Monmouthshire Replacement Local Development Plan

2018-2033

Minerals Background Paper

October 2024

monmouthshire
sir fynwy

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Minerals

1. Introduction

1.1. This paper is one of a series produced by Monmouthshire County Council (MCC) as part of the evidence base for the Replacement Local Development Plan (RLDP) which covers the period 2018-2033. The purpose of the paper is to provide further information on the policies relating to minerals contained within the RLDP. It reflects the position at the date of publication and may be subject to update and revision as the RLDP progresses through the plan preparation process.

2. Planning Policy Context

Future Wales: The National Plan 2040

2.1. Future Wales was published in February 2021 and is the National Development Framework for Wales. It recognises that aggregates underpin economic growth, providing construction related products essential for the delivery of placemaking, housing and infrastructure. Effective planning ensures that a reliable supply of minerals, which is capable of simultaneously meeting demand in all regions of Wales, is always available.

2.2. Future Wales also introduces the tier of Strategic Development Plans (SDP) to guide planning matters at the regional scale. Mineral resource planning is identified at this regional scale and is anticipated to be incorporated into SDPs once prepared. Progress on an SDP for the South East Wales region will be monitored as the RLDP preparation continues.

Planning Policy Wales 12 (PPW12) February 2024

2.3. Minerals policy guidance is set out in Planning Policy Wales: Edition 12 (February 2024). It states that the role of the planning authority in relation to mineral extraction is to balance the fundamental requirement to ensure the adequate supply of minerals with the protection of amenity and the environment. The key principles are to:

- provide positively for the safeguarding and working of mineral resources to meet society's needs now and in the future, encouraging the efficient and appropriate use of high quality materials;
- protect environmental and cultural characteristics of places, including those highly cherished for their intrinsic qualities, such as wildlife, landscapes, ancient woodlands and historic features, and to protect human health and safety and general well-being;
- reduce the impact of mineral extraction and related operations during the period of working by ensuring that impacts on relevant environmental qualities caused by mineral extraction and transportation, for example air quality and soundscape, are within acceptable limits; and
- achieving, without compromise, a high standard of restoration and aftercare so as to avoid dereliction and to bring discernible benefits to communities, heritage and/or wildlife, including beneficial after uses or opportunities for enhancement of biodiversity and the historic environment.

2.4. It recognises at paragraph 5.14.4 that mineral working is different from other forms of development in that:

- extraction can only take place where the mineral is found to occur;
- it is transitional and cannot be regarded as a permanent land use even though operations may occur over a long period of time; and
- when operations cease land needs to be reclaimed to a high standard and to a beneficial and sustainable after-use so as to avoid dereliction and to bring discernible benefits to communities and/or wildlife.

2.5. It notes at paragraph 5.14.10 that each mineral planning authority should ensure that it makes an appropriate contribution to meeting local, regional and UK needs for primary minerals which reflects the nature and extent of resources in the area and their best and most appropriate use, subject to relevant environmental and other planning considerations. For aggregates this should be done under the aegis of the North and South Wales Regional Aggregates Working Parties, whose role is to provide a regional overview of supply and demand and through the framework provided by the Regional Technical Statements for Aggregates (paragraph 5.14.10).

2.6. A minimum ten-year landbank of crushed rock and minimum seven-year landbank for sand and gravel should be maintained during the entire plan period, unless agreement is reached for other authorities to make a compensating increase in their provision.

2.7. The above extracts relate specifically to minerals, however, PPW covers a broad range of policy areas that need to be balanced against the overarching mineral objectives. PPW sets out a series of protected designations including SSSIs, SACs, SPAs, national parks, AONBs and ancient woodland, where mineral workings would only be considered in exceptional circumstances. Additionally, Chapter 6 of PPW12 sets out the step-wise approach that planning authorities must follow to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated.

2.8. In addition, PPW12 notes that agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification (ALC) system is the best and most versatile and should be conserved as a finite resource for the future. It goes on to note in paragraph 5.14.41 that as well as the ALC grade, the objective should be, where possible, to minimise any adverse effects on agriculture occurring as a result of mineral development.

Minerals Technical Advice Note (Wales) 1: Aggregates (MTAN1) (March 2004)

2.9. The Minerals Technical Advice Note (Wales) sets out detailed advice on the mechanisms for delivering the policy for aggregates extraction by mineral planning authorities and the aggregates industry.

2.10. Describing the need for landbanks to meet demand, paragraph 45 notes a landbank is a stock of planning permissions for the winning and working of minerals. It is composed of the sum of all permitted reserves at active and inactive sites at any given point in time and for a given area. Development plans should include an assessment of:

- The current landbank and state how many years of mineral extraction the landbank will provide, based on the latest 3-year production figures;

- The future landbank – to include land specifically allocated for working of aggregates, as an "extended landbank".

2.11. It recognises that in some mineral planning authorities it may not be possible or acceptable to provide an adequate current or extended landbank and goes on to state that in some areas, suitable resources are not available geologically or are not appropriate for extraction because of environmental designations or the need for protection of existing and future amenity (paragraph 46).

2.12. It requires the preparation of Regional Technical Statements (RTS) for the areas covered by both the South Wales and North Wales Regional Aggregates Working Parties (RAWPs), to ensure that an adequate supply of primary aggregates can be maintained taking into account sustainability objectives. RTSs should be reviewed every 5 years.

3. South-East Wales Regional Technical Statement 2nd Revision (October 2020)

3.1. As noted above, MTAN1 requires the preparation of a Regional Technical Statement (RTS) for the area covered by the South Wales Regional Aggregates Work Party (SWRAWP), which should be reviewed every 5 years. The first RTS was completed in 2008, the first review was undertaken in 2013/2014 and the second review commenced in 2018 and was published in 2020 and is more commonly referred to as RTS2. A clarification letter was published in November 2021 to correct an error in the calculations in the RTS2.

3.2. MTAN1 requires a minimum landbank of 10 years for crushed rock and 7 years for land-based sand and gravel throughout the full 15-year plan period. This results in a requirement of 25 years for crushed rock (15-year plan period + 10 years MTAN1 crushed rock requirement) and 22 years for sand and gravel (15-year plan period + 7 years MTAN1 sand & gravel requirement). Apportionment figures are also identified for sub-regional groupings of Local Planning Authorities (LPAs). Monmouthshire is part of the 'Former Gwent' sub-region along with Newport, Torfaen and Blaenau Gwent. MTAN1 requires the apportionment and allocation requirements of the RTS2 to be incorporated within the RLDP.

3.3. It is for the individual LPAs to determine how the strategic requirements identified in the RTS2 should be met within their areas. This includes identifying allocations, where these are required by the RTS2 and setting out policies within the RLDP to guide the development process for future mineral extraction.

3.4. Where it is justified by new evidence, it is open for individual LPAs to depart from the apportionment and allocation figures recommended by the RTS2 when preparing their RLDP policies. In doing so, however, an LPA would need to demonstrate that their intended departure would not undermine the overall RTS2 strategy. To reinforce this concept, the RTS2 introduces a new requirement for all LPAs within each sub-region to agree a Statement of Sub-Regional Collaboration (SSRC), and for this to be approved by the RAWP, prior to the Examination of any individual LDP within that area.

3.5. Each member Local Planning Authority is asked to formally endorse the final version. Monmouthshire County Council partially endorsed[1] the RTS2 in relation to the individual apportionment for aggregates for the Monmouthshire area only and did not agree to the principle of meeting the wider sub-regional apportionment requirement due to the lack of information regarding the implications for the RLDP available at that time. It was also agreed, however, to progress with the preparation of a Statement of Sub-Regional Collaboration to explore options of how the sub-regional apportionment could be met.

Monmouthshire Apportionment

3.6. The RTS2 (updated in the Nov 2021 clarification letter) sets out the following apportionment for Monmouthshire.

Table 1: Monmouthshire RTS2 Apportionment

Resource	Annualised Apportionment for crushed rock	Total Apportionment required over 25 years	Existing permitted reserves at end of 2016 in mt	Existing Landbank (years)	Surplus or Shortfall (-) of Existing Permitted Reserves (mt)	Minimum Allocation needed to meet required provision (mt)	Additional reserves at Dormant site in 2016 (mt)
Crushed Rock	0.242	6.05	11.25	47.9	5.2	0	0
Sand and Gravel	0	0	0	N/A	0	0	0

3.7. Appendix B of the RTS2 sets out the apportionment for each LPA in the South Wales area. As Table 1 above sets out, the total apportionment for Monmouthshire is 6.05 million tonnes for crushed rock over 25 years. There are11.25 million tonnes of reserves identified at Ifton Quarry giving Monmouthshire a surplus of 5.2 million tonnes. In relation to sand and gravel, the RTS2 notes that in the south-east Wales region (Cardiff and Former Sub-Gwent sub regions) marine dredged material comes from the Severn Estuary and Bedwin Sands. It notes that similar levels of production are likely to continue in future years.

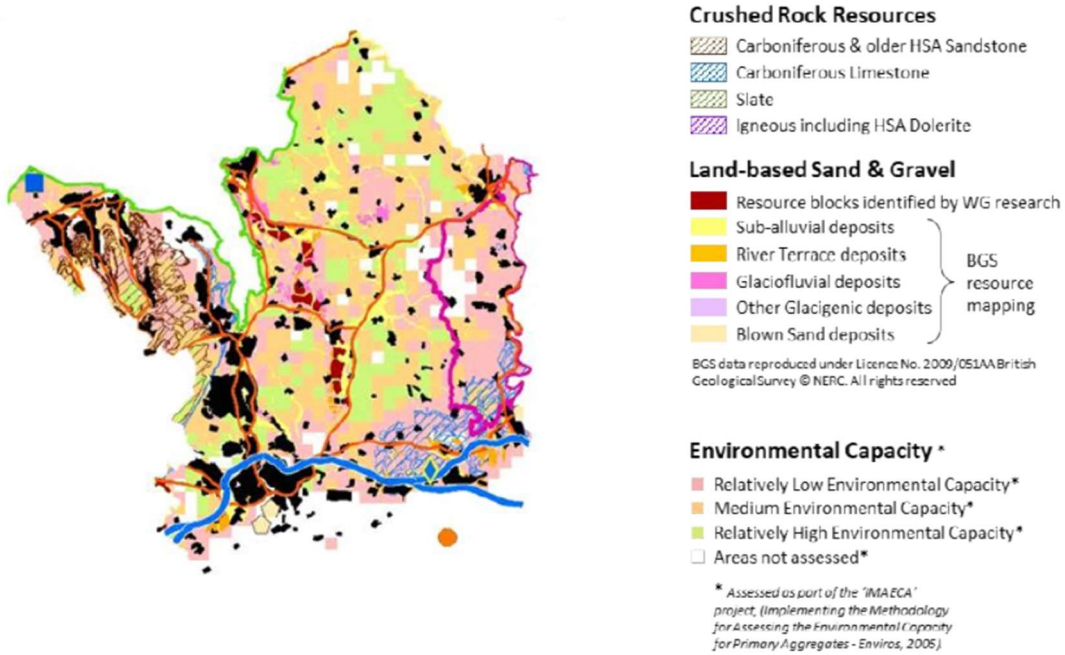
3.8. The RTS2 concludes that in view of the surplus of existing permitted reserves for crushed rock and the alternative arrangements for sand and gravel, no further allocations for future working are specifically required to be identified within the RLDP. It does note, however, that it may be necessary for new allocations to be identified in Monmouthshire to offset the deficits in Torfaen and Newport.

3.9. The RTS2 notes that Monmouthshire has extensive unworked resources of carboniferous limestone, together with potential resources of sand and gravel along parts of the Usk Valley and elsewhere. Most of the resources, however, fall primarily

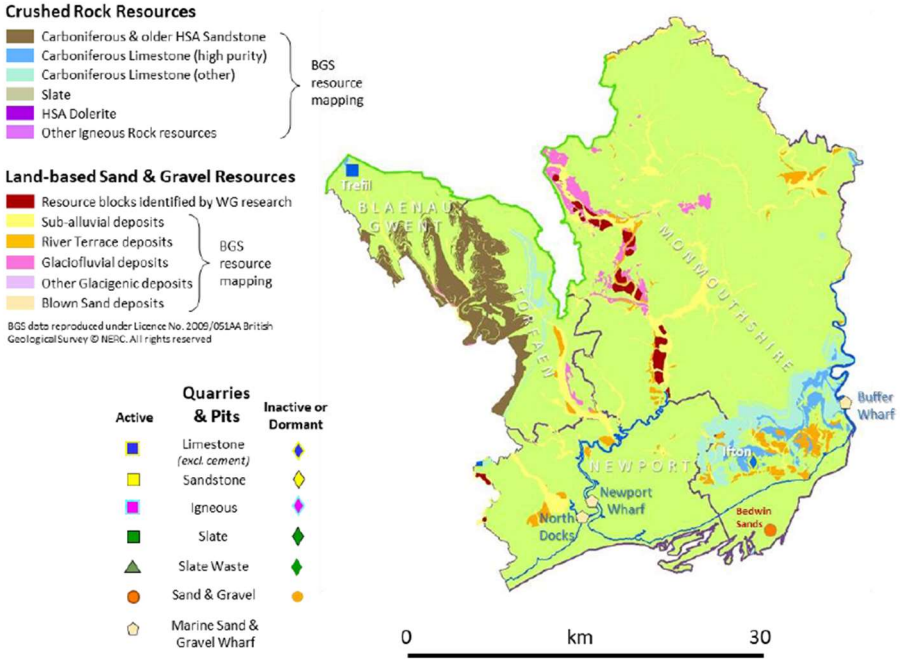
[1] Individual Cabinet Member Report agreed on 13th January 2021

within areas of relatively low environmental capacity[2] and much of the limestone lies beneath the water table within a principal aquifer. As the illustration below of the Former Gwent Sub-Region shows, Monmouthshire's resources in the main overlap with areas identified as having relatively low environmental capacity to undertake mineral workings.

Extract from RTS2: Figure B11 – Environmental Capacity in the Former Gwent Sub-Region



Extract from RTS2: Figure B10, the broad distribution of land-based aggregate resources within the Former Gwent Sub-Region



[2] The RTS2 sets out an analysis of Environmental Capacity across Wales providing an indication of the capacity of different areas to accept the environmental impacts of additional quarrying activity.

Former Gwent Sub-Region Apportionment

3.10. At a sub-regional level, the RTS2 establishes the following crushed rock apportionments for each Local Planning Authority:

Table 2: Former Gwent Sub-Region Apportionments

LPA	Annual Apportionment	Total Apportionment (15-year plan period + 10 yr. land bank)	Reserves	Shortfall / Surplus	RTS2 App 2 Specifications
Blaenau Gwent	0.204 Mtpa	5.100 Mt	1.32 Mt	3.78 Mt Shortfall	The main requirement is to supplement the existing reserves of Carboniferous Limestone; although RTS2 also references the potential of HSA Sandstone.
Monmouthshire	0.242 Mtpa	6.05 Mt	11.25Mt	5.2Mt Surplus	In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are specifically required to be identified within the LDP.
Newport	0.452 Mtpa	11.3 Mt	0	11.2Mt shortfall	Requirement is specifically for Carboniferous Limestone, although contributions from land won sand & gravel resources might be feasible.
Torfaen	0.15 Mtpa	3.75 Mt	0	3.75Mt Shortfall	Requirement could be fulfilled either by HSA Sandstone and/or by Carboniferous Limestone, although contributions from land won sand & gravel resources might also be feasible.
Total	1.048 Mtpa	26.2 Mt	12.57 Mt	-13.53 Mt	Figures do not tally due to rounding off within the RTS2

3.11. As it can be seen from the above table all authorities, with the exception of Monmouthshire, have a shortfall in crushed rock reserves.

4. Statement of Sub-Regional Collaboration (SSRC)

4.1. The RTS2 introduces a new requirement for all LPAs to agree Statements of Sub-Regional Collaboration (SSRC) in respect of its contribution to the future provision of land won primary aggregates[3], with guidance on how to prepare them set out at Annex A of the RTS2. SSRCs are required to be prepared, collaboratively, by all constituent LPAs within each RTS sub-region as part of the evidence base needed to

[3] Land won primary aggregates: aggregates sourced directly from naturally occurring geological materials as a primary product, for example Carboniferous Limestone.

support each RLDP. The timescale for preparation is noted as being geared towards the timescale for the earliest RLDP (or SDP) submission within the sub-region.

4.2. Representatives of the Former Gwent Sub-Region have met on a regular basis to discuss the requirements of the RTS2 and consider options for addressing the sub-regional shortfall. Work is ongoing in this regard, with Appendix 1 setting out the Former Gwent Sub-Region SSRC Position Statement.

4.3. In summary, the position statement concludes that it is not possible at this stage to establish what the sub-regional shortfall is and how it can be met until relevant planning applications/candidate site submissions in Blaenau Gwent and Torfaen are determined. The situation will continue to be monitored and the Position Statement will be updated as necessary. Appendix 1 should be reviewed for full details.

Monmouthshire Limestone Aggregate Resource Assessment – February 2024

4.4. To inform the preparation of the Former Gwent Sub-Region SSRC Position Statement a Monmouthshire Limestone Aggregate Resource Assessment has been undertaken. This concludes that due to the coverage of constraints within Monmouthshire, the potential does not exist at this stage to meet some or all of the carboniferous limestone apportionment/allocations required for other LPAs within the Former Gwent sub-region. Full details are set out in Appendix 2.

5. RLDP Policy Approach

Strategic Policy

5.1. In accordance with national and regional policy requirements, the RLDP policy framework encourages a sustainable approach to minerals planning in Strategic Policy S16 – Sustainable Minerals Management.

Strategic Policy S16 – Sustainable Minerals Management

The Council will sustainably manage its mineral resources by:

i) Safeguarding known/potential land won sand and gravel, sandstone and limestone resources for future possible use;

i) Maintaining a minimum 10-year bank of crushed rock reserves throughout the Plan period in line with the requirements of the latest South Wales Regional Aggregates Working Party Regional Technical Statement on Aggregates; and

ii) Encouraging the efficient and appropriate use of high-quality minerals and maximising the potential for the use of secondary and recycled aggregates as an alternative to primary won resources.

5.2. No site-specific allocations are required to meet Monmouthshire's RTS2 apportionment due to the unworked reserves at Ifton Quarry.

Minerals Safeguarding Maps

5.3. In accordance with national guidance and following correspondence with Welsh Government officials, the RLDP Proposals Map safeguards Category 1 minerals reserves identified on the British Geological Survey (BGS) Aggregate Safeguarding

Map for South East Wales. Policy M2 of the RLDP sets out the criteria that development within a Minerals Safeguarded Area will be assessed against.

Buffer Zone

5.4. PPW states that buffer zones should be used by planning authorities to 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 (paragraph 5.14.44). Paragraph 71 of MTAN clarifies that in a buffer zone of a minimum of 200 metres should be adopted in relation to hard rock quarries. A buffer zone has therefore been identified around the permitted extent of Ifton Quarry.

Ifton Quarry

5.5. Ifton Quarry is located to the north of the M48, to the north of Rogiet in the south of the County. It is bordered by ancient woodlands to the south and north-west and pockets of ancient woodland to the west beyond which is open countryside. Dewstow Golf Course borders the site to the north-east and east. Access to the site is gained via a private haul road which enters the quarry to the south, leading up to the private entrance, the highway goes under the M48 and then joins Caldicot Road, Rogiet, further to the south.

5.6. The original planning permission for the site dates back to 1985 (ref: M/23770), which was initially granted on 26th February 1985. Subsequent to this permission, a modification order was completed in relation to the quarry on the 21st May 2001. The amended conditions were subsequently incorporated into planning permission 23770 on the 21st August 2001. The site was granted planning permission until 26th February 2045.

5.7. Planning application DM/2023/01062 was approved 15th February 2024 and sought the prior written approval of the Authority to progress with minerals extraction, as required by condition 2 of modified planning conditions approved in 2001. The extraction of limestone shall be confined to within the limits of excavation shown on the approved plans and sections, drawing numbers FSA/12/84 and FSA/14/84 respectively (available to view on the Council's website). Other than with prior written approval of the MPA, the initial phase of extraction shall be carried out strictly in accordance with Drawing Numbers 116d/2a and 116d/2b and the prior approval of the MPA is therefore required in accordance with the planning conditions.

5.8. The next area of extraction will be in phases 2 and 3 and this will be to the west of the existing quarry face, towards the un-felled woodland and would consist of a relatively narrow strip of land, approximately 50 meters. It is anticipated that this phase of development would release some 500,000 tonnes of reserve. All operations would remain above the water table and there would be no requirement to obtain an abstraction licence from NRW at this time.

Call for Candidate Sites

5.9. As part of the RLDP preparation process, the Council invited land-owners, developers and the public to put forward ‘candidate sites’ to be considered for development, redevelopment or protection. Stage 1 of this process involved an Initial Call for Candidate Sites for a 16-week period from 30th July 2018 to 19th November 2018. A

Second Call for Candidate Sites took place from the 5th July 2021 to 31st August 2021. No mineral related candidate sites were put forward as part of this process.

Appendix 1: Former Gwent Sub-Region Statement of Sub-Regional Collaboration – Position Statement

Former Gwent Sub-Region

Statement of Sub-Regional Collaboration - Position Statement

September 2024

Prepared by:

Blaenau Gwent County Borough Council

Monmouthshire County Council

Newport City Council

Torfaen County Borough Council

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1. Introduction

1.1. National Planning Policy in the Welsh Government's Planning Policy Wales (PPW 12) (February 2024) and Minerals Technical Advice Note 1 on 'Aggregates' (MTAN1) (March 2004) state that ensuring the sustainable supply of minerals is a strategic issue which plays a fundamental underpinning role in supporting non-minerals development. Each local planning authority (LPA) should ensure that it makes an appropriate contribution to meeting local, regional and UK needs for primary minerals which reflects the nature and extent of resources in the area and their best and most appropriate use, subject to relevant environmental and other planning considerations. For aggregates (namely 'crushed rock' and 'sand & gravel') this should be done under the aegis of the North and South Wales Regional Aggregates Working Parties (made up of the constituent LPAs, Welsh Government, specialist advisers and the minerals & recycling industries), whose role is to provide a regional overview of supply and demand and through the framework provided by the Regional Technical Statements for Aggregates; which are required to be reviewed every 5 years.

1.2. The latest Regional Technical Statement for the North Wales and South Wales Regional Aggregates Working Parties- Second Review (RTS2) Main Document and Appendix B for South Wales (both September 2020) identifies the necessary apportionments and allocations at LPA level but also at a sub-regional level from 2017-2042 (from a December 2016 Aggregates Survey base date) for crushed rock and 2039 for land won sand and gravel. This is to allow sub-regional areas to adjust apportionments within those sub-regions if more detailed investigation by the LPAs indicates that such adjustments are justified. However, due to an error in the RTS2 apportionment calculations, the Welsh Government revised all the South-East Wales RTS2 apportionments in a 'Policy Clarification Letter' (5th November 2021).

1.3. To that end, RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared collaboratively, by all constituent LPAs within each RTS sub-region (as defined by the RTS 2nd Review) as part of the evidence base needed to support each Local Development Plan (LDP) or Strategic Development Plan (SDP). Once agreed, an SSRC will remain in place until it becomes superseded by the requirements of future reviews of the RTS, or new information comes forward which justifies a change.

1.4. This document is the position statement for the SSRC for the Former Gwent sub-region which comprises Blaenau Gwent, Monmouthshire, Newport and Torfaen local planning authority areas.

2. RTS2 Apportionments and Allocation Requirements

2.1. RTS2 notes that in South Wales, marine dredged sand from the Bristol Channel, Severn Estuary and Bedwin Sands provide for most of the supply; and similar levels of production are likely to continue in future years. On this basis, there is no RTS2 requirement to make any provision for the extraction of land-based 'sand and gravel' resources in the Former Gwent sub-region.

2.2. However, Table 1 below sets out the individual LPA apportionment and allocation requirements for 'crushed rock' as set out in the RTS2 within the Former Gwent sub-region (as amended by the RTS2 Policy Clarification Letter).

Table 1: RTS2 Apportionment and Allocation Requirements

LPA	Annual Apportionment	Total Apportionment (15-year plan period + 10 yr. land bank)	Reserves	Shortfall / Surplus	RTS2 Specifications
Blaenau Gwent	0.204 Mtpa	5.100 Mt	1.32 Mt	3.78 Mt Shortfall	The main requirement is to supplement the existing reserves of Carboniferous Limestone; although RTS2 also references the potential of HSA Sandstone.
Monmouthshire	0.242 Mtpa	6.05 Mt	11.25 Mt	5.2 Mt Surplus	In view of the surplus of existing permitted reserves for crushed rock, and the lack of sand & gravel production, no further allocations for future working are specifically required to be identified within the LDP.
Newport	0.452 Mtpa	11.3 Mt	0	11.2 Mt shortfall	Requirement is specifically for Carboniferous Limestone, although contributions from land won sand & gravel resources might be feasible.
Torfaen	0.15 Mtpa	3.75 Mt	0	3.75 Mt Shortfall	Requirement could be fulfilled either by HSA Sandstone and/or by Carboniferous Limestone, although contributions from land won sand & gravel resources might also be feasible.
Total	1.048 Mtpa	26.2 Mt	12.57 Mt	-13.53 Mt	Figures do not tally due to rounding off within RTS2

2.3. As it can be seen from the above table all authorities, with the exception of Monmouthshire, have a shortfall in crushed rock reserves. Monmouthshire has sufficient permitted reserves to meet its apportionment, so no further allocations are necessary within its RLDP. However, in accordance with RTS2 further consideration is required in relation to the other three authorities.

2.4. RTS2 states that by default, each SSRC will simply confirm that all constituent LPAs within a particular RTS sub-region accept the individual apportionment for aggregates for their individual authority areas, as set out in the table above.

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

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

1. *Inability to meet RTS apportionments*: In order to demonstrate an inability to meet RTS apportionments, an LPA would need to show either that it has no (or insufficient) workable aggregate resources of the type required by the RTS and/or that there is no interest from the minerals industry in developing such resources within the area. It will *not* be sufficient simply to demonstrate that the area has no existing quarries or no recent production, or that alternative resources and/or permitted reserves exist within another LPA.
2. *An alternative pattern of supply*: Where an alternative pattern of supply is proposed this will entail transferring some or all of the RTS apportionment from one LPA to one or more other LPAs within the same sub-region, so as to make corresponding increases in provision within those authorities, as required by MTAN1. The receiving authorities will need to increase their apportionments (and, where necessary, allocations), to ensure that *as a minimum*, the overall requirements for ongoing supply within that sub-region, as set out in the RTS, as met (both numerically and in terms of aggregate type). It will not normally be appropriate to merely transfer apportionments to an LPA with sufficient existing reserves to arithmetically absorb the apportionment, without reference to the additional consideration of productive capacity.

3. Latest Position

3.1. Representatives of the Former Gwent Sub-Region have met on a regular basis to discuss the requirements of the RTS2 and consider options for addressing the sub-regional shortfall. The first stage in this process was for each LPA to undertake an aggregates resource assessment to establish the potential for accommodating some or all of its own apportionment as well as another LPA's apportionment. Work is ongoing in this regard, with Table 2 setting out a summary of the latest position for each LPA.

Table 2: Former Gwent Sub-Region Apportionment Position

LPA	RTS2 Endorsement	RLDP Position	SSRC Position	Summary
Blaenau Gwent	RTS2 not endorsed by Council	Preferred Strategy consulted on Jan/Feb 2020. Revised DA agreed July 2024. The Replacement Deposit Plan consultation is now scheduled for early 2025 (February to April).	Limestone Aggregates Resource Assessment undertaken (March 2024). This concludes that Blaenau Gwent can meet its own apportionment if the planning application to extend Trefil Quarry (Carboniferous Limestone) is approved. However, there are currently NRW objections regarding the impact on the Mynydd Llangynidir geological SSSI and consideration of alternatives. If the application is refused there are no other areas of Carboniferous Limestone resource within Blaenau Gwent that are suitable for extraction. The Adopted LDP identifies two other Preferred Areas: Land East of Cwm (potential for 60 Mt of HSA Sandstone) and Tir Pentwys Tip, Llanhilleth (potential for HSA Sandstone). These are being reviewed as part of the RLDP and resource assessment. Cwm in particular is known to have access and deliverability constraints. It is therefore uncertain at this time if Blaenau Gwent will be in a position to meet its own apportionment, but it is not in a position to meet another LPAs apportionment.	Can potentially meet its own apportionment but cannot meet another LPA's apportionment.
Monmouthshire	RTS2 endorsed by Cabinet Member on 13th January 2021. Endorsed	Preferred Strategy consultation undertaken between	RTS2 identifies sufficient reserves to satisfy Monmouthshire's apportionment and concludes that no allocations are required.	Can meet its own apportionment but cannot

	in relation to the individual apportionment only and not to agreeing to the principle of meeting the wider sub-regional apportionment due to the lack of information regarding the implications for the RLDP.	December 2022 and January 2023. Report taken to Council in October 2023 to agree Preferred Strategy following consultation. Deposit Plan scheduled for consultation autumn/winter 2024. No mineral related candidate sites submitted.	Limestone Aggregate Resource Assessment (Feb 2024) undertaken which concludes that due to the level of constraints applicable to the identified reserves in Monmouthshire, potential does not exist at this stage, to meet some or all of the Carboniferous Limestone apportionment required for other LPAs within the Former Gwent Sub-Region. Monmouthshire's landbank reserves are located at Ifton Quarry. A recent planning permission (DM/2023/01062) approved the next phase of extraction at Ifton Quarry, which is estimated to release approximately 500,000 tonnes of Carboniferous Limestone. Use of the surplus land bank tonnage to meet the requirements of the Former Gwent Sub-Region is therefore not considered achievable due to limitations on annual extraction.	meet another LPA's apportionment.
Newport	RTS2 endorsed by Cabinet Member on 9 October 2020.	Preferred Strategy consultation undertaken between October and December 2023. Deposit Plan consultation scheduled for late 2024.	Review into Carboniferous Limestone resources undertaken (2023). Findings conclude Newport will not be able to accommodate any of its Carboniferous Limestone apportionment in its RLDP. Formal correspondence to other authorities in the Former Gwent Sub-Region was despatched July 2023 requesting they investigate their ability to accommodate Newport's apportionment. In response, after assessing the potential Carboniferous Limestone resources in their areas, none of these authorities were able to accommodate Newport's apportionment.	Cannot meet its apportionment or another LPA's apportionment. In addition, none of the Former Gwent LPA's able to accommodate Newport's apportionment.

Torfaen	RTS2 endorsed at Council on 16th November 2021; and *"noted that a report on the 'Statement of Sub-Regional Collaboration' will be presented to Council for consideration at a future date."*	The Torfaen RLDP Delivery Agreement (DA) preparation Timetable has slipped; and a new DA Timetable is expected to be agreed by the Council / Welsh Government later in 2024. At which point it will be know when the Council expects to consult on its Preferred Strategy and Deposit RLDPs.	Torfaen is preparing its RLDP Minerals Background Paper for consideration by Council at a future date. Early draft conclusions are that there are no potential Carboniferous Limestone resources in Torfaen due to landscape, highway capacity and sterilisation by proximal development issues. Some HSA Sandstone resources have been investigated; with several prospects being ruled out as they are considered to conflict with the Welsh Government's Future Wales 'Pre-Assessed Areas for Wind Energy' and the 'Valleys Regional Park' Policies 17 and 35 respectively. The main prospect to meet Torfaen's RTS2 apportionment is the adopted Torfaen LDP (Policy M3) 'Tir Pentwys Preferred Area for Aggregates' (7.2 Mt of HSA Sandstone) which has been submitted as a 4.75 Mt (est. 250,000 tonnes p.a.) Candidate Site in the new Torfaen RLDP (2022-2037); with a proposal for a new 10km northern access road, the majority of which is within Blaenau Gwent. Environmental Impact Assessment Scoping Opinions were submitted to TCBC (22/P/0762/SCOPE) and BGCBC in October 2022 on this latest proposal. The Council is currently evaluating this Candidate Site for potential inclusion in its RLDP.	Can potentially meet its own apportionment but not another LPA's Carboniferous Limestone apportionment.

3.2. As it can be seen from Table 2, there are a set of challenging circumstances in place across the four authorities, which collectively make it difficult at this point to establish what the sub-regional shortfall is and how it can be met.

3.3. RTS2 states that in the event that allocations (or new permissions) cannot be made to address the shortfall, consideration may, subject to the circumstances and considerations set out in Annex A of the RTS Main Document, need to be given to collaborative working with neighbouring LPAs within the same sub-region, such that some of the required provision (apportionment) is effectively transferred. Where there is clear evidence that the sub-region as a whole cannot meet its collective apportionment, collaboration with other LPAs in directly adjoining parts of a neighbouring sub-region may occur.

3.4. At this stage it is not possible to establish what the collective shortfall of the Former Gwent Sub-Region is until the planning applications/candidate site submissions in Blaenau Gwent and Torfaen are determined. It is therefore premature to discuss collaborative working with other authorities in a neighbouring sub-region. The Former Gwent Sub-Region authorities will continue to monitor the situation and review next steps forward in line with national policy and RTS2 recommendations.

Appendix 2: Monmouthshire Limestone Aggregate Resource Assessment

FEBRUARY 28, 2024

MONMOUTHSHIRE LIMESTONE AGGREGATE RESOURCE ASSESSMENT

HUGH TOWNS
CARMARTHENSHIRE COUNTY COUNCIL
On behalf of Monmouthshire County Council

Introduction

Future Wales: The National Plan 2040 - recognises that aggregates underpin economic growth, providing construction related products essential for the delivery of placemaking, housing and infrastructure. Effective planning ensures that a reliable supply of minerals, which is capable of simultaneously meeting demand in all regions of Wales, is always available.

Planning Policy Wales – Edition 12 (PPW) - acknowledges that society needs, and will continue to need for the foreseeable future, a wide range of minerals. Minerals are the principal constituents of most construction products, many pharmaceutical, chemical, agricultural, automotive, metallurgical, electronics, aerospace, plastics ceramic and paper products. Construction related minerals and mineral products are particularly important in Wales and are essential for housing and infrastructure, such as schools, roads, railways, airports and flood defences and a steady and adequate supply of materials is necessary. (Para 5.14.1)

PPW advises that the role of the planning authority in relation to mineral extraction is to balance the fundamental requirement to ensure the adequate supply of minerals with the protection of amenity and the environment. The key principles are to:

• provide positively for the safeguarding and working of mineral resources to meet society's needs now and in the future, encouraging the efficient and appropriate use of high-quality materials;

• protect environmental and cultural characteristic of places, including those highly cherished for their intrinsic qualities, such as wildlife, landscapes, ancient woodlands and historic features, and to protect human health and safety and general well-being;

• reduce the impact of mineral extraction and related operations during the period of working by ensuring that impacts on relevant environmental qualities caused by mineral extraction and transportation, for example air quality and soundscape, are within acceptable limits; and

• achieving, without compromise, a high standard of restoration and aftercare so as to avoid dereliction and to bring discernible benefits to communities, heritage and/or wildlife, including beneficial after uses or opportunities for enhancement of biodiversity and the historic environment. (Para 5.14.2)

PPW states that in certain areas, mineral extraction may not be acceptable. For example, where a proposal for mineral extraction would cause demonstrable harm to the environment, including designated sites, or amenity, which cannot be overcome by planning conditions or agreements, planning permission should not be granted. (Para 5.14.3)

Mineral working is different from other forms of development in that extraction can only take place where the mineral is found to occur. (Para 5.14.4)

Ensuring the sustainable supply of minerals is a strategic issue which plays a fundamental underpinning role in supporting non-minerals development. Each mineral planning authority should ensure that it makes an appropriate contribution to meeting local, regional and UK needs for primary minerals which reflects the nature and extent of resources in the area and their best and most appropriate use, subject to relevant environmental and other planning considerations. For aggregates this should be done under the aegis of the North and South Wales Regional Aggregates Working Parties, whose role is to provide a regional overview of supply and demand and through the framework provided by the Regional Technical Statements for Aggregates. (Para 5.14.10)

A land-bank is a stock of planning permissions which usually relates to the extraction of non-energy minerals and provides for continuity of production in spite of fluctuations in demand. For the purposes of commercial stability, the aggregates industry requires a proven and viable landbank. Planning authorities should include policies in their development plans for the maintenance throughout the plan period of land-banks for non-energy minerals which are currently in demand. This must be adequate but not excessive. 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 of each development plan unless agreement is reached for other authorities to make a compensating increase in their provision. There is no requirement for a landbank to be maintained within National Parks and AONBs. (Para 5.14.15)

Planning authority boundaries may form a suitable area basis on which to base a land-bank policy, however for some authorities the administrative area may be too small, the environmental constraints too important, or the availability of a workable resource too limited to enable an individual land-bank policy to be applied. In these circumstances, authorities must agree a joint approach with neighbouring authorities in line with current regional arrangements and may require liaison with relevant mineral planning authorities in England. (Para 5.14.16)

Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable and include policies which protect sensitive environmental designations or historic features and environmental and resource protection. This approach brings a high degree of certainty to all. Policies and proposals should relate to identifiable areas of land unless there is a good reason why this is not possible and should cover mineral resources which are currently used, or which may need to be used in the foreseeable future. These should be clearly identified on a proposals map and should, in the following order of preference, take the form of:

• Specific Sites where mineral resources of commercial significance exist and where any planning applications which come forward for those sites are likely to be acceptable in planning terms;

• Preferred Areas which will be areas of known resources with some commercial potential and where planning permission might reasonably be anticipated;

• Areas of Search where it is likely that some sites will be appropriate for mineral extraction, depending on economic and/or environmental circumstances. Areas of search will define broad areas that are believed to contain mineral resources of commercial significance but whose extent is uncertain. Within these areas it is likely that appropriate mitigation measures can overcome all environmental effects. Within areas of search, planning permissions could be granted to meet a shortfall in supply should specific sites, preferred areas, or extensions to existing sites identified in the plan, not come forward. It will not usually be appropriate for an authority to identify only areas of search in a plan; full justification for adopting such an approach would be needed (Para 5.14.19).

Minerals development should not take place in National Parks and AONB except in very exceptional circumstances and following the most rigorous examination. (Para 5.14.35)

Development adjacent or close to these areas may have a 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. (Para 5.14.36)

Minerals proposals within or likely to significantly affect Sites of Special Scientific Interest and National Nature Reserves, potential and classified Special Protection Areas, designated, candidate or proposed Special Areas of Conservation or Ramsar sites should not take place except in exceptional circumstances. If the proposal would adversely affect the integrity of the site, taking into account advice from NRW, and conditions would not remove this effect, planning permission should not be granted, unless alternative supplies cannot be made available at reasonable cost, there is no scope for meeting the need in some other way and regard has been paid to considerations such as the need for the development in terms of UK mineral supply and the impact on the local economy of permitting the development or refusing it. Minerals development in non-statutory nature conservation sites should be carefully assessed to determine whether the environmental and amenity impact is acceptable or not relative to the benefits to be gained from mineral development. (Para 5.14.37)

Mineral proposals within the setting of a scheduled ancient monument (SAM) may have an impact on its significance and should be carefully considered. The impact of mineral extraction on a SAM and its setting should be considered and where impacts cannot be satisfactorily mitigated, planning permission refused unless there are exceptional circumstances. (Para 5.14.38)

Planning authorities and the minerals industry should take into account the need to protect the quantity and quality of surface and groundwater supplies. Changes in the water table as a result of mineral extraction or the disposal of mineral wastes must not cause unacceptable impact or otherwise damage or adversely affect water resources or sources of water, in line with the principles contained in the Water Framework Directive. Such resources might be an integral part of sites of high landscape value or nature conservation importance, including protected habitats and species. (Para 5.14.39)

As well as the Agricultural Land Classification grade, other agricultural factors such as farm structure, soil conservation, farm water supply, surface water and field drainage may be matters to take into account when appraising the full extent of mineral working, restoration and aftercare proposals. The objective should be, wherever possible, to minimise any adverse effects on agriculture occurring as a result of mineral development. These factors are likely to be particularly relevant where agriculture is to be the after-use of the site (Para 5.14.41)

To avoid conflict between mineral workings and other land uses buffer zones should be identified in development plans around existing or proposed minerals sites. The maximum extent of the buffer zone would depend on a number of factors: the size, type and location of workings, the topography of the surrounding area, existing and anticipated levels of noise and dust, current and predicted vibration from blasting operations and availability of mitigation measures. (Para 5.14.45)

Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless very exceptionally there are significant and clearly defined public benefits; this protection must prevent potentially damaging operations and their unnecessary loss. (Para 6.4.43)

Minerals Technical Advice Note (Wales) 1: Aggregates (MTAN1) –

It is essential to the economic and social well-being of the country that the construction industry is provided with an adequate supply of the materials it needs but not to the unacceptable detriment of the environment or amenity. (Para 6).

The overarching objective in planning for aggregates provision therefore is to ensure supply is managed in a sustainable way so that the best balance between environmental, economic and social considerations is struck, while making sure that the environmental and amenity impacts of any necessary extraction are kept to a level that avoids causing demonstrable harm to interests of acknowledged importance. This acceptable minimum may not be possible in all instances, and where that is the case, extraction should not take place. (Para 7)

A landbank is a stock of planning permissions for the winning and working of minerals. It is composed of the sum of all permitted reserves at active and inactive sites at any given point in time and for a given area. Development plans should include an assessment of:

• the current landbank and state how many years of mineral extraction the landbank will provide, based on the latest 3 years production figures (see also Para 47 regarding dormant reserves);

• the future landbank - to include land specifically allocated for the working of aggregates, as an "extended landbank".

Together, this will enable a clear picture to emerge of permitted reserves and likely future aggregates extraction where planning permission is probably acceptable. This will allow for sensible forward planning for the extraction of resources that will be set out in the Regional Technical Statement (Para 50) and provide a sound basis for future generations to make critical decisions about how best to continue to supply aggregates. (Para 45)

In some local planning authorities it may not be possible or acceptable to provide an adequate current or extended landbank. In National Parks and Areas of Outstanding Natural Beauty (AONBs), Minerals Planning Policy Wales states that mineral extraction should only take place in exceptional circumstances and may be undesirable in other areas that have been identified for their natural heritage importance. In some areas, suitable resources are not available geologically or are not appropriate for extraction because of environmental designations or the need for protection of existing and future amenity (Para 46)

It is acknowledged that, for the purposes of commercial stability, the aggregates industry requires a proven and viable landbank. This must be adequate but not excessive. A minimum 10-year landbank of crushed rock should therefore be maintained during the entire plan period of each development plan except within National Parks and AONBs, unless agreement is reached for other authorities to make a compensating increase in their provision. (Para 49)

As aggregate resources are not ubiquitous across Wales, it is unlikely to be possible or desirable to maintain an adequate landbank in every mineral planning authority. The Assembly Government will shortly commission a study of the geological availability of suitable minerals and the "environmental capacity" of each local authority to contribute to the supply of aggregates to meet regional demand. The RAWPs will be expected to prepare a 5-year technical statement for their region to ensure that an adequate supply of primary aggregates can be maintained taking into account the sustainable objectives outlined earlier in this section for the provision of aggregates. This regional statement should be prepared by each RAWP within 18 months of the completion of the environmental capacity assessment for Wales. The Regional Technical Statement will be reviewed every 5 years. (Para 50).

After careful consideration, including consultation with a number of interested and informed parties, the Welsh Assembly Government takes the view that the following minimum distances should be adopted unless there are clear and justifiable reasons for reducing the distance. An example may be

that, because of other means of control, there is very limited impact from the mineral extraction site. (Para 71)

Mineral Extraction Type	Minimum Distance
Hard rock quarries	200 metres

The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties- Second Review (RTS2) (September 2020) (as corrected by the Policy Clarification Letter dated 11 November 2021)

The total apportionment for Monmouthshire over 25 years as set out in RTS2 is 6.05 million tonnes. The existing permitted reserves at the end of 2016 was 11.25 million tonnes, more than sufficient to meet the required apportionment with a potential surplus of 5.2 million tonnes.

No resource allocations are therefore required within the LDP. Monmouthshire was also not required to make any resource allocations in the initial RTS (2008) or RTS: First Review (2014).

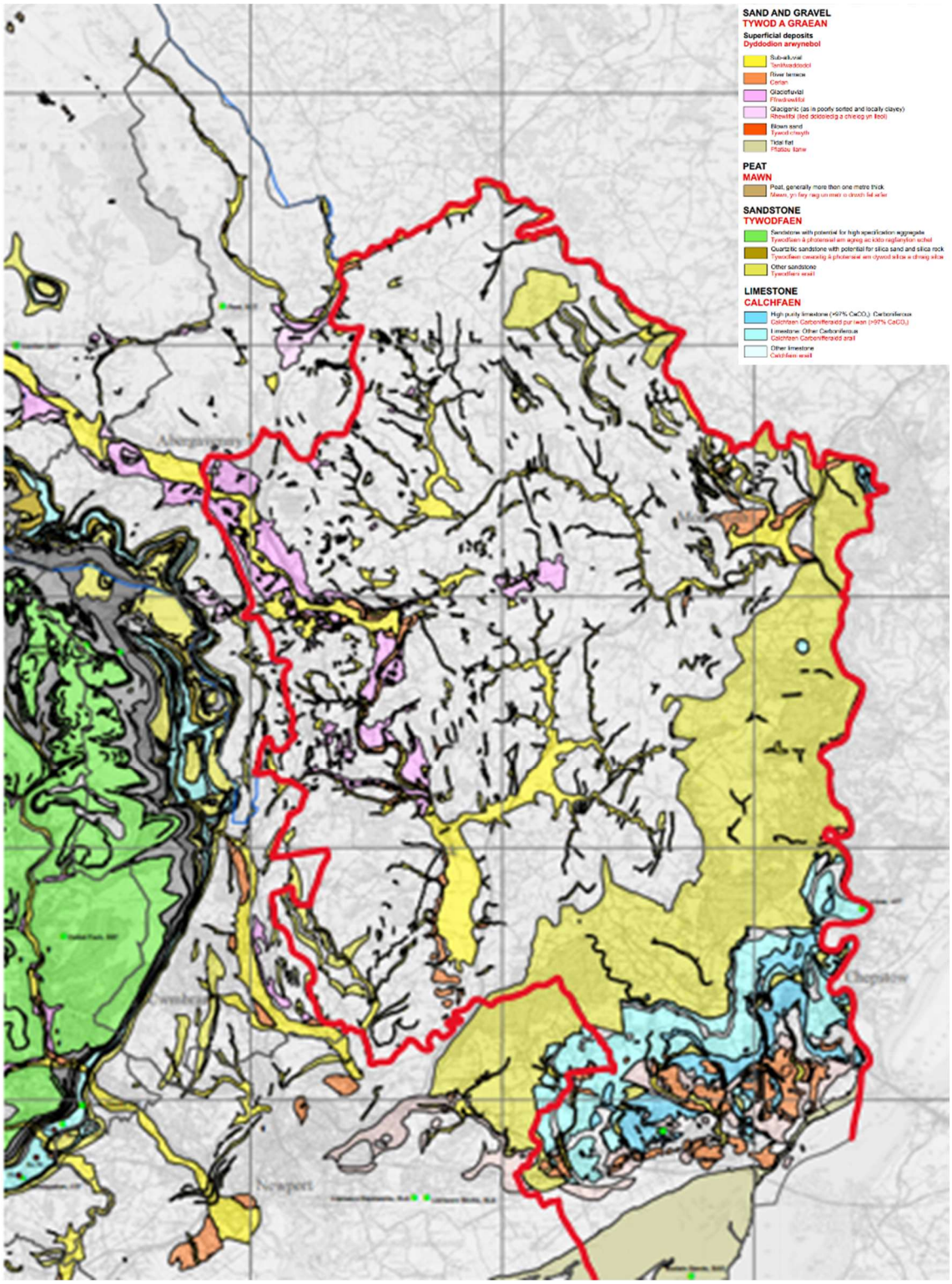
'Former Gwent' Aggregates Safeguarding Study - 2009

Monmouthshire is not explicitly required by the RTS to make a resource allocation within its LDP. It may have scope to do so, however, should this become necessary. In particular, as noted above, workable resources of Carboniferous Limestone are known to exist adjacent to Ifton Quarry. Hanson Aggregates has advised that land within its control, immediately to the west and north-west of the quarry, contains an estimated 30 Million tonnes of proven reserves (in addition to the 11Mt of existing permitted reserves at this site).

Mineral Resource Map for South East Wales

In 2010 the BGS published a Mineral Resource Map for South East Wales which shows all minerals which geologically have resource potential, irrespective of the extent of the deposit and proximity to markets or other economic factors.

MAP 1 – Mineral Resource Map

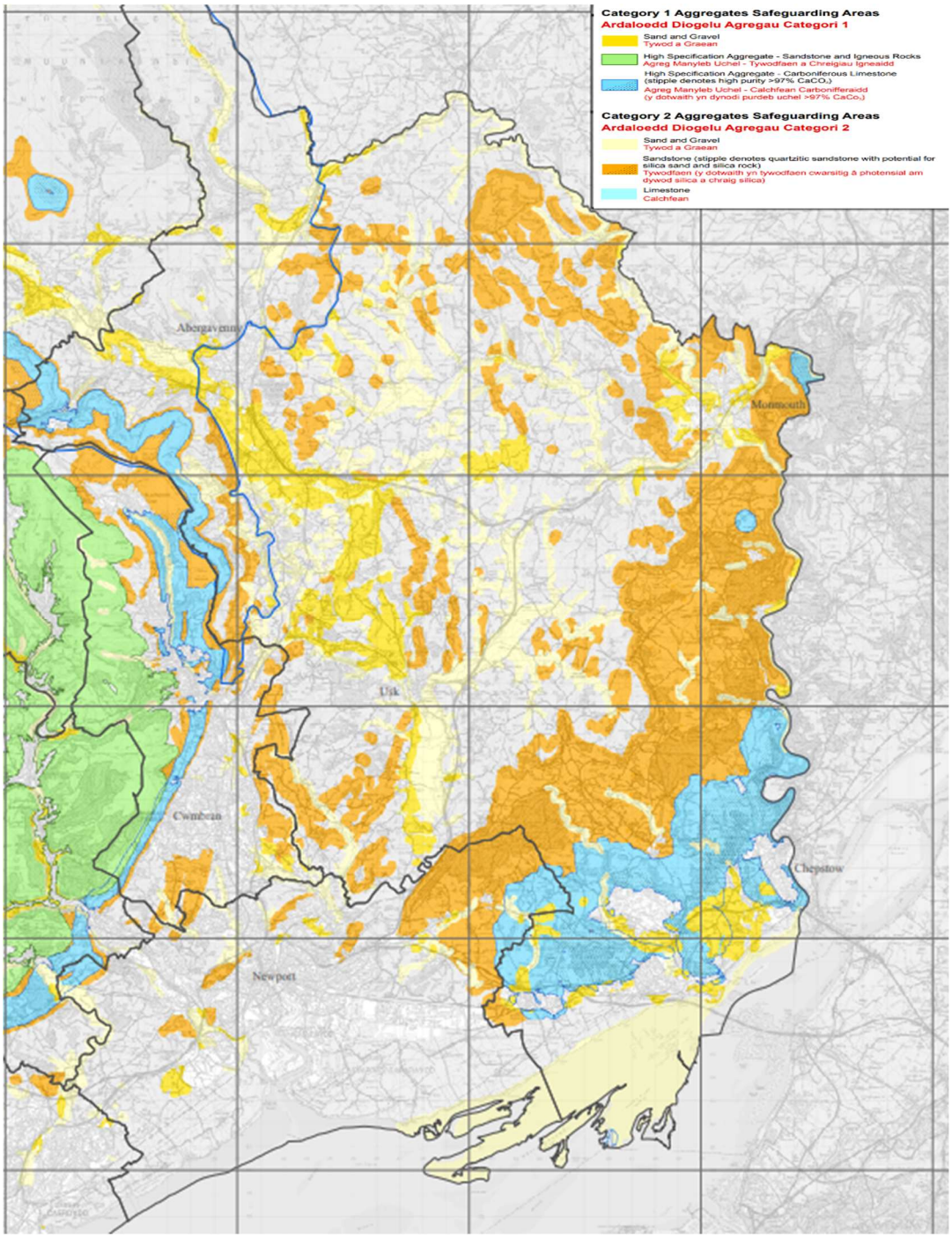


Aggregate Safeguarding Map of South East Wales

The Aggregate Safeguarding Map of South East Wales was published in 2012. Essentially, it selected the aggregate mineral resources that should be safeguarded from the mineral resource maps and categorised the aggregate resources into Nationally (Category 1), Regionally (Category 2) and Locally

Important Minerals (Category 3 – not shown on the plans). Safeguarding Areas do not apply in Urban Areas.

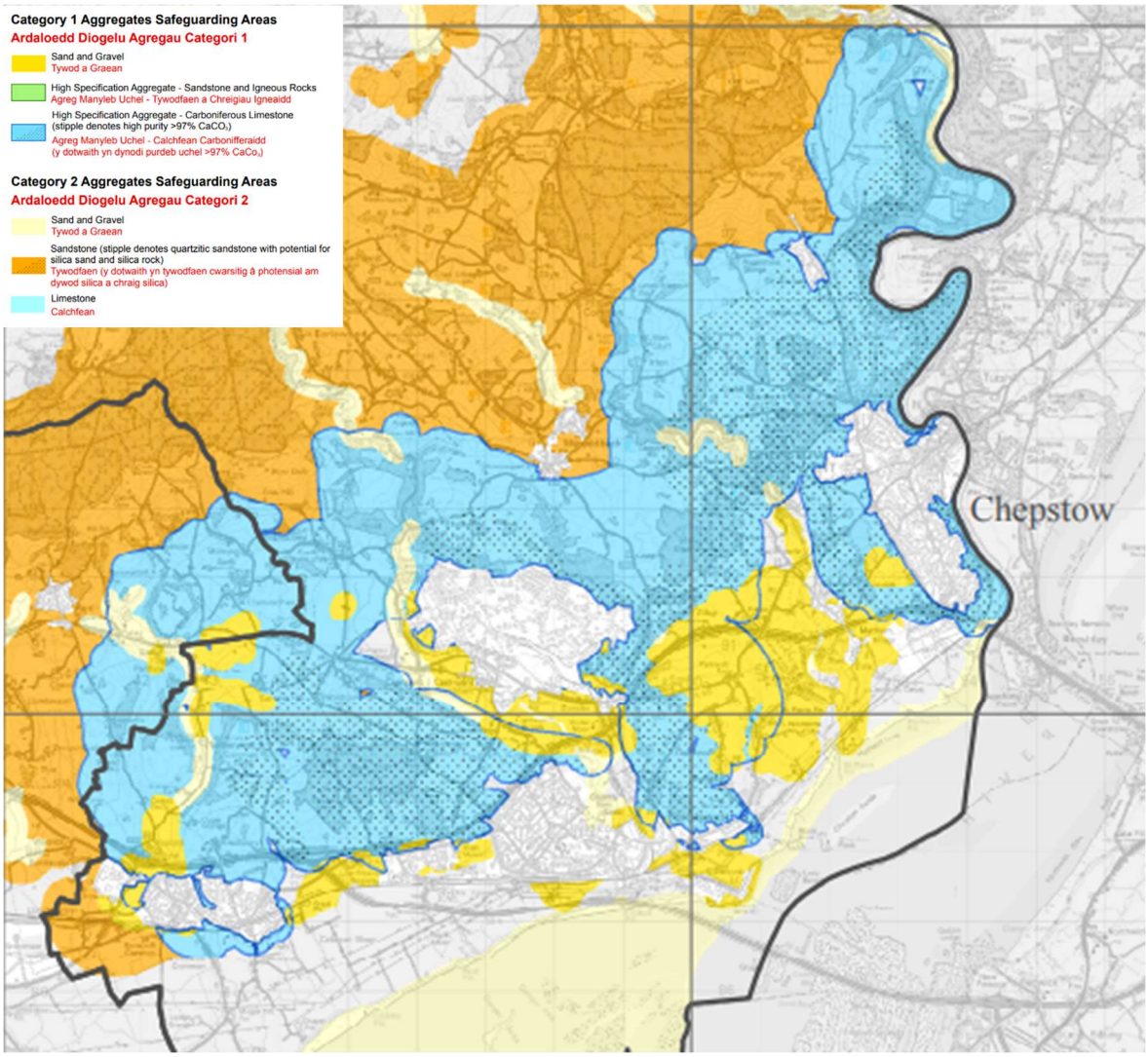
MAP 2 - Aggregate Safeguarding Map



There are two relatively small areas of safeguarded Category 1 Carboniferous Limestone resources (shown light blue on the map above), one to the east of Monmouth and the other to the north of The Narth. Both of these areas lie within the AONB.

The main Category 1 Carboniferous Limestone resource block runs across the southern part of the County in a generally north easterly direction from Magor/Undy in the west to Chepstow/Tintern in the east.

MAP 3 – Main Limestone Resource Block



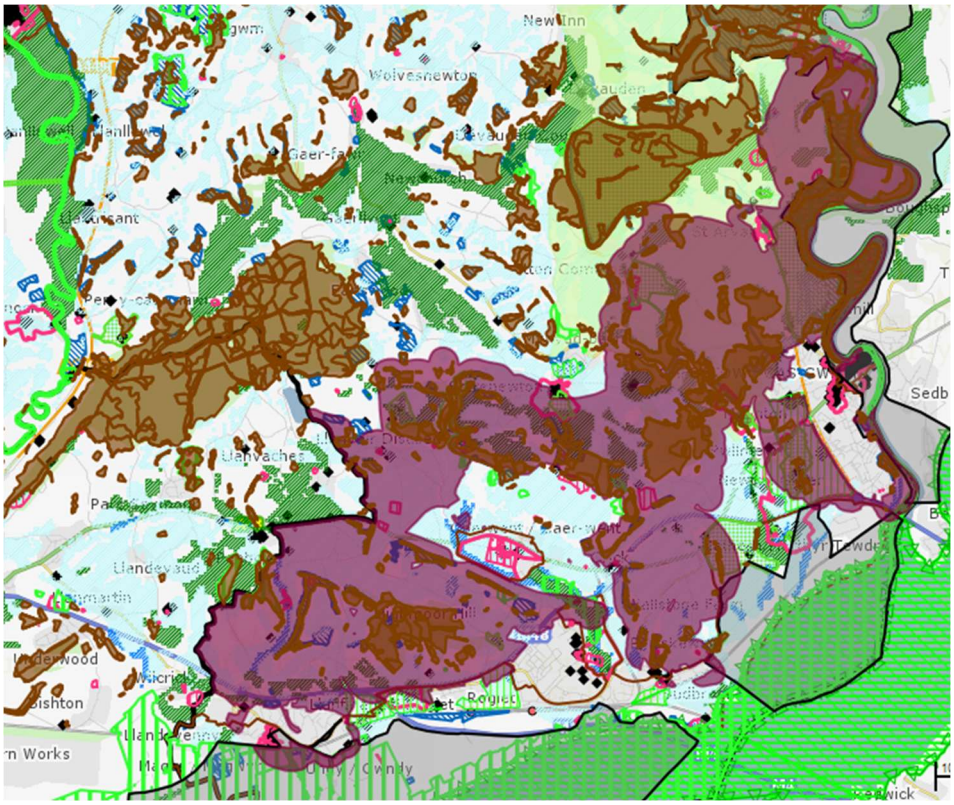
Aggregate Resource Assessment Methodology.

First Sieve - The following GIS layers were overlaid on the Carboniferous Limestone Safeguarding areas (purple shading) to identify the main constraints to mineral extraction.

- AONB (green shading)
- SINC's (blue diagonal hatching)
- National Nature Reserves (brown hatch)
- Ancient Woodland (brown shading)
- SAC (green horizontal lines)
- RAMSAR (green diagonal lines)
- SPA (green triangle boundary
- SSSI (thick green horizontal lines)

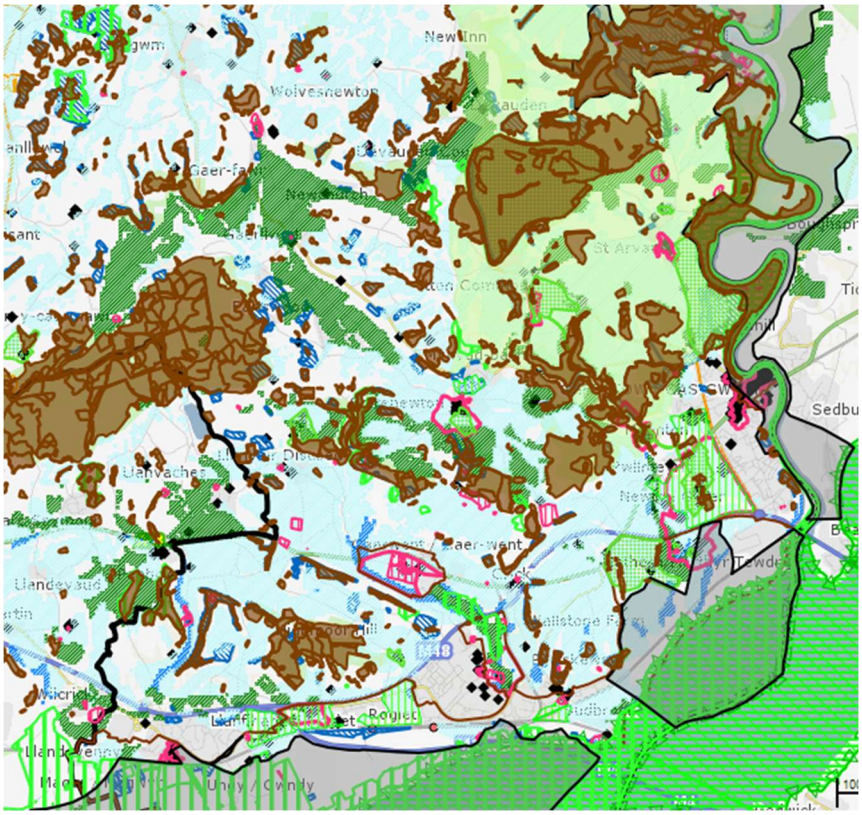
- Green Wedge (green vertical lines)
- SAM (pink horizontal lines)
- Listed Buildings (black diamond)
- Areas of Archaeologically Sensitivity (brown boundary)
- Conservation Areas (pink boundary)
- Landscape of Outstanding Historic Interest (grey shading)
- Historic Parks & Gardens (green hatching)
- Predictive ALC 1, 2 and 3a (dark blue, light blue & green respectively)

MAP 5 - Sieve 1 (Limestone Safeguarding Area)



Note - Limestone Safeguarding Area shown in purple.

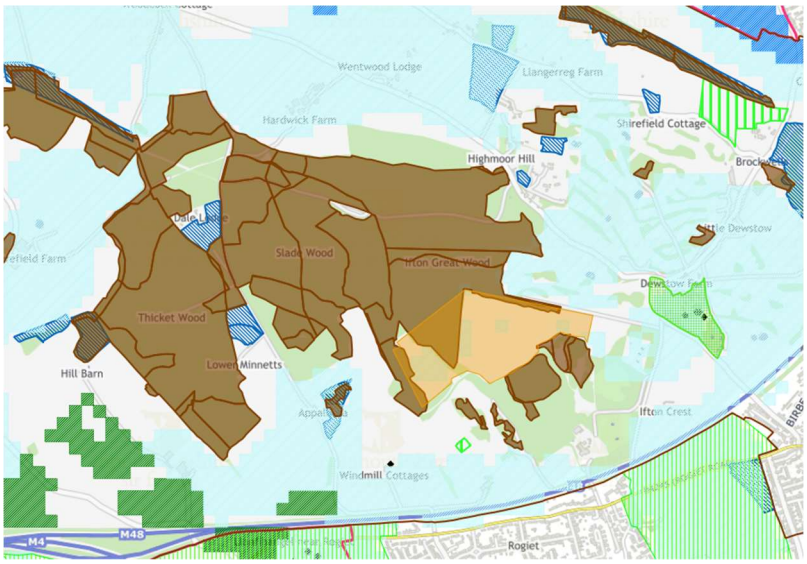
MAP 6 – Sieve 1 (Constraints)



This first sieve has identified that the area is heavily constrained with no potential areas identified as being suitable for limestone extraction.

The 'Former Gwent Aggregates Study' noted workable resources of Carboniferous Limestone are known to exist adjacent to Ifton Quarry. Hanson Aggregates has advised that land within its control, immediately to the west and north-west of the quarry, contains an estimated 30 Million tonnes of proven reserves (in addition to the 11Mt of existing permitted reserves at this site). However, the land to the west and north-west is designated ancient woodland.

Map 7 – Ifton Quarry (orange) & Ancient Woodland (brown)



Conclusion

PPW states that each mineral planning authority should ensure that it makes an appropriate contribution to meeting local, regional and UK needs for primary minerals which reflects the nature and extent of resources in the area and their best and most appropriate use, subject to relevant environmental and other planning considerations. However, it also accepts that as aggregate resources are not ubiquitous across Wales, it is unlikely to be possible or desirable to maintain an adequate landbank in every mineral planning authority. Whilst planning authority boundaries may form a suitable area basis on which to base a land-bank policy, for some authorities the administrative area may be too small, the environmental constraints too important, or the availability of a workable resource too limited to enable an individual land-bank policy to be applied. In these circumstances, authorities must agree a joint approach with neighbouring authorities in line with current regional arrangements.

The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties- Second Review (RTS2) (September 2020) does not require Monmouthshire to make allocations of limestone within the LDP.

The former Gwent Aggregates Study concluded that although Monmouthshire is not explicitly required by the RTS to make a resource allocation within its LDP, it may have scope to do so should this become necessary. In particular, workable resources of Carboniferous Limestone are known to exist adjacent to Ifton Quarry. Hanson Aggregates has advised that land within its control, immediately to the west and north-west of the quarry, contains an estimated 30 Million tonnes of proven reserves (in addition to the 11Mt of existing permitted reserves at this site). However, the area to the west and north-west of Ifton Quarry is designated ancient woodland, giving rise to a significant constraint to the accessibility of this resource.

Although Monmouthshire is not required to make new allocations, RTS2 states that in view of the fact that the neighbouring authorities of Torfaen and Newport may have difficulty in meeting their own new apportionments, given the limited resources in those areas, Monmouthshire may, subject to the circumstances and considerations set out in Annex A of the RTS Main Document, need to work in collaboration with those authorities, and with Blaenau Gwent, in order to meet the combined requirements for the Former Gwent sub-region as a whole.

Where different apportionments are agreed, these will need to be set out in a Statement of Sub-Regional Collaboration, produced in accordance with the guidance set out in Annex A, before any of the constituent LDPs are submitted for Examination.

Therefore, for the reasons set out above, it is considered that the potential does not exist at this stage to meet some or all of the carboniferous limestone apportionment/allocations required for other LPA’s within the former Gwent sub-region.