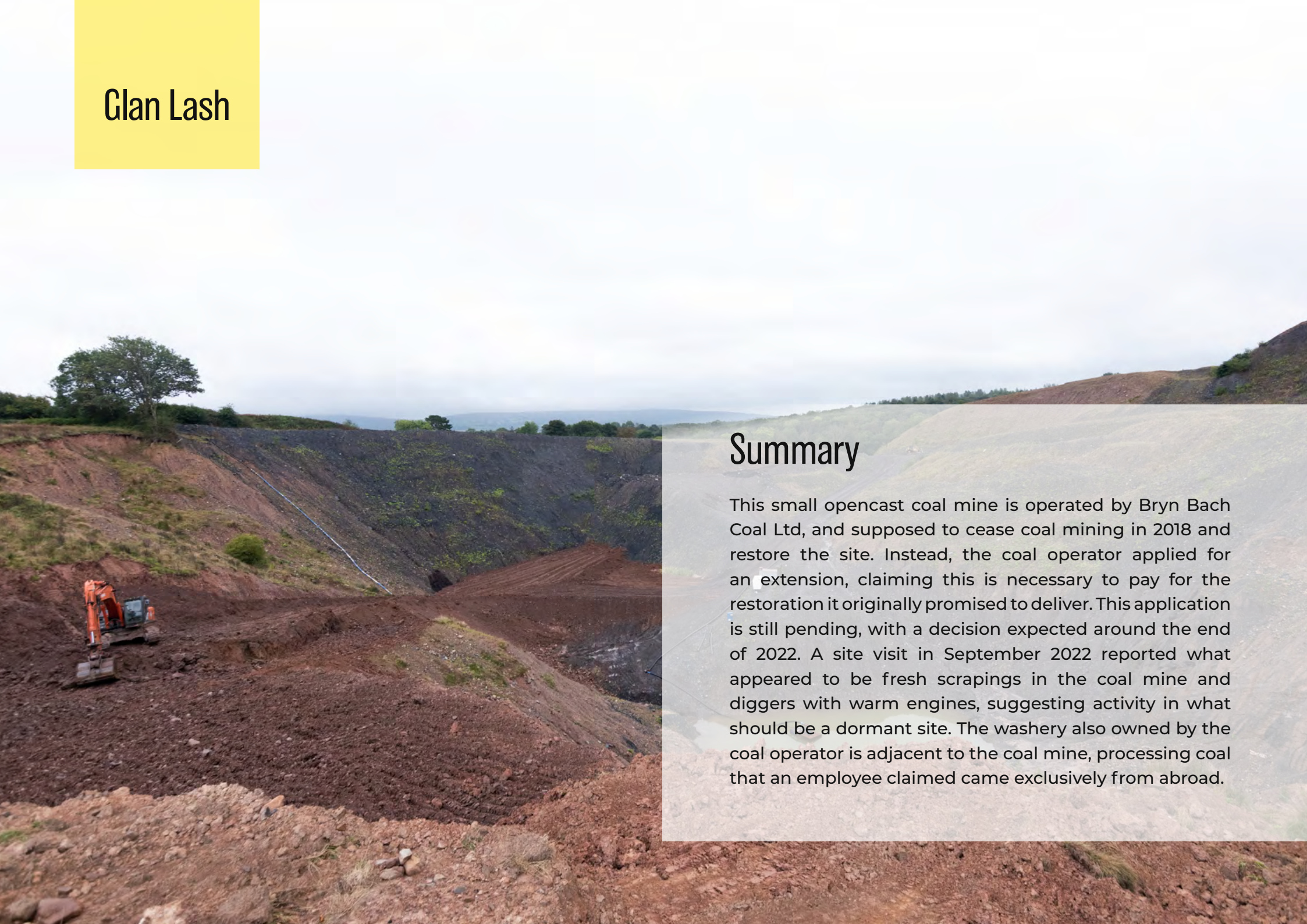


Glan Lash



Summary

This small opencast coal mine is operated by Bryn Bach Coal Ltd, and supposed to cease coal mining in 2018 and restore the site. Instead, the coal operator applied for an extension, claiming this is necessary to pay for the restoration it originally promised to deliver. This application is still pending, with a decision expected around the end of 2022. A site visit in September 2022 reported what appeared to be fresh scrapings in the coal mine and diggers with warm engines, suggesting activity in what should be a dormant site. The washery also owned by the coal operator is adjacent to the coal mine, processing coal that an employee claimed came exclusively from abroad.

Glan Lash opencast coal mine

Address

Glan Lash Mine Site, Shands Road, Llandybie, Blaenau,
Carmarthenshire SA18 3NA

Expected completion

Planning condition: 31 December 2017 + 5 year aftercare for the
mine site, delayed by the coal operator until [31st March 2020](#),
then again

The Tir-y-dail Tip was due to be restored by 31 December 2013 + 5
year aftercare.

Council

Carmarthenshire County Council

Mining operator

Bryn Bach Coal Ltd – since 2012.

Restoration by

Bryn Bach Coal Ltd

Cost of restoration

£549,000 was to be deposited into a Restoration Guarantee Bond
by Bryn Bach Coal Ltd prior to soil stripping or excavation works.
The Council reports a planning bond balance £564,000 has been
accumulated for restoration.



What happens to the land after restoration

Davies & Lumber Ltd, an estate agent, [owns the land](#) and post-restoration it will be returned to the owner. The company's [2022 ecology report](#) proposes it become a conservation site after restoration, but that would seem unlikely given its ownership. There will be public access via a footpath over the site, and the [company plans](#) for the final restoration of the current opencast site (9.31 hectares, 5.25 hectare excavation area) to be primarily agricultural grazing (grass), and for the site of the extension (6.68 hectares) to eventually become woodland and marshy grassland.

Site visit (September 2022)

The report from a site visit pointed out that the coal washery owned also by Bryn Bach Coal Ltd is only metres from the opencast coal mine, across a quiet private road (with public access). A worker in the washery told the site visitor that since planning permission had expired, the company was importing coal to the washery

from Colombia, Venezuela, and other countries, then selling it on. Should Glan Lash be granted permission for expansion, the worker claimed Volvo expressed interested in buying coal from the site. The washery had coal stores and a number of heavy vehicles and diggers parked on site.

Although there hasn't been planning permission since 2017 in the opencast coal mine, fresh excavation was visible (by the difference in colour), the fencing around the top edge had been taken out and laid further back, and at least one of the two diggers in the coal mine was warm from activity that day. Badger tracks were spotted along the precipice of the coal mine.



Photo left: digger with a warm engine in the dormant Glan Lash coal mine. Photo right: coal, purportedly from abroad in the washery.

Views of local community

Quarterly meetings of the Glan Lash Liaison Committee have been taking place, with representatives of Bryn Bach Coal Ltd, Carmarthenshire County Council, local County Councillors, Llandybie Community Council, Bleanau Community Council, and 4 local residents.

Regarding the extension proposal, there are many [calls to reject it](#) on the grounds of climate change, citing Planning Policy Wales (Edition 10). But Llandybie Community Council and Councillor Davies [support it](#)—citing jobs, community fund, and repeating the company's claims of low climate change impact.

Notes

The original Glan Lash licence permitted the extraction of 92,500 tonnes of coal over a 4.6 year period, plus 8 months of restoration.

A subsequent, live application, submitted in 2019, by Bryn Bach Coal Ltd to expand the Glan Lash opencast coal mine by 6.68 hectares (originally 7.98 hectares) with the site boundary at 10.03 hectares, to extract a further 95,038 tonnes of coal (which represents more than the original coal mine licenced for just 92,500 tonnes) over 6.1 years (planning ref. E/39917). This amounts to around 325 tonnes/week. The [Standard Mineral Application Form](#) submitted to the Council is only partially filled out. The Council planning hearing to determine the application was scheduled for July 2022, but the coal operator has been asked to provide additional information regarding a number of matters within 6 months, to enable determination.

Bryn Bach Coal Ltd claim Glan Lash produces 'premium quality anthracite', without parallel in South Wales—a similar claim is [also made by EnergyBuild Ltd](#) about their Aberpergwm deep coal mine in South Wales.

Bryn Bach Coal Ltd paid £5,000 into a Glan Lash Liaison Committee fund every year of operation, totalling [£35,000](#) by 2018.

Issues

Information on the original Glan Lash opencast coal mine is limited as only some of the related documents have been uploaded to the Carmarthenshire County Council planning portal. Letters of objection have not been uploaded, for example. The Council rejected an FOI request that would require searching through physical archives due to their incomplete upload as this would purportedly incur too great a cost.

Based on the [planning permission](#) issued on 25 January 2012, coal mining was to cease by the end of 2016 and the coal mine was to be progressively restored, with restoration completed by the end of December 2017, followed by a 5-year aftercare period. However, as so often happens, this promised restoration has yet to even be started. Bryn Bach Coal Ltd submitted a Section 73 time-extension application to delay restoration works, which the Council permitted ahead of the coal operator submitted an application to extend mining. As a consequence, the local community has suffered a dormant unrestored coal mine on their doorsteps for almost 5 years whilst the mining extension application is considered.



Photo: signs and planning notices obscured by growth of vegetation after 3 years of a pending application to expand.

The Glan Lash opencast coal mine was one of several coal mines supplying the Aberthaw coal-fired power station ([closed at the end of March 2020](#)) which emitted 8.5 million tonnes of CO2 annually, discharged mercury into the water, and breached local air quality limits for years.



Llandybie Community Council recommended approval of the application but [52 letters of objection](#) were received from local residents, including MP Jonathan Edwards for Carmarthen East and Dinefwr, along with a petition signed by 312 people—mostly living locally, with some further afield in Wales. The grounds for objection included the proximity of the site to a gas pipeline, the history of poor restoration of opencast sites in the area, pollution of rivers, and climate change—as well as traffic, amenity, visual, and environmental impacts. A number of objections mentioned they were not made aware by the Council of the proposal. One objector who lived just 350 metres from the proposed coal mine wrote: “The value of my house will decrease by 30%... is it fair that we suffer, while the owners of Bryn Bach Coal become rich?”.

The closest residence to works at the coal mine was under 250 metres—much less than the 500 metre minimum distance advised in the Minerals Technical Advice Note (MTAN) 2, para. 29, which was adopted by Wales 3 years earlier. The coal operator tried to negotiate the 500 metre buffer zone down to just 50 metres, as Glan Lash is a smaller coal mine. Although this argument was rejected, the Planning Officer advised Planning Councillors that the purported need for the coal made the application exempt from the MTAN.

“ ...is it fair that we suffer, while the owners of Bryn Bach Coal become rich? ”

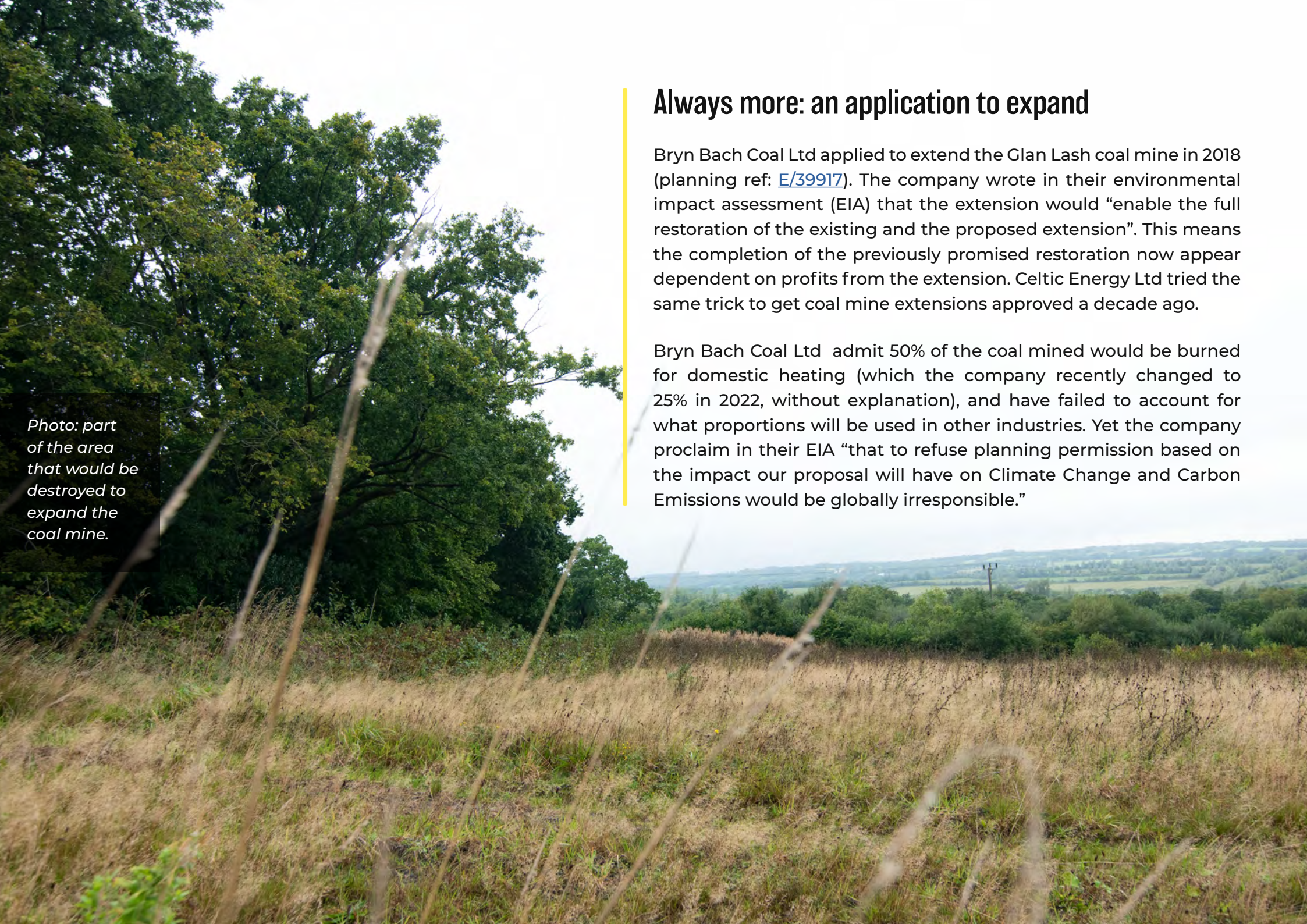


Photo: part of the area that would be destroyed to expand the coal mine.

Always more: an application to expand

Bryn Bach Coal Ltd applied to extend the Glan Lash coal mine in 2018 (planning ref: [E/39917](#)). The company wrote in their environmental impact assessment (EIA) that the extension would “enable the full restoration of the existing and the proposed extension”. This means the completion of the previously promised restoration now appear dependent on profits from the extension. Celtic Energy Ltd tried the same trick to get coal mine extensions approved a decade ago.

Bryn Bach Coal Ltd admit 50% of the coal mined would be burned for domestic heating (which the company recently changed to 25% in 2022, without explanation), and have failed to account for what proportions will be used in other industries. Yet the company proclaim in their EIA “that to refuse planning permission based on the impact our proposal will have on Climate Change and Carbon Emissions would be globally irresponsible.”

According to information gained under an FOI request, the planning application was scheduled to be determined in July 2022 but instead the Council commissioned independent reviews of the technical reports paid for, and submitted by, Bryn Bach Coal Ltd on how the coal mine extension would impact water flows (hydrology) and the ecology reliant on that in the area.

The Council has given Bryn Bach Coal Ltd 6 months more to provide additional information in response to the finding of these reviews. One review was in the form of an independent Planning Ecology report in July 2022. This report recommends rejection of the application to fulfil the Council's duty to

“maintain and enhance biodiversity under Section 6 of the Environment (Wales) Act 2016, Section 6.4.21 of Planning Policy Wales or under Well-being Goal Two of the Well-being and Future Generations Act 2015 (A Resilient Wales)”, and points out “documentation provided by the applicant is misleading in places as it makes frequent reference to the restoration of habitats”. In a [letter to the Council](#), Friends of the Earth Cymru precede this independent Ecology Planning report's conclusions by pointing out that “While mitigation is proposed in the form of restoration and replanting, these trees and associated landscape proposals will take years to grow back to current levels, and existing habitats may not recover”.

“ documentation provided by the applicant is misleading in places... ”

The 2018 EIA report paid for by the coal operator, Bryn Bach Coal Ltd, identifies that ancient woodland extends 2.52 hectares inside the site boundary, which would be at risk if the extension goes ahead, but claim the woodland should not be categorised as ancient woodland. The ecologists refute the 2011 classification by the *Countryside Council for Wales and Forestry Commission Wales*, by citing a more obscure historic 1988 source that does not list it as ‘ancient woodland’. In a more recent EIA report by Pryce Ecologists, the downgraded term ‘historic woodland’ was dropped and it stuck to the correct ‘ancient woodland’ classification. This is reinforced by the July 2022 independent [Planning Ecology report](#) citing the woodland to be “circa 120 years old” and “...cannot be compensated for by the creation of new woodland within a 17-year timeframe”.

This is in direct contraction to what was claimed by the Pryce Ecologists EIA report paid for by Bryn Bach Coal Ltd. The independent report goes on to say it would take 120 years for the newly planted woodland to support the same biodiversity, by which time the existing woodland would be 240 years old if it wasn't removed, and therefore probably still ahead in biodiversity. The independent report is also critical of the 2018 EIA report: ‘The applicant has incorrectly assessed that none of the hedgerows on the site are “important”’. This new report instead states the loss of these hedgerows should be a ‘material consideration when considering this planning application’, particularly as the “amount of new hedgerow planting [in the restoration plan] is well below the 2:1 ratio associated with habitat compensation and habitat loss” and “40-50% of this planting is in positions where it will contribute little to biodiversity”.

“ ...the loss of a 2.48 ha woodland of circa 120 years old cannot be compensated for by the creation of new woodland... ”

Photo: hedgerows that would be destroyed to expand the coal mine.

“

...unsafe assumption[s]

”

The independent hydrology review commissioned by Council is highly critical of the reports provided by Bryn Bach Coal Ltd, with specific criticisms like “it is my very strong opinion that the information provided is insufficient”, “here appears to have been a complete absence of research on the hydrological management of abandoned mine workings in the area”, and “unsafe assumption[s]”, “I disagree entirely with this statement, and find it hard to understand how the reported data collection exercise could have informed the understanding of whether the marshy grassland is groundwater-dependent to any degree”.

Lambasting one of the most recent hydrology reports by Humphries and Leverton in 2022 (again commissioned by Bryn Bach Coal Ltd), the independent review claims “it is based on a wholly inadequate ecohydrological conceptual model, the central limitation being an extremely poor understanding of the hydrogeology

of the area ... I am strongly of the opinion that

the information provided is not sufficient

to enable the Local Authority

to determine whether or not

the proposals will cause

significant ecohydrological

impacts”. In relation to the

restoration plan, the review

highlights that the “current

claim that sequential

backfilling of mined areas

will completely restore the

original hydrology as the workings move

from west to east is, in my opinion, unsafe.”

Photo: pump to prevent the void filling with water over time.



Photo: sacks of washed coal in Bryn Bach Coal Ltd's washery.

As a statutory consultant, Environmental Planner [Neil Bateman responded](#) to the extension application by pointing out that the Planning Policy Wales 10 (para. 5.10.14-15) applies in this case: “Proposals for opencast, deep-mine development or colliery spoil disposal should not be permitted...” (although acknowledging there is ambiguity about whether this applies extensions or only new coal mines). Bateman also highlights that the policy *MTAN 2, para. 29* states “coal working will generally not be acceptable within 500 metres (m) of settlements”. The nearest settlement to the extension would be 440 metres away, 60 metres less than the minimum distance in this policy.

There is a pending call-in request (from 03/01/2020) to the Welsh Ministers to determine this application. If the Council would be minded to grant planning permission, Welsh Ministers will consider calling in the decision to be made at the Ministerial level.

A large-scale open-cast coal mine site. The foreground shows a red excavator working on a dark, rocky slope. The background features a vast, layered landscape of coal and rock, with a power line tower visible in the distance under a clear sky.

Summary

This small opencast coal mine is operated by Bryn Bach Coal Ltd, and supposed to cease coal mining in 2018 and restore the site. Instead, the coal operator applied for an extension, claiming this is necessary to pay for the restoration it originally promised to deliver. This application is still pending, with a decision expected around the end of 2022. A site visit in September 2022 reported what appeared to be fresh scrapings in the coal mine and diggers with warm engines, suggesting activity in what should be a dormant site. The washery also owned by the coal operator is adjacent to the coal mine, processing coal that an employee claimed came exclusively from abroad.

Photo: coal stored in Bryn Bach Coal Ltd's washery.

Disclaimer

Efforts have been made to corroborate assertions and figures reported in good faith herein, but the authors acknowledge inaccuracies and errors may have been made; planning documents can be highly technical and companies operate opaquely. We welcome Councils and companies to get in touch to highlight evidence that improves the accuracy of this report.

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Coal Action Network works for an end to coal-fired power generation, coal extraction and coal imports in the UK, and for justice for communities affected by the UK's current and historical coal consumption and mining.

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