

Further Changes from BCBC 2013 02 22 with Inspector Comments

MAC 10.1

Action point 10.1

(M2)The plan attempts to reflect local circumstances that prevail in Bridgend CBC. No coal extraction proposals are likely to come forward for tertiary coal alone without including the target seams in the primary/secondary coal resource. It is not viable to work in such a manner and no such proposals are anticipated within the plan period or beyond. It is widely acknowledged the break even figure for coal to waste (overburden) proposals is 1:20. The extraction of tertiary seams alone would certainly not generate this ratio.

(M3/4)The Council is happy to accept the revised wording "[Elsewhere proposals for coal extraction will need to satisfy the mineral development criteria of policy ENV11](#)" and also add "[Where this cannot be achieved, any adverse effects resulting from coal extraction operations will need to demonstrate local or community benefits which clearly outweigh the disbenefits](#)".

Inspector's Comment It is not necessary to determine how likely it is that coal extraction proposals will come forward outside the primary and secondary safeguarded areas. There is conflicting evidence on that point. My original comment sought only to address that the original MAC wording meant that the amended LDP policy ENV12 would not have addressed such an eventuality as it only applied in the safeguarded areas.

The first part of the amended wording in blue above (which BCBC supports) suitably addresses this.

The second part of the amended wording in blue now suitably reflects MTAN guidance on weighing residual harm with community benefits

MAC 10.2

Action Point 10.2

(M5)The reserves figure of 107 years has been accepted by the SWRAWP and is published as such in the SWRAWP's annual report-Annual Survey 2011(WD82, page 3, table 2 headed 'landbank of reserves' column 'Bridgend'). This figure is calculated by using the amount of reserves = 47.49mt* and dividing it by the average sales of rock over the last 3 years i.e.0.44mtpa. This latter figure is confidential. If a 50:50 split is taken for aggregate to non-aggregate end-use in Cornelly/Grove quarries run by Tarmac, this is the average over the last 3 years, there would be 22.5mt of reserves for aggregates and 22.5mt for non-aggregates. But, non-aggregates reserves can also be used for aggregate use and therefore if Tata steel at Port Talbot closed down, there would still be the opportunity to run an aggregate quarry at Cornelly.

*At the hearing reference was made to the three main quarries i.e. Cornelly/Grove/Gaens in South Cornelly but there are also two other quarries which have landbanks albeit relatively small i.e. Stormy Down and Cefn Cribbwr. The

reserves in these quarries amounts to 1.1mt. This figure forms part of the total landbank for Bridgend CBC.

In the Council's rebuttal the figure of 25 years relates to the estimated reserve for aggregates in Cornelly quarry. On reflection this figure is conservative and taking the reserves at the quarry itself (35mt) if this figure is halved to allow for a 50:50 split i.e. 18 mt, this would give a reserve in years of approximately 42 years. This is considerably more than that required by MTAN1-para49.

Inspector's Comment [The original comment M5 relates to MAC10.2.] The footnote to Table 2 of Document WD82 advises that in authority areas including Bridgend 'aggregate reserve figures may include some non-aggregate reserves'. In Bridgend's case that appears to be understating the situation if at least half of limestone production from the largest quarry is used for non-aggregate purposes. It would therefore not be appropriate to adopt a new 107 year landbank figure as an aggregate reserve, particularly at this late stage in the LDP examination and when other Representors have argued for a much lower figure.

Neither is there any evidence before me to support the new suggestion that the Port Talbot steelworks may close down, or that the high quality limestone used for steelmaking would then necessarily be available for aggregate use.

In these circumstances there would not appear to be good reason on the Council's part to depart from the 40 year aggregate reserve figure cited in LDP paragraph 4.3.1. However this should be qualified in the LDP text firstly by the date of assessment (still 2011?) and secondly by some text to the effect that this estimate is based on recent average production figures for aggregates after allowing for non-aggregate use and that these may be subject to change in the future.

Conclusion

I have recently reissued my original comments on the Council's suggested MAC10 changes using the same format as has been used for other Session MACs (eg Comment M1 becomes comment IC1).

I would therefore suggest that the Council reviews its Session 10 MAC changes in the light of both the original comments (as renumbered IC1-IC12) and the above additional comments and then present them using the same tabular format that identifies all the new and deleted text in the submitted LDP policies and supporting text.

Robert Mellor
Inspector
25 February 2013