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This Statement has been prepared by Blaenau Gwent County Borough Council in order to help facilitate appropriate discussion at the Minerals Hearing Session. The Paper provides a response to the questions set by the Planning Inspector (Mr Vincent Maher).

down to the local authority level. Where the Council does not intend to provide any additional written evidence the Inspector's attention is directed to the relevant part of the Evidence Base, which in the view of the Council addresses the matters raised. The paper will not repeat evidence previously submitted for consideration.

The Council's detailed responses to the representations received to Minerals are contained in the Report of Representations (**G8\$+V**).

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1. How does the Plan translate national minerals planning policy down to the local authority level? Shortly, the national
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Policies SP12 (d) and (e); and DM19 (d), (e), (f), (g), (i), (k) and (n) ensures that the Plan limit the environmental impact of mineral extraction.

In addition, buffer zones are required to address conflict between mineral working and other land uses due to noise, dust and blasting. Policies M2 and M4 identify Mineral Buffer Zones to address this issue.

MPPW (K&( ) also encourages minerals to be carried by rail in preference to road. Policy DM19 (h) is included in the Plan (G8\$%) to address this issue.

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Suitable restoration should be identified before planning permission is permitted and after-uses should be identified in advance of permissions. Policies SP12(d) and DM19 (n) ensure proposals achieve a high standard of restoration and beneficial after-use.

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It should be ensured that high quality minerals should not be wasted and are only used where necessary, not for a lower grade purpose. Policies SP12 (f) and DM19 (a) and (b) address this issue.

The Development Plan is required to take into consideration the need to encourage the practice of on-site recycling of construction and demolition material. The Plan addresses this issue through policy DM1 (d).

The Plan translates national policy down to an objective (G8\$%ž page 19 objective 15), which seeks to deliver the resources required by the Regional Technical Statement (G8 - , ) and safeguard resources. Policy SP12 identifies the overall strategy for delivering a sustainable pattern of mineral development within Blaenau Gwent. Development Management Policy DM19 identifies what would be required of new developments in terms of meeting need; protecting areas of importance; limiting environmental impact; achieving high standards of restoration and beneficial after-use; and encouraging efficient and appropriate use of minerals; and the re-use and recycling of suitable materials. Policy DM20 identifies how minerals are to be safeguarded in accordance with MPPW advice (K&(ž page 18, paragraph 40). The Plan identifies, through Policy M1, the mineral areas to be safeguarded from sterilisation. Policy M2, in

It is agreed that MTAN 1 (**K&** page 20, paragraph 49) recommends a minimum of 10 year landbank. It is agreed that in the interest of soundness Strategic Policy SP12 criterion (a) needs to be amended accordingly.

Is there merit in seeking to pursue up to 6 million tonnes of minerals and aggregate extraction over the lifetime of the Plan?

No. The Regional Technical Statement (**G8-**,) seeks to achieve a more

taken into consideration in the process of identifying Blaenau Gwent's requirement figure.

Dr Alan Thomson's final conclusion on the RTS on behalf of Torfaen stated *'the existing apportionments based only on the per capita calculation, are clearly inappropriate without consideration of environmental capacity and other factors which will influence the viability of potential resources'*. The Council does not agree to increase the 3Mt requirement without consideration of these other factors. This is a matter for the South Wales Regional Aggregates Party.

2. Does the Plan adequately distinguish between energy
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whole of the outcrop, together with an appropriate buffer zone around them, should be identified as Mineral Safeguarding Areas. Discussion with WG identified that a buffer around the resource was not required.

The study identified that areas of mineral safeguarding areas should include relevant outcrops within areas protected by environmental constraints (G8 - - paragraph 2.5). It also suggested that it was appropriate for the former Gwent area to exclude areas of existing development, as defined by the MPAs.

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Coal safeguarding areas are based on British Geological Survey information with regard to the primary and secondary coal resources. This accords with paragraphs 36 of MTAN2 (K&\*ž' page 12, paragraph 36).

4. What is the logic for the Mineral Buffer Zones identified in Policy M2 and the sites identified in Policy M4? Why are these zones identified in different policies? Are these buffers soundly based?

What is the logic for the identification of areas in Policy M3 where minerals or aggregates working will not be acceptable?

Policy M3 relates only to where coal working will not be acceptable, it does not apply to aggregates. The logic for these areas is set out in MPPW which seeks to provide certainty in the future extraction of energy minerals (K&Z page 8, paragraph 15).



are “deemed exceptions”? positively that prior extracti appropriate sites including housing sites? If not, why not?	Should the policy state more on will be encouraged on
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Is the drafting of Policy SP12 soundly based?

Yes. The drafting of Policy SP12 is considered to be soundly based. With respect to soundness test C2, the Policy does not contain any criteria which are not consistent with national policy. Whilst it is accepted that it repeats national policy this is not considered to be a wasteful/unnecessary repetition but enables the setting of a coherent strategy from which its' policies and allocations logically flow.

With respect to test CE1, Policy SP12 is drafted with the purpose of setting out a coherent strategy from which its' policies and allocations logically flow. This provides the basis for the policies set out later in the Plan and logically flow from the objective set out earlier in the Plan. The Policy clearly relates to the theme and objective of the Plan and is cross-referenced to relevant policies. In accordance with the soundness test, the Plan now identifies inconsistencies with neighbouring authorities (G8%\$Uz page 27, MC30).

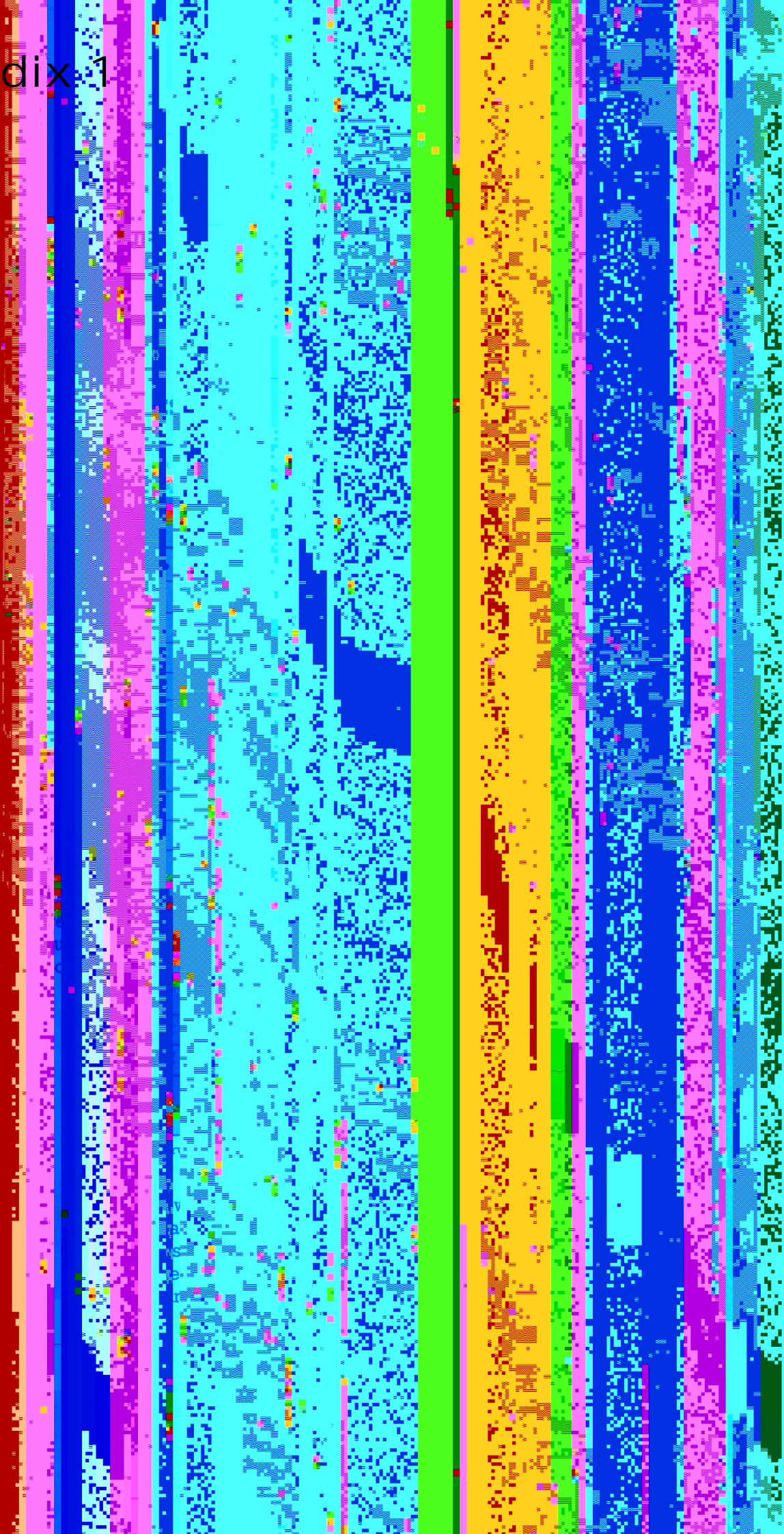
The Policy is considered to accord with soundness test CE2 as it is founded on a robust and credible evidence base in the form of the Regional Technical Statement (G8-), The Former Gwent Aggregates Safeguarding Study (G8-- ) and the Candidate Site Assessment (G8 '\$ and G8 '&). The policy is also considered to be realistic and

Is the term “acceptable proven safe limit” clear in its intention?

The Council accepts that the information within the Policy is covered either within national policy and/or within existing Development Management Policies. However, it considers that the policy is necessary for the logical flow of the Plan in accordance with soundness test CE1.

# Appendix 1

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# Appendix 2

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G]hY'BU a Y'	8Yg][ bUh]cb'	FYgYf jYg'	5bbiU' Cihdih'
Penderyn	Active	33,700,000	500,000
Penwyllt	Inactive	1,000,000	0
Blaen Onneu	Inactive	23,900,000	0
Vaynor	Inactive	3,000,000	0
Ammanford	Active	100,000	1,000
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### Notes

1. Vaynor has reserves of 50.4 million tonnes but only 3 million of those reserves are in the National Park. The vast majority is in Merthyr.
2. Blaen Onneu planning permission is suspended until an Environmental statement is submitted for the stalled ROMP.
3. Penderyn Output is as published in their ROMP application but there has been a general downturn in the economy so this is probably now somewhat less than that.
4. There are quarries at Llanfair and Abercriban but these are for building stone rather than aggregates. Llanfair is dormant in any event and the planning permission at Abercriban expires in August 2012.