



**COFNOD O BENDERFYNIAD WEDI'I DDIRPRWYO GAN SWYDDOG**  
**RECORD OF DELEGATED OFFICER DECISION**

**Penderfyniad Allweddol | Key Decision** ✓

**PWNC | SUBJECT:**

Draft Regional Technical Statements for the North and South Wales Regional Aggregates Working Parties – 2nd Review.

**DIBEN YR ADRODDIAD | PURPOSE OF THE REPORT:**

To seek approval to submit representations on behalf of Rhondda Cynon Taf County Borough Council to the Welsh Government consultation on the Draft Regional Technical Statements for the North and South Wales Regional Aggregates Working Parties – 2nd Review.

**PENDERFYNIAD WEDI'I DDIRPRWYO | DELEGATED DECISION:**

It is agreed that:

Representations are submitted on behalf of Rhondda Cynon Taf County Borough Council to the Welsh Government consultation on the Draft Regional Technical Statements for the North and South Wales Regional Aggregates Working Parties – 2nd Review.

**Llofnod y Prif Swyddog**  
Chief Officer Signature

**Enw (priflythrennau)**  
Name (Print Name)

**Dyddiad**  
Date

**Mae'r penderfyniad yn cael ei wneud yn unol ag Adran 15 o Ddeddf Llywodraeth Leol 2000 (Swyddogaethau'r Corff Gweithredol) ac yn y cylch gorchwyl sy wedi'i nodi yn Adran 5 o Ran 3 o Gyfansoddiad y Cyngor.**

The decision is taken in accordance with Section 15 of the Local Government Act, 2000 (Executive Functions) and in the terms set out in Section 5 of Part 3 of the Council's Constitution.

**YMGYNGHORI | CONSULTATION**



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25/11/19

**LLOFNOD YR AELOD YMGYNGHOROL O'R CABINET**  
**CONSULTEE CABINET MEMBER SIGNATURE**

**DYDDIAD | DATE**

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**LLOFNOD SWYDDOG YMGYNGHOROL**  
**CONSULTEE OFFICER SIGNATURE**

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**DYDDIAD | DATE**

**RHEOLAU'R WEITHDREFN GALW-I-MEWN | CALL IN PROCEDURE RULES.**

**A YW'R PENDERFYNIAD YN UN BRYD A HEB FOD YN DESTUN PROSES GALW-I-MEWN GAN Y PWYLLGOR TROSOLWG A CHRAFFU?:**

**IS THE DECISION DEEMED URGENT AND NOT SUBJECT TO CALL-IN BY THE OVERVIEW AND SCRUTINY COMMITTEE:**

**NAC YDY | NO**

**Rheswm dros fod yn fater brys | Reason for Urgency:**

*Os yw'n cael ei ystyried yn fater brys - llofnod y Llywydd, y Dirprwy Lywydd neu Bennaeth y Gwasanaeth Cyflogedig yn cadarnhau cytundeb fod y penderfyniad arfaethedig yn rhesymol yn yr holl amgylchiadau iddo gael ei drin fel mater brys, yn unol â rheol gweithdrefn trosolwg a chraffu 17.2:*

*If deemed urgent - signature of Presiding Member or Deputy Presiding Member or Head of Paid Service confirming agreement that the proposed decision is reasonable in all the circumstances for it being treated as a matter of urgency, in accordance with the overview and scrutiny procedure rule 17.2:*

N/A  
.....  
(Llywydd | Presiding Member)                      (Dyddiad | Date)

**DS - Os yw hwn yn benderfyniad sy'n cael ei ail-ystyried yna does dim modd galw'r penderfyniad i mewn a bydd y penderfyniad yn dod i rym o'r dyddiad mae'r penderfyniad wedi'i lofnodi.**

**NB - If this is a reconsidered decision then the decision Cannot be Called In and the decision will take effect from the date the decision is signed.**

**AT DDEFNYDD Y SWYDDFA YN UNIG | FOR OFFICE USE ONLY**

**DYDDIADAU CYHOEDDI A GWEITHREDU | PUBLICATION & IMPLEMENTATION DATES**

**CYHOEDDI | PUBLICATION**

Cyhoeddi ar Wefan y Cyngor | Publication on the Councils Website:- 25<sup>th</sup> November 19

**DYDDIAD | DATE**

**GWEITHREDU'R PENDERFYNIAD | IMPLEMENTATION OF THE DECISION**

**Nodwch:** Fydd y penderfyniad hwn ddim yn dod i rym nac yn cael ei weithredu'n llawn nes cyn pen 3 diwrnod gwaith ar ôl ei gyhoeddi. Nod hyn yw ei alluogi i gael ei "Alw i Mewn" yn unol â Rheol 17.1, Rheolau Gweithdrefn Trosolwg a Chraffu.

**Note:** This decision will not come into force and may not be implemented until the expiry of 3 clear working days after its publication to enable it to be the subject to the Call-In Procedure in Rule 17.1 of the Overview and Scrutiny Procedure Rules.

Yn amodol ar y drefn "Galw i Mewn", caiff y penderfyniad ei roi ar waith ar / Subject to Call In the implementation date will be

29<sup>th</sup> November 19

**DYDDIAD / DATE**

**WEDI'I GYMERADWYO I'W GYHOEDDI: ✓ | APPROVED FOR PUBLICATION :✓**

**Rhagor o wybodaeth | Further Information:**

Cyfadran   Directorate:	Prosperity and Development
Enw'r Person Cyswilt   Contact Name:	Simon Gale
Swydd   Designation:	Director of Prosperity and Development
Rhif Ffôn   Telephone Number:	01443 281114

**RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL**

**A REPORT TO ACCOMPANY A DECISION OF THE DIRECTOR OF  
PROSPERITY AND DEVELOPMENT**

**NOVEMBER 2019**

**DRAFT REGIONAL TECHNICAL STATEMENTS FOR THE NORTH AND SOUTH  
WALES REGIONAL AGGREGATES WORKING PARTIES – 2ND REVIEW.**

**AUTHOR: Owen Jones – Development Services Manager**

**1.0 PURPOSE OF THE REPORT**

- 1.1 To seek approval to submit representations on behalf of Rhondda Cynon Taf County Borough Council to the Welsh Government consultation on the Draft Regional Technical Statements for the North and South Wales Regional Aggregates Working Parties – 2nd Review.

**2.0 RECOMMENDATIONS**

- 2.1 It is recommended that approval is given to submit representations on behalf of Rhondda Cynon Taf County Borough Council to consultants working for Welsh Government, in response to the consultation on the Draft Regional Technical Statements for the North and South Wales Regional Aggregates Working Parties – 2nd Review. These are set out in detail in section 5 below.

**3.0 REASON FOR RECOMMENDATION**

- 3.1 The Draft Regional Technical Statements (RTS) for the North and South Wales Regional Aggregates Working Parties – 2nd Review has been prepared on behalf of Welsh Government and provides the supporting detail to national planning policy as set out Planning Policy Wales and Minerals Technical Advice Note 1: Aggregates. The aim of the RTS is to ensure that an adequate and steady supply of construction aggregates can be maintained throughout Wales.
- 3.2 The RTS plays an important role in terms of decision making through identifying need for mineral allocations in SDP's and LDP's and in determining planning applications. Accordingly, it is important that we ensure that its conclusions are acceptable to us, prior to indicating that we will endorse the final document. The current conclusions, and the methodology in reaching it, are currently not acceptable to us. We now propose amendments through this consultation response, to make the RTS acceptable.

## 4.0 BACKGROUND

- 4.1 Minerals Technical Advice Note 1: Aggregates (2004) (MTAN 1) 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). Whereas MTAN1 develops the national policy set out in Planning Policy Wales (PPW), the RTS provides the supporting detail which allows this to be implemented.
- 4.2 The Regional Technical Statement (RTS) sets out the requirements of each Local Planning Authority (LPA) with regards to the quantities of quarried construction aggregate which need to be supplied from their area (apportionments) over a given time. If the RTS identifies shortfalls, it also sets out the scale of necessary new allocations to be made in an LDP to ensure that adequate supply is maintained throughout the plan period.
- 4.3 The original RTS was completed in 2008 and is required, by MTAN 1, to be reviewed every five years. The First Review was undertaken in 2013/14 and the Second Review has been drafted and is currently out for consultation. The methodology used in previous versions of the RTS focused primarily on historical sales averages and various 'drivers' such as socio-economic changes. However, the 2<sup>nd</sup> Review has introduced a revised methodology which also includes a consideration of planned future requirements, related in particular to housing construction activity. This is based on housing requirements set out in each Local Authority's Local Development Plan (LDP).
- 4.4 Brief synopsis of methodology
- 4.5 In order to calculate the apportioned supply of aggregate required for each local authority the RTS follows two stages referred to as Option A and Option B.
- 4.6 Option A sets out requirements at a Wales wide level, continuing the previous method of identifying average past aggregate sales. It then expands to consider the influence of the house building industry on aggregate usage, as housing accounts for approximately 30% of all construction activity in Great Britain. The RTS then considers future LDP housing delivery forecasts set against past housing delivery rates. As these forecast rates are double the evidenced delivery rates, it identifies a need for a 30% uplift in future provision. The identified provision figure is then divided between the North and South Wales regions, and deriving from this, RCT is given an associated apportionment.
- 4.7 Option B then considers individual LPA housing requirements (as set out in current LDPs) as a percentage of the total sub-regional housing requirement (South East Wales). The sub-regional apportionment total for aggregate identified in Option A is then further divided in line with this same percentage to give a second aggregate apportionment for each local authority.

- 4.8 Following this, it is determined that the final preferred annualised apportionment is calculated by taking the average of options A and B (as opposed to choosing one over the other).
- 4.9 What does the RTS mean for RCT?
- 4.10 The RTS proposes a requirement for RCT to meet a minimum provision of 0.862 million tonnes (mt) per year (21.55 mt over the 25 year RTS period) of crushed rock aggregates throughout the Plan period and for 10 years thereafter. In view of the shortfall of existing crushed rock reserves within RCT, allocations totalling at least 11.714 mt are required and are to be identified within a future LDP. This is formed from a base date of calculations from 2017, to 25 years hence. There is currently a planning application for the extension of Craig-yr-Hesg Quarry, Pontypridd, amounting to approximately 10 million tonnes, being determined by the Council. If this was refused, then the above 11.74 mt would need to be accounted for in any future revised LDP, or if allowed, then an additional allocation would need to be made for the remaining shortfall of 1.714 mt.
- 4.11 It should firstly be noted that we agree with elements of the methodology, with particular regards to its intention to ensure that there is sufficient permitted aggregate reserves to allow for future development growth.
- 4.12 However, there are elements of the methodology which we have concerns over.
- 4.13 There is objection to the fact that historical population and household projections from as far back as 2007 have been used to inform the calculations in the RTS. Moreover, they have considerable influence over the outcomes of the apportionment proposals in both Options A and B and subsequently, the combined final apportionment. It is accepted that these are the only approved requirement figures available for the process, taken from the adopted RCT LDP.
- 4.14 However, more recent household projections would indicate more realistic housing delivery forecast and needs. For example, the principle household projections from the 2014 data would indicate a requirement of approximately 600 dwellings per annum. Informal calculations have indicated that this reduced housing delivery figure would result in reducing the total aggregate requirement by approximately 5.8 million tonnes. The current LDP indicates a need for 959 houses a year, which is the figure used in this draft RTS second revision, which we feel vastly and incorrectly exaggerates our future aggregates apportionment.
- 4.15 Additionally, the RTS poses a departure from the Draft NDF. The basis of the 30% uplift proposed in the RTS is derived from historical annual house building rates (6,423.6) being approximately half of the housing requirements of all LDPs combined in Wales (12,808 per annum) therefore meaning that housing's contribution of 30% of all construction activity should double. However, the NDF states that an average of 8,300 additional homes are required annually in Wales, rather than 12,808. If the NDF figure were to be used instead of the

combined LDP housing requirements, this would cause an uplift of approximately 9%. It would be assumed that the NDF would be given appropriate consideration in this RTS.

- 4.16 Accordingly, in its current format, it is not considered appropriate to endorse this RTS Second Revision.

## **5.0 PROPOSED AMENDMENT TO THE RTS**

- 5.1 However, we consider it a more pragmatic approach if we could propose alternative methods of calculation in order to seek changes to enable us to endorse this RTS.

- 5.2 Firstly, the main outcome of the RTS is the identification of whether each local authority has sufficient permitted reserves to meet its identified apportionment requirements or otherwise whether there are shortfalls. It states that shortfalls should be met by LDP allocations. Accordingly, it is proposed that the housing forecast element of the equation in Options A and B is also identified through the plan preparation process i.e. the most up to date, agreed LDP housing targets. It is therefore requested that the RTS does not include final apportionment targets and just sets out the methodology and equation to allow this to take place at the appropriate time. It is accepted that paragraph 1.27 of the RTS allows for some such considerations, although, we feel it would be more appropriate not to quote completely unsuitable figures at this stage that we could be tied to. It is very difficult to imagine how we could ever explain the rationale behind allocating further quarries in the preparation of a new LDP, based on 2007 evidence base to the public or a LDP Inspector alike. This is especially so when the preparation of the very same new LDP would identify a new (probably far lower) housing requirement figure.

- 5.3 Another proposed amendment is again associated with the significantly outdated and unrealistic LDP housing provisions. When calculating apportionments, it identifies that housing provision in RCT accounts for 14.53% of all housing provision in the Cardiff City and Former Gwent sub-regions combined. However, in reality, evidence provided by the RTS itself suggests that RCT has on average delivered just 11.17% of houses built in the combined sub-regions during this period. There are several other authorities in the region that are similarly misrepresented. Some areas have also built more than they have forecast in their LDP's. The use of annualised future housing requirements therefore should not be fully relied upon to calculate these aggregate apportionments.

- 5.4 We therefore propose that the equations in Options A and B in the RTS's are amended to also take account of actual average annual house completions (2007-2016) rather than just forward-looking LDP annual housing requirements. Using this amended methodology will present a more accurate view of where recent housing development has occurred, alongside where it is (correctly) forecast to occur; and that those authorities have the sufficient landbanks to accommodate their development.

5.5 Thirdly, there is a requirement in the RTS that a sub-regional statement of collaboration is prepared which may identify opportunities to share reserves with neighbouring authorities; if there are shortfalls in final individual apportionments. We propose that we go further than this and instigate true collaborative and sub-regional methods of working. The local authorities making up the sub region in the RTS include Cardiff, The Vale of Glamorgan, Bridgend, RCT, Merthyr Tydfil, Brecon Beacons National Park and Caerphilly. Simply put, if the permitted reserves of these authorities were combined, and set against their individual apportionments, then the associated landbank of aggregates would result in there being sufficient reserves to last 47 years. i.e. no requirement to allocate further quarries, or their extensions, during this time.

5.6 A further step would be to adopt this methodology for the Cardiff Capital Region as a whole, in line with the proposed SDP area, which would have a landbank of 43.2 years. This seems a logical approach from both an appropriate step-change to true regional working and also to make more economical use of existing quarries; whilst saving the considerable process of identifying suitable new quarries.

## **6.0 EQUALITY AND DIVERSITY IMPLICATIONS**

6.1 An Equality Impact Assessment (EqIA) screening form has been prepared for the purpose of this report. It concluded that a full report is not required at this time.

## **7.0 CONSULTATION**

7.1 The Draft Regional Technical Statement – 2nd Review is out to public consultation on behalf of Welsh Government. Appropriate officers with an interest in the RTS and its outcomes have been consulted.

## **8.0 FINANCIAL IMPLICATION(S)**

8.1 There are no financial implications associated with the proposed consultation responses.

## **9.0 LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED**

9.1 There are no legal implications associated with the proposed consultation responses.

## **10.0 LINKS TO THE COUNCILS CORPORATE PLAN/OTHER CORPORATE PRIORITIES/SIP**

10.1 There are no direct links to the above in relation to the content of the proposed consultation responses.

## **11.0 CONCLUSION**

11.1 In conclusion, it is recommended that the proposed responses to the RTS consultation are approved, as set out in section 5 above.

**Other Information: -**

***Relevant Scrutiny Committee***

Finance and Performance Scrutiny Committee

**Contact Officer: Simon Gale Tel: (01443) 281114**

