



BLAENAU GWENT LOCAL DEVELOPMENT PLAN EXAMINATION

HEARING SESSION 18

MINERAL SITE ALLOCATIONS

SUBMISSION ON BEHALF OF PEAKMAN LIMITED

BY

ANDREW R. MUIR BSc Econ (Hons) DipT.P. MRTPI

3830/ARM/caj
Harmers Limited
May 2012

Harmers Limited
39 Lambourne Crescent
Cardiff Business Park
Llanishen
Cardiff
CF14 5GG

Tel No. - 029 2076 5454
Fax No. - 029 2076 1536
Email – harmers@btconnect.com
Website – <http://www.harmers.biz>

The submissions have been prepared on behalf of Peakman Ltd. in relation to Tir Pentwys Tip (M4.2) in response to the following questions set by the Planning Inspector.

What is the logic for identifying Tir Pentwys Tip (M4.2) as a preferred area for aggregates?

Is the site allocation soundly based?

The former Tir Pentwys opencast coal site crosses the Torfaen/Blaenau Gwent boundary and contains an overburden spoil mound of secondary high PSV sandstone/general aggregate estimated at 4.75M tonnes. The part of the site which is within Torfaen is subject to a planning application (03/P/09336) for the reclamation of former opencast workings, recovery of secondary aggregates and construction of new access road. The planning application is undetermined and the development of the area within Blaenau Gwent would be accessed from the Torfaen part of the site and is therefore dependent on the Torfaen part receiving planning permission

The planning application site area is also identified as a Preferred Area in the Torfaen LDP (see attached plan from the Focussed Changes) which has recently been submitted to the Welsh Government and Planning Inspector for Examination. The western boundary of the planning application coincides with the local authority boundary and the Preferred Area in Blaenau Gwent provides a logical extension to this cross boundary proposal. The designation of the Preferred Area therefore meets the consistency test of soundness C1 as it has regard to other relevant plans, policies and strategies relating to the adjoining local authority.

The resource at Tir pentwys is for high PSV (polished stone value) sandstone which is predominantly used as top coating for highways

Minerals Planning Policy Wales made special provision for high specification aggregates. Paragraph 69 of MPPW states that high specification of aggregates are required for skid resistance that are of importance to the UK and that their fundamental characteristics is their ability to meet the stringent specifications required for road construction and repair. Paragraph 69 continues that authorities should identify potential high specification aggregate resources and states "*The importance to the UK of these minerals should be taken into account when planning applications are being considered ...*"

The RTS apportionment figure of 3Mt for Blaenau Gwent is based on a per capita basis and as such is not a realistic basis for the assessment in the case of high PSV sandstone as most of the production does not meet the needs of the local area with the majority of production exported to England.

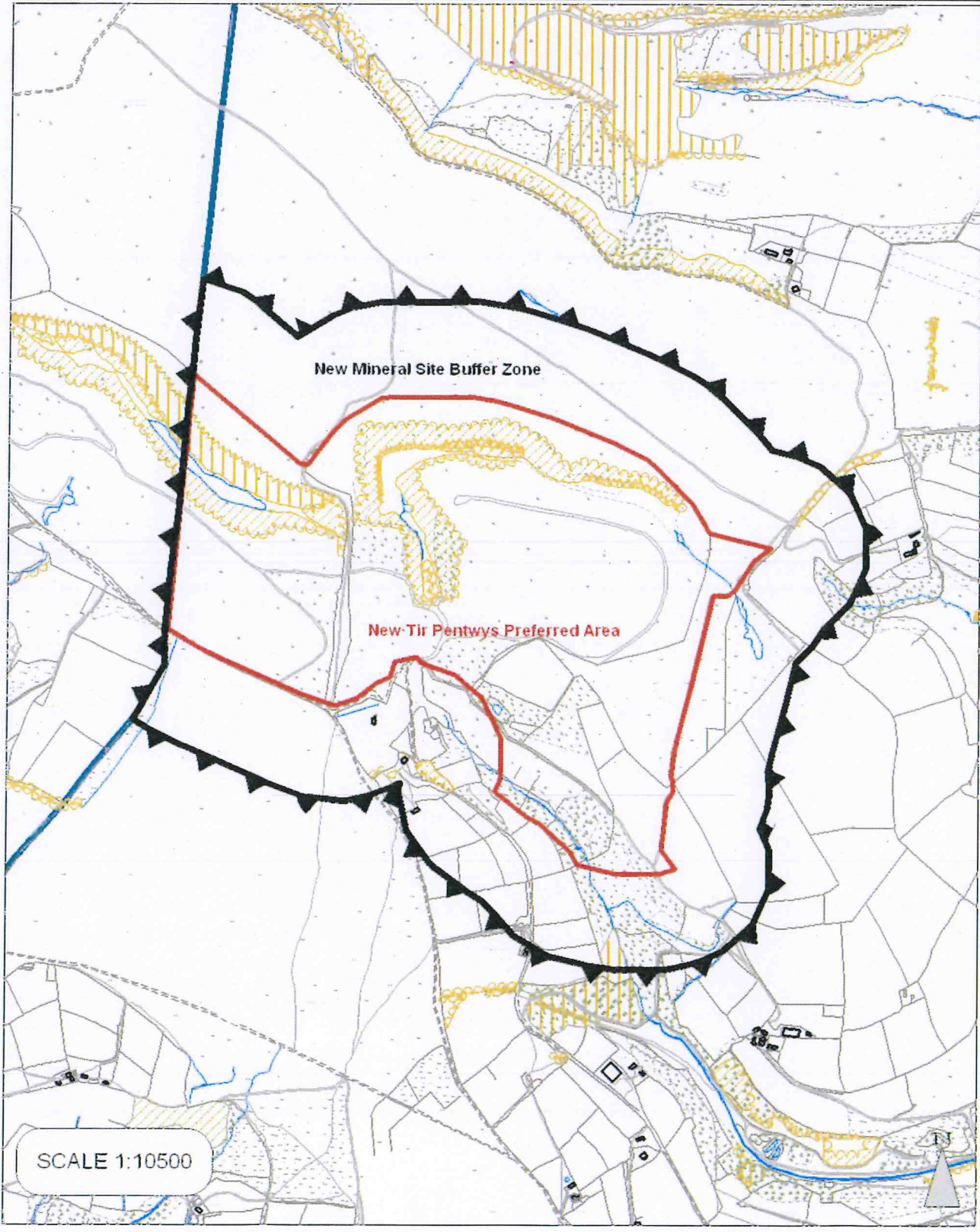
The designation of the site as a preferred area is therefore in conformity with the advice in paragraph 14 of MPPW as the area is one of known resource with some

commercial potential, and where planning permission might reasonably be anticipated.

In conclusion this site allocation is soundly based.

Amended Tir Pentwys

PRODUCED UNDER LICENSE FROM ORDNANCE SURVEY & WITH PERMISSION OF HER MAJESTY'S STATIONER



SCALE 1:10500