



**Pembrokeshire County Council
Local Development Plan (to 2021)**

**Mineral Landbank Calculations (based on December 2008 data)
– Summary Statement for Pembrokeshire County Council**

Development Plans

**November
2010**

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Introduction

1. Hard rock and sand and gravel resources in Pembrokeshire are worked to provide a component of the regional supply of these materials. They are the raw materials that facilitate economic development. The Local Development Plan (LDP) being prepared by Pembrokeshire County Council is required to ensure that there is an adequate landbank of these materials.
2. The Welsh Assembly Government's Minerals Technical Advice Note 1 (MTAN1) requires a landbank to be maintained for the entire period of the Council's LDP on the following basis:
 - a) A minimum of 10 years for hard rock; and
 - b) A minimum of 7 years for sand and gravel.

For the purposes of LDP preparation, this has been clarified as a requirement for Local Planning Authorities (except for National Parks) to demonstrate that the mineral is capable of being won throughout the plan period (i.e. to 2021) and for 10 years and 7 years respectively beyond the plan period.

3. Landbank calculations have been carried out in accordance with the requirements of Minerals Technical Advice Note 1 (MTAN1): Aggregates (March 2004) and are based on annual survey returns (2008 data), with results from individual sites aggregated to provide data for Local Planning Authority areas. Disaggregated landbank figures for individual sites are commercially sensitive and are not published here.
4. Landbank figures for Carmarthenshire, Pembrokeshire and Ceredigion are tabulated in the Appendix, presenting a sub-regional context.

Carmarthenshire

Hard rock

5. The LDP for Carmarthenshire is expected to run from 2006 – 2021. The 2008 landbank for hard rock of 89.5 years is sufficient for the plan period, leaving 76.5 years of supply at 2021. Based on the MTAN1 requirement, no hard rock allocations will therefore be necessary in the Carmarthenshire LDP.

Sand and gravel

6. The 2008 landbank for sand and gravel of 262.5 years is sufficient for the plan period, leaving 249.5 years of supply at 2021. Based on the MTAN 1 requirement, no sand and gravel allocations will therefore be necessary in the Carmarthenshire LDP.

Ceredigion

Hard rock

7. The LDP for Ceredigion is expected to run from 2007 to 2022. The 2008 landbank for hard rock is 43 years, which is sufficient for 29 years of supply at 2022. Based on the MTAN1 requirement, no hard rock allocations will therefore be necessary in the Ceredigion LDP.

Sand and gravel

8. The 2008 sand and gravel landbank is 14.9 years, which is sufficient for 0.9 years of supply at 2022. Ceredigion County Council has resolved to approve an extension of Crug-yr-Eyr quarry and when the decision is released, the sand and gravel landbank will rise to 17.16 years, sufficient for 3 years of supply at 2022. Based on the MTAN1 requirement, a Ceredigion LDP response will therefore be required to address the sand and gravel landbank shortfall that emerges towards the end of the plan period.

Pembrokeshire

9. There are two Local Planning Authorities in Pembrokeshire, one of these being the Pembrokeshire Coast National Park Authority and the other Pembrokeshire County Council. The situation prevailing in each is considered in turn, below.

Pembrokeshire Coast National Park

10. The Pembrokeshire Coast National Park Authority is not required to maintain a landbank for hard rock or for sand and gravel and is only expected to contribute to minerals supply in exceptional circumstances. The Pembrokeshire Coast National Park Authority's LDP (which is adopted) does not therefore make allocations for either hard rock or sand and gravel.
11. Although there is no landbank requirement in the National Park, there is existing minerals production, supplying both hard rock and sand and gravel to local and regional markets. The hard rock quarries in the National Park supplement an already adequate landbank position in the County, while those for sand and gravel represent the only current production of these materials in Pembrokeshire. Ultimately production at these sites is likely to cease and is unlikely to be replaced in other National Park locations, reflecting the position set out in the Regional Technical Statement for Minerals. However, it will take some years for this position to be reached, providing other Local Planning Authorities in South West Wales with the time and opportunity to explore alternative production opportunities through inter-authority discussion and dialogue with the minerals operators.
12. There have been two recent planning applications to extend existing sand and gravel quarries in the National Park. One of these, at Pant Gwyn, now has planning permission. The other, at Trefigin, is yet to receive permission, but the Welsh Assembly Government has indicated that it is minded to grant consent, subject to clarification of the efficacy of the Section 106 Unilateral Undertaking (in relation to the relinquishment of quarrying rights on another part of the site). In each case, there was recognition by the Welsh Assembly Government that exceptional circumstances existed in relation to sand and gravel production in Pembrokeshire.
13. There is an expectation that significant minerals working will ultimately cease within all National Parks in Wales and hence in the long-term production will move to non-National Park locations. Finding alternative sources of supply is a regional issue but to date no agreement has been reached in South West Wales regarding apportionment of future minerals supply between the various non-National Park Local Planning Authorities. However, it has to be assumed that a part of re-apportionment will rely on resources in Pembrokeshire but outside the National Park. It also means that the future provision for minerals supply set out in the South West Wales LDPs should not solely reflect the MTAN1 requirement for individual plan areas.

14. For the purpose of preparing its LDP, the County Council has reached an 'in principle' agreement with the Pembrokeshire Coast National Park Authority to take a 'whole county' approach to the minerals landbank, taking account of permitted reserves within the Pembrokeshire Coast National Park and the remainder of Pembrokeshire. A Pembrokeshire-wide reserve will therefore be used as a basis for evaluating the need for future provision of minerals for the Pembrokeshire County Council LDP. By doing this, the Council will move beyond the MTAN1 requirement for its own plan area in the evaluation of future provision to be made through its LDP.

Pembrokeshire County Council's planning area

Hard rock

15. Taking the whole-County approach set out above, there was a 47.40 year hard rock landbank in 2008 (37.15 years excluding National Park reserves). At 2021, this equates to a 34.40 year landbank (24.15 years excluding National Park reserves). This level of reserve is adequate without being excessive. Based on the MTAN1 requirement, but applied on a whole-County basis, no hard rock allocations will therefore be necessary in the Pembrokeshire County Council LDP.

Sand and gravel

16. For sand and gravel, the position for the County Council's LDP is more complex. As recorded above, all current sand and gravel production in Pembrokeshire is within the Pembrokeshire Coast National Park. Therefore, if the Council's planning area is taken in isolation, the theoretical 7-year landbank requirement expected throughout and at the end of the LDP plan period is 7 x nil production, which is nothing. However, such an approach is not satisfactory, either from the viewpoint of meeting the commitment of the Regional Technical Statement for Minerals to take minerals production out of the National Parks (including the Pembrokeshire Coast National Park) in the long-term, or in the context of providing a sufficient sand and gravel supply to support local and regional requirements for building projects.
17. Taking the whole-County approach, the sand and gravel reserve in Pembrokeshire (assuming that the Trefign quarry extension proposal will be consented in due course) will meet the requirements of the Council's LDP (to 2021) but cannot provide a full 7-year supply at 2021. The inability to meet the full landbank requirement of MTAN 1 in a whole-County context therefore requires a County Council LDP response, although it could be argued that other South West Wales Local Planning Authorities (excepting the Pembrokeshire Coast National Park) should also assist in meeting the shortfall as their contribution to meeting the commitment of the Regional Technical Statement for Minerals to taking minerals production out of National Parks.

18. Once again adopting the whole-County approach and taking into account the recent planning consent at Pant Gwyn and the likelihood of consent being granted at Trefigin, there was a 15.42 year¹ sand and gravel landbank in 2010 (3 years if National Park reserves are excluded). At 2021, this equates to a 2.42 year landbank (nil years if National Park reserves are excluded). Based on the MTAN1 requirement, but applied on a whole-County basis, a shortfall of sand and gravel will arise towards the end of the plan period which will require a Pembrokeshire County Council LDP response. The sand and gravel landbank may also slightly reduce in comparison to that presented in this paper, because the part of the Trefigin quarry proposed for relinquishment of quarrying rights in conjunction with the consenting of the extension proposal.
19. Where a landbank shortfall is predicted for the LDP period or for the 10-year (hard rock) or 7 year (sand and gravel) period beyond the close of the plan period, consideration must be given to ways in which this shortfall can be addressed. The shortfall in Pembrokeshire only relates to the sand and gravel resource and there are three possible ways in which it could be addressed, each of which is discussed below.
20. The first option is to allocate new sites for sand and gravel production in the County Council's LDP. However, the industry has not so far given an indication of its preferences for future sand and gravel production sites within the Council's plan area and the Minerals Resource Mapping recently published by the Welsh Assembly Government would provide a logical baseline for work required to identify reserves capable of economic exploitation. This option is therefore likely to be discounted for the first iteration of the plan, but has potential to inform plan review.
21. The second option is to indicate Preferred Areas for future production of sand and gravel in the County Council's LDP, but as recorded above, the industry has not so far provided any indication of preferred locations for future working of these resources and there is no evidence to indicate which parts of the resource are economically viable and / or in areas that are suitable in terms of other planning considerations, for instance landscape and amenity impacts and conservation objectives. This option is also likely to be discounted for the first iteration of the plan.

¹ Derived from the 2008 landbank survey, but also taking into consideration the Pant Gwyn quarry extension consent and the positive indication in relation to the Trefigin quarry extension.

22. The third option is to identify Areas of Search for future production of sand and gravel in the County Council's LDP. In accordance with Welsh Assembly Government guidance, the Council will be safeguarding the sand and gravel resource of the plan area. The safeguarded area for the sand and gravel resource could form the basis for an Area of Search, with further work being undertaken over the plan period to evaluate the most suitable sites, taking into consideration the views of the industry on economic viability, as well as the planning constraints identified in different locations. However, such an Area of Search approach would need to exclude the part of the Trefign quarry resource that is proposed for the relinquishment of mineral development rights in conjunction with the consenting of the National Park extension proposal on another part of the site. This option is the one most likely to be suitable for the County Council's LDP and would provide a foundation for follow-up discussions and investigations.

Secondary aggregates

23. There is an expectation that secondary aggregates (included recycled aggregates) will form an increasingly important component of the local and regional supply of aggregates. Although not forming part of the landbank requirement under MTAN1, these sources are expected to become more significant in the future, both in Pembrokeshire and in South West Wales generally. They will supplement land-won resources.

Marine-won aggregates

24. Marine-won aggregates, primarily from the Bristol Channel, are landed at the sand and gravel wharf at Pembroke Dock. Future production from such resources is somewhat uncertain, as there are significant constraints to marine operations as well as a significant resource potential. Marine-won aggregates do not form part of the landbank requirement under MTAN1 but are likely to continue to provide an important component of Pembrokeshire and regional production for some time to come, supplementing land-won resources.

Recommendations for the Pembrokeshire County Council LDP

25. No hard rock allocations will be necessary for the Pembrokeshire County Council LDP.
26. Supplies of sand and gravel will be adequate for the plan period, but the reserve does not extend far beyond the close of the plan period in 2021. Additionally, minerals production may ultimately cease in the Pembrokeshire Coast National Park, requiring a regional response to re-apportionment. Although allocations and / or Preferred Areas could be used to address the shortfall that is likely to arise at the end of the plan period, it is more likely that the LDP will use Areas of Search based on the safeguarded resource area. Further regional discussions should also take place, together with dialogue with minerals operators regarding industry preferences regarding the best potential locations for future sand and gravel working in Pembrokeshire and South West Wales.

Appendix

Mineral landbank / reserve information for Carmarthenshire, Pembrokeshire and Ceredigion

	Carmarthenshire	Ceredigion	Pembrokeshire – excluding National Park reserves	Pembrokeshire – including National Park reserves	Pembrokeshire – including National Park reserves, the Pant Gwyn quarry extension approval and the probable Trefigin quarry approval
2008 hard rock landbank	89.50 years	43 years	37.15 years	47.40 years	47.40 years
2008 sand and gravel landbank	262.50 years	14.90 years	3 years	4.22 years	15.42 years*
2021 hard rock landbank (2022 for Ceredigion)	76.50 years	29 years	24.15 years	34.40 years	34.40 years
2021 sand and gravel landbank (2022 for Ceredigion)	249.50 years	0.90 years	Nil	Nil	2.42 years*

* The Pant Gwyn decision and Trefigin indication were published in 2010. The Trefigin indication references a requirement to relinquish quarrying rights on another part of the site and this will ultimately slightly reduce the landbank figure presented.