

**Bridgend County Borough Council  
Bridgend Local Development Plan Examination**

**Schedule of Matters Arising Changes (MAC) with Inspector Comment (IC) in green**

**Session 12 - Energy**

MAC Reference	Location in LDP	Details of Change	Reason for Change
MAC 12.1 (Action Point 1)	Policy PLA4	<p><b>Amend the opening sentence of Policy PLA4 to read as follows:</b></p> <p><i>“All development proposals will be required to make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change and Peak Oil Issues <del>by:</del> <u>Means of achieving this may include.</u>”</i></p>	To clarify the intent of the policy.
		<b>IC1 - Agreed</b>	
MAC 12.2 (Action Point 2)	Criterion 2 Policy PLA4	<p><b>Amend criterion 2 of Policy PLA4 to state:</b></p> <p><i>“2) Utilising local materials and supplies <del>(including food)</del> wherever feasible”</i></p>	To ensure the provisions of policy PLA4 are deliverable through the planning system.
		<b>IC2 – Agreed</b>	
MAC 12.3 (Action Point 3)	Paragraph 4.6.5	<p><b>Delete paragraph 4.6.5</b></p> <p><del>The Council will therefore require energy statements to be prepared for all major development proposals (defined in Policy ENV17) to set out how they can make a positive contribution towards providing increased levels of energy generation from renewable and low/zero carbon sources. It therefore will expect all major development proposals to examine the potential for renewable energy generation and/or low/zero carbon technologies on-site and, where appropriate</del></p>	To ensure the supporting text reflects the provisions of Policy ENV17.

		<p><del>the sharing of renewable energy with the wider community.</del></p> <p><b>Replace with the following:</b></p> <p><u><i>“In order for development proposals to set out how they will make a contribution towards providing increased levels of energy generation from renewable and low/zero carbon resources, energy statements should be prepared for all major development proposals (defined in Policy ENV17). The Council will therefore expect all major development proposals to examine the potential for renewable and low/zero carbon technologies on-site and, where appropriate, the sharing of that energy with the wider community”.</i></u></p>	
		<p><b>IC3</b> – Agreed. I have reinserted the deleted text above for clarity as to what is being changed.</p>	
<p><b>MAC 12.4 (Action Point 4)</b></p>	<p><b>Paragraph 4.6.6</b></p>	<p><b>Amend paragraph 4.6.6 to read as follows:</b></p> <p><i>“To this end, the Council will take a proactive, corporate role in not only seeking to make its own buildings more energy efficient and generators of renewable energy generation, but will produce an Energy Opportunities Plan (EOP) as SPG to the LDP. <u>The EOP will</u> <del>to</del> assist the development industry by spatially identifying possible sources of renewable energy including suitable areas for smaller scale wind, hydropower generation and district heating networks. <u>Such networks utilise a single source of energy to provide heating to a number of different buildings and can help to minimise carbon emissions and energy costs. The Council will expect major developments to be designed to enable connection to such networks where they exist or are proposed, where viable.</u></i></p>	<p>To clarify the intention of Policy ENV17 regarding district heat networks.</p>
		<p><b>IC4</b> - Agreed</p>	
<p><b>MAC 12.5 (Action Points 5 and 6)</b></p>	<p><b>Policy ENV17</b></p>	<p><b>Amend final section of Policy ENV17 to read as follows:</b></p> <p><i>The following sites are <del>safeguarded</del> <u>allocated</u> for renewable energy generation: <u>Technology</u></i></p>	<p>To clarify the intentions of the policy and to delete an allocation which has been implemented.</p>

		ENV17(1) Former Llynfi Power Station      Biomass ENV17(2) Tythegston Landfill                  Landfill Gas <del>ENV17(3) Penybont Waste Treatment Works Sewage Gas</del>	
		IC5 – Agreed subject to current public consultation on the definition of the sites on the Proposals Map	
Action Point 7	Proposals Map	Sites allocated by Policy ENV17 using a notational symbol on the Proposals Map will be assigned a definitive boundary and included on the list of sites subject to public consultation.	
		IC6 – See IC5	
MAC 12.6 (Action Point 8)	Policy ENV18	<p><b>Amend criteria 1 of Policy ENV18 as follows:</b></p> <p>Proposals for renewable energy developments will be permitted provided that:</p> <p>1) <i>In the case of wind farm developments of 25MW or more, <u>the preference will be for them to be located</u> within the boundary of the refined Strategic Search Area <del>and required to meet the indicative generating capacity;</del></i></p>	To clarify the intentions of the Policy.
		IC7 - Agreed	
MAC12.7 (Action Point 8)	Paragraph 4.6.9	<p><b>Amend paragraph 4.6.9 to read as follows:</b></p> <p><del>The wider SSA areas form part of national policy and therefore will continue to be considered as the starting point for assessment of large scale wind energy developments. However, the <u>The</u> locally refined SSA within Bridgend County Borough (as shown on the Proposals Map) are seen by the Council as the preferred location within the County Borough <u>for large scale wind energy</u> developments. <del>of this nature. In this respect applications for these projects will expect to be accompanied by assessments which examine locations in a sequential order: firstly the locally refined SSA, then the original TAN8 area and lastly areas outside of the SSA which are in accordance with Policy</del></del></p>	To clarify the intentions of the Policy.

		<u><del>ENV18.</del> Outside of the refined areas, the Council will operate a case-by-case approach to these schemes. Where development proposals can be justified, however, careful attention to landscape issues will need to be considered in accordance with Policy SP2 as well as the criteria of Policy ENV18.</u>	
		<b>IC8</b> – Agreed but first sentence needs amending according to whether SSA is regarded as one area (which encroaches on Bridgend in several places) or as several areas on the Proposals Map.	
<b>MAC12.8</b> (Not included in original Action Points schedule but discussed at hearing session)	<b>Policy ENV11</b> (See also MAC Changes from Session 10)	<p><b>To amend the opening of Policy ENV11 to read as follows:</b></p> <p>All mineral related developments, including <del>coalbed methane</del> <u>underground gas extraction</u>, will be permitted only where all of the following criteria are satisfied:</p> <p><u>1) Pollution of ground and surface waterbodies is avoided.</u></p> <p><del>2)</del> Measures <del>can</del> <u>will</u> be taken to reduce, and where possible avoid, damage or disturbance to the environment to acceptable levels with specific reference to:</p> <p>a) <del>Pollution or</del> <u>The</u> disturbance <del>to</del> <u>of</u> ground or surface <u>waterbodies and their</u> supply <del>or</del> <u>and</u> drainage;</p>	To clarify the coverage of the Policy.
		<b>IC9</b> – There is now an apparent conflict between criterion (1) which requires that waterbody pollution is avoided and criterion (2) which apparently would allow waterbody pollution as long as it is 'reduced'. This is not a coherent approach.	
<b>MAC12.9</b> (Action Points 9 & 10)	<b>Paragraphs 4.6.13 – 4.6.18</b>	<p><b>Move paragraphs 4.6.13 – 4.6.18 to follow Policy ENV11 and amend to read as follows:</b></p> <p><b><del>Coal Bed Methane Extraction (CBM)</del></b></p> <p><del>4.6.13 The extraction of CBM as a source of energy can take place without adverse environmental impacts. The impacts arising from the extraction of CBM are entirely different in scale and kind from the impacts arising from opencast or deep coal mining</del></p>	To clarify the coverage of the Policy.

operations.

4.6.14 The location and siting of CBM well sites need to be carefully chosen. This involves a sieving process which identifies all relevant designations from the Local Development Plan and consultation with relevant stakeholders. The process is designed to locate the proposed site in the most appropriate location taking into account all relevant designations and sensitive areas.

4.6.15 Current and emerging technologies in drilling now allow the gas resource to be explored and developed horizontally in the seam without having to be vertically above the target areas of coal. Operations at depth can therefore be close to sensitive areas, without creating adverse affects on the basis that surface operations, including drilling equipment and compounds can be located away from potentially sensitive areas.

4.6.16 Proposals for CBM extraction will therefore be assessed against Policy SP2: Sustainable Place Making, as well as other policies from the Environment chapter, to ensure that they do not adversely affect environmental designations or amenity. Policy ENV11 provides additional policy guidance on mineral extraction which would relate to such proposals.

4.6.17 With the abundance of coal resources, coalbed methane (CBM) is present in potentially commercial quantities in the northern part of the Borough. Several exploratory test boreholes have been drilled over the last 10 years but none have progressed to a full production level to date. Because CBM is a finite resource it is not considered to be a source of renewable energy and therefore not truly sustainable. Nonetheless, its benefits and efficiency as a source of energy when compared to other fossil fuels and the ability to combine CBM operations with carbon capture are still being developed and evaluated and this may prove useful in reducing levels of CO<sub>2</sub> and hence reduce climate change in the future to some degree. All CBM proposals will be considered against mineral criteria based policy in ENV11 and determined

~~on a case by case basis.~~

~~4.6.18 It should be noted that the defined Coal safeguarding areas, as shown on the LDP Proposals Map, would protect coalbed methane resources to some degree by virtue of their boundaries being coincident. Nonetheless as the extent of the gas resource cannot be accurately defined, it cannot be shown as a separate resource on the Proposals Map.~~

### **Underground Gas Extraction**

4.3.11 It is possible that the extraction of underground gases as a source of energy can take place with minimal environmental impacts that can be mitigated against by appropriate safeguarding and monitoring measures. The impacts are entirely different from those arising from opencast or deep coal mining operations.

4.3.12 The location and siting of sites need to be carefully chosen. This involves a sieving process which identifies all relevant designations from the LDP and consultation with relevant stakeholders. The process is designed to locate the proposed site in the most appropriate location taking into account all relevant designations and sensitive areas.

4.3.13 Policy ENV11 provides policy guidance on mineral extraction which would relate to such proposals. In addition, proposals for underground gas extraction will be assessed against Policy SP2: Sustainable Place Making, as well as other policies from the Environment chapter, to ensure that they do not adversely affect environmental designations or amenity.

4.3.14 Mineral gas is a finite resource and it is not considered to be a source of renewable energy and therefore not truly sustainable. Nonetheless, its benefits and efficiency as a source of energy when compared to other fossil fuels and the ability to combine such operations with carbon capture are still being developed and evaluated. This may prove useful in reducing levels of CO2 and hence

		<p><u>reduce climate change in the future to some degree. All underground gas extraction proposals will be considered against policy ENV11 and determined on a case by case basis.</u></p>	
		<p>Renumber subsequent paragraphs.</p>	
		<p><b>IC10</b> – I have reinserted the deleted text above for clarity as to what is being changed. The reason for the changes might be better expressed as to relocate the text closer to the most relevant Policy ENV11 and to clarify that Policies SP2 and ENV11 apply to all forms of mineral gas extraction as well as to other forms of mineral development.</p>	