

**Association of Greater Manchester Authorities**

**Greater Manchester Joint Minerals Development Plan Document**

**Defining Mineral Safeguarding Areas**

**Consultation Outcomes Report**

National Minerals Planning Policy 1 requires Mineral Planning Authorities to define Mineral Safeguarding Areas (MSAs) in order that proven resources are not needlessly sterilised by non-minerals development.

An MSA is an area of known mineral resource that is of sufficient economic or conservation value to warrant protection for generations to come. The purpose of safeguarding a resource is to ensure that it is a consideration during planning applications for non-minerals development: there is no presumption that any area within a Minerals Safeguarding Area will ultimately be environmentally acceptable for mineral extraction. Defining an MSA does not prevent other forms of development taking place, but ensures that mineral resources are adequately and effectively considered in landuse planning decisions.

In broad terms, the definition of an MSA for a mineral resource is aimed at ensuring that viable mineral resources are not sterilised and opportunities are maximised for the extraction of a mineral prior to sterilisation by another development

A report was made available for consultation between Friday 6<sup>th</sup> August and Friday 27<sup>th</sup> August 2010 which set out the information available on mineral resources in Greater Manchester and how it is proposed to use this information in developing Mineral Safeguarding Areas.

The consultation sought:

- Views on the options for defining MSAs for the following resources:
  - Glaciofluvial sand and gravel
  - Carboniferous Millstone Grit (sandstone)
  - Brickclay
  - Peat
  - Surface mined coal (shallow coal) and fireclay
- Any further information on mineral resources that stakeholders may have.

This Outcome Report documents the comments received, setting out the preferred approach as chosen by respondents and how these responses will be used to inform the development of the Preferred Approach of the Minerals Plan.

Responses were received from the following 13 organisations:

- Network Rail
- Confederation of UK Coal Producers (CoalPro)
- The Coal Authority
- English Heritage
- Emerson Group
- Environment Agency
- Lancashire CC
- Natural England
- Offerton Sand and Gravel
- Wienerberger Ltd
- National Trust
- Salford City Council
- Peel Holdings (Environmental) Ltd

## Safeguarding Glaciofluvial sand and gravel

**Question 1:** Which options for safeguarding Glaciofluvial sand and gravel do you prefer?

- Option 1 – Safeguard the entire resource
- Option 2 – Safeguard the entire resource outside the urban area, and limit safeguarding in the urban area to regeneration and brownfield site development over 5ha in size.
- Option 3 – Safeguard areas outside the urban area and international designations.
- Option 4 - Limit safeguarding to extensions to resource around existing quarries.

Name/Organisation	Preferred Option	Comments
Emerson Group	4	none
Natural England	None	Natural England has no specific comment to make on the different options for safeguarding Glaciofluvial sand and gravel. However, we do agree that areas covered by International nature conservation designations are already protected and therefore do not require further protection through safeguarding.
Colin Jacobs on behalf of Offerton Sand and Gravel Ltd	4	Option 1- It would not be appropriate to safeguard deposits overlain by development or small unworkable or uneconomic units due to a wide range of planning objections. Option 2- It would not be appropriate to safeguard these sites due to the disruption and traffic aspects arising. Option 3- There are no apparent justifications for doing this <b>Option 4- Option 4 is the most appropriate.</b>
National Trust	2	Option 2 is considered to be the most realistic on the basis that 'safeguarding' does not mean 'exploitation'. In considering the exploitation of the resource it would be necessary to assess a range of factors, including the impact upon designated sites (international or otherwise) and their settings. Provided there are robust criteria based policies in place to inform the assessment of individual proposals it is appropriate to safeguard the bulk of the resource. The main drawback

		<p>with such an approach would be that it could be a constraint upon other, needed, development taking place on such a site - especially if the sand/gravel could not be viably extracted in advance of development.</p> <p>The Trust would also wish to note that at present where this resource is being exploited it is not meeting a 'high-level' need, rather it is mostly being used as bulk fill - this is an area where it is increasingly possible to use re-cycled aggregates which should be the preferred approach.</p>
Salford City Council	<b>3</b>	<p>Option 3 is preferred.</p> <p>Options 1 and 2 are both felt to impose too much of a constraint on development.</p> <p>Option 4 is considered unwise as it limits safeguarding to areas around existing sites. These may not be the most sustainable locations for further extraction. Astley Moss East, for example, is surrounded by areas of peat bog undergoing or due to undergo restoration. Any further extensions to the quarry would have serious impacts on nature conservation, and there may be a risk of impacting the nearby Special Area of Conservation.</p>
Peel Holdings (Environmental) Ltd	<b>Combination of 3 &amp; 4</b>	<p>Peel Environmental Ltd would suggest that a combination of Option 3 &amp; 4 is the preferred option. This would allow potentially new resources of minerals to be worked whilst safeguarding existing sites and safeguarded extensions to resources around existing quarries. This option should specify that existing deposits will be safeguarded as detailed in the supporting text.</p>

## Response

Responses received indicate Option 4: Limit safeguarding to extensions to resource around existing quarries, and Option 3: safeguard areas outside the urban area and international designations are the favoured options.

From the responses received it seems that consultees have focussed on the MSA as a proposal for mineral development, which is not the case. The purpose of defining an MSA is to simply alert developers about the presence of a mineral and the need to adequately consider extraction prior to other development. Therefore these responses have been screened to ensure the most appropriate approach to defining an MSA for sand and gravel is taken forward. To this end a combination of Options 2 and 3 will be taken forward to inform the

development of the Preferred Approach.

One respondent suggested that there was little point in safeguarding the resource within international designations as this is already protected and it is unlikely that development would take place there anyway. However the purpose of the international designations does not coincide with the purpose of defining an MSA to safeguard sand and gravel resources. Therefore the MSA for sand and gravel should include international designations.

Stakeholders commented that there is little point in safeguarding resources within the urban area because they have already been sterilised by development. Glaciofluvial sand and gravel resources are found widely across Greater Manchester and so they are not considered valuable or scarce enough to warrant safeguarding in the urban area. However, it was also commented that provided there are robust policies in place to inform the assessment of individual proposals, it is appropriate to safeguard the entire resource.

Therefore, Options 1, 2 and 3 will be used to inform the development of the Preferred Approach to defining a Mineral Safeguarding Area for Glaciofluvial Sand and Gravel.

Several respondents, representing landowners within Greater Manchester, suggested that Option 4 would be the most appropriate, however there are just three sand and gravel quarries in Greater Manchester and limiting safeguarding to the area around these could result in sterilisation of resources elsewhere. Therefore this option will not be taken forward.

## Safeguarding sandstone, brick clay and peat

**Question 2:** Do you agree with this statement:

For the following mineral resources it has been assumed that, due to the adverse environmental and social impacts associated with the extraction of the materials, it is not appropriate to do so in the urban area.

- Carboniferous Millstone Grit (Sandstone);
- Brick clay; and
- Peat.

If not, can you provide information to support the identification of an MSA for sandstone, brick clay or peat in the urban area?

Name/Organisation	Agree/disagree with statement	Comments
Emerson Group	<b>Agree</b>	None
Natural England	<b>None</b>	Natural England has no comment to make on the above statement.
Colin Jacobs on behalf of Offerton Sand and Gravel Ltd	<b>Agree</b>	
Salford City Council	<b>Agree</b>	
Peel Holdings (Environmental) Ltd	<b>Disagree</b>	It is not clear what is being classified as an urban area. Certain sites may be located in close proximity to urban areas and benefit from this location due to aspects such as good transport links. It is considered that in certain locations mineral extraction can be conducted in such locations without adverse and social impacts.

### Response

Respondents agreed with the Preferred Approach to exclude the urban area from the MSA defined for sandstone, Brick clay and peat. However, it was also commented that provided there are robust policies in place to inform the assessment of individual proposals, it is appropriate to safeguard the entire resource.

## Safeguarding Carboniferous Millstone Grit (Sandstone)

**Question 3:** Which options for safeguarding carboniferous millstone grit do you prefer?

- Option 1 – Safeguard the entire resource
- Option 2 – Safeguard the entire resource outside the urban area, and limit safeguarding in the urban area to regeneration and brownfield site development over 5ha in size.
- Option 3 – Safeguard areas outside the urban area and international designations.
- Option 4 – Limit safeguarding to extensions to resource around existing quarries.

Name/Organisation	Preferred Option	Comments
Emerson Group	4	None
Natural England	None	Natural England has no preference for any of the options for safeguarding carboniferous millstone grit.
Colin Jacobs on behalf of Offerton Sand and Gravel Ltd	3	
English Heritage	3	The report recognises the value of sandstone and Brickclay in the conservation of the area's historic environment. When conserving historic buildings and places stone or brick that closely replicate the original in its appearance, chemical, physical and mineralogical properties, strength, durability should be source. For this reason it is difficult to choose between the options posed for sandstone and brick clay. Whilst safeguarding the entire resource may be considered unrealistic it is not clear what impact the various levels of safeguarding below this would have on the conservation of heritage assets. Whilst limiting safeguarding to existing quarries will include heritage quarries selecting this option may limit the ability to source appropriate material from potential new quarries. Option 3 for sandstone and brick clay would therefore appear to meet existing and potential needs for conservation. However, 'heritage quarries' could be found in areas of international designation. It would however be helpful if the impact of the

		options in terms of the issues outlined above was explained.
National Trust	<b>2</b>	Option 2 appears to be the most practical approach - there is in practice little difference with Option 3 and in any event any proposals that came forward would need to be assessed against their impacts upon all designated sites and their settings, not solely international designations.
Salford City Council	<b>None</b>	Not relevant to Salford as none of the reserves are found within the city.
Peel Holdings (Environmental) Ltd	<b>4</b>	This option should also specify that the areas currently being worked will also be safeguarded, as stated within the supporting text for this option. This option recognises that the economic viability of these resources has already been established and enables site specific policies to be proposed. Peel also wishes to nominate Fletcher Bank Quarry for the continued extraction of mineral resources, along with promoting the potential to extend the existing quarry where appropriate. As identified on the Map for Sandstone MSA Option 4, Fletcher Bank Quarry and the proposed resource surrounding the existing quarry should be safeguarded to ensure prior extraction of minerals before non mineral development can take place in the future.

## Response

Responses received indicate Option 3: Safeguard sandstone resources outside the urban area and international designations and Option 4: Limit safeguarding to extensions to resource around existing quarries, are the favoured options.

Respondents agreed that it would not be appropriate to safeguard sandstone within the urban area due to the potential adverse social and environmental impacts associated with extraction. In addition, the length of time required to extract sandstone would mean it is unlikely to be viable to consider prior extraction in the urban area. However, not safeguarding the resource within the urban area could impact on the conservation of heritage assets. Respondents suggested that there was little point in safeguarding the resource within international designations as this is already protected and it is unlikely that development would take place there anyway. However the purpose of the international designations does not conflict with the purpose of defining an MSA to safeguard sandstone resources.

Therefore, Options 1, 2 and 3 will be used to inform the development of the Preferred Approach. Option 4, limiting safeguarding to existing quarries, could mean that resources elsewhere are sterilised by non-minerals development.

## Safeguarding Brick clay

**Question 4:** Which options for safeguarding Brickclay do you prefer?

- Option 1 - Safeguard the entire resource
- Option 2 - Safeguard the entire resource outside the urban area, and limit safeguarding in the urban area to regeneration and brownfield site development over 5ha in size, and for which there is known industry interest.
- Option 3 - Safeguard areas outside the urban area and international designations.

Name/Organisation	Preferred Option	Comments
Emerson Group	<b>None</b>	Options 1, 2 and 3 are too restrictive and will sterilise large areas of land. Rather than designating the areas as safeguarded and then putting the emphasis on developers to come forward to demonstrate there is no viable deposit in that location it would be more appropriate to not safeguard the areas and leave landowners, developers and clay extraction companies to come forward and demonstrate that there are deposits in the location worth working and safeguard those area instead. The level of safeguarded land in way in excess of anticipated requirements, it will sterilise land, when there is no evidence that it is viable to extract clay there or that it will be needed. Many brick factories have closed with the economic climate and low demand, particularly with alternative building products and methods.
Natural England	<b>None</b>	Natural England has no preference for any of the options for safeguarding brick clay.
Weinerberger Ltd	<b>3</b>	Currently our brickmaking clay is imported from our site in Glossop Derbyshire to our Denton brickworks. Our Cheadle site has currently stopped producing brick due to the down turn in the construction industry. Option 1 - To safeguard the entire resource would be our preference to insure our industry can survive long term within the Greater Manchester

		<p>area, however we recognise that this would not be a realistic option, due to development objection and the issues with trying to manage this option.</p> <p>Option 2 - This would be a more realistic approach, however we feel that the above issues would also be raised, the information is also not available to identify these sites currently and would require a lot of investigation work</p> <p><b>Option 3 - due to the above reasons we would support this option and put the responsibility onto the developers to prove or disprove the existence of minerals before development takes place.</b></p>
Colin Jacobs on behalf of Offerton Sand and Gravel Ltd	<b>2</b>	
National Trust	<b>2</b>	Option 2 is preferred - for similar reasons to those set out in the responses to Questions 1 and 3.
Salford City Council	<b>3</b>	Option 3 is preferred as Options 1 and 2 are considered to impose too much of a constraint upon development.
Peel Holdings (Environmental) Ltd		Peel has no preference for the safeguarding of Brickclay

## Response

Responses received indicate Option 3: Safeguard brick clay resources outside the urban area and international designations, is the favoured option. From the responses received it seems that the information on the purpose of defining an MSA for brick clay was confusing to a number of consultees. As a result the responses seem to focus on the MSA as a proposal for development, which is not the case. Therefore these responses have been screened to ensure the most appropriate approach to defining an MSA for brick clay is taken forward.

Respondents suggested that it would not be appropriate to safeguard brick clay within the urban area due to the potential adverse social and environmental impacts associated with extraction. In addition, the length of time required to extract clay would mean it is unlikely to be viable to consider prior extraction in the urban area. However, it is recognised that brick clay is an important resource and should be

taken into consideration by developers. Respondents suggested that there was little point in safeguarding the resource within international designations as this is already protected and it is unlikely that development would take place there anyway. However the purpose of the international designations does not coincide with the purpose of defining an MSA to safeguard brick clay resources. Therefore the Preferred Approach to defining the MSA for brick clay is to include the entire resource together with international designations but excluding the urban area.

Options 1 and 2 will be used to inform the development of the Preferred Approach to defining a Mineral Safeguarding Area for brick clay.

## Safeguarding Peat

**Question 5:** Which options for safeguarding Peat do you prefer?

- Option 1- Safeguard the entire resource
- Option 2 – Only safeguard resource which is not covered by an international designation

Name/Organisation	Preferred Option	Comments
Emerson Group	<b>None</b>	<p>Options 1 and 2 are too restrictive and sterilise land that is not necessarily viable to be used for peat extraction. Rather than designating the areas to be safeguarded and then putting the emphasis on developers to come forward to demonstrate there is no viable deposit in that location it would be more appropriate not to safeguard the areas and ask landowners, developers and peat extraction companies to come forward and demonstrate that there are deposits in the location worth working and grant consent or not at that time.</p> <p>Alternatively to have a policy that in the zoned areas land which are designated for alternative uses or have planning consent are exempt from safeguarding. Government Guidance on future sustainability states compost should be made out of garden waste from householder waste site rather than from extraction. So it is unsustainable and undesirable to extract and move peat.</p>
Natural England	<b>None</b>	<p>Natural England acknowledges the value of peat as a finite resource. It holds a value for biodiversity and as a carbon sink. Natural England supports the preservation of peat lands and wants to ensure that eroding peat soils and blanket bog are stabilised, properly vegetated, and can actively absorb carbon.</p> <p>We consider that it would be prudent to wait for the forthcoming guidance from Defra on peat protection. Natural England considers that our peatlands provide a vital role in combating climate change. Natural England's recent Report: England's</p>

		peatlands – Carbon Storage and Greenhouse Gases, available via the following web-link to our Press notice dated 17th March 2010. The report is a timely reminder of what's at stake if we fail to look after our peatlands. Peat soils are extremely valuable carbon stores as well as being home to wildlife and important to archaeology, and we should be doing everything we can to protect them. It should also be acknowledged that peat soils are often subject to disturbance and potential degradation, through the extraction of other minerals (typically sand and gravel in the lowlands or hard rock in the upland); in addition to the commercial removal of peat itself.
Environment Agency	<b>None</b>	<p>We note that the Minerals Plan will not seek to identify any new sites for peat extraction, a position we would support.</p> <p>In view of the intention to phase out the use of peat, we would question whether peat should be viewed as a resource of economic interest. Option 2 for peat suggests that sites protected by international designations are unlikely to come forward for non-minerals development and should not therefore be identified as MSAs.</p> <p>Whilst the existing sites are not afforded the protection of designation, we would not wish to see any of these sites come forward for development. However, we also note that by identifying peat as a MSA, it does not give a presumption for development.</p> <p>It would therefore appear that the peat sites will be assessed through the development control process regardless of whether or not they are designated MSA. As such, we have no preference for option 1 or option 2.</p>
Colin Jacobs on behalf of Offerton Sand and Gravel Ltd	<b>1</b>	
English Heritage	<b>None</b>	In view of the need to safeguard peat deposits intact and currently permitted extraction, I am not clear if the suggested safeguarding options for peat are aimed at safeguarding this resource for potential future exploitation and extraction. It is our view that peat extraction is unsustainable.

National Trust	<b>None</b>	It is not clear that there is any overwhelming need to safeguard peat resources for extraction. They are an important resource in terms of their role as a carbon sink and there is increasing availability of suitable peat-free alternatives for horticultural purposes. Accordingly it is considered that a case can be made for not safeguarding peat resources.
Salford City Council	<b>2</b>	<p>Of the two options presented in the consultation paper, Option 2, which excludes international sites, is preferred. Officers from the city council have concluded that we are able to support the designation of a Safeguarding Area in order to prevent the long term sterilisation of peat reserves. Where development which is otherwise considered acceptable is to go ahead on top of peat, we recognise that there may be some circumstances where it may be more appropriate to extract the peat first.</p> <p>It is nonetheless considered that a stronger policy approach to peat should be taken within the minerals plan. This is because the circumstances surrounding peat are quite different from those of the other safeguarded minerals and in Salford have formed a very distinctive policy approach at Chat Moss, including the designation of a 'Heartland', where the emphasis is on the restoration of lowland raised bog. The approach currently set out in the draft policy direction for MSAs is too blunt and simplistic when applied to peat. We therefore wish to see peat having its own policy (as coal bed methane currently does) within chapter 3 on minerals.</p>
Peel Holdings (Environmental) Ltd	<b>2</b>	<p>Peel would like to ensure that the following peat resources are safeguarded within the preferred approach taken forward in the Minerals Plan:</p> <ul style="list-style-type: none"> <li>• Little Woollen Moss</li> <li>• Chat Moss (Twelve Yards Road)</li> <li>• Astley Moss</li> </ul> <p>Peel would welcome evidence to demonstrate the statement in paragraph 7.7 which states that 'it is also recognised that there is</p>

		currently sufficient permitted peat extraction sites within the North West'. As stated in MPS1 Minerals can only be worked where they are located. Significant demand for peat exists on a national basis, and it is in accordance with National Mineral Policy that this demand should be supplied from sites which are not protected by statutory designations and which have been subjected to previous workings.
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## Response

From the responses received it seems that many consultees would not wish to see an MSA defined for peat because they infer that defining an MSA automatically identifies the mineral for extraction, which is not the case. Minerals Policy Statement 1: Planning and Minerals (MPS1) requires Mineral Planning Authorities to define Mineral Safeguarding Areas. A Mineral Safeguarding Area is an area of known mineral resource that is of sufficient economic or conservation value to warrant protection for generations to come.

Respondents suggested that there was little point in safeguarding peat resources within international designations as this is already protected and it is unlikely that development would take place there anyway. This approach has been rejected because the purpose of the international designations does not coincide with the purpose of defining an MSA to safeguard peat resources. Therefore, Options 1 and 2 will be used to inform the development of the Preferred Approach.

Peel (Holdings) Environmental Ltd comments in relation to safeguarding specific sites for extraction is outside the scope of this current consultation on defining Mineral Safeguarding Areas. The sites referred to will be identified as existing permitted peat extraction sites in Greater Manchester. The phrase in paragraph 7.7 relates to evidence supplied to the North West Regional Spatial Strategy Examination in Public Panel. The evidence was used to inform the development of Policy EM7 Mineral Extraction, reporting on this the Panel Report makes reference to '*extant planning permissions for peat workings in the North West... expire in 2042... these would be sufficient to meet the expected needs of the industry up to that time*'. (NW RSS EiP Panel Report, May 2007). Although RSS documents have been abolished, the evidence base used to inform them is still reliable, leading to the inclusion of the information in paragraph 7.7.

Stakeholders, including Natural England, highlighted the importance of peat for biodiversity, archaeology and a carbon sink and Salford Council suggested that there was a need to include an additional policy on peat which would prevent the granting of further peat extraction in Greater Manchester.

It has been concluded that an additional policy approach preventing any further Peat extraction in Greater Manchester will not be included within the Minerals Plan. Instead there will be a section containing background information on Peat which will be relevant to any future applications for peat extraction. This approach is justified by the following information:

- In response to growing concern about the use of peat as a growing media, MPG 13 introduced the first target for the reduction of peat use, that a minimum of 40% of the materials used in growing media and soil improvers should be peat-free by 2005. This means that peat will still be an ingredient of growing media and soil improvers. Therefore the approach suggested by respondents to completely prevent further peat extraction in Greater Manchester would be unjustified in national planning terms.
- The more recent concerns relating peat extraction to carbon sequestration and climate change have yet to be reflected in national planning guidance but the research and evidence is certainly a material consideration for planning authorities when determining planning applications. The approach suggested by respondents to completely prevent further peat extraction in Greater Manchester would prejudge the impacts of every peat extraction application in future without allowing full consideration on a case by case basis.
- The Minerals Plan recognises there is sufficient permissions for peat extraction in Greater Manchester by not allocating additional sites within the Plan;
- Where a planning application is submitted for peat extraction in Greater Manchester relevant considerations such as biodiversity, hydrology and archaeology would be weighed in the balance as with any other planning decision. The approach suggested by respondents to completely prevent further peat extraction in Greater Manchester would effectively prejudge these considerations and this is unjustified;
- Additional guidance on peat is due from DEFRA at the end of 2010, once available this guidance will feed into the development of the Publication stage of the Minerals Plan.

## Safeguarding Surface mined coal (shallow coal) and Fireclay within the Pennine Coal Measures Formation.

**Question 6:** Which options for safeguarding Surface Coal and Fireclay do you prefer?

- Option 1- Safeguard entire resource
- Option 2- Safeguard the entire resource outside the urban area, and limit safeguarding in the urban area to regeneration and brownfield site developments over 5ha in size, and for which there is known industry interest.
- Option 3- Safeguard areas outside the urban area and international designations.

Name/Organisation	Preferred Option	Comments
Emerson Group	<b>None</b>	<p>None of the options are suitable. The zoning would sterilise land that is not necessarily viable to be mined. There are areas outside the urban area which would be safeguarded under Option 3 but are not appropriate to be so. For example, ahead if such broad safeguarded designations were provided. For example, there is a large strategic regeneration site in Horwich which is washed over as a whole deposit which will be harmed by the safeguarding of coal deposits in the area for future extraction. Perhaps an exclusion policy that states within the safeguarded areas land which is designated for residential, commercial or other purposes or with planning consent is exempt from the safeguarded designation.</p> <p>Government advice is to move away from fossil fuels. The need to extract coal should reduce in the future as more sustainable forms of energy take over. Coal extraction is unneighbourly and should not take place near the residential area of Horwich, or the Middlebrook destination due to unneighbourly issues affecting amenity and business. Instead of safeguarding large area the onus should be to put the developers and extraction companies to promote viable extraction sites and grant consent or not at the appropriate time.</p>
Natural England	<b>None</b>	Natural England has no preference for any of the options for safeguarding surface coal and fireclay.

Coal Pro	1	<p>CoalPro considers that the entire shallow coal resource should be safeguarded. It is recognised that opportunities for extraction on sites less than 5ha in size in the urban area will be limited but believes the possibilities should not be excluded.</p> <p>Should such opportunities arise, there is no reason why limited extraction of reserves should not take place. Should a proposal arise, it will be subject to the stringent planning guidance that applies as set out in MPG3.</p> <p>Allowing for this possibility may ensure that where ground stability issues arise, they can be resolved by limited extraction as opposed to grouting and consequent sterilisation.</p>
The Coal Authority	1	<p>The approach set out in Option 1 to safeguard the Entire Surface Coal Resource would in our view comply fully with the guidance set out in MPS1. National planning policy in MPS1 indicates the requirement for MPAs to define Mineral Safeguarding Areas (MSAs) in LDDs, in order that proven resources are identified and not needlessly sterilised by non-mineral development, although there is no presumption that resources defined in MSAs will be worked. A significant swathe of Greater Manchester is underlain by proven and economically viable coal resources that are capable of extraction using surface mining methods. Whilst much of Greater Manchester is extensively built-up, sites in this area may be redeveloped during the plan period and without the resource being identified as part of an MSA any opportunity to secure incidental extraction of the surface coal would be lost. The Coal Authority has many examples of prior extraction or incidental extraction of surface coal resources as part of brownfield regeneration proposals in urban areas, including cities, on sites as small as 0.06ha.</p> <p>Where there is a possibility of new development going over surface coal resource in accordance with national policy in MPS1 in relation to mineral sterilisation. In such circumstances guidance in MPS1 requires that consideration be given to the prior extraction of the mineral to avoid sterilisation. This possibility will need to be addressed through policy,</p>

		<p>either in the Core Strategy or another DPD as you may deem appropriate. Another key aspect of this is that, once an MSA is defined, prior extraction can be encouraged, where practicable, if it is necessary for non-mineral development to take place within the MSA. Whilst much of Greater Manchester is predominantly urban in nature, we still consider that prior extraction is feasible, and therefore failure to identify an appropriate MSA for the entire surface coal resources would render the Council's approach unsound. The BGS publication "A guide to mineral safeguarding in England" (October 2007) sets out how national safeguarding policy should be applied at the local level and states that mineral safeguarding should not be curtailed by other planning designations, such as urban areas, without sound justification. The Coal Authority therefore considers that the Core Strategy requires an overarching planning policy setting out the local mineral planning issues, which would accord with the approach set out in the BGS guide. This policy would include the identification of MSAs with their broad locations illustrated on the Key Diagram; exact boundaries can then be subsequently defined on the Proposals Map.</p> <p>How you implement Mineral Safeguarding through your policy approach is how you ensure that the requirement to consider the sterilisation of minerals and the role of prior extraction is the correct methodology by which to ensure proportionality. For example it could be that it is considered reasonable to exclude householder development from the need to consider mineral sterilisation across the whole MSA. The Coal Authority would be likely to support such an exclusion we would not however be likely to support any use of a site size threshold.</p>
Colin Jacobs on behalf of Offerton Sand and Gravel Ltd	<b>2</b>	
National Trust	<b>2</b>	Option 2 is preferred - for similar reasons to those set out in the responses to Questions 1 and 3.
Salford City Council	<b>3</b>	Option 3 is preferred as Options 1 and 2 are considered to impose too

		much of a constraint upon development.
Peel Holdings (Environmental) Ltd	<b>None</b>	Peel Environmental Ltd has no preference for the safeguarding of Surface coal and Fireclay.

## Response

Respondents appear to be fairly evenly split across the options for safeguarding shallow coal and fireclay. The following points set out the range of comments received:

- The whole shallow coal resource should be safeguarded because this would be in line with national policy and would ensure that opportunities for coal extraction within the urban area are considered as part of planning applications for regeneration/redevelopment.
- Option 2 offers the most 'realistic' option.
- Option 3 would impose the least constraint on development
- MSA for coal could sterilise land and so there should be no MSA for shallow coal.

Options 1, 2 and 3 will be used to inform the development of the Preferred Approach to defining a Mineral Safeguarding Area for shallow coal.

## General Comments

### Lancashire County Council

We have no preference for any of the options for mineral safeguarding expressed in your 'Defining Mineral Safeguarding Areas' consultation document, but can confirm that we are seeking to exclude urban areas through the MSA policy in our emerging Minerals and Waste Development Framework Site Allocations and Development Management Policies development plan document, and support the exclusion of urban areas in the Greater Manchester Minerals Plan.

### Network Rail

Network Rail will seek to protect their interests/infrastructure from the potential impacts of mineral extraction and waste management operations. Network Rail is prepared to meet with applicants to discuss significant proposals prior to the submission of planning applications. It is requested that Network Rail is consulted on all planning applications for minerals and waste management proposals within 200 metres and 250 metres respectively of railway property.

## **Natural England**

### *Soils*

The Minerals Development Plan Document should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpin our well being and prosperity. Decisions about minerals development and restoration should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver; for example:

- Soil is a key component of most landscapes and a significant component in understanding the links between landscape and the historic environment.
- The role of soil in maintaining carbon stores and regulating greenhouse gases needs to be better appreciated, understood and embedded in habitat and land management practices in order that its potential to mitigate against the effects of climate change is realised.

Good soil management is a critical component of sustainable minerals development and best restoration practice – not only in agriculture, but also in forestry, woodland and recreational management, habitat restoration and re-creation and in urban design, green infrastructure and the creation of other greenspace. When considering development options, the DPD should have regard to the permanency of the impact on soils and take particular care over planned changes to the most potentially productive soil (for the ecosystem services it supports and for its role in agriculture and food production) but also allow for the anticipated impacts of climate change (e.g. in relation to flood risk, water management and biodiversity, etc).

### *RSS*

Although now abolished, the NW RSS, was committed to using our natural and man-made resources actively, prudently and efficiently, as well as protecting and enhancing the Region's historic, built and natural environmental assets, and unique culture and heritage. We would welcome this being transposed into this Minerals Plan for Greater Manchester.

The Minerals Plan should deliver an integrated approach to conserving and enhancing the landscape, natural environment, historic environment and woodlands of the sub-region. Special consideration should be given to the impacts of climate change and adaptation measures. It should also identify, protect, conserve and enhance natural, historic and other distinctive features that contribute to the natural environment in Greater Manchester

## **Response to general comments**

The Greater Manchester Minerals Plan will seek to incorporate the general comments received through the development of policies and allocations where appropriate.

**Peel Holdings (Environmental) Ltd**

Peel requests that clarification as to the relationship of an MSA and its implications for proposed non minerals development be given in subsequent consultation documents, in line with guiding policy. Peel also requests that further information explaining what might be necessary to prove whether or not extraction is feasible in relation to a non minerals development be provided in subsequent Mineral Plan consultation documents. Some guidance within the Minerals Plan stating that the information requested should be proportionate to the value of the resource and that common sense should prevail, would be welcomed by Peel.