



deunyddiau hanfodol  
atebion cynaliadwy

essential materials  
sustainable solutions

**MPA Wales/Cymru**

Penyfron Fron  
Garthmyl Powys SY15 6SA

[www.mineralproducts.org](http://www.mineralproducts.org)

6<sup>th</sup> April 2023

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

Email: [forward.planning@carmarthenshire.gov.uk](mailto:forward.planning@carmarthenshire.gov.uk)

Dear Sir/Madam

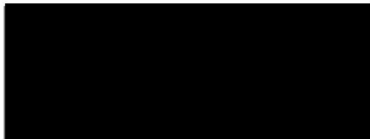
**2<sup>nd</sup> DEPOSIT REVISED CARMARTHENSHIRE LOCAL DEVELOPMENT PLAN 2018 - 2033**

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

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

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

Yours faithfully



Nick Horsley  
Director of Planning, MPA Wales

Email: [Redacted]  
Tel: [Redacted]

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

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Registered Office: Gillingham House  
38 - 44 Gillingham Street London SW1V 1HU

| Paragraph/<br>Policy/Page<br>Number                              | Current wording   | Comment  | Suggested amendment   |
|--|---|--|---|
| Section 7.6  | SO5   | The formatting of the document is confusing in that SO5 appears before SO3 and SO4   | Amend the formatting of the document and ensure SO3, SO4 and SO5 appear in the correct order.   |
| Section 7.6  | Strategic Objectives  | It remains unclear why the provision of a sustainable and adequate supply of minerals is not identified as a Strategic Objective. This is a fundamental requirement of PPW and the need for minerals is the thread which stitches together many of the strategic objective identified, providing raw materials to deliver and address issues such as employment, housing, climate change, infrastructure, transport and environmental aspirations. | Include a further Strategic Objective to reflect the need for a sustainable and adequate supply of minerals.  |
| Policy BHE1:<br>Listed<br>Buildings and<br>Conservation<br>Areas | Subsections 2. & 3.<br>State:<br><i>“2. Developments within or adjacent to a conservation area will be permitted, where it would preserve or enhance the character or appearance of the conservation area, or its setting.</i><br><br><i>3. New developments in conservation areas should be of a high standard of design which responds to the area’s special characteristics and features.”</i> | It remains unclear how the requirements of these subsections will be achieved. Maintaining the characteristic fabric of these buildings and conservation areas routinely requires an indigenous supply of local stone and materials, sympathetic to the character of the area and its buildings. There are no policies within the plan supporting the development of indigenous sources of building stone/materials.                               | Clarify within the plan how the characteristics of conservation areas and listed buildings will be maintained using materials sympathetic to the area. Sources of indigenous building materials will be needed and reflected within the policies in the plan. |
| Strategic<br>Policy SP 18:<br>Mineral<br>Resources               | Subsection a) states <i>“Ensuring an adequate supply of minerals, including maintaining an adequate landbank of permitted</i>   |  | We welcome the amendments now incorporated.   |

| Paragraph/<br>Policy/Page<br>Number              | Current wording  | Comment  | Suggested amendment  |
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|  | <p><i>aggregate reserves (a minimum 10 years for hard crushed rock, and a minimum 7 years for sand and gravel) throughout the Plan period;</i></p>   |  |  |
| <p>Strategic Policy SP 18: Mineral Resources</p> | <p>Subsection c) states <i>“Safeguarding minerals infrastructure, and areas underlain by minerals of economic importance where they could be worked in the future, to ensure that such resources and infrastructure are not unnecessarily sterilised by other forms of development;”</i></p>   |  | <p>We welcome the amendments now incorporated</p>  |
| <p>Paragraph 11.564</p>                          | <p><i>“For crushed rock, Carmarthenshire forms part of the Swansea City Sub-region, along with the local authorities of Swansea and Neath Port Talbot. Although at present, Swansea is unable to demonstrate an inability to meet RTS2 apportionments, there are more than sufficient reserves within NPT and Carmarthenshire to take up the joint apportionment within this period without resulting in under provision. A statement of subregional collaboration (SSRC) has been produced which demonstrates how the constituent</i></p> | <p>We have concerns that the approach proposed does not accord with the RTS, not least that the concerns raised in our response to the draft Swansea SSRC, dated 19<sup>th</sup> November 2020 have not been addressed. Where authorities are seeking to “absorb” apportionments from neighbouring authorities, it is necessary that there is a corresponding increase in provision within those authorities, as required by MTAN 1. The receiving authorities will need to increase their apportionments (and, where necessary, allocations), to ensure that <i>as a minimum</i>, the overall requirements for ongoing supply within that sub-region, as set out in the RTS, are met (both numerically and in terms of aggregate type). It will</p> | <p>Amend the text accordingly to reflect the RTS second review requirements (Annex A).</p> |

| Paragraph/<br>Policy/Page<br>Number | Current wording  | Comment  | Suggested amendment   |
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|                                     | <i>Authorities satisfy the requirements of RTS2 in respect of future crushed rock provision.”</i>  | 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. Whilst the shortfall in allocation relates primarily to Swansea, it is inappropriate for this flaw to be reflected in the Carmarthenshire RLDP.  |   |
| Paragraph 11.565                    | <i>“.....Therefore, a joint approach is being pursued by Pembrokeshire, Ceredigion and Carmarthenshire for the provision of the allocation requirement for 3.626 million tonnes over the period up to 2038.”</i>   | The allocation specified in the RTS is a minimum. The wording should be amended accordingly.   | <i>“.....Therefore, a joint approach is being pursued by Pembrokeshire, Ceredigion and Carmarthenshire for the provision of the allocation requirement for <u>a minimum</u> 3.626 million tonnes over the period up to 2038.”</i>   |
| Paragraph 11.566                    | <i>“In the event that the allocations for sand and gravel in the three constituent authorities are not sufficient to meet the 3.626 million tonnes over the period up to 2038, an ‘area of search’ for sand and gravel has been identified on the proposals map (with further areas being identified by Pembrokeshire and Ceredigion in their respective Revised LDPs). Furthermore, a statement of sub-regional collaboration (SSRC) is being produced which will demonstrate how</i> | Firstly, the 3.626mt is a minimum allocation and this should be reflected in the text.<br><br>Secondly, the comments above apply equally to this paragraph. In addition, the wording in paragraph 11.566 conflicts with paragraph 11.564. Paragraph 11.564 states “ <u>A statement of subregional collaboration (SSRC) has been produced which demonstrates how the constituent Authorities satisfy the requirements of RTS2</u> ”. However, this paragraph (11.566) states “ <u>a statement of sub-regional collaboration (SSRC) is being produced.</u> (our underlining).<br><br>The wording is confusing and needs to be rectified. | Amend the text accordingly, firstly to reference the “minimum” allocation and secondly to clarify the status of the RTS.<br><br><i>“In the event that the allocations for sand and gravel in the three constituent authorities are not sufficient to meet the <u>minimum</u> 3.626 million tonnes”.....</i> |

| Paragraph/<br>Policy/Page<br>Number     | Current wording  | Comment   | Suggested amendment   |
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|   | <p><i>the constituent Authorities will satisfy the requirements of RTS2 in respect of future sand and gravel provision.”</i></p>   | <p>It is imperative that the adoption of the SSRC must follow the process outlined in the RTS 2<sup>nd</sup> Review.</p>  |   |
| <p>Paragraph 11.567</p>                 | <p><i>“In respect of working the resource within the area of search, this will not be carried out within 100m of residential properties. Proposals for extraction will also need to accord with the criteria set out within Policy MR1 Mineral Proposals. On those elements of the area of search that contain grade 3a agricultural land, the need for extraction will be considered in accordance with paragraph 3.59 of PPW Ed.11.”</i></p> | <p>This paragraph does not properly reflect MTAN1 and should be amended accordingly. MTAN1 states “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.” (Our underlining)</p> <p>For Sand and Gravel this should be 100m.</p> <p>The wording should be amended to reflect MTAN1.</p> | <p>Amend the text to read “<i>“In respect of working the resource within the area of search, this will not be carried out within 100m of residential properties <b><u>unless there are clear and justifiable reasons for reducing the distance.</u></b> Proposals for extraction will also need to accord with the criteria set out within Policy MR1 Mineral Proposals. On those elements of the area of search that contain grade 3a agricultural land, the need for extraction will be considered in accordance with paragraph 3.59 of PPW Ed.11.”</i></p> |
| <p>Policy MR2: Mineral Buffer Zones</p> | <p><i>This Policy states: “Provision has been made for Buffer Zones around all sites with extant planning permission for mineral working.”</i></p>   | <p>PPW requires that Buffer Zones are provided as “<u>areas of protection around permitted and proposed mineral workings</u>” also “<u>buffer zones should be identified in development plans around existing or proposed minerals sites</u>” (Our underlining). This is also reflected in MTAN1.</p>   | <p>Amend the text to read: “<i>Provision has been made for Buffer Zones around all sites with extant planning permission for mineral working <b><u>and proposed mineral workings.</u></b>” We note the amendment to para 11.571 to reflect this.</i></p>  |
| <p>MR3: Mineral Safeguarding Areas</p>  | <p><i>The policy states “Planning permission will not be granted for development proposals where they would permanently</i></p>  | <p>We note changes from the previous wording, but feel this does not reflect the wider requirements of PPW in terms of minerals resources and infrastructure. Minerals safeguarding is not solely</p>   | <p>Amend the wording to read “<i>Planning permission will not be granted for development proposals where they would permanently sterilise <b><u>mineral resources and</u></b></i></p>   |

| Paragraph/<br>Policy/Page<br>Number | Current wording  | Comment   | Suggested amendment   |
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|                                     | <i>sterilise resources of aggregate....”</i>   | about safeguarding aggregate resources. This should include a wider minerals base and minerals infrastructure.                                  | <b><u>minerals infrastructure.</u></b> <del>of aggregate....”</del>   |
| Paragraph 11.573                    | The wording states “ <i>PPW stresses the importance of safeguarding mineral resources that meet society’s needs now and in the future.</i> ” | PPW also stresses the importance of safeguarding “minerals related infrastructure” (para 5.14.7). The wording should be amended to reflect PPW. | Amend the wording to read “ <i>PPW stresses the importance of safeguarding mineral resources that meet society’s needs now and in the future, together with <u>minerals related infrastructure.</u></i> ” |