

ES17.3

**BLAENAU GWENT COUNTY BOROUGH COUNCIL LOCAL  
DEVELOPMENT PLAN EXAMINATION**

**SESSION17: MINERALS**

**THE COUNTRYSIDE COUNCIL FOR WALES' RESPONSE TO THE**

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

No Comment

***2. Does the Plan adequately distinguish between energy generating and non-energy minerals and aggregates?***

No comment.

***3. What is the logic for the minerals safeguarding areas? Are they soundly drawn?***

No Comment

***4. What is the logic for the Minerals 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?***

No comment.

***5. What is the logic for the identification of areas in Policy M3 where minerals or aggregates working will not be acceptable? In identifying areas where minerals and aggregates working would not be acceptable, should the Council have taken account of the county's proximity to the Brecon Beacons National Park? If not, why not?***

CCW consider that the Council should have taken account of the county's proximity to the Brecon Beacons National Park in identifying areas where minerals and aggregate working will not be acceptable.

Minerals Planning Policy Wales (para 21) states that minerals development should not take place in National Parks save in exceptional circumstances. It goes on in paragraph 22 to recognise that development close to National Parks may also have significant detrimental effect on the special qualities of National Parks, and that proposals that might affect the setting of nationally designated areas should be assessed carefully to determine whether the environmental and amenity impact is acceptable, and whether the impact can be suitably mitigated. These requirements are also recognised in paragraphs 78 and 79 of Minerals TAN 2: Coal.

Clarification is therefore required in policy M3 and /or its supporting text to identify that development outside the Brecon Beacons National Park may have significant detrimental impacts on its special qualities, and whilst such proposals will not automatically be considered unacceptable, they will be rigorously assessed to ensure they will not affect the setting or special qualities of the National Park.

***6. Should mining legacy areas or coal mining referral areas be shown on the constraints map?***

No comment.

***7. Is the drafting of Policy SP12 soundly based? What is the logic for criterion (e) of this policy? Is the term “acceptable proven safe limit” clear in its intention? Why does the FC version of the Plan distinguish between residential areas and areas that are “deemed exceptions”? Should the policy state more positively that prior extraction will be encouraged on appropriate sites including housing sites? If not, why not?***

No comment

***8. Does Policy DM19 contain significant overlaps with other national policies? If so, what does this policy add in its current form that is not contained elsewhere?***

No Comment