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Former Gwent Sub-Region

Statement of Sub-Regional Collaboration - Position Statement

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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.
- 3.2. Confirmation of aggregate shortfalls has remained uncertain due to pending planning application and candidate site decisions. However, following the approval of the proposed extension to Trefil Quarry in May 2025, the sub-region is now able to confirm shortfalls in Carboniferous Limestone apportionments. These shortfalls are unable to be met within the sub-region and collaboration with LPAs in neighbouring sub-regions will now take place. While there is more certainty regarding Carboniferous Limestone apportionments, work is ongoing to confirm Sandstone aggregate provision. Table 2 sets 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 Delivery Agreement (DA) agreed July 2024. The Replacement Deposit Plan consultation is anticipated for September / October 2025.	<p>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) were to be approved (application ref C/2022/0171).</p> <p>On 14th November 2024 Planning Committee resolved to grant planning permission for the proposed Trefil Quarry extension. Following the required 'call in' period for Welsh Ministers to consider whether there were any issues of more than local importance, a decision notice was issued for the Trefil Quarry extension on 21/5/2025.</p> <p>Blaenau Gwent can therefore meet its own apportionment but is unable to meet another LPAs apportionment. While the land bank of approved reserves results in a modest surplus against the RTS2 requirements, the reserves at Trefil are located within the Mynydd Llangynidr geological SSSI where exceptional circumstances for working the mineral have been demonstrated. It would not be appropriate for the surplus to address another LPAs aggregate needs where alternative provision outside a SSSI may be available.</p> <p>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.</p>	Can meet its own apportionment but cannot meet another LPA's apportionment.

Monmouthshire	RTS2 endorsed by Cabinet Member on 13 th January 2021. Endorsed 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.	<p>Preferred Strategy consultation undertaken between December 2022 and January 2023. Report taken to Council in October 2023 to agree Preferred Strategy following consultation.</p> <p>Deposit Plan consultation undertaken November/December 2024. Submission to Welsh Government anticipated autumn 2025.</p> <p>No mineral related candidate sites submitted.</p>	<p>RTS2 identifies sufficient reserves to satisfy Monmouthshire's apportionment and concludes that no allocations are required.</p> <p>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.</p>	Can meet its own apportionment but cannot 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 currently scheduled for late 2025.	<p>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.</p> <p>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.</p>	<p>Cannot meet its apportionment or another LPA's apportionment.</p> <p>In addition, none of the Former Gwent LPA's able to accommodate Newport's apportionment.</p>

Torfaen	RTS2 endorsed at Council on 16 th November 2021; and <i>“noted that a report on the ‘Statement of Sub-Regional Collaboration’ will be presented to Council for consideration at a future date.”</i>	<p>The Torfaen RLDP Revised Delivery Agreement (DA), Nov 2024 preparation Timetable expects to consult on the RLDP Preferred Strategy in Nov-Dec 2025 and the Deposit RLDP in Nov-Dec 2026.</p> <p>Tir Pentwys (Llanhilleth) Quarry Candidate Site submitted for the recovery of 4.75 Mt (est. 250,000 tonnes p.a.) of HSA Sandstone.</p>	<p>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.</p> <p>Seven HSA Sandstone resource prospects are being investigated; with four prospects being ruled out as they are considered to conflict with the Welsh Government’s Future Wales ‘Pre-Assessed Areas for Wind Energy’ (also likely to be sterilised by the Mynydd Maen DNS wind farm application (DNS/3276725) if permitted) and the ‘Valleys Regional Park’ (Policies 17 and 35 respectively). In addition, a fifth HSA Sandstone prospect (Waun Wen) is also likely to be sterilised by the current DNS application for the Abertillery (DNS/3278009) windfarm if permitted.</p> <p>Therefore, the Council’s respective ‘Local Impact Reports’ have identified the negative impact of the proposals on safeguarded (under Policy M1 of the Torfaen LDP) HSA Sandstone aggregate resources / and the reduced potential for Torfaen to meet its RTS2 apportionment; which will be for PEDW/WG to consider in their balanced determination of these applications.</p> <p>The main remaining HSA Sandstone 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 13.5km 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 prospective quarry developer is currently reviewing the alignment of the access road, and both Councils are awaiting confirmation of the proposed access route. The Council is therefore evaluating this Candidate Site for potential inclusion in its RLDP.</p>	Can potentially meet its own apportionment but not another LPA’s Carboniferous Limestone apportionment.
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- 3.3. As it can be seen from Table 2, there are a set of challenging circumstances in place across the four authorities, which has to date made it difficult to establish what the sub-regional shortfall is and how it can be met. Monmouthshire and Blaenau Gwent are able to meet their own apportionment needs but not another LPAs. Torfaen may be able to meet its own Sandstone apportionment but is unable to meet another LPAs Carboniferous Limestone apportionment; noting that the majority of HSA Sandstone prospects are likely to be sterilised if two current DNS windfarm applications are permitted in the near future. Newport is unable to meet their own apportionment or another LPAs apportionment. While candidate site decisions regarding potential sandstone reserves are due to be confirmed in Deposit Plan publications, the position for Carboniferous Limestone is now more certain.
- 3.4. 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.
- 3.5. At this stage it is not possible to establish what the collective shortfall of the Former Gwent Sub-Region is until candidate site submissions in Blaenau Gwent and Torfaen are determined with regards to Sandstone aggregate. However, as Newport's Carboniferous Limestone apportionment is unable to be met by the Former Gwent Sub-Region, the next step under the RTS2 guidance will be for collaboration with other LPAs in directly adjoining parts of the neighbouring Cardiff Capital sub-region.
- 3.6. The Former Gwent Sub-Region authorities will therefore contact local authorities in the Cardiff Capital sub-region and will continue to monitor the situation and review next steps forward in line with national policy and RTS2 recommendations.