



BLAENAU GWENT LOCAL DEVELOPMENT PLAN EXAMINATION

HEARING SESSION 17

MINERALS (POLICIES SP12, DM19 AND M4)

SUBMISSION ON BEHALF OF GRYPHONN QUARRIES

BY

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These submissions have been prepared on behalf of Gryphonn Quarries in response to some of the questions set by the Planning Inspector for Session 17.

- 1 (a) How does the Plan translate national minerals planning policy down to the local authority level?
(b) Should the Plan seek to identify a **minimum** 10 year landbank?
(c) Is there merit in seeking to pursue up to 6 million tonnes of minerals and aggregate extraction over the lifetime of the Plan?
(d) Should the county accommodate a proportion of the minerals allocated to the Brecon Beacons National Park? If not, why not?

(a) The LDP background document entitled the Former Gwent Aggregates Safeguarding Study (Ref. SD99) provides a detailed explanation of how national policies for minerals should be applied in Blaenau Gwent. This document was produced by Dr. Alan Thompson of Cuesta Consulting Limited who has been instructed by Gryphonn Quarries to advise on the Preferred Area (M4.1) adjacent Trefil Quarry which is subject to objection by CCW. Dr. Thompson will attend Session 17 on behalf of Gryphonn Quarries and will provide any additional explanation of the information contained in the study if required.

Blaenau Gwent Council in preparing its LDP Minerals Policies has followed the guidance and advice in the Aggregates Safeguarding Study.

(b) Paragraph 49 of MTAN1: Aggregates recognises that for the purposes of commercial stability the aggregates industry requires a proven and viable landbank and that a minimum 10 year landbank of crushed rock should be maintained during the **entire** plan period of each development plan.. There is therefore a requirement for there to be a minimum 10 year landbank at the end of the plan period in 2021.

(c) Policy SP12 (a) states that Blaenau Gwent will address the 3Mt apportionment identified in the Regional Technical Statement.

Paragraph 50 of MTAN1 requires the Regional Aggregates Working Party (RAWP) to produce a Regional Technical Statement (RTS) for aggregates. The current RTS is dated October 2008 and its main purpose is to set out the strategy for the provision of the aggregates in the South Wales region for the period until 2021. As appropriate MPAs are to include allocations for future aggregate provisions in their area as part of the LDP process. The RTS noted that permitted reserves are relatively high in many MPAs but not in the former Gwent area. It also states that the possible implications of meeting the demand currently sourced from National Parks in the longer terms, from non park areas are reviewed and it is considered that in most instances, this would be feasible over the medium term (say 5-10 years) given some local adjustments.

In relation to Blaenau Gwent the recommendation of the RTS is that the MPA should assess the potential to make a resource allocation of at least 3Mt in the LDP. It should be noted that the 3Mt apportionment figure is a minimum requirement.

When the RTS was subject to consultation in January 2008 objections were submitted on behalf of Gryphonn Quarry that the apportionment figure should be at least 6Mt for Blaenau Gwent. Concerns were expressed about the methodology adopted which is based on a per capita basis and has insufficient regard for the availability of the resource and results in the situation such as Newport where there are no active quarries and no minerals reserves having a RTS requirement of 8-8.5Mt which clearly cannot be met .

In addition it is not clear how the 3M tonne figure was derived. The RTS states that the calculation was derived on a per capita basis using the population as a proxy for the consumption of aggregates per head (estimated at 4.45 tonnes/head per annum) (see table A19.11 from the RTS attached). From the table it can be seen that the population of Torfaen is approximately 32% more than Blaenau Gwent yet the RTS requirement for Torfaen is 6M tonnes i.e. twice that of Blaenau Gwent. On an equivalent per capita calculation the RTS apportionment figure for Blaenau Gwent should have been 4.5M tonnes ($68,400 \times 4.45 \text{ tpc} = 304380 \text{ tonnes per annum} \times 15 = 4.5\text{Mt}$).

Torfaen County Borough Council also objected to the RTS when it was issued for public consultation and engaged Dr.Alan Thompson to provide a professional opinion on the document which was submitted with the Torfaen's comments on the draft RTS.Dr.Thompson's final conclusion was *"The existing apportionments, based only on the per capita principle, are clearly inappropriate without consideration of environmental capacity and other factors which will influence the viability of potential resources."*

Although objections were submitted to the draft RTS Consultation Document these objections were largely ignored and the SWRAWP Member Group adopted the RTS in March 2008. The problem with such an approach is that it has not been subject to any proper scrutiny and the only way that the figures can be scrutinised is through the LDP process. Table A 19.13 of the RTS which is also attached shows that the former Gwent authorities had a theoretical deficit of 921000 tonnes in 2005 and this deficit will not be rectified unless there is a formal mechanism of ensuring that the requirements arising in those authorities where there are no resources are provided for elsewhere.

There is also the opportunity for Blaenau Gwent to take some of the apportionment requirements for Brecon Beacons National Park. The RTS referred to the potential of meeting the demand currently sourced from National Parks from non park areas which would be feasible over the medium term (say 5-10 years). The only realistic way this can be achieved is through the LDP process but there is little evidence of this happening so far. If the apportionment figure for Blaenau Gwent were to become 6M tonnes then there would be greater potential for Blaenau Gwent to accommodate some of Brecon Beacons National Park requirements.

- 3 What is the logic for the mineral safeguarding areas? Are they soundly drawn?

The Former Gwent Aggregate Safeguarding Study deals with this issue in Section 2 and Dr. Thompson will be available to provide any additional details about this matter if required.

- 5 (a) What is the logic for the identification of areas in Policy 3 when minerals or aggregates working will not be acceptable?

(b) In identifying areas where minerals and aggregates working would not be accessible, should the Council have taken account of the County's proximity to the Brecon Beacons National Park? If not, why not?

Policy M3 refers specifically to coal working and not aggregates and as such the policy is in conformity with the MTAN 2: Coal which requires LDPs to identify on the proposals map areas where coal will not be acceptable, for example within 500m of settlements. This national policy requirement does not apply to aggregates and there is therefore no requirement for Policy M3 to refer to aggregates.

Although neither geological resources of aggregate nor consumption is evenly distributed throughout the region, it has been suggested that a more equitable distribution of operations may be gained by allying production points more closely to consumption, and to do this by applying the average consumption per capita to population distribution [ref to EMAADS Report].

Average consumption of primary aggregates per head in the region is 4.45tpa. Theoretical consumption base figures using this per capita rate is displayed below.

Table A19.11: Average per capita-based crushed rock consumption estimates (S. Wales 2005)

Former County	Mineral Planning Authority	Population (k) (a)	%	Consumption All Primary (kt) (b)	Consumption Crushed Rock (kt)
Powys	Powys/BBNP (f)	131.5	5.8	585	495
Dyfed	Ceredigion	78.3	3.4	348	290
	Pembrokes (e)	117.5	5.1	523	435
	Carmarthensh	178.1	7.8	793	666
W Glam	Swansea	226.4	15.8	1007	1349
	Neath-PTalbot	135.6		603	
Mid/S Glam/ Gwent	Bridgend	130.8	11.1	582	948
	Vale of Glam	122.9		547	
	Cardiff	319.7	24.2	1423	2066
	RTC	231.6		1031	
	MerthyrTydfil	54.9	9.9	244	845
	Caerphilly	170.2		757	
	Blaenau Gwent	68.4	16.9	304	1443
	Torfaen	90.3		402	
	Monmouthshire	87.7		390	
	Newport	139.6		621	
Total		2283.5	100	10160	8537

- a) Population in thousands from mid-year estimates for 2005 (takes into account recent boundary changes (2003/2005));
 - b) Based on average per capita consumption of 4.45tpc;
 - c) As above by former counties;
 - d) Sub-regional consumption based on the AM 2005 National Collation (provisional);
 - e) Includes Pembrokeshire Coast National Park;
 - f) Brecon Beacon National Park population is distributed to all the relevant authority areas otherwise listed but most of the population is resident in Powys.
- Small differences in total due to rounding.

Table A19.13: Theoretical Surpluses and Deficits (Base Year) ('000Tonnes)

Mineral Planning Authority	Per Capita Crushed Rock Consumption 2005	Per Capita Rebased to 2003-05 Average (a)	Residual consumption (b)	Difference
Powys/BBNP	495	460	818	+358
Ceredigion	290	269	200	-69
Pembrokeshire CC/PCNP	435	404	670	+266
Carmarthenshire	666	618	1058	+440
Neath-PT/Swansea	1349	1252	375	-877
Bridgend/Vale of Glamorgan	948	880	1965	+1085
Rhondda-Cynon-Taff/Cardiff	2066	1918	1432	-486
Merthyr Tydfil/Caerphilly	845	784	988	+204
Blaenau Gwent/Torfaen/Monmouth/Newport	1443	1339	418	-921
Total	8537	7924	7924	0

- a) i.e. calculated 2003-2005 consumption multiplied by percentage of population;
 b) Calculated in table A19.12

The table above indicates those MPA areas which are theoretically in “surplus” (shown as +) and those in “deficit” (shown as -), based on a very broad brush approach which compares notional per capita consumption (see cautions in the introductory notes and Appendix 19) with that part of the output derived from within each MPA area, which was sold within the region (as previously noted, it is not possible obtain actual sales at MPA level). This is in effect a very generalised indicator of those MPA areas which are contributing more than their ‘share’ and those which are dependent on others. In reality, in most cases these are net figures and there inflows and outflows to almost all areas of different aggregate types (ie apart from the current non-producers).