.33 | 0.33 | 261.75 | 10.47 | 10.47 |
| TOTALS Wales | 31.02 | 1.41 | 1.41 | 406.75 | 16.27 | 16.27 |

SOURCE: Derived from the historical sales figures presented in Table 3.1, with adjustments to address the requirements summarised in para. 4.37 above, and discussed further in the text below. Green shaded cells indicate apportionments that are set higher than historical sales. Those shaded pink indicate corresponding reductions. The sub-total figures for North Wales and South Wales, and the totals for all of Wales remain unchanged from the figures indicated by historical sales.

*Where apportionments are shown for National Parks, these relate to production from existing permitted reserves in those areas. There is no requirement for National Parks to provide future allocations

Table 5.2: Comparison of total apportionments for land-based sand & gravel, 2011 to 2033 with existing (December 2010) landbanks of permitted reserves.

| Mineral Planning Authority | Total Apportionment (Provision) for sand & gravel over 22 years - from Table 5.1 (mt) | Existing Sand & Gravel Landbank - at 31 December 2010 - from Table 3.7 (mt) | Surplus (+) or Shortfall (-) of Existing Reserves (Landbank minus Apportionment) (mt) | Minimum Allocation needed in LDP to meet the Required Provision for Land-based Sand & Gravel (mt) |
|-----------------------------|---|---|---|---|
| Wrexham | 12.76 | 15.24 | +2.48 | 0 |
| Flintshire | 4.4 | 3 | -1.4 | 1.4 |
| Denbighshire | 2.2 | 0 | -2.2 | 2.2 |
| Conwy | 0 | 0 | 0 | 0 |
| Snowdonia NPA | 0 | 0 | 0 | 0 |
| Anglesey | 0 | 0 | 0 | 0 |
| Gwynedd | 4.4 | 0.7 | -3.7 | 3.7 |
| Sub-totals, N. Wales | 23.76 | 18.94 | -4.82 | 7.3 |
| Ceredigion | 7.26 | 2.41 | -2.94 | 2.94 |
| Pembrokeshire | | 1.65 | | |
| Pembs Coast NPA* | | | | |
| Carmarthenshire | | 0.26 | | |
| Swansea | 0 | 0 | 0 | 0 |
| Neath Port Talbot | 0 | 0 | 0 | 0 |
| Powys | 0 | 0.53 | +0.53 | 0 |
| Bridgend | 0 | 0 | 0 | 0 |
| Brecon Beacons NPA | 0 | 0 | 0 | 0 |
| Merthyr Tydfil | 0 | 0 | 0 | 0 |
| Vale of Glamorgan | 0 | 0 | 0 | 0 |
| Rhondda Cynon Taf | 0 | 0 | 0 | 0 |
| Cardiff | 0 | 0 | 0 | 0 |
| Caerphilly | 0 | 0 | 0 | 0 |
| Blaenau Gwent | 0 | 0 | 0 | 0 |
| Torfaen | 0 | 0 | 0 | 0 |
| Newport | 0 | 0 | 0 | 0 |
| Monmouthshire | 0 | 0 | 0 | 0 |
| Sub-totals, S. Wales | 7.26 | 4.85 | -2.41 | 2.94 |
| TOTALS Wales | 31.02 | 23.79 | -7.23 | 10.24 |

NOTE: Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2010, or by allocations that have already been identified in LDPs.

*Although the Pembrokeshire Coast National Park makes an important contribution to the existing provision for this group of authorities, it is not expected to contribute to the suggested allocation of new reserves, unless here are no environmentally acceptable alternatives.

Table 5.3: Comparison of total apportionments for crushed rock aggregates, 2011 to 2036 with existing (December 2010) landbanks of permitted reserves

| Mineral Planning Authority | Total Apportionment (Provision) for crushed rock over 25 years - from Table 5.1 (mt) | Existing Crushed Rock Landbank - at 31 December 2010 - from Table 3.7 (mt) | Surplus (+) or Shortfall (-) of Existing Reserves (Landbank minus Apportionment) (mt) | Minimum Allocation needed in LDP to meet the Required Provision for Crushed Rock (mt) |
|-----------------------------|--|--|---|---|
| Wrexham | 78.25 | 0 | -3.84 | 3.84 |
| Flintshire | | 74.41 | | |
| Denbighshire | 22.25 | 22.07 | -0.18 | 0.18 |
| Conwy | 30.75 | 67.43 | +36.68 | 0 |
| Snowdonia NPA | | | | |
| Anglesey | 7.0 | 5.69 | -1.31 | 1.31 |
| Gwynedd | 6.75 | 8.51 | +1.76 | 0 |
| Sub-totals, N. Wales | 145.0 | 178.11 | +33.11 | 5.33 |
| Ceredigion | 5.0 | 13 | +8 | 0 |
| Pembrokeshire | 21.0 | 28 | +14 | 0 |
| Pembs Coast NPA | | 7 | | |
| Carmarthenshire | 26.75 | 47 | +20.25 | 0 |
| Swansea | 0 | 0 | 0 | 0 |
| Neath Port Talbot | 14.75 | 9 | -5.75 | 5.75* |
| Powys | 62.75 | 119 | +56.25 | 0 |
| Bridgend | 18.75 | 47 | +28.25 | 0 |
| Brecon Beacons NPA | 20.5 | 94 | +73.5 | 0 |
| Merthyr Tydfil | | | | |
| Vale of Glamorgan | 27.25 | 13.7 | -13.55 | 13.55 |
| Rhondda Cynon Taf | 17.25 | 13 | -4.25 | 4.25 |
| Cardiff | 21.5 | 41 | +19.5 | 0 |
| Caerphilly | 19 | 27.8 | +8.8 | 0 |
| Blaenau Gwent | 4.25 | 3 | -1.25 | 1.25 |
| Torfaen | 0 | 0 | 0 | 0 |
| Newport | 0 | 0 | 0 | 0 |
| Monmouthshire | 3.0 | 11 | +8 | 0 |
| Sub-totals, S. Wales | 261.75 | 473.5 | 211.75 | 24.8 |
| TOTALS Wales | 406.75 | 651.61 | +244.86 | 30.13 |

NOTE: Where allocation requirements are shown these are the minimum amounts required to meet the RTS requirements. In many cases an application for an individual new permission will exceed these amounts, in the interests of economic viability. Such applications should not be rejected purely on the grounds of exceeding the minimum requirements shown here. In some cases, the suggested allocations may already have been partially or entirely fulfilled, either by new permissions granted since 2010, or by allocations that have already been identified in LDPs.

* This requirement has already been fulfilled by a recent (2012) permission to extend Gilfach Quarry, which has provided 8.42 million tonnes of additional permitted reserves (but see para. 5.9 for further observations).

24. Based on the above figures, the Regional Technical Statement provides the following strategic guidance for Pembrokeshire (including the National Park) in Appendix B (South Wales):
25. "PEMBROKESHIRE / PEMBROKESHIRE COAST NATIONAL PARK
26. Apportionment for the future provision of land-won primary aggregates
27. The two planning authorities are already working jointly with regard to minerals planning, with a view to gradually reducing extraction within the National Park. Each authority has an adopted LDP, but they are both committed to working collaboratively with other authorities in south west Wales. In conjunction with Carmarthenshire and Ceredigion they are required to make future provision for land-won primary aggregates within their respective Development Plans on the basis of the following annualised apportionments:
- Land-won sand & gravel provision: **0.33 million tonnes per year** (jointly with Carmarthenshire and Ceredigion) until the end of the Plan period and for 7 years thereafter.
 - Crushed rock aggregates provision: **1.09 million tonnes per year** until the end of the Plan period and for 10 years thereafter.
28. These figures are based on the assumption that average annual demand for land-won primary aggregates within the area, over the period to 2036, will be comparable to the average annual sales over the baseline period used in the First Review of the RTS (i.e. 2001 to 2010).
29. They are also based on the assumption that supplies of alternative aggregates, from marine, secondary and recycled sources, will continue to be maintained in proportions comparable to those experienced during the baseline period.
30. The accuracy of these assumptions will continue to need to be monitored by the planning authority, using information from various data sources and new surveys (e.g. by NRW, WG etc.) and that data will be used to inform a revision of the apportionment requirements, if this is needed, as part of the next review of the RTS.
31. It should be emphasised that the annualised apportionments noted above are given only as a guide to the calculation of the total apportionment required over the duration of the LDP. In practice, sales will vary from year to year and there is no requirement for the authorities to maintain or limit these in line with either the annualised apportionment or the historical sales averages.

32. The need for provision to extend beyond the Plan period is based on the requirement in MTAN1 for maintaining landbanks of 7 years for sand & gravel and 10 years for crushed rock, throughout the full duration of the LDP. Subject to this requirement being met, the overall provision at any given time may comprise both landbanks of permitted reserves and allocations for future working, where these are required (see below).

Comparison with existing landbanks

33. The total apportionments for Pembrokeshire and the National Park, as calculated in Table 5.1 of the main document, over the 25-year horizon covered by the First Review of the RTS are 7.26 million tonnes for land-won sand & gravel (shared with Carmarthenshire and Ceredigion) and 21 million tonnes for crushed rock (for Pembrokeshire and the National Park only). These figures compare with existing landbanks (excluding dormant sites) of 4.32 million tonnes for sand & gravel (between the four authorities) and 35 million tonnes for crushed rock (as at 31st December 2010).

Allocations required to be identified in the Local Development Plan

34. Unless new permissions have been granted since December 2010 to address the resulting sand & gravel shortfall, new allocations totalling at least 2.94 million tonnes will need to be identified within the LDPs of one or more of the four authorities over which the apportionment is shared.
35. Paragraph 49 of MTAN 1 notes that landbanks are not required to be maintained within National Parks or Areas of Outstanding Natural Beauty. For this reason, allocations will not be required within the National Park unless no environmentally acceptable alternatives can be found within Pembrokeshire, Ceredigion or Carmarthenshire, or from the increased use of alternative aggregates, particularly from marine sources.
36. In view of the surplus of existing permitted crushed rock reserves, no further allocations for crushed rock are required to be identified within either of the two LDPs. However, consideration should be given to whether any of the factors set out in paragraph B75 above give rise to any other requirements for resource allocations.
37. As far as possible, any land-based 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 reserves, in order to reflect the uncertainties involved. As noted in the main document, it may sometimes be better (in terms of deliverability) to rely on specific sites in neighbouring authorities (additional to the MPAs' own requirements), where these have been agreed through collaborative working, in preference to relying upon highly uncertain Areas of Search.

Treatment of Dormant sites

38. A total of three dormant quarries (two in Pembrokeshire and one in the National Park) exist within this area. The planning authorities should assess the likelihood of each of these sites being worked within the Plan period, subject to the completion of an initial review of planning conditions and submission of an Environmental Impact Assessment. Where there is a likelihood of reactivation, and where the site(s) in question are considered by the authority to conform to the definition of 'Specific Sites', as set out in paragraph 14 of Minerals Planning Policy Wales, they may be offset against any requirements that may otherwise be identified for allocations for future working.

Use of alternative aggregates

39. The whole of this area lies within a 30 mile radius of Pembroke Docks, where marine aggregates are landed from dredging in the outer Bristol Channel. The northern part of the area is in closer proximity to land-based sand & gravel sites within the National Park, located to the south-west of Cardigan. The possibility might need to be considered that, as the current permitted reserves at those sites are depleted, marine aggregates may need to provide a greater contribution in future years. For the time being, however, Pembrokeshire should retain a focus on maintaining adequate supplies from terrestrial sources, and all land-based options would need to be thoroughly tested by the Local Plan process before any consideration is given to such a shift in local policy. It should also be recognised that marine sand and gravel cannot always substitute for terrestrial materials in specific end uses.
40. Slate waste is produced in very small quantities in the northern part of the National Park although the extent to which this has hitherto been utilised as aggregate is understood to be minimal, and the prospects for future utilisation would seem to be equally limited. Recycled aggregate production from construction, demolition and excavation wastes is likely to be concentrated within the various towns of southern and central Pembrokeshire, outside the National Park.
41. The residual requirements for primary land-won aggregates assume that all of these alternative materials will continue to be utilised and the authority should continue to encourage this.

Safeguarding of primary aggregate resources

42. Resources of both crushed rock aggregates and land-based sand & gravel should be safeguarded within the Local Development Plan in accordance with the British Geological Survey's safeguarding maps, or such other geological information as may be available and suitable for this purpose.

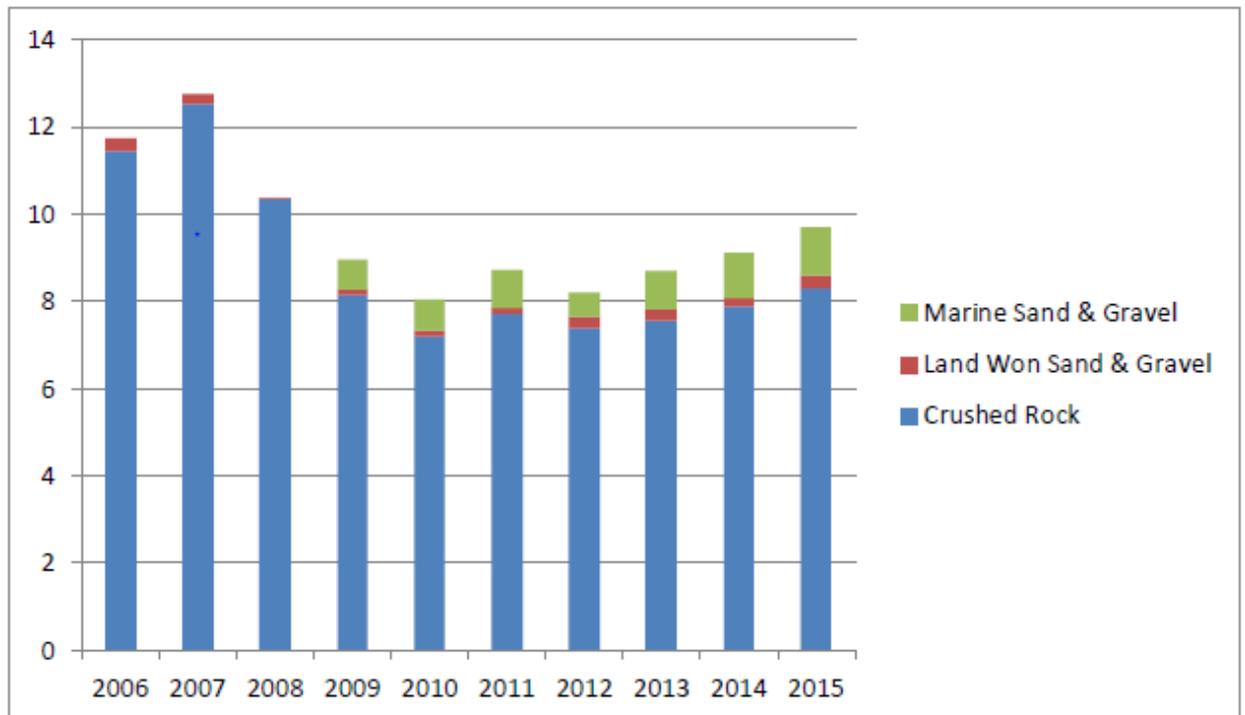
Safeguarding of wharves and railheads

43. All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, in order to provide a full range of sustainable transport options (whether or not they are currently utilised).” (Regional Technical Statement, 2014, Appendix B, p39-41)
44. Since the endorsement of the Regional Technical Statement in August 2014, Carmarthenshire County Council were able to demonstrate in their Local Development Plan Examination that the new allocation requirement of 2.94 million tonnes of sand and gravel had already been provided by new permissions, a dormant site and allocations within the Ceredigion Local Development Plan. None of the existing dormant sites identified within the Regional Technical Statement are considered likely to work again in the future.

South Wales Regional Aggregates Working Party Annual Report for 2015 (2017)

45. The report gives the results for the calendar year of 2015, published in December 2017. It collates the aggregates sales information for all mineral operators within the region.
46. “The collated information in this report makes a significant contribution to the ongoing study of supply and demand patterns, and provides a vital input into the monitoring and review of WG’s supply and demand policy for aggregates enshrined in Planning Policy Wales and amplified in Minerals Technical Advice Note 1: Aggregates (MTAN1). It also assists in the monitoring of progress towards the achievement of the recommendations set out in the *Regional Technical Statement – First Review (RTS) – August 2014*. This information is also useful to Mineral Planning Authorities in carrying out their statutory functions in respect of the preparation of local development plans and the determination of planning applications.” (South Wales Regional Aggregate Working Party Annual Report for 2015, (2017), para 1.2)

Primary Aggregate Sales 2006-2015 (million tonnes)



(SWRAWP Annual Report for 2013 – Figure 1, p10)

47. “The sales of primary aggregate rose in 2015 to 9.71 million tonnes compared to 9.12 million tonnes in 2014. Crushed rock sales rose to 8.31 million tonnes in 2015 compared to 7.87 million tonnes in 2014, with a significant increase in sales in South East Wales. Sales of crushed rock in South West Wales were slightly down on 2014 and sales in Powys were slightly up on 2014.” (South Wales Regional Aggregate Working Party Annual Report for 2015, para 3.4)
48. “Marine sand and gravel sales rose to 1.13 million tonnes in 2015 compared to 1.05 million tonnes in 2014 and 865,000 tonnes in 2013. The increase was accounted for in South East Wales in the main where there was a 30% rise in sales from 800,000 tonnes to 870,000 tonnes. There was a slight increase in marine sand sales in South West Wales but marine sales in this region have been very stable over the last three years.” (South Wales Regional Aggregate Working Party Annual Report for 2015, para 3.5)
49. “Land-won sand and gravel sales in 2014 showed a reduction to 200,000 tonnes from 280,000 tonnes in 2013. This reduction has been reversed during 2015 where sales have rebounded to 270,000 tonnes. Land won sand and gravel sales come exclusively from sites in South West Wales. The difference appears to be a change at one site where a significant proportion of its output was used for Non Aggregate uses in 2014 but this Non-Aggregate use was not seen in 2015.” (South Wales Regional Aggregate Working Party Annual Report for 2015, para 3.6)

50. “Figure 1 shows that the steep decline in aggregate sales during the economic recession from 2008 onwards has certainly stabilised. There is a clear upward trend in total aggregate sales since 2012. However, sales of crushed rock aggregate continue to be approximately 34% lower than they were in 2007.” (South Wales Regional Aggregate Working Party Annual Report for 2015, para 3.7)
51. “Crushed rock continues to account for 85.58% of primary aggregate sales with marine landings contributing 11.64% and land won sand and gravel approximately 2.78%. Powys (including Brecon Beacons) has the highest crushed rock sales at 3.28 million tonnes (40%), with South East Wales at 3.22 million tonnes (39%) and South West Wales 1.81 million tonnes (21%). Marine sand and gravel sales are highest in South East Wales at 870,000 tonnes (77%) with South West Wales accounting for 260,000 tonnes (23%).” (South Wales Regional Aggregate Working Party Annual Report for 2015, para 3.8)
52. The South West Wales region is made up of the following Mineral Planning Authorities – Carmarthenshire, Ceredigion, Pembrokeshire, Pembrokeshire Coast National Park, Neath Port Talbot and Swansea.
53. Sites Included in 2015 Aggregates Minerals Surveys relating to the area of Pembrokeshire Coast National Park are:

| Mineral Planning Authority | Site Name | Mineral Type | Site Owner or Operator | Designation |
|-----------------------------------|------------------|---------------------|-------------------------------|--------------------|
| Pembrokeshire Coast National Park | Carew | Limestone | T Scourfield & Sons | Active |
| | Penberry | Igneous | Mr Jamieson | Dormant |
| | Rhyndaston | Igneous | Mason Bros | Active |
| | Syke | Igneous/Sandstone | GD Harries | Inactive |
| | Pantgwyn | Sand & Gravel | L Rees | Active |
| | Trefigin | Sand & Gravel | Trefigin Quarries Ltd | Active |

(South Wales Regional Aggregate Working Party Annual Report, 2015, Appendix B)

Crushed Rock

| Table 4 Crushed Rock Reserves and Landbanks on 31.12.2015 by Mineral Planning Authority (million tonnes) based on 3 year average sales 2013-2015 | | | | |
|---|----------------------------|------------------------------------|-----------------------------------|---|
| Region | Mineral Planning Authority | Crushed Rock Reserve 31.12.2015 | Average Annual Sales 2013-2015 | Landbank (years) based on 3 year sales average |
| Powys (inc Brecon Beacons) | Powys | 206.44 | 3.12 | >50 |
| | Brecon Beacons NP | | | N/A |
| South West Wales | Carmarthenshire | 59.96 | 0.82 | >50 |
| | Neath Port Talbot | 16.76 | 0.34 | 49 |
| | Pembrokeshire | 27.49 | 0.51 | 49 |
| | Pembrokeshire Coast NP | | | N/A |
| | Ceredigion | 5.54 | 0.16 | 35 |
| | Swansea | 0 | 0 | 0 |
| South East Wales | Blaenau Gwent | 33.10 | 0.30 | 9 |
| | Caerphilly | | | >50 |
| | Torfaen | 0 | 0 | 0 |
| | Newport | 0 | 0 | 0 |
| | Monmouthshire | * | * | >50 |
| | Rhondda Cynon Taf | 66.60 | 0.68 | 16 |
| | Merthyr Tydfil | | | >50 |
| | Bridgend | 78.05 | 1.96 | >50 |
| | Cardiff | | | 29 |
| | Vale of Glamorgan | | | 47 |
| | | | | |
| SOUTH WALES TOTAL | | * | * | |

(South Wales Regional Aggregate Working Party Annual Report for 2015, Table 5)

| Table 5 Crushed Rock Reserves and Landbanks at 31.12.2015 by Mineral Planning Authority (million tonnes) based on 10 year average sales 2006-2015 | | | | |
|--|----------------------------|------------------------------------|-----------------------------------|--|
| Region | Mineral Planning Authority | Crushed Rock Reserve 31.12.2015 | Average Annual Sales 2006-2015 | Landbank (years) based on 10 year sales average |
| Powys (inc Brecon Beacons) | Powys | 206.44 | 2.98 | >50 |
| | Brecon Beacons NP | | | N/A |
| South West Wales | Carmarthenshire | 59.96 | 0.88 | >50 |
| | Neath Port Talbot | 16.76 | 0.49 | 34 |
| | Pembrokeshire | 27.49 | 0.74 | 33 |
| | Pembrokeshire Coast NP | | | N/A |
| | Ceredigion | 5.54 | 0.19 | 29 |
| | Swansea | 0 | 0 | 0 |
| South East Wales | Blaenau Gwent | 33.10 | 0.65 | 10 |
| | Caerphilly | | | >50 |
| | Torfaen | 0 | 0 | 0 |
| | Newport | 0 | 0 | 0 |
| | Monmouthshire | * | * | >50 |
| | Rhondda Cynon Taf | 66.60 | 0.81 | 17 |
| | Merthyr Tydfil | | | >50 |
| | Bridgend | 78.05 | 2.16 | 49 |
| | Cardiff | | | 33 |
| | Vale of Glamorgan | | | 26 |
| | | | | |
| SOUTH WALES TOTAL | | * | * | |

(South Wales Regional Aggregate Working Party Annual Report for 2015, Table 5)

54. "The 10 year average sales figures have generally been higher across the board than the 3 year average sales figures since the economic recession in 2008. However, there are now signs that the three year average production figures are starting to exceed the ten year production average figures in a number of Local Planning Authority areas. Powys, Brecon Beacons National Park, Blaenau Gwent, Cardiff and RCT have sales over the last three years which are higher than the 10 year average. This trend indicates that planning purely on the basis of the ten year average production figure could lead to under-provision in those areas." (South Wales Regional Aggregate Working Party Annual Report for 2015, para 4.19).
55. "Using the 10 year sales average, landbanks across the SWRAWP region are still relatively healthy, with only Blaenau Gwent and RCT having a landbank of 25 years or less." (South Wales Regional Aggregate Working Party Annual Report for 2015, para 4.21).

Sand and Gravel

| Table 9 Land Won Sand & Gravel Reserves and Landbanks by Mineral Planning Authority (million tonnes) based on 3 year average sales 2013-2015 | | | | |
|---|----------------------------|----------------------------|-------------------------------------|--|
| Region | Mineral Planning Authority | Sand & Gravel Reserve 2015 | Average Annual Production 2013-2015 | Landbank (years) based on 3 year sales average |
| Powys (inc Brecon Beacons) | Powys | 4.27 | 0.25 | >50 |
| South West Wales | Carmarthenshire | | | >50 |
| | Ceredigion | | | 12 |
| | Pembrokeshire Coast NP | | | N/A |

| Table 10 Land Won Sand & Gravel Reserves and Landbanks by Mineral Planning Authority (million tonnes) based on 10 year average sales 2006-2015 | | | | |
|---|----------------------------|----------------------------|--------------------------------|---|
| Region | Mineral Planning Authority | Sand & Gravel Reserve 2015 | Average Annual Sales 2006-2015 | Landbank (years) based on 10 year sales average |
| Powys (inc Brecon Beacons) | Powys | 4.27 | 0.24 | >50 |
| South West Wales | Carmarthenshire | | | 48 |
| | Ceredigion | | | 13 |
| | Pembrokeshire Coast NP | | | N/A |

(South Wales Regional Aggregate Working Party Annual Report for 2015)

56. "On the basis of either the 3-year or 10-year landbank calculations only Ceredigion has a landbank of less than 22 years. It is also worth noting that the sales based on a 3 year average production are now greater than the sales based on a 10 year average production... Care must be exercised in relying on the landbank figures for Powys and Carmarthenshire as these are based on very small annual sales from relatively small sites. The RTS 1st Review suggests that the four Mineral Planning Authorities in South West Wales work collaboratively to plan strategically for adequate reserves of land won sand and gravel in the period up until 2033. Meetings between the four Authorities have taken place during 2015 and will continue." (South Wales Regional Aggregate Working Party Annual Report for 2015, paras 5.4-5.5)
57. Within Carmarthenshire County Council's Minerals Topic Paper, the following is stated:
- "The figure for Carmarthenshire is not reliable enough to meet the sand and gravel requirements of Carmarthenshire over the period of the LDP. In reality, a large proportion of the sand currently used in Carmarthenshire is marine dredged sand. This is typical of South Wales as a whole, where in 2005, marine sources for sand represented over 78% of the regional consumption. Further sand resource may be reaching the County from sites in neighbouring authorities. Reliance on marine dredged sources and land won sources from outside Carmarthenshire is not a position that is sustainable. Sand and Gravel allocations might be a possibility in the future. However at the present time, the LDP Proposals Map highlights potential sand and gravel resources within the County (based on the BGS Aggregate Safeguarding Map of Wales). In respect of any interest from the minerals industry, the Proposals Map should be the first point of reference." (Carmarthenshire County Council Local Development Plan Minerals Topic Paper 7, paras 6.4. 7. June 2013)
58. Whilst the Pembrokeshire County Council landbank for sand and gravel is NIL, an in principle agreement was reached between Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority which allowed the County to take account of permitted reserves within the National Park so that a Pembrokeshire wide landbank calculation can be used for the Pembrokeshire County Council Local Development Plan. This being the case no sand and gravel allocations are provided within the Local Development Plan.

59. "Addressing the need to move production of minerals out of the National Park in the medium to long term is an issue for the wider region. The most pressing issue in this respect concerns sand and gravel production, although hard rock production will also need to be considered. New sand and gravel quarry sites in PCC's planning area might well be a part of the solution to the issue, but there are broader issues around reducing demand for primary won aggregates, for instance through use of secondary / recycled aggregates. However, other authorities might also contribute and there are broader issues around sand and gravel production relating to marine-won aggregates. It may be that proposals coming forward under PCC LDP policy GN.24 will address this issue." (Taken from Pembrokeshire County Council Local Development Plan Mineral Landbank Summary Statement, July 2012, para 6).
60. Within the adopted Local Development Plan for Ceredigion (April, 2013), two allocations are provided for sand and gravel extraction, in order to provide the extended landbank necessary, in accordance with the apportionment set within the original Regional Technical Statement (2008). The allocations are confined to extensions to two existing sand and gravel quarries, Cardigan Sand and Gravel, Penyparc and Pant near Llandewi Brefi (Ceredigion County Council Local Development Plan 2013, Appendix 6 para 12.31).
61. The Regional Technical Statement 1st Review suggests that the four Mineral Planning Authorities in South West Wales work collaboratively to plan strategically for adequate reserves of land won sand and gravel in the period up until 2033.
62. Carmarthenshire County Council provided an update on progress made towards addressing this shortfall during the Examination of the Carmarthenshire County Council Local Development Plan. The Council identified that additional provision via the inclusion of subsequent planning permissions, two allocations within Ceredigion County Council's Local Development Plan and a dormant site within the region amounted to an additional 3.253 million tonnes being made available. It was resolved that the shortfall had therefore been addressed and no further allocations were required (Carmarthenshire Local Development Plan 2006-2021: Inspector's Report, October 2014, paragraph 15.4).

Marine Dredged Aggregate

| Table 11 Port Statistics for Marine Dredged Aggregate Landings 2015 | | | | |
|--|--------------------------|----------------------|----------------------|----------------------|
| Mineral Planning Authority | Landing Port | 2013 Tonnages | 2014 Tonnages | 2015 Tonnages |
| Neath Port Talbot | Briton Ferry/Port Talbot | 5,700 | 7,085 | 4,789 |
| Carmarthenshire | Burry Port | 102,029 | 73,347 | 110,112 |
| Cardiff | Cardiff Docks | 172,055 | 185,924 | 169,067 |
| Pembrokeshire | Port of Pembroke | 13,300 | 14,462 | 24,531 |
| Newport | Newport Docks | 201,739 | 215,754 | 241,776 |
| Monmouthshire (Bedwyn Sands) | Newport/Chepstow | * | * | * |
| Swansea | Swansea Docks | 129,515 | 136,271 | 103,481 |
| Total | | 624,338 | 632,843 | 653,756 |

Source: The Crown Estate Summary of Statistics 2013, 2014 and 2015

(South Wales Regional Aggregate Working Party Annual Report for 2015)

63. "Marine Dredged Sand and Gravel is landed in the Region by Cemex UK Marine Ltd, Hanson Aggregates Marine Ltd, Tarmac Marine Ltd, Severn Sands Ltd and Llanelli Sand Dredging Ltd. Dredging Licences (as at December 2013) exist for North Middle Ground, West Middle Ground, North Bristol Deep, Holm Sands and Nobel Bank. A site with planning permission at Bedwyn Sands, Monmouthshire also contributes towards sales data. Landings of marine sand and gravel have increased by approximately 21,000 tonnes between 2014 and 2015. Significantly increased landings have occurred in Newport, Pembroke and Carmarthenshire but these have been partly offset by reductions in Cardiff and Swansea." (South Wales Regional Aggregate Working Party Annual Report for 2015, paras 6.1-6.3)

Sub Regional Minerals Working Group

64. A sub regional group to consider Minerals and Waste issues has been established between this Authority, Pembrokeshire County Council, Ceredigion County Council and Carmarthenshire County Council. The group has discussed safeguarding, landbanks and mineral reserves and will seek to address the requirements of the revised Regional Technical Statement for the region, including the overall strategy to locate future mineral extraction sites outside of the National Park.
65. The National Park is not required to maintain a landbank for hard rock or sand and gravel and is only expected to contribute to supply in exceptional circumstances. As such it is not considered appropriate to allocate sites for mineral extraction as part of the Local Development Plan Review as other potential sites outside of the National Park have yet to be fully considered.

Local

National Park Management Plan (2015-2019)

66. Presumes against new mineral workings and extensions unless exceptional circumstances are demonstrated and promotes the recycling of aggregate materials, minerals efficiency and use of alternatives (in accordance with existing national and local planning policy).

Minerals Planning Applications

67. The following mineral planning applications have been considered by the National Park Authority:

Trefigin sand and gravel

68. The National Park Authority was minded to grant planning permission (application 06/159) for 'Extension of quarry operations & modification of previously approved restoration scheme for existing quarry site'. The extension for 1.25mt to the south of Trefigin sand and gravel, and subject to the revocation of an existing permission for 0.5mt (within the planning jurisdiction of Pembrokeshire County Council). The Authority considered that the National Park test of exceptional circumstances has been met.
69. The application was however referred to the Welsh Assembly Government under the guidance of Minerals Technical Advice Note 1 (paragraph 52). Subsequently, by letter of the 22nd September 2009, the Welsh Assembly Government called in the application. An inquiry was held and the application was subsequently granted planning permission by the then Welsh Assembly Government in October 2011. As such, the extension has not been included in the Regional Technical Statement First Review calculations and can therefore be taken to address some of the apportionment deficit.

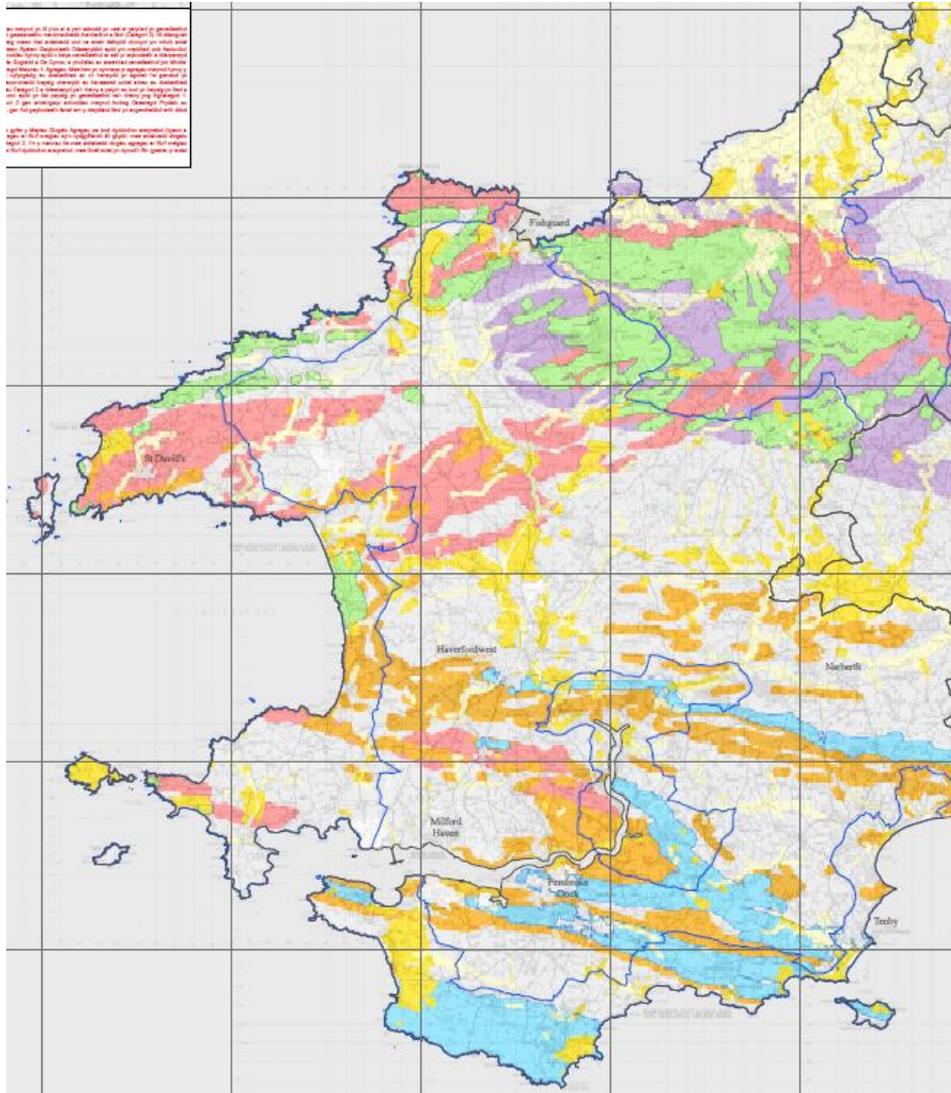
Pantgwyn sand and gravel

70. The National Park Authority was minded to grant planning permission (application 08/418) for 'Extension of minerals extraction area' to the south and east of the existing sand and gravel operations. The extension areas comprise 8.33 hectares. The proposed extension areas contain a net saleable reserve of approximately 1.1Mt. The remaining reserve within the current operational area is all but worked out. The Authority considered that the National Park test of exceptional circumstances has been met. The application was however referred to the Welsh Assembly Government under the guidance of Minerals Technical Advice Note 1 (paragraph 52). Subsequently, by letter of the 22nd September 2009, the Welsh Assembly Government called in the application.
71. An inquiry was held and the application was subsequently granted planning permission by the then Welsh Assembly Government in August 2010. The buffer zones around Trefigin and Pantgwyn quarries have been updated on the Development Management GIS constraints layer as a result of the above approvals. The Local Development Plan Proposals Maps will also need to be amended accordingly at Local Development Plan Review.
72. The following have also been considered by the Authority:
- NP/10/482 – Carew Quarry, Carew Newton. Approved in March 2011. A variation of condition to allow the processing of up to 10,000 tonnes of imported construction and demolition waste per annum which will be crushed and screened for use as secondary aggregate, assisting in minimising the use of primary mineral resources.
 - Penberry Quarry, St Davids (Dormant) Prohibition Order - The making of a Prohibition Order to prevent the resumption of mineral working at Penberry Quarry be approved and that the Order be publicised and submitted to the Welsh Government for confirmation. This included the inclusion of a restoration condition in the Prohibition Order requiring the derelict buildings on the site to be demolished in the interests of landscape and visual amenity. This was approved by the Authority in January 2014.
 - NP/14/0450 - Review of Mineral Planning Conditions at Syke Quarry, Walwyns Castle, received August 2014. Approved in June 2015.
73. The following mineral planning applications are currently being considered by the Authority:
- NP/12/0601 – Review of Mineral Planning Conditions at Carew Quarry, Carew Newton, received December 2012. The Authority is undertaking a Habitats Regulations Assessment due to the hydrogeological interrelationship between the site and Carew Mill Pond.

Safeguarding Mineral Deposits within the Pembrokeshire Coast National Park

74. This section is intended to set out both an approach to safeguarding minerals within the National Park, information sources, areas to be safeguarded and proposed way forward.
75. The Welsh Government published the Mineral Resource Map of Wales in 2010. Guidance and maps for planning authorities in relation to safeguarding the minerals resources of Wales has been produced by the British Geological Survey, in partnership with Welsh Government. This was published in October 2012 and is entitled 'Aggregates Safeguarding Maps of Wales'. It includes a map for South West Wales, which details the location and extent of mineral resources for the whole region that should be safeguarded; it includes the recommended separation distances advised within Minerals Technical Advice Note 1 Aggregates (see page 5 of this paper).
76. In terms of its implications, the Authority's minerals safeguarding zones have been updated accordingly on the planning application constraints layer. The area of safeguarded resources has increased significantly since adoption of the Local Development Plan, particularly across the Preseli region, where data was previously unavailable. The inclusion of the recommended separation distances has also caused significant increases in safeguarded land across the National Park. This will need to be reflected in the replacement Local Development Plan with updates to the Local Development Plan Proposals Maps, including all Inset Maps.
77. As mentioned above, the Authority has updated its 'Safeguarding Minerals Zones' Supplementary Planning Guidance in response to the changes.

British Geological Survey and Welsh Government: South West Wales Aggregate Safeguarding Map (2012)



Category 1 Aggregates Safeguarding Areas
Ardaloedd Diogelu Agregau Categori 1

- Sand and Gravel
Tywod a Graean
- High Specification Aggregate - Sandstone and Igneous Rocks
Agreg Marnyleb Uchel - Tywodfaen a Creigiau Igneidd
- High Specification Aggregate - Carboniferous Limestone (stipple denotes high purity >97% CaCO₃)
Agreg Marnyleb Uchel - Calchfean Carboniferaidd (y dotwaith yn dynodi purdeb uchel >97% CaCO₃)

Category 2 Aggregates Safeguarding Areas
Ardaloedd Diogelu Agregau Categori 2

- Sand and Gravel
Tywod a Graean
- Sandstone (stipple denotes quartzitic sandstone with potential for silica sand and silica rock)
Tywodfaen (y dotwaith yn tywodfaen cwarstilg â photensial am dywod silica a chraig silica)
- Igneous Rocks
Creigiau Igneidd
- Slate
Llechfaen

Administrative Areas
Ardaloedd Gweinyddol

- Mineral Planning Authority: Unitary Authority
Awdurdod Cynllunio Mwynol: Awdurdod Unedol
- Mineral Planning Authority: National Park Authority
Awdurdod Cynllunio Mwynol: Parc Cenedlaethol

WARNING: Please be aware that the printed colours may differ due to the settings of the plotter used.
 DAUER DYLLW: Gall y lliwau printiedig fod yn wahanol o gynnwys i osodiadau'r plotydd.

78. There are currently three categories of safeguarded minerals that are shown on the adopted LDP Proposals Maps, these are Sandstone, Limestone and Sand and Gravel. However the above map also identifies safeguarding areas for igneous rock and slate, which will therefore also need to be displayed in the updated Proposals Maps. In order to minimise the number of categories shown on the Proposals Maps, it is proposed to display the new mineral safeguarding zones as two categories. These would comprise a 'Sand and Gravel' category and a 'Hard Rock' category (merging all Limestone, Sandstone, Igneous Rock and Slate safeguarding zones together). The reasons for this distinction in categories are as follows:
79. The Regional Technical Statement identifies a shortfall in land based sand and gravel provision (see Table 5.2 within the Regional Technical Statement section of this paper, page 9). The long-term intention is to take minerals production out of the National Park and no allocations are considered appropriate as part of this review, minerals development should not take place in National Parks save in exceptional circumstances, in accordance with national planning policy. However, the importance of safeguarding, should exceptional circumstances arise, is recognised and in light of the identified short fall in sand and gravel, it is considered appropriate to provide a category distinction in this regard. This would not necessarily indicate an acceptance of working, but would indicate the location of resources within the National Park.
80. Categorisation in this way would remain consistent with the Pembrokeshire County Council Local Development Plan Proposals Maps, for which the Inspector required separation of Sand and Gravel as an 'Area of Search' for identifying potential sites for future extraction. The National Park shares the vast majority of it's boundary with Pembrokeshire County Council and as this is a cross boundary issue, consistency in this regard would be beneficial.

Principles of Safeguarding

81. The safeguarding areas do not indicate areas which can be worked. They are identified in order to ensure that areas of resource are not unnecessarily sterilised by permanent development. Any proposals for working within the lifetime of the Local Development Plan will be considered within the context of the preferred strategy for minerals and planning policy.
82. This has been framed by national and regional policy which advises that minerals within National Parks will only be worked in exceptional circumstances.
83. Areas where there is permanent existing development on top of the resources will be excluded from the safeguarding areas. Whilst environmental and landscape impact considerations have not been considered as part of this process, they will inevitably be a consideration in any future working, should individual proposals for local working come forward.

Unconventional Gas Exploration

What is the Welsh Government's Position?

84. A report of Shale Gas Policy was presented to the Assembly Cabinet in November 2013; it highlights the type of shale gas identified in Wales, the issues involved with its extraction, the current policy position and current actions. The following recommendations of the report were agreed.

85. Consider the following energy policy position on unconventional gas:

- Energy Wales sets out our ambition to create a low carbon economy that delivers jobs long term wealth and benefits to the people of Wales. We are committed to a transition to a low carbon economy but recognise the major challenges of energy security and climate change.
- We recognise the key role of gas in that transition - whether indigenous gas from unconventional sources can sustainably contribute to energy security and benefit the people of Wales requires more research.
- We recognise the concerns about the methods by which unconventional gas is extracted and a high priority will be to ensure the safeguards in place, through existing regulation, and our precautionary planning approach to minerals development in Wales are robustly applied.
- We note the scientific evidence that the risks associated with shale gas development can be effectively managed, provided operational best practices are implemented and enforced through regulation.
- We continue to consider all the available evidence, including further research into the potential benefits and disbenefits of unconventional gas development in Wales.
- Agree that more research is required to understand the unconventional gas resource in Wales and the impacts associated with its exploration and potential development.

(Welsh Assembly Government Cabinet Report: Shale Gas Policy, 2013)

86. A policy clarification letter dated 8th July 2014 from the Minister for Housing and Regeneration confirmed Minerals Planning Policy Wales (Now merged into Planning Policy Wales, Edition 9, 2016) as the valid policy, along with Local Development Plans, for assessing planning applications for unconventional gas exploration/extraction. Planning Policy Wales (Edition 9, 2016) also states that mineral extraction should not take place in National Parks, save in the exceptional circumstances (Welsh Government Policy Clarification Letter CL-04-14, 2014).

87. A new Direction has been issued by Welsh Government to require that any planning application for onshore gas or oil development which proposes to use unconventional methods (including hydraulic fracturing) to stimulate extraction for any stage of development (exploration, appraisal, or commercial extraction) be referred where local planning authorities are minded to approve them. This new direction will apply to any application for planning permission registered as valid on or after 16th February 2015. A letter dated 14th August from the Minister re-affirms a precautionary policy approach to hydraulic fracturing and that the Welsh Government's vision for energy in Wales is based on renewable energy. This followed from recent UK Government announcements on changes in the planning system to expedite shale gas exploration, which applies to England only (Welsh Government Minister for Natural Resources Letter, August 2015).

What potential exists within the PCNP?

88. A study was prepared by the British Geological Survey, commissioned by Welsh Government (see current actions in above Cabinet report). Entitled 'A Study of Potential Unconventional Gas Resource in Wales', it explored the potential of Wales' different types of gas (Methane) for extraction. Areas identified follow the Welsh coalfields. Whilst Pembrokeshire has a coalfield that runs continuously from Saundersfoot through the Daugleddau area to Broad Haven and Newgale, no areas of potential are identified at present in Pembrokeshire. Further research is required across Wales to explore the viability of extraction, which at present is concentrated around the Swansea and Valleys area in South Wales, hence their inclusion in the current round for license applications.

Implications for the Authority

89. The evidence suggests that the exploration and extraction of shale gas or oil should not impact Pembrokeshire in the near future. However, further research and technological advances **may** open up the Pembrokeshire reserves as a viable option in the long term. Should this occur and the Authority receives planning applications for exploration/extraction of shale gas or oil, the existing Planning Policy Wales policy context (specifically paragraph 14.3.2 relating to the major development tests), along with the relevant Local Development Plan policies will be used to determine them, as would be the case for any application for mineral extraction in the National Park. The Local Development Plan reasoned justification in paragraph 4.105 can be updated to refer to the national policy context, to include reference to unconventional gas and oil extraction to remove doubt.

Major Developments

90. Major development projects will have a significant impact on minerals land-banks, if they go ahead. This may affect house-builders, in particular smaller scale builders who may not be able to compete for resources. As such there may be a need for an early review of the Regional Technical Statement for Aggregates to address these issues. Planning applications for borrow pits might be expected and shall be considered under the existing policy context. Examples of major developments in the pipeline comprise:

- Swansea Tidal Lagoon;
- Other tidal lagoons proposals for the Bristol Channel;
- The 'Circuit of Wales';
- The M4 Newport relief road.

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