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Dear Sirs

Bridgend Local Development Plan Pre-Deposit Proposals Consultation

Thank you for consulting the Mineral Products Association in respect of the Pre-Deposit Proposals LDP.

The Mineral Products Association is the principal trade association representing the quarrying industry in Great Britain. Our members represent 100% of GB cement production, 90% of GB aggregates production and 95% of GB asphalt and ready-mixed concrete production. They are also responsible for producing important industrial materials such as silica sand, agricultural and industrial lime and mortar.

Having reviewed the document we have the following comments to make.

Policy SP6 – Minerals Supply

The proposed 15 year landbank to be maintained for all aggregates is too prescriptive. There is no evidence to show that the individual landbanks for sand and gravel and crushed rock will be maintained at the end of the plan period. This makes it difficult to determine if landbanks are being maintained in line with national policy requirement of 7 year minimum landbank for sand and gravel and 10 year minimum landbank for crushed rock (MTAN, Para 49). The policy is therefore unsound as it is inconsistent with national policy and fails soundness test C2.

The policy also incorrectly states 'A landbank of aggregate resources sufficient to'. Resources are minerals that do not have planning permission and therefore do not count towards the landbank, which is a stock of permitted reserves.

Policy SP7 – Minerals Protection

In paragraph 9.3.6 of the plan it is suggested the requirements of national policy in relation to aggregates supply and future protection/safeguarding will be satisfied.

However the policy is only protecting coal resources not aggregate such as sand and gravel. Mineral Planning Authorities are required to safeguard sand and gravel resources in their development plans in accord with MPPW (Para.13) and to make it clear whether or not it will be acceptable for the resource to be exploited during the plan and what criteria future proposals will be judge.

The approach of policy SP7 is not in accordance with national policy (MTAN, Para. 32, bullet point 4) and is therefore unsound failing soundness test C2.

Yours sincerely

Andrew Bromley
Planning Officer