

Outcomes from Minerals Plan Issues and Options Consultation

Contents

1	Introduction	3
2	Aims and Objectives	5
3	Minerals in Greater Manchester	15
4	Method of Identifying and Protecting Mineral Resources	35
5	Development Management Policies	83
6	Monitoring and Implementation	105
7	General Comments	109
8	Next Steps	119

Contents

Introduction

1 Introduction

Introduction

1.1 The Joint Minerals Development Plan Document (Minerals Plan): Issues and Options Report set out the issues and options relating to minerals planning in Greater Manchester. This Outcomes Report outlines comments received as part of the six week consultation. It sets out the nature of responses received and how those responses will be used to inform future stages of the Minerals Plan.

Background

1.2 The Issues and Options Report was issued for public consultation from the 17th February to the 31st March 2010 and was made available both online and at deposit points throughout Greater Manchester in line with the Statements of Community Involvement of the 10 Local Authorities. Consultees were able to respond online using the Limehouse Consultation system or by written response.

1.3 The purpose of the Issues and Options Report was to seek comments on the issues and options relating to the development of the site selection methodology for the Minerals Plan and also the topics to be covered by policies to guide future minerals development in Greater Manchester.

1.4 A total of twenty-six responses were received as a result of this consultation from the following organisations:

- National Grid
- Shevington Parish Council
- Ramblers Association
- Greenpark Energy Ltd
- CoalPro
- 4NW
- CPRE Cheshire Branch
- Highways Agency
- Graham Bell - Chartered Surveyor
- Network Rail
- The Emerson Group
- UK Coal
- Lancashire County Council
- Salford City Council (Sustainable Regeneration)
- Environment Agency
- Horwich Vision
- Private Individual: 1
- Peel
- Mineral Products Association
- English Heritage
- Government Office North West

1 Introduction

- Cemex
- National Trust
- Manchester Airport
- United Utilities
- Natural England

Aims and Objectives

2 Aims and Objectives

2.1 This section sets out the Questions made available for public comment in relation to the Aim and Objectives of the Minerals Plan, a summary of the responses received and recommendations for dealing with them.

Aim

Question 1

Is there anything else that should be covered by the proposed aim?

Table 1 Responses to Question 1

Responses Received	No. of Responses	Respondents
Support with conditions	6	UK Coal/Highways Agency/National Trust/Peel Environmental/4NW/Natural England
Observations	2	Ramblers Association/GONW
Object	1	Mineral Products Association

2.2 The comments relating to the Aim are set out in the table below.

Table 2 Aim Representations

Respondent	Representation	Comments
UK Coal	The aim set out in paragraph 2.3 should be amended to include the safeguarding of all potentially economically viable minerals resources, as set out in bullet 3 of the objectives.	The suggestion to amend the aim to refer to the safeguarding of all potentially economically viable mineral resources

2 Aims and Objectives

Respondent	Representation	Comments
Highways Agency	Support	will be taken forward to the next stage of the Minerals Plan.
National Trust	Generally the Aim is agreed – the first two sentences are very appropriate and well crafted. However, in terms of environmental issues the aim should be higher than simply ‘protection’, rather it should include the opportunity for enhancement; e.g. suitable safeguards during extraction followed by appropriate restoration measures have the potential not only to protect bio-diversity but to enhance it – there can be similar potential in respect of the historic environment.	Noted The suggestion to amend the aim to refer to ‘enhancement’ of the environment will be taken forward to the next stage of the Minerals Plan.
4NW	<p>We welcome the suggested aim and strategic objectives, which reflect RSS policy. Whilst this may be the case, you may wish to consider the spatial principles set out in RSS Policy DP 1 and in particular the need for an additional objective relating to climate change.</p> <p>RSS Policy DP1 sets out the spatial principles underpinning RSS which includes measures for reducing emissions and ensuring effective adaptation to the impacts of climate change. Other regional, sub-regional and local plans and strategies and all individual proposals, schemes and investment decisions should adhere to these principles.</p> <p>Policies DP 2 to 9 amplify these principles and should be taken together as the spatial principles underlying the Strategy.</p>	The suggestion to include an objective on climate change will be explored during development of the next stage of the Minerals Plan.

Aims and Objectives

Respondent	Representation	Comments
Natural England	<p>RSS Policies EM 15 to 17 also seek to promote energy efficiency and use of renewable energy. Policy EM17 also requires developments over a certain size to incorporate renewable energy production to meet at least 10% of their requirements</p> <p>We broadly support an aim to reduce Greater Manchester’s reliance on primary minerals through better use of recycled aggregates and secondary mineral products. Development can bring significant benefits to the environment and rural areas. It also has the potential to cause significant negative effects, including cumulative effects that may erode the character, biodiversity or historic resource of an area. We consider that the aim should ensure that potential negative effects can be avoided or mitigated. A reduction in the reliance on primary minerals should conserve and enhance the natural environment; and facilitate sustainable development</p>	Noted
Peel Environmental	<p>In order to enhance the scope of the aim, it is suggested that the aim could incorporate objective 1 into its remit. Consequently, the aim of the plan could also be to ‘provide a sustainable supply of minerals to meet the national and regional needs, in particular ensure provision of aggregates to meet regional requirements’.</p>	The suggestion to include objective 1 within the aim will be taken forward and explored at the next stage of the Minerals Plan.
Ramblers Association	<p>We would add “recreational” to the last sentence, to read “...whilst protecting long-term residential and recreational amenity and the environment.”</p>	The suggestion to amend the aim to refer to ‘recreation’ will be taken forward to the next stage of the Minerals Plan.
GONW	<p>Given the position of Greater Manchester as a significant importer of aggregates, this document says surprisingly little about the relationship</p>	Noted

Aims and Objectives

Respondent	Representation	Comments
Mineral Products Association	<p>of the plan to cross-boundary considerations as expressed (for example, and in particular) the regional apportionment process. It would make sense for the Core Strategy to give some attention to this.</p> <p>We disagree with the proposed aim as drafted. It is surely more important (as subsequent questions imply and as RSS Policies EM7 and EM8 indicate) to provide for the sub regional apportionment (or a proportion thereof) than to reduce Greater Manchester's reliance on primary aggregates, which is not in the mineral planning authorities' control anyway. We therefore believe the aim should be something along the lines of the following, (additions = bold; deletions = strikethrough)</p> <p>The overall aim of the Minerals Plan is to make provision for a steady and adequate supply of minerals to meet the subregion's apportionment of land-won aggregates reduce Greater Manchester's reliance on primary minerals and to promote a through better use of recycled aggregates and secondary mineral products. However, where a need for primary minerals is recognised, To this end sites for extraction along with depots for transport and storage will be identified and safeguarded. The Minerals Plan will strive to manage the overall use of minerals so as to support economic growth whilst protecting long-term residential amenity and the environment.</p>	<p>One of the Government's national objective for minerals planning is 'to ensure, so far as practicable, efficient and sustainable use of minerals and recycling of suitable materials, thereby minimising the requirement for new primary extraction' (MPS1, paragraph 9). It is Government policy to encourage the greatest possible use of alternatives to primary aggregates. Whilst Greater Manchester will work to meet its aggregate apportionment, it does not follow that this is more important than reducing Greater Manchester's reliance on primary aggregates. Both the need to ensure provision of aggregates to meet regional apportionment and the promotion of alternatives to primary aggregates are included in the proposed Minerals Plan objectives.</p>

Response

Aims and Objectives

2.3 The wording of the aim will be reviewed in light of comments received and where suggested changes improve the overall aim of the Minerals Plan, these will be taken forward to the next stage.

Objectives

Question 2

Is there anything else that should be covered by the proposed objectives?

Table 3 Responses to Question 2

Responses Received	No. of Responses	Respondents
Support	6	Ramblers Association/UK Coal/Highways Agency/National Trust/Coal Authority/4NW
Support with conditions	3	GONW/English Heritage/Peel Environmental/Natural England
Object	1	Mineral Products Association

2.4 The comments relating to the Objectives are set out in the table below.

Table 4 Objectives Representations

Respondent	Representation	Comments
Ramblers Association	We have no additional suggestions.	Noted
UK Coal	The objectives are appropriate and we are particularly supportive of the 3rd and 4th bullet points.	Noted

2 Aims and Objectives

Respondent	Representation	Comments
Highways Agency	Not as far as we are aware	Noted
Coal Authority	<p>The Coal Authority welcomes the stated objectives to: safeguard potentially economically viable mineral resources from sterilisation; protect local communities and the natural and built environment from the impacts of minerals development and recognise the importance of high quality restoration; and support the development of local energy minerals where required to supplement the energy mix nationally and regionally.</p> <p>Reason – These objectives are consistent with national policy and setting them out clearly will help to ensure that appropriate policy mechanisms are put in place to deliver them.</p>	Noted
4NW	<p>We welcome the suggested aim and strategic objectives, which reflect RSS policy. Whilst this may be the case, you may wish to consider the spatial principles set out in RSS Policy DP 1 and in particular the need for an additional objective relating to climate change.</p> <p>RSS Policy DP1 sets out the spatial principles underpinning RSS which includes measures for reducing emissions and ensuring effective adaptation to the impacts of climate change. Other regional, sub-regional and local plans and strategies and all individual proposals, schemes and investment decisions should adhere to these principles.</p> <p>Policies DP 2 to 9 amplify these principles and should be taken together as the spatial principles underlying the Strategy.</p>	The suggestion to include an objective on climate change will be explored during development of the next stage of the Minerals Plan.

Aims and Objectives

Respondent	Representation	Comments
	<p>RSS Policies EM 15 to 17 also seek to promote energy efficiency and use of renewable energy. Policy EM17 also requires developments over a certain size to incorporate renewable energy production to meet at least 10% of their requirements</p>	
National Trust	<p>Nothing new to add to the list of Objectives but:</p> <ul style="list-style-type: none"> · In the fourth Objective the point raised under Q.1 above again needs to be picked up, i.e. inclusion of the potential for enhancement. · In the fifth Objective the word 'encourage' is weak, it is suggested that sustainable transportation should be promoted. 	<p>The suggestion to amend the fourth objective to refer to 'enhancement' of the environment will be taken forward to the next stage of the Minerals Plan.</p> <p>The suggestion to replace the word 'encourage' with 'promoted' will be taken forward for consideration at the next stage of the Minerals Plan.</p>
GONW	<p>"Recognise the importance of" seems a somewhat weak term given the importance of securing high quality post-extraction restoration. We recommend that this objective be expressed more firmly.</p>	<p>The suggestion to amend this objective will be taken forward to the next stage of the Minerals Plan.</p>
English Heritage	<p>We assume that the supply of traditional building materials will be covered by the first objectives bullet, but suggest that this scarce resource may warrant special mention in that same way that aggregates is mentioned.</p> <p>An objective promotes the re-use of secondary aggregate products. English Heritage prioritises the continued use or adaptive re-use of buildings and places. It would be appropriate for the minerals plan to</p>	<p>The suggestion to refer specifically to natural building in objective 1 will be taken forward to the next stage of the Minerals Plan.</p> <p>The potential for the re-use of stone or other building materials as aggregate will be explored during the next stage of the Minerals Plan.</p>

Aims and Objectives

Respondent	Representation	Comments
Peel Environmental	<p>encourage the re-use of demolition materials, especially stone and other decorative building materials before re-use as aggregate. This is a more sustainable approach and minimises demolition waste.</p> <p>There are a number of suggested alterations which could enhance the proposed objectives:</p> <p>Objective 2. Promote reuse and recycling of secondary aggregate products, where appropriate.</p> <p>Objective 5. Encourage the sustainable transportation, storage and processing of minerals, wherever possible.</p>	<p>The suggested amendments to objectives 2 and 5 will be considered at the next stage of the Minerals Plan. It is noted that it may not always be possible to transport minerals by sustainable methods of transport as this depends on infrastructure.</p>
Natural England	<p>We note that the Objectives include reference to 'protecting the natural environment from the impacts of mineral development, and recognising the importance of high quality restoration once operations have ceased'. We question any definition of 'high quality restoration'. We wish to add that consideration should be given to conservation and enhancement of the natural environment during the consideration of any minerals proposal and restoration and after-use should be examined more widely so as to provide benefits for biodiversity and public access where opportunities lie.</p>	<p>Noted. Use of the term 'high quality' will be either qualified or a more precise term will be used.</p> <p>The environment will be an important consideration in any policy on the restoration of mineral workings.</p>
Mineral Products Association	<p>In the light of our answer to question 1 it will consequently be necessary to amend the proposed objectives. We suggest the following:</p>	<p>Objective 1 - The suggestion to include 'steady and adequate' supply of materials will be taken forward to the next stage of</p>

Aims and Objectives

Respondent	Representation	Comments
	<ul style="list-style-type: none"> · Provide a steady and adequate sustainable supply of minerals to meet national and regional needs, in particular ensure provision of aggregates to meet regional requirements an appropriate proportion of the subregional apportionment; · Maintain a minimum landbank of aggregates of seven years for sand and gravel and ten years for crushed rock; · Promote reuse and recycling of secondary aggregate products; · Safeguard potentially economically viable mineral resources of economic importance from sterilisation and encourage the best use of high quality materials; · Protect local communities and the natural and built environment from the impacts of minerals development and recognise the importance of high quality restoration once operations have ceased; · Encourage the sustainable transportation of minerals; and · Support the development of local energy minerals (excluding peat) where required to supplement the energy mix nationally and regionally. 	<p>the Minerals Plan. The subregional apportionment is not broken down further therefore it is unlikely that an appropriate proportion will be identified in the Minerals Plan.</p> <p>Objective 2 - MPS1 provides policy on the minimum landbank therefore the Minerals Plan should not repeat this.</p>

Response

2.5 Responses to Question 2 generally support the objectives and make suggestions on how they could be improved. The wording of the objectives will be reviewed in light of these comments and where changes would improve an objective, these will appear in the next stage of the Minerals Plan.

Aims and Objectives

Minerals in Greater Manchester

3 Minerals in Greater Manchester

3.1 This section sets out the Questions made available for public comment in relation to minerals found in Greater Manchester, including their uses and how much is currently extracted. A summary is provided of the responses received and recommendations for dealing with them.

Construction Materials

Question 3

It is proposed that the sub-regional break downs will be used to inform the need for aggregates in Greater Manchester. Are you aware of any other information that could be used to determine the need for aggregates?

Table 5 Responses to Question 3

Responses Received	No. of Responses	Respondents
Observations	6	4NW/Ramblers Association/Highways Agency/National Trust/Environment Agency/Natural England
Support with Conditions	1	Mineral Products Association

3.2 The comments relating to determining the need for aggregates are set out in the table below.

Table 6 Determining the Need for Aggregates Representations

Respondent	Representation	Comments
4NW	The Regional Aggregates Working Party (RAWP) is currently engaged in assessing the updated national and regional guidelines for aggregates provision in England between 2005 and 2020 . The work to be undertaken	Noted. GMGU are working with 4NW and other RAWP sub-regional bodies on the

3 Minerals in Greater Manchester

Respondent	Representation	Comments
	<p>via the RAWP will provide an opportunity to test the regional figure and any subsequent potential changes to the apportionment for aggregates at a sub-regional level.</p> <p>The recommendations from the RAWP will feed into Regional Strategy policy development during 2010. It will be necessary to ensure that any potential implications from the revised figures are accounted for as the Minerals DPD progresses.</p>	sub-regional aggregate apportionments. The revised apportionments, which will be set out in the Regional Strategy 2010, will be used to inform preparation of the Minerals Plan.
Ramblers Association	Not aware of any other information that could be used to determine the need for aggregates	Noted
Highways Agency	Not aware of any further information	Noted
National Trust	The Trust is not aware of any other relevant information	Noted
Environment Agency	The quantity of secondary or recycled aggregates in the market as addressed in paragraphs 3.7 – 3.13 will assist in determining the need for aggregates	Noted
Natural England	Natural England does not hold any information that could be used to determine the need for aggregates.	Noted
Mineral Products Association	Agree that the subregional breakdowns can be used to inform aggregates supply policy for Greater Manchester. However, it is possible to overcome confidentiality restrictions to breakdown provision further if this is thought desirable. This could be done on the basis of a long term average split in historical production between administrative areas, or on the proactive	Noted. These sources of information will be explored during the next stage of the Minerals Plan.

Minerals in Greater Manchester

Respondent	Representation	Comments
	<p>basis of the distribution of unworked resources. Approaches to individual operators can be profitable in releasing information that would otherwise be confidential, and other sources of information can be explored such as ONS's publication PA1007.</p>	

Response

3.3 The comments received in response to Question 3 have been noted and will be used to inform the next stage of the Minerals Plan.

Brick Clay

Question 4

Are there any brickworks that rely on brick clay from Greater Manchester or which may need to rely on sites in Greater Manchester to ensure they have a minimum supply of 25 years?

Table 7 Responses to Question 4

Responses Received	No. of Responses	Respondents
Support	3	Ramblers Association/Highways Agency/National Trust
Observations	4	CoalPro/Lancashire County Council/English Heritage/Natural England

3.4 The comments relating to brick clay are set out in the table below.

3 Minerals in Greater Manchester

Table 8 Brick Clay Representations

Respondent	Representation	Comments
Ramblers Association	Not aware of any brickworks that rely on brick clay from Greater Manchester	Noted
Highways Agency	Not aware of any other relevant information	Noted
National Trust	The Trust is not aware of any other relevant information in respect of other brickworks	Noted
CoalPro	There is a need to recognise that fireclay, a mineral in short supply nationally and an essential mineral for the production of high quality buff-coloured facing bricks, can generally only be mined economically in conjunction with the extraction of coal. Sources of supply are much less well distributed than for brick clays generally and fireclay often needs to be supplied to non-local sources.	Noted.
Lancashire County Council	Manchester has two brickworks that appear not to rely on supplies from within Greater Manchester. It needs to be established where they intend to obtain the raw material from, and then the planning authority (Greater Manchester) needs to establish if that source planning authority is happy to continue supplying such material to the brickworks. Cross boundary flows may not be acceptable to the host authority.	Noted. Greater Manchester will continue to work with adjacent authorities. This may be a commercial decision although it will be explored further as part of work on the Minerals Plan.
English Heritage	The English Heritage BGS Strategic Stone Study will help the identification of active and historic stone quarries. It will be important for the minerals	Noted. These sources of information will be used to

Minerals in Greater Manchester

Respondent	Representation	Comments
	plan to accommodate information from the new database England's Building Stone Pits EBSPits which will be available on www.mineralsUK.com. Greater Manchester's local authority conservation officers together with the GM Historic Environment Record (HER) may also be able to supply information for this question.	inform preparation of the Minerals Plan.
Natural England	Natural England does not hold any information concerning the supply of brick clay	Noted

Response

3.5 The comments received in response to Question 4 have been noted and will be used to inform the next stage of the Minerals Plan.

Natural Building Stone

Question 5

3.6 Are you aware of any sites in Greater Manchester that provide minerals of conservation value? For example, for the conservation and restoration of the historic built environment.

Table 9 Responses to Question 5

Responses Received	No. of Responses	Respondents
Support	2	Ramblers Association/Highways Agency
Observations	4	Lancashire County Council/National Trust/English Heritage/ Natural England

3 Minerals in Greater Manchester

3.7 The comments relating to minerals of conservation value are set out in the table below.

Table 10 Minerals of Conservation Value Representations

Respondent	Representation	Comments
Ramblers Association	No	Noted
Highways Agency	No	Noted
Lancashire County Council	High Moor Quarry has traditionally provided block stone to saw sheds for cutting together with walling stone for dry stone construction. Again Middle Hill Quarries are a series of small quarry workings that straddle the boundary between Greater Manchester and Lancashire. This area would benefit from comprehensive assessment of the remaining reserves and likely working of such reserves.	Noted. Operators at both these sites have been contacted as part of work on the Minerals Plan. Minerals extraction has ceased at Highmoor. Middle Hill Quarry has planning permission for the extraction of stone until August 2019.
National Trust	The Trust has not identified any sites within Greater Manchester that it relies on, or knows of, that provide stone for heritage purposes (Trust properties within and close to Greater Manchester generally source building stone for repairs from outside the plan area, e.g. red sandstone from Cheshire).	Noted.
English Heritage	The English Heritage BGS Strategic Stone Study will help the identification of active and historic stone quarries. It will be important for the minerals plan to accommodate information from the new database England's Building Stone Pits EBSPits which will be available on www.mineralsUK.com . Greater Manchester's local authority	Noted. These sources of information will be used to inform preparation of the Minerals Plan.

Minerals in Greater Manchester

Respondent	Representation	Comments
	conservation officers together with the GM Historic Environment Record (HER) may also be able to supply information for this question.	
Natural England	Natural England does not hold any information concerning the supply of brick clay	Noted

Response

3.8 The comments received in response to Question 5 have been noted and will be used to inform the next stage of the Minerals Plan.

Energy Minerals - Coal

Question 6

Do you agree with the approach to coal set out above?

Table 11 Responses to Question 6

Responses Received	No. of Responses	Respondents
Support	6	Ramblers Association/CoalPro/UK Coal/Coal Authority/Highways Agency/4NW
Support with Conditions	1	GONW
Observation	1	Natural England

3.9 The comments relating to coal are set out in the table below.

Minerals in Greater Manchester

Table 12 Coal Representations

Respondent	Representation	Comments
Ramblers Association	We agree with this approach to the safeguarding of known surface-coal resources from other forms of development.	Noted
CoalPro	CoalPro agrees with the approach to coal set out in these paragraphs.	Noted
UK Coal	<p>Agree to the approach to coal set out in paragraphs 3.26 – 3.29, and are supportive of the approach to safeguard known surface coal resources from other forms of development.</p> <p>The coal from Cutacre is sold commercially throughout the north of England and extraction is due to cease in 2011. An application for an extension of time to complete the extraction of coal is to be submitted shortly.</p> <p>The Government's current position regarding indigenous coal supply is evident in a recent speech given by Lord Hunt to the Coal UK Conference, 22 February 2010. A copy of Lord Hunt's speech is attached but the following points are particularly pertinent.</p> <p>"So what is the role of coal in this mix? Today, coal represents under 20 per cent of the UK's total energy supplies. But with most of that used for generation, its contribution to our electricity supplies is double that. Take the 3 week cold spell after Christmas and over New Year as an example, coal generation accounted for a weekly average of nearly 40% and a daily average of 36%.</p> <p>We know the advantages of keeping up access to our supplies of indigenous coal.</p> <p>During 2009, the Government was pleased to see several major generators demonstrating that they also appreciate the advantages of continuing supplies of locally produced coal...</p>	Noted.

Minerals in Greater Manchester

Respondent	Representation	Comments
	This Government's framework envisages a continuing role for coal, particularly in the generating sector, for the foreseeable future, provided that its potential environmental effects can be managed."	
Coal Authority	<p>The Coal Authority welcomes the stated approach of determining individual applications on a case-by-case basis whilst seeking to secure known surface coal resources from sterilisation by other forms of development</p> <p>Reason – The safeguarding of mineral resources, such as coal, is an important requirement of MPS1 (Planning & Minerals).</p>	Noted
Highways Agency	Yes	Noted
4NW	The proposed approach would be in line with RSS Policy EM7 which requires plans and strategies to safeguard mineral resources from other forms of development as well as the inclusion of criteria-based policies to indicate the circumstances under which extraction might or might not be permitted.	Noted.
GONW	We note the intention "to seek" to safeguard" coal reserves, which seems vague. The advice of the Coal Authority will be important here and should be taken into account as regards the presence, and the need for and feasibility of safeguarding, shallow coal, along with the question of accessibility to deep coal and coalbed methane.	<p>Noted.</p> <p>Consideration will be given at the next stage of the Minerals Plan as to whether this is too vague a term to use.</p>

Minerals in Greater Manchester

Respondent	Representation	Comments
Natural England	Natural England does not wish to comment on the approach to coal.	Noted

Response

3.10 The comments received in response to Question 6 have been noted and will be used to inform the next stage of the Minerals Plan.

Energy Minerals - Coal Bed Methane

Question 7

Are you aware of any areas that are likely to come forward for coalbed methane extraction in future?

Table 13 Responses to Question 7

Responses Received	No. of Responses	Respondents
Observations	5	Euan Brown/Coal Authority/GONW/Peel Environmental/Natural England

3.11 The comments relating to coal bed methane are set out in the table below.

Table 14 Coal Bed Methane Representations

Respondent	Representation	Comments
Euan Brown	Greenpark Energy Ltd holds Exploration Licence EXL 273, a small part of which falls within the Wigan Council Area. The map (submitted separately via email) shows EXL 273 as it relates to the Wigan Council Area. Greenpark	Noted. This site will be taken forward for assessment during the next stage of the Minerals Plan.

Minerals in Greater Manchester

Respondent	Representation	Comments
Coal Authority	<p>envisages developing the available CBM resources in this area as part of the wider development of EXL 273. N.B. Greenpark has not yet begun a detailed site search process for this licence area. The potential areas shown on the submitted map are indicative only.</p> <p>The Coal Authority is able to provide details of areas which are currently licensed for Coal Bed Methane extraction/exploration in order to assist in demonstrating operators' interest in the exploration/extraction of this resource within the DPD area. We will contact you separately with a view to providing this information.</p> <p>Reason – In order to comply with the guidance in MPS1 (Planning & Minerals).</p>	Noted. GMGU will liaise with the Coal Authority regarding this information.
GONW	<p>We note the intention “to seek” to safeguard” coal reserves, which seems vague. The advice of the Coal Authority will be important here and should be taken into account as regards the presence, and the need for and feasibility of safeguarding, shallow coal, along with the question of accessibility to deep coal and coalbed methane.</p>	Noted. Consideration will be given at the next stage of the Minerals Plan as to whether this is too vague a term to use.
Peel Environmental	<p>Peel is currently working with the relevant Petroleum Exploration Drilling Licence (PEDL) holder(s) to develop a network of coal bed methane production sites, which could provide a local source of energy which has the potential to benefit local industry and the economy in general. The current area of search for potential sites is land lying to the south of the Newton-Le-Willows to Eccles railway line, as this area appears to be the most suitable location for CBM due to coal seams being at a depth where they have not been subjected to mineral extraction in the past.</p>	Noted. GMGU will contact Peel for further information on this area.

3 Minerals in Greater Manchester

Respondent	Representation	Comments
Natural England	Natural England does not hold any information about sites that may provide coal bed methane.	Noted

Response

3.12 The comments received in response to Question 7 have been noted and will be used to inform the next stage of the Minerals Plan.

Energy Minerals - Conventional On-Shore Oil and Gas

Question 8

Do you agree that the Minerals Plan should not identify sites or Areas of Search for conventional on-shore oil and gas in the Minerals Plan?

Table 15 Responses to Question 8

Responses Received	No. of Responses	Respondents
Support	4	Ramblers Association/Highways Agency/National Trust/4NW
Observations	1	Natural England

3.13 The comments relating to conventional on-shore oil and gas are set out in the table below.

Minerals in Greater Manchester

Table 16 Conventional On-Shore Oil and Gas Representations

Respondent	Representation	Comments
Ramblers Association	We agree that the Minerals Plan should not identify sites or Areas of Search for conventional on-shore oil and gas in the Minerals Plan	Noted
Highways Agency	Yes	Noted
National Trust	Yes	Noted
4NW	It is acknowledged that there is limited information available for resources of on-shore oil and gas resources and that there has been no active extraction in Greater Manchester. As a result it is considered appropriate to not identify sites or areas of search at this stage. Whilst this may be the case, if additional information comes forward, or new technologies are developed which could release the potential of previously unviable or inaccessible minerals in the future, it may be necessary to reconsider this position.	Noted
Natural England	Natural England does not wish to comment on areas of search for on-shore oil and gas.	Noted

Response

3.14 The comments received in response to Question 8 have been noted and will be used to inform the next stage of the Minerals Plan.

Question 9

Do you agree with this approach to dealing with new and changing technologies for the extraction of minerals?

3 Minerals in Greater Manchester

Table 17 Responses to Question 9

Responses Received	No. of Responses	Respondents
Support	7	Euan Brown/Ramblers Association/Highways Agency/National Trust/Peel Environment/4NW/Natural England

3.15 The comments relating to new and changing technologies are set out in the table below.

Table 18 New and Changing Technologies

Respondent	Representation	Comments
Euan Brown	Case by case would appear to be the most appropriate basis for dealing with minerals extraction of this type.	Noted
Ramblers Association	We agree that proposals involving new technologies for currently unviable or inaccessible minerals should be dealt with on a case-by-case basis.	Noted
Highways Agency	Yes	Noted
National Trust	Yes	Noted
Peel Environment	Peel agrees with the proposed case-by-case approach to dealing with new technologies that could release the potential of previously unviable or inaccessible minerals in the future	Noted
4NW	It is acknowledged that there is limited information available for resources of on-shore oil and gas resources and that there has been no active extraction in Greater Manchester. As a result it is considered appropriate to not identify sites or areas of search at this stage. Whilst this may be the case, if additional information comes	Noted

Minerals in Greater Manchester

Respondent	Representation	Comments
	forward, or new technologies are developed which could release the potential of previously unviable or inaccessible minerals in the future, it may be necessary to reconsider this position.	
Natural England	Natural England agrees that the Plan should ensure that applications to win previously unviable or inaccessible minerals through new technologies should be determined on a case by case basis.	Noted

Response

3.16 The comments received in response to Question 9 have been noted and will be used to inform the next stage of the Minerals Plan.

Peat

Question 10

Do you agree with the approach to peat outlined above?

Table 19 Responses to Question 10

Responses Received	No. of Responses	Respondents
Support	5	Ramblers Association/Highways Agency/United Utilities/English Heritage/4NW
Support with Conditions	5	National Trust/Peel Environmental/Salford City Council/Environment Agency/Natural England

3 Minerals in Greater Manchester

3.17 The comments relating to peat are set out in the table below.

Table 20 Peat Representations

Respondent	Representation	Comments
Ramblers Association	Agree that no new sites or extensions to existing sites for the extraction of peat should be allocated under the Minerals Plan. We support the protection of peat bogs for the environmental reasons given in paragraphs 3.38 and 3.40 of the document and we would encourage the use of alternatives to peat.	Noted
Highways Agency	Agreed	Noted
United Utilities	<p>United Utilities Water supports the comments on peat.</p> <p>Where there are drinking water catchment grounds and deep peat supporting blanket bog vegetation any disturbance can cause damage to the peat and change its hydrology.</p> <p>Degeneration of disturbed peat soils results in an increase in the generation of dissolved organic carbon (colour) compounds. These compounds have significant negative effects on raw water quality.</p>	Noted
English Heritage	The report identifies the potential archaeological value of peat and we agree with the approach suggested of no new allocations or extensions.	Noted
4NW	RSS Policy EM7 requires plans and strategies to recognise the national significance of the Region's reserves of peat. In order to decide whether to allocate any new sites or extensions to existing sites for peat extraction it will be necessary to consider future need, bearing in mind existing planning permissions, industry requirements and environmental considerations.	Noted. The Minerals Plan will conform to regional planning policy.

Minerals in Greater Manchester

Respondent	Representation	Comments
National Trust	<p>It is agreed that no new sites should be identified. There is also concern about the extent of the existing 'reserves' which a) go far beyond the plan period, and b) relate to a resource for which demand is in decline as it is increasingly realised that we should be utilising the alternatives to peat to safeguard biodiversity and protect carbon stores. It is suggested that the Plan should consider the mechanisms that might be put in place to reduce the permitted level of extraction of peat; including, for example, the approach to be taken to any application for variation of an existing permission.</p>	Noted
Peel Environmental	<p>Peel has a number of comments to make with regard to the proposed approach to peat and it is suggested that further clarification is required.</p> <p>Although it is acknowledged that there are existing planning permissions for peat extraction until 2042, this does not necessarily mean that there are sufficient reserves remaining at those sites to supply the needs of the horticultural market to 2042. The site known as Little Woodden Moss, Salford, has planning permission for peat extraction up to 2042, but it is anticipated that the site will cease harvesting before that date.</p> <p>In the context of this and the statement made in Para 3.42 an assessment of the quantity of the remaining reserves at existing peat harvesting sites should be made.</p> <p>It should be noted that the planning permission at Chat Moss (also known as the Twelve Yards Road) is due to expire at the end of 2010. However, the existing permitted peat depth has not yet been reached.</p> <p>Extending the time limit for the extraction of this already permitted mineral would provide the opportunity to deliver a restoration scheme that would be in accordance with the desired restoration outcome as referred to in Para 1.8. Utilisation of this local mineral resource would mean that the peat would be replaced by the importation of peat from countries from</p>	The comments regarding specific sites have been noted and will be considered at the next stage of the Minerals Plan.

3 Minerals in Greater Manchester

Respondent	Representation	Comments
	<p>(predominately) Eastern Europe, where there is less control on the restoration of the sites and it would also mean the transportation of the peat over long distances by road, which may negate carbon sequestration efforts related to the prevention of further peat harvesting.</p> <p>Consequently, it is suggested that the approach be clarified as follows; 'Given that the existing permissions are valid until beyond the Minerals Plan time frame, it is not proposed to allocate any new sites or extensions in area to existing sites for peat extraction'.</p> <p>Based on current information, the remaining peat depths at the peat harvesting sites within Peel ownership are set out below;</p> <p>The operator at Little Woolden Moss has indicated that there was circa 600,000 cu m of permitted reserves which confirms that there are adequate reserves to last for another 10-15 years (depending on weather conditions).</p> <p>The planning permission for Chat Moss expires in 2010 but the site has at least another 15 years of reserves remaining to reach the permitted 2m depth.</p>	
Salford City Council	Salford's view is that the Minerals Plan should contain a clear policy statement that no further peat extraction will be permitted including time extensions to existing permissions.	Noted.
Environment Agency	Are pleased to see that no new peat extraction sites are to be allocated. However, the document refers to future extraction of peat being restricted to sites which are already severely damaged. Even extraction from damaged sites is likely to have significant climate change implications due to the release of stored carbon. MPG13 was published in 1995 and does not take into account current thinking with regard to peat and climate change. Section 3.42 also acknowledges that need for peat until 2042 can be met through existing permissions. The document states that	Noted.

Minerals in Greater Manchester

Respondent	Representation	Comments
	<p>there are to be no extensions to existing sites, however it is unclear as to whether this refers only to extensions in the amount of peat removed or extensions in the time allowed to remove it.</p> <p>Since there are a number of suitable alternatives to peat and there are government proposals to phase out the use of peat based compost entirely by 2020, (http://www.defra.gov.uk/news/2010/100308a.htm), we would like to see the policy taken further to preclude any further extraction of peat beyond current planning permissions, including time extensions.</p> <p>Natural England have recently produced a report regarding England's peatlands, carbon and greenhouse gases.</p> <p>http://www.naturalengland.org.uk/about_us/news/2010/180310.aspx</p> <p>http://naturalengland.etraderstores.com/NaturalEnglandShop/NE257</p>	
Natural England	<p>We positively welcome the Proposed Approach to Peat outlined by Question 10. Subject to constraints associated with historic planning permissions etc, this broadly reflects the findings and recommendations of Natural England's recent Report: England's Peatlands – Carbon Storage and Greenhouse Gases, available via the following web-link to our Press notice dated 17th March 2010:</p> <p>http://www.naturalengland.org.uk/regions/east_of_england/press_releases/2010/180310.aspx</p> <p>However, as regards Peat and Mineral extraction, it should also be recognised 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.</p>	Noted

Minerals in Greater Manchester

Response

3.18 The majority of responses to this question relate to the adverse environmental impacts of peat extraction. No respondents suggested that new sites or lateral extensions to existing sites should be considered through the Minerals Plan. However, responses were received regarding time limits of existing peat extraction sites and the need to ensure that the Minerals Plan meets regional policy. All comments will be taken forward to the next stage of the Minerals Plan for consideration.

Method of Identifying and Protecting Mineral Resources

4 Method of Identifying and Protecting Mineral Resources

4.1 This section sets out the Questions made available for public comment in relation to the Method of Identifying and Protecting Mineral Resources in Greater Manchester. A summary is provided of the responses received and recommendations for dealing with them.

Methodology for Identifying Mineral Safeguarding Areas in Greater Manchester

Question 11

Do you agree with the proposed list of mineral resources to be safeguarded/ not safeguarded?

Table 21 Responses to Question 11

Responses Received	No. of Responses	Respondents
Support	4	Highways Agency/4NW/Mineral Products Association/National Trust
Support with Conditions	3	Greenpark Energy/UK Coal/Peel Environmental
Object	1	Ramblers Association
Other	1	Coal Authority
Observations	1	Natural England

4.2 The comments relating to mineral resources to be safeguarded/not safeguarded are set out in the table below.

4 Method of Identifying and Protecting Mineral Resources

Table 22 Mineral Resources to be Safeguarded/Not Safeguarded

Respondent	Representation	Comments
Highways Agency	Agreed	Noted
National Trust	Agreed	Noted
4NW	The proposed approach would be in line with RSS Policy EM7 which requires plans and strategies to safeguard mineral resources from other forms of development. Whilst this may be the case Policy EM7 also stresses the need to identify and protect sources of building stone for use with historic buildings and public realm improvements.	Noted
Greenpark Energy	Greenpark Energy is comfortable with the position taken with regard to not safeguarding areas for Coal Bed Methane. However, the lack of specific safeguarding areas should not become a reason to restrict CBM development in the plan area.	Noted
UK Coal	Whilst we support the approach being recommended within Para 4.15 in terms of the shallow coal resource we do have some concerns regarding the overall approach to safeguarding mineral resources. We do not believe that the approach to safeguard some sites and not safeguard others is in accordance with national planning policy. There also seems to be some discrepancy over the approach to safeguarding, for example one of the overall objectives is to 'Safeguard potentially economically viable mineral resources from sterilisation and encourage the best use of high quality materials'. If sites have been identified then it can be expected that there are economically viable mineral resources available. This being the case then there is no justification for not safeguarding such reserves as it is clearly an objective of the Minerals Plan.	The Minerals Plan will meet national minerals planning policy requirements. Where proven mineral resources are of potential future economic viability, they will be safeguarded from alternative forms of development. The approach taken by Nottinghamshire County Council to safeguard an entire resource

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>MPS1 recommends that if there is a proven mineral resource then this should be safeguarded.</p> <p>Planning and Minerals Practice Guide, Nov 2006, Para 32 states:</p> <p>The planning system has an important role to play in safeguarding proven deposits of minerals which are, or may become, of economic importance within the foreseeable future, from unnecessary sterilisation by surface development.</p> <p>Irrespective of the size of the resource it is important that mineral resources are protected from sterilisation. It is important to note that there is no presumption that resources safeguarded through MSAs or MCAs will actually be worked for minerals.</p> <p>We would recommend that mineral safeguarded areas should be expanded to cover the whole of the authority's mineral resource. The approach being taken forward by Nottinghamshire County Council to mineral safeguarding is a sensible approach. Nottinghamshire have, where appropriate, taken the whole mineral resource area and have identified within the resource constraints (such as built development, environmental sensitive areas) that would preclude working. This approach provides a clear steer to all parties involved in the planning process the need to protect valuable mineral resources. Given the national importance of coal we believe that all coal resources should be safeguarded.</p>	<p>will be researched to determine whether Greater Manchester would benefit from a similar approach.</p> <p>The Minerals Plan recognises the importance placed by the Government on the Country's coal resources.</p>
Peel Environmental	Peel agrees with the proposed list of mineral resources for safeguarding. However, as stated above, there is potential for continued peat extraction at	The summary regarding peat in table 2 of the Issues and Options

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>the site within Chat Moss in order to allow the operator to reach the existing permitted depths. Therefore, Peel believes the comment which suggests that there is "limited potential for further peat harvesting as area already extensively worked" is not entirely accurate and should be amended.</p>	<p>was made in light of the current drive towards carbon sequestration. However, the comment regarding the extensive working of peat will be reviewed and further research undertaken on this during the next stage of the Minerals Plan.</p>
Ramblers Association	<p>In view of the serious environmental concerns associated with peat extraction, we do not agree that peat should be safeguarded for possible future working</p>	<p>Noted</p>
Mineral Products Association	<p>We agree with the list of proposed mineral types to be safeguarded, namely glacio-fluvial sand and gravel and Carboniferous Millstone Grit. If further information on sub alluvial sand and gravel should become available as a result of industry exploration, the situation should be reviewed.</p>	<p>Noted. GMGU welcome any additional information regarding minerals in Greater Manchester.</p>
Coal Authority	<p>The Coal Authority welcomes the stated approach of identifying a Minerals Safeguarding Area (MSA) to safeguard surface mined (shallow) coal from sterilisation by other forms of development. The commitment to use the Coal Authority's Surface Coal Resource Plan as the basis for identifying the MSA for surface coal, as set out in paragraph 4.8, is also supported.</p> <p>However, it is considered that the information in Table 2 is confusing and potentially misleading. Column 1 of Table 2 identifies that surface mined (shallow) coal resources should be safeguarded from sterilisation by other forms of development. However, column 2 of the table, which is intended to provide a summary of the mineral resource, refers only to the current surface</p>	<p>The summary in Table 2 will be revised to ensure clarity. It is not intended to restrict any safeguarding policy to the Cutacre site and the Minerals Plan will meet the requirements of MPS1. The comments regarding deep coal and coalbed methane are noted.</p>

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>mine operations at Cutacre in Bolton. This could be interpreted to mean that only the current operations at Cutacre would be subject to safeguarding through inclusion within an MSA for coal. Such an approach would not be consistent with the guidance in MPS1 and would fail to safeguard the substantial surface coal resources present across much of Greater Manchester. The Coal Authority would object if such an approach were taken at any future stage.</p> <p>The Coal Authority therefore considers that the information in Table 2 needs clarification – in particular, the summary of the mineral resource to be safeguarded (as set out in the second column) should outline the full extent of the surface coal resource area within Greater Manchester, as outlined on the Coal Authority’s Surface Coal Resource Plan.</p> <p>The Coal Authority is satisfied that deep coal and coal bed methane resources do not need to be specifically included within MSAs providing that policies to enable the favourable consideration of appropriate proposals to extract these resources are included within the Plan.</p> <p>Reason – In order to comply with the requirements of MPS1 (Planning & Minerals) and ensure that the full extent of the surface coal resource within Greater Manchester is safeguarded from sterilisation.</p>	
Natural England		Noted

Response

4 Method of Identifying and Protecting Mineral Resources

4.3 These comments will be taken forward and used to inform further work on identifying mineral safeguarding areas in Greater Manchester. Where further clarification has been requested, this will be provided at the next stage of the Minerals Plan.

Question 12

Do you agree that these parts of the resource should be removed from the Mineral Safeguarding Area?

Table 23 Responses to Question 12

Responses Received	No. of Responses	Respondents
Support	5	Ramblers Association/4NW//Highways Agency/Coal Authority/Natural England
Support with Conditions	4	UK Coal/National Trust/GONW/English Heritage
Object	1	Mineral Products Association
Observation	1	Lancashire County Council

4.4 The comments relating to removal of parts of the mineral safeguarding area are set out in the table below.

Table 24 Mineral Safeguarding Representations

Respondent	Representation	Comments
Ramblers Association	Agree that these parts of the resource should be removed from the Mineral Safeguarding Area.	Noted
4NW	The proposed approach would be in line with RSS Policy EM7 which requires plans and strategies to safeguard mineral resources from other forms of development. Whilst this may be the case Policy EM7 also stresses	Noted. GMGU will liaise with English Heritage, The National Trust and any other bodies to ensure the protection

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Highways Agency	<p>the need to identify and protect sources of building stone for use with historic buildings and public realm improvements.</p> <p>Yes</p>	<p>of sources of building stone for the repair and restoration of historic buildings.</p> <p>Noted</p>
Coal Authority	<p>The Coal Authority welcomes the proposal not to use the urban area as a constraint for the surface coal MSA as it is a valuable national resource and there are known examples of coal extraction for land stability purposes in developments/re-developments within urban areas.</p> <p>Reason – This approach is considered consistent with the guidance in MPS1 and the BGS Guide to Mineral Safeguarding in England.</p>	<p>Noted</p>
Natural England	<p>Natural England does not wish to comment on safeguarding mineral resources.</p>	<p>Noted</p>
UK Coal	<p>Whilst we support the approach being recommended within Para 4.15 in terms of the shallow coal resource we do have some concerns regarding the overall approach to safeguarding mineral resources. We do not believe that the approach to safeguard some sites and not safeguard others is in accordance with national planning policy. There also seems to be some discrepancy over the approach to safeguarding, for example one of the overall objectives is to 'Safeguard potentially economically viable mineral resources from sterilisation and encourage the best use of high quality materials'. If sites have been identified then it can be expected that there</p>	<p>The Minerals Plan will meet national minerals planning policy requirements. Where proven mineral resources are of potential future economic viability, they will be safeguarded from alternative forms of development.</p> <p>The approach taken by Nottinghamshire County Council to safeguard an entire resource will be</p>

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>are economically viable mineral resources available. This being the case then there is no justification for not safeguarding such reserves as it is clearly an objective of the Minerals Plan.</p> <p>MPS1 recommends that if there is a proven mineral resource then this should be safeguarded.</p> <p>Planning and Minerals Practice Guide, Nov 2006, Para 32 states:</p> <p>The planning system has an important role to play in safeguarding proven deposits of minerals which are, or may become, of economic importance within the foreseeable future, from unnecessary sterilisation by surface development.</p> <p>Irrespective of the size of the resource it is important that mineral resources are protected from sterilisation. It is important to note that there is no presumption that resources safeguarded through MSAs or MCAs will actually be worked for minerals.</p> <p>We would recommend that mineral safeguarded areas should be expanded to cover the whole of the authority's mineral resource. The approach being taken forward by Nottinghamshire County Council to mineral safeguarding is a sensible approach. Nottinghamshire have, where appropriate, taken the whole mineral resource area and have identified within the resource constraints (such as built development, environmental sensitive areas) that would preclude working. This approach provides a clear steer to all</p>	<p>researched to determine whether Greater Manchester would benefit from a similar approach.</p> <p>The Minerals Plan recognises the importance placed by the Government on the Country's coal resources.</p>

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
National Trust	<p>parties involved in the planning process the need to protect valuable mineral resources. Given the national importance of coal we believe that all coal resources should be safeguarded.</p> <p>It is agreed that these areas should be removed. It is noted that the designations identified are ecological ones and there is a case for also including some heritage designations – in particular Registered Historic Parks and Gardens and also Scheduled Monuments (especially where these relate to land/landform rather than built structures, e.g. the sites of hill forts). In addition for all such natural and built environment assets it is considered that an area of protection should be included around the assets as development (especially extraction) up to their edge would undoubtedly adversely impact upon the assets themselves.</p>	<p>Noted.</p>
GONW	<p>Question 12 and Paragraph 4.13. Note that the guidance on mineral safeguarding states (page 15) that “mineral safeguarding should not be curtailed by ... environmental designations without sound justification”. Such justification is at present lacking. Paragraph 14 of MPS1 and Circular 06/2005 outline the circumstances where mineral development in or affecting nature conservation sites may be permissible and it is thus illogical to exempt these areas from safeguarding.</p>	<p>These comments will be taken forward and further work undertaken during the next Stage of the Minerals Plan on how environmental designations will be used during the development of Mineral Safeguarding Areas.</p>
English Heritage	<p>Paragraph 4.13 lists areas to be excluded from MSAs. This list should also include designated heritage assets and their setting, refer to the newly published PPS5.</p>	<p>The newly published PPS5 will be reviewed and used to inform work on the Minerals Plan, including work on mineral safeguarding areas.</p>

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Mineral Products Association	<p>We do not agree with the proposal to exclude certain types of environmental designation or urban areas from safeguarding, which is contrary to the advice of the BGS. The BGS document, A Guide to Mineral Safeguarding in England states that, "Effective safeguarding of mineral resources for the long term requires their definition be based principally upon the best available geological information. Mineral safeguarding should not be curtailed by other planning designations, such as urban areas and environmental designations without sound justification. Defining MSAs alongside environmental and cultural designations will ensure that the impact of any proposed development on mineral resources will be taken into account alongside other planning considerations. In urban areas, MPAs should define MSAs where they consider this will be of particular value. This might comprise highlighting the potential for extracting valuable or scarce minerals (such as Etruria Formation clays, coal or river terrace sand and gravel resources) beneath large regeneration projects, brownfield sites and reservoirs." (page 15)</p> <p>Certainly, if it is proposed to continue with the exclusions identified we would expect a closely argued and cogent case in favour or we will continue to maintain an objection.</p>	<p>Noted. The approach to identifying mineral safeguarding areas and how constraints will be used to inform the approach will be reviewed in light of this comment and others received to ensure the Minerals Plan is in conformity with national minerals planning policy.</p>
Lancashire County Council	<p>Conflicts with Government guidance on this topic which clearly states that such areas should not be excluded from Mineral Safeguarding Areas.</p>	<p>Noted. The approach to identifying mineral safeguarding areas and how constraints will be used to inform the approach will be reviewed in light of this comment and others received to ensure the Minerals Plan is in</p>

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
		conformity with national minerals planning policy.

Response

4.5 The approach to identifying mineral safeguarding areas, the mineral resources identified as suitable for safeguarding and how constraints will be used to inform the approach will be reviewed in light of responses to Question 12. This will ensure the Minerals Plan is in conformity with national minerals planning policy.

Question 13

Should the Minerals Plan safeguard any other mineral resources? For example, do you know of any historical quarries that are important for the conservation of historic buildings?

Table 25 Responses to Question 13

Responses Received	No. of Responses	Respondents
Support	4	Ramblers Association/Highways Agency/National Trust/4NW
Support with Conditions	1	UK Coal
Observations	3	Lancashire County Council/English Heritage/Natural England

4.6 The comments relating to safeguarding other mineral resources are set out in the table below.

Method of Identifying and Protecting Mineral Resources

Table 26 Other Mineral Resources Representations

Respondent	Representation	Comments
Ramblers Association	Are not aware of any other mineral resources that should be safeguarded in the Minerals Plan.	Noted
Highways Agency	No	Noted
National Trust	No	Noted
4NW	The proposed approach would be in line with RSS Policy EM7 which requires plans and strategies to safeguard mineral resources from other forms of development. Whilst this may be the case Policy EM7 also stresses the need to identify and protect sources of building stone for use with historic buildings and public realm improvements.	Noted. GMGU will liaise with English Heritage, The National Trust and any other bodies to ensure the protection of sources of building stone for the repair and restoration of historic buildings.
UK Coal	Whilst we support the approach being recommended within Para 4.15 in terms of the shallow coal resource we do have some concerns regarding the overall approach to safeguarding mineral resources. We do not believe that the approach to safeguard some sites and not safeguard others is in accordance with national planning policy. There also seems to be some discrepancy over the approach to safeguarding, for example one of the overall objectives is to 'Safeguard potentially economically viable mineral resources from sterilisation and encourage the best use of high quality materials'. If sites have been identified then it can be expected that there are economically viable mineral resources available. This being the case then there is no justification for not safeguarding such reserves as it is clearly an objective of the Minerals Plan.	The Minerals Plan will meet national minerals planning policy requirements. Where proven mineral resources are of potential future economic viability, they will be safeguarded from alternative forms of development. The approach taken by Nottinghamshire County Council to safeguard an entire resource will be

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>MPS1 recommends that if there is a proven mineral resource then this should be safeguarded.</p> <p>Planning and Minerals Practice Guide, Nov 2006, Para 32 states:</p> <p>The planning system has an important role to play in safeguarding proven deposits of minerals which are, or may become, of economic importance within the foreseeable future, from unnecessary sterilisation by surface development.</p> <p>Irrespective of the size of the resource it is important that mineral resources are protected from sterilisation. It is important to note that there is no presumption that resources safeguarded through MSAs or MCAs will actually be worked for minerals.</p> <p>We would recommend that mineral safeguarded areas should be expanded to cover the whole of the authority's mineral resource. The approach being taken forward by Nottinghamshire County Council to mineral safeguarding is a sensible approach. Nottinghamshire have, where appropriate, taken the whole mineral resource area and have identified within the resource constraints (such as built development, environmental sensitive areas) that would preclude working. This approach provides a clear steer to all parties involved in the planning process the need to protect valuable mineral resources. Given the national importance of coal we believe that all coal resources should be safeguarded.</p>	<p>researched to determine whether Greater Manchester would benefit from a similar approach.</p> <p>The Minerals Plan recognises the importance placed by the Government on the Country's coal resources.</p>

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Lancashire County Council	See previous comments re High Moor Quarry.	Noted
English Heritage	The English Heritage BGS Strategic Stone Study will help the identification of active and historic stone quarries. It will be important for the minerals plan to accommodate information from the new database England's Building Stone Pits EBSPits which will be available on www.mineralsUK.com . Greater Manchester's local authority conservation officers together with the GM Historic Environment Record (HER) may also be able to supply information for this question.	Noted. These studies will be reviewed and used to inform work on the Minerals Plan.
Natural England	Natural England does not hold any information about historic quarries that are important for the conservation of historic buildings.	Noted

Response

4.7 The comments received in response to Question 13 have been noted and will be used to inform the next stage of the Minerals Plan.

Question 14

Do you agree with the proposed approach to safeguarding mineral resources in Greater Manchester?

Table 27 Responses to Question 14

Responses Received	No. of Responses	Respondents
Support	3	Ramblers Association/Highways Agency/4NW

Method of Identifying and Protecting Mineral Resources

Responses Received	No. of Responses	Respondents
Support with Conditions	3	Mineral Products Association/CoalPro/UK Coal
Observations	2	Cheshire West and Chester/Natural England

4.8 The comments relating to the approach to safeguarding are set out in the table below.

Table 28 Approach to Safeguarding Representations

Respondent	Representation	Comments
Ramblers Association	We agree with the proposed approach to safeguarding mineral resources in Greater Manchester, apart from peat (please see our comments on Question 11).	Noted
Highways Agency	Yes	Noted
4NW	The proposed approach would be in line with RSS Policy EM7 which requires plans and strategies to safeguard mineral resources from other forms of development. Whilst this may be the case Policy EM7 also stresses the need to identify and protect sources of building stone for use with historic buildings and public realm improvements.	Noted
Mineral Products Association	You indicate proposed buffers for sand and gravel resources of 250 m. We agree that this is a sensible distance since MPS2 indicates that the amenity effects of mineral working usually extend no further than this from most sensitive land uses. However, this should not be taken as evidence that mineral working cannot be successfully undertaken at closer distances if mitigation is	Comments regarding the sand and gravel buffer are noted. A buffer distance for sandstone will be included in the next stage of the Minerals Plan.

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
CoalPro	<p>employed; merely that for the purposes of safeguarding such a distance would tend to capture most proposals that if permitted, might affect the ability of a mineral site to be worked.</p> <p>However, we also note that you do not specify a proposed buffer for sandstone. We assume that this will be rectified in subsequent consultation documents.</p> <p>CoalPro agrees with the approach to safeguarding mineral resources and is pleased that there is recognition that coal may be worked within the urban area, and appropriately safeguarded, when required for purposes of land stability. However, this approach should be extended to allow coal to be extracted prior to development/redevelopment to avoid sterilisation, even if not required for land stability purposes, subject to appropriate environmental safeguards.</p>	<p>Noted. It is intended that any policy on mineral safeguarding areas would require developers to consider extraction of a mineral prior to developing a site.</p>
UK Coal	<p>Whilst we support the approach being recommended within Para 4.15 in terms of the shallow coal resource we do have some concerns regarding the overall approach to safeguarding mineral resources. We do not believe that the approach to safeguard some sites and not safeguard others is in accordance with national planning policy. There also seems to be some discrepancy over the approach to safeguarding, for example one of the overall objectives is to 'Safeguard potentially economically viable mineral resources from sterilisation and encourage the best use of high quality materials'. If sites have been identified then it can be expected that there are economically viable mineral resources available. This being the case then there is no justification for not safeguarding such reserves as it is clearly an objective of the Minerals Plan.</p>	<p>The Minerals Plan will meet national minerals planning policy requirements. Where proven mineral resources are of potential future economic viability, they will be safeguarded from alternative forms of development.</p> <p>The approach taken by Nottinghamshire County Council to safeguard an entire resource will</p>

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>MPS1 recommends that if there is a proven mineral resource then this should be safeguarded.</p> <p>Planning and Minerals Practice Guide, Nov 2006, Para 32 states:</p> <p>The planning system has an important role to play in safeguarding proven deposits of minerals which are, or may become, of economic importance within the foreseeable future, from unnecessary sterilisation by surface development.</p> <p>Irrespective of the size of the resource it is important that mineral resources are protected from sterilisation. It is important to note that there is no presumption that resources safeguarded through MSAs or MCAs will actually be worked for minerals.</p> <p>We would recommend that mineral safeguarded areas should be expanded to cover the whole of the authority's mineral resource. The approach being taken forward by Nottinghamshire County Council to mineral safeguarding is a sensible approach. Nottinghamshire have, where appropriate, taken the whole mineral resource area and have identified within the resource constraints (such as built development, environmental sensitive areas) that would preclude working. This approach provides a clear steer to all parties involved in the planning process the need to protect valuable mineral resources. Given the national importance of coal we believe that all coal resources should be safeguarded.</p>	<p>be researched to determine whether Greater Manchester would benefit from a similar approach.</p> <p>The Minerals Plan recognises the importance placed by the Government on the Country's coal resources.</p>
Cheshire West and Chester	SPA, SAC and SSSI allocations may not be strong enough on their own to protect minerals from unnecessary sterilization. There is the potential for permissions to be granted for non-minerals development in exceptional	This comment will be considered along with guidance in PPS 9 and the accompanying Circular and

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>circumstances. It is therefore suggested that MSAs should be included in the plan for those areas where minerals resources can be identified within these allocations.</p> <p>If the above allocations are used to remove areas from proposed MSAs, there is the potential for the remaining areas to be viewed more as areas of search rather than MSAs. It is perhaps more beneficial and more in line with the guidance, for MSAs to be outlined in their more simple form.</p>	used to inform the next stage of the Minerals Plan.
Natural England	Natural England does not wish to comment on safeguarding mineral resources.	Noted

Response

4.9 The comments received in response to Question 14 have been noted and will be used to inform the next stage of the Minerals Plan.

Identifying Future Mineral Resources

Question 15

4.10 To meet national and regional guidelines, it may be necessary to release additional aggregate resources over the Minerals Plan period. How should we identify sand, gravel and gritstone resources?

1a) Identify extensions to existing sites where these do not result in unacceptable environmental or social impacts

1b) Identify new sites where these do not result in unacceptable environmental impacts or social impacts

Method of Identifying and Protecting Mineral Resources

- 1c) Identify areas of search which could meet any shortfall in provision during the Minerals Plan period
- 1d) A combination of the above
- 1e) A different approach

Table 29 Responses to Question 15

Responses Received	No. of Responses	Respondents
Observations	8	Ramblers Association/Highways Agency/4NW/Lancashire County Council/National Trust/Mineral Products Association/Peel Environmental/Natural England
Object	1	GONW

4.11 The comments relating to identifying sand, gravel and gritstone resources are set out in the table below.

Table 30 Identifying Sand, Gravel and Gritstone Resources Representations

Respondent	Representation	Comments
Ramblers Association	We have no knowledge as to how sand, gravel or gritstone resources might be identified	Noted
Lancashire County Council	Specific sites should be allocated- landowner support should not be a consideration. Preferred Areas and Areas of Search are not necessary if safeguarding proposals are in place for the whole of the resource.	It is considered that without landowner support, there may be issues with minerals development on a site. It is considered that minerals safeguarding areas have a different purpose to preferred areas and areas of search.

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Highways Agency	Option 1a as this would have the least impact in transport terms.	Noted
National Trust	It is unclear how the identification of sites will be related to levels of demand and the extent to which that demand can be met by secondary and re-cycled resources. Fundamentally the plan needs to be clear about what "sufficient provision" is and how that provision is to be met in terms of the amount of primary extraction required. It is anticipated that these considerations will also need to include an assessment of the scale of the current and future importation of minerals into Greater Manchester.	<p>Greater Manchester is required to contribute to the sub-regional aggregate apportionment and maintain a sufficient landbank of aggregates. The sub-regional apportionment takes into account the use of secondary and recycled aggregate. Therefore, the Minerals Plan is required to plan to contribute to the sub-regional aggregate apportionment.</p> <p>There are no targets set for other primary minerals.</p> <p>A survey of imports/ exports of minerals is being undertaken as part of the national aggregates survey and this information, along with information provided by industry, will be used to inform the Minerals Plan.</p>
Mineral Products Association	We would support an approach that is site specific wherever possible. The only circumstances where we feel an Area of Search approach is justified is when not enough is known of the mineral resource sufficient to identify a site's boundary with certainty, or where operators have not come forward with definite proposals, or where it is intended to indicate the location of development in the longer	Noted. It is likely that the Minerals Plan will identify some combination of specific sites, preferred areas and areas of search. Specific sites will be identified where landowners/ developers nominate sites for assessment.

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Peel Environmental	<p>term (i.e. beyond the plan period). In all other cases, we believe that the aim of providing certainty for both the industry and local communities is best served by a detailed assessment of site specific information, and we commend this approach to the authorities.</p> <p>Peel suggests that option 1a would be the most appropriate option to identify reserves, which aims to 'identify extensions to existing sites where these do not result in unacceptable environmental or social impacts'.</p> <p>However, it may also be appropriate to combine the options as suggested in option 1d, so new sites and areas of search can be identified to meet any shortfall in provision</p>	Noted
4NW	<p>RSS Policy EM8 requires mineral planning authorities to continue to work together to make provision for the agreed apportionment of land-won aggregate requirements. It is considered that Option 1d, combination of all three options including identifying existing sites, new sites and areas of search would seek to ensure that Greater Manchester meets its required contribution to aggregates apportionments and maintain a sufficient landbank.</p> <p>There are no other constraints or categories of land that we wish to suggest at this stage.</p>	Noted
Natural England	Natural England does not wish to comment on the means of identifying mineral resources.	Noted

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
GONW	Question 15 and Paragraphs 4.17 and 4.18. The assumption that not distinguishing between Specific Sites and Preferred Areas will “avoid confusion” is questionable. In the minds of the public a likely result might be that Preferred Areas will be lumped together with Specific Sites in a way which will cause unnecessary levels of objection. We suggest that this approach be carefully considered.	The approach to specific sites and preferred areas will be reviewed in light of GONW comments and in line with MPS1.

Response

4.12 The comments received in response to Question 15 have been noted and will be used to inform the next stage of the Minerals Plan. The favoured options were 1a) and 1d) and these will be taken forward to the next stage of the Minerals Plan.

Question 16

Do you know of any sites for sand, gravel or gritstone that you would like to nominate for consideration in the Minerals Plan?

Table 31 Responses to Question 16

Responses Received	No. of Responses	Respondents
Observations	8	Ramblers Association/Highways Agency/The Emerson Group/National Trust/Mineral Products Association/Peel Environmental/Graham Ball/Natural England

4.13 Details of nominated sites for sand, gravel or gritstone are set out in the table below.

Method of Identifying and Protecting Mineral Resources

Table 32 Nominated Sand, Gravel or Gritstone Sites Representations

Respondent	Representation	Comments
Ramblers Association	We are not able to nominate any sites for sand, gravel or gritstone for the Minerals Plan.	Noted
Highways Agency	Not as far as we are aware	Noted
The Emerson Group	In answer to question 16 the site of despoits of pean gravel and sand at Gibb Farm on the east and west of the M61 Horwich and Bolton, is available to deliver mineral despoits during this plan period.	Noted. This site will be assessed as part of the Minerals Plan.
National Trust	No	Noted
Mineral Products Association	We have no comment to make on identifying sites. However, we would comment that the various elements of Option 1 should be undertaken in a sequential manner if possible. For example, in the light of our comments on question 15 the best approach would be to identify extensions if environmentally acceptable, then new sites, then areas of search	Noted
Graham Ball	Gibb Farm, Horwich I formally write as discussed to make a Representation for the above farm to be included within the Areas of Search within the proposed plan. As explained, the process of preparing this Minerals Plan has only recently become known to our client. As such, whilst drawing this matter to your attention, as a agreed a Consultant Minerals Surveyor will be appointed at	Noted. This site will be assessed as part of the Minerals Plan.

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Peel Environmental	<p>an early date to negotiate and discuss the situation fully with yourselves in order to clarify the situation concerning this farm, prior to the Preferred Options paper being concluded</p> <p>Fletcher Bank Quarry has resources of gritstone, and aggregate beyond the already permitted reserves. Peel owns land at Fletcher Bank Quarry which it wishes to nominate for consideration in relation to the Minerals Plan, and is shown hatched on the attached plan.</p> <p>The minerals themselves are located in land within Lancashire however the access and likely destination of the minerals is likely to be Greater Manchester.</p>	Noted. This site will be assessed as part of the Minerals Plan.
Natural England	Natural England does not wish to nominate any sites.	Noted

Response

4.14 The comments received in response to Question 16 have been noted and will be used to inform the next stage of the Minerals Plan. Any sites or areas nominated for consideration will be assessed during the next stage of the Minerals Plan.

Question 17

Are you aware of any old minerals sites that were not worked out and which should be considered for inclusion in the Minerals Plan?

Method of Identifying and Protecting Mineral Resources

Table 33 Responses to Question 17

Responses Received	No. of Responses	Respondents
Observations	5	Ramblers Association/Highways Agency/National Trust/Mineral Products Association/Natural England

4.15 Details of old mineral sites are set out in the table below.

Table 34 Old Mineral Site Representations

Respondent	Representation	Comments
Ramblers Association	We are not able to nominate any old minerals sites that were not worked out.	Noted
Highways Agency	Not as far as we are aware	Noted
National Trust	No	Noted
Mineral Products Association	We have no comment to make on identifying sites. However, we would comment that the various elements of Option 1 should be undertaken in a sequential manner if possible. For example, in the light of our comments on question 15 the best approach would be to identify extensions if environmentally acceptable, then new sites, then areas of search	Noted
Natural England	Natural England does not wish to nominate any old minerals sites for inclusion in the Minerals Plan.	Noted

Response

4 Method of Identifying and Protecting Mineral Resources

4.16 The comments received in response to Question 16 have been noted and will be used to inform the next stage of the Minerals Plan.

Question 18

Do you know of any other constraints that should be considered?

Table 35 Responses to Question 18

Responses Received	No. of Responses	Respondents
Support with Conditions	2	Ramblers Association/English Heritage
Observations	5	Highways Agency/National Trust/Environment Agency/4NW/Natural England
Object	1	Mineral Products Association

4.17 The comments relating to other constraints are set out in the table below.

Table 36 Other Constraints Representations

Respondent	Representation	Comments
Ramblers Association	We would suggest that an additional constraint could be “access land” i.e. land mapped as open country or registered common land and also land dedicated for access under the Countryside and Rights of Way Act 2000.	The suggested constraint ‘access land’ will be taken forward and considered during the site search for the Minerals Plan.
English Heritage	Paragraph 4.29 lists constraints and for the historic environment only mentions conservation areas. It will be important to include all designated	The list of constraints will be amended to include the ‘setting’ of heritage

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	<p>heritage assets and their setting. There may also be important undesignated assets. It will be important to obtain up to date information from the GM HER and from LA conservation officers. Refer to our guidance note http://www.helm.org.uk/upload/pdf/Mineral-Extraction.pdf?1270042884</p>	<p>assets. GMGU will liaise with the Greater Manchester Archaeological Unit to ensure any important undesignated assess are taken into account.</p>
Highways Agency	<p>Not as far as we are aware</p>	<p>Noted</p>
National Trust	<p>In respect of para 4.28 it is noted that it is also the case that environmental designations and related knowledge will have changed; for example, new designations may have been made, boundaries amended or sites re-graded – equally in rare cases de-designation may have occurred. It is important that the information on environmental designations is the latest available.</p> <p>The overall list of constraints should include Registered Historic Parks and Gardens, Registered Battlefields (if any) and Scheduled Monuments such as hill forts. The settings of designated assets is also a material consideration in planning decisions; but it is recognised that it would be a major task to assess the settings of all these features and that the most straightforward approach is to work initially to the extent of the designations. However, it will then be essential to ensure that the issue of settings is picked up elsewhere in terms of the consideration of environmental impacts when either a) allocating a specific site, or b) preparing criteria based policies for sites within preferred areas or areas of search.</p>	<p>GMGU will seek to use the latest boundary data for designated sites. Registered Historic Parks and Gardens, Registered Battlefields (if any) and Scheduled Monuments and, where appropriate, their settings will be considered during the site assessment stage. The issue of 'settings' of historic sites will be taken into account during work on the Minerals Plan.</p>

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Environment Agency	<p>Flood risk should be considered as part of the constraints. PPS25 recognises that sand and gravel workings are water compatible development, however, a flood risk assessment would be required for extraction within flood risk areas due to changes in the hydrology. It is possible that extraction within some areas may provide an opportunity for flood storage, thereby reducing flood risk elsewhere. Information should be sought from Strategic Flood Risk Assessments carried out by local authorities.</p>	<p>Flood risk will be considered during the site assessment stage. In addition Strategic Flood Risk Assessments will be used during site assessments.</p>
4NW	<p>RSS Policy EM8 requires mineral planning authorities to continue to work together to make provision for the agreed apportionment of land-won aggregate requirements. It is considered that Option 1d, combination of all three options including identifying existing sites, new sites and areas of search would seek to ensure that Greater Manchester meets its required contribution to aggregates apportionments and maintain a sufficient landbank.</p> <p>There are no other constraints or categories of land that we wish to suggest at this stage</p>	Noted
Natural England	<p>In 4.29 we would welcome references to sub-regional biodiversity maps and frameworks of statutory and local wildlife sites, with specific reference to Special Areas of Conservation (SAC) and Special Protection Areas (SPA). We would welcome inclusion of Public Rights of Way, including National Trails; and Access Land (designated under the CROW Act) included in Constraints.</p>	<p>These suggestions for constraints will be taken forward to the next stage of the Minerals Plan.</p>

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Mineral Products Association	We do not agree with the proposed methodology. We believe that it will be difficult for the authorities to demonstrate that they have used a sound evidence base if previous work, which has not been tested with the same degree of rigour, is used without being confirmed for current validity. In short, the authorities should start from scratch with the evidence base of the mineral resource and successively apply a considered range of new constraints.	Noted. The original list of constraints will be reviewed to ensure it is up to date.

Response

4.18 The comments received in response to Question 17 have been noted and will be used to inform the next stage of the Minerals Plan.

Question 19

Should we exclude any other categories of land?

Table 37 Responses to Question 19

Responses Received	No. of Responses	Respondents
Support	1	Mineral Products Association
Observations	5	Ramblers Association/Highways Agency/National Trust/4NW/Natural England

4.19 The comments relating to any other categories of land are set out in the table below.

4 Method of Identifying and Protecting Mineral Resources

Table 38 Other Categories of Land Representations

Respondent	Representation	Comments
Mineral Products Association	We agree with the list of potential exclusions of sites and areas unlikely to be worked for minerals.	Noted
Ramblers Association	We cannot suggest any other categories of land that should be excluded from aerial photography for the purpose of identifying areas with little or no prospect of mineral working taking place.	Noted
Highways Agency	Not as far as we are aware	Noted
National Trust	No other categories come to mind	Noted
4NW	RSS Policy EM8 requires mineral planning authorities to continue to work together to make provision for the agreed apportionment of land-won aggregate requirements. It is considered that Option 1d, combination of all three options including identifying existing sites, new sites and areas of search would seek to ensure that Greater Manchester meets its required contribution to aggregates apportionments and maintain a sufficient landbank. There are no other constraints or categories of land that we wish to suggest at this stage.	Noted
Natural England	Natural England has no comment to make on exclusion criteria.	Noted

Response

4.20 No other categories of land have been suggested at this stage therefore no other categories of land will be considered.

Method of Identifying and Protecting Mineral Resources

Question 20

Do you agree that the proposed method for identifying Areas of Search is appropriate?

Table 39 Responses to Question 20

Responses Received	No. of Responses	Respondents
Support	2	Ramblers Association/Highways Agency
Object	1	Lancashire County Council
Observations	5	National Trust/Mineral Product Association/Horwich Vision/4NW/Natural England

4.21 The comments relating to the proposed method for identifying Areas of Search are set out in the table below.

Table 40 Identifying Areas of Search Representations

Respondent	Representation	Comments
Ramblers Association	We agree that the proposed method for identifying Areas of Search is appropriate.	Noted
Highways Agency	Yes as far as we are aware	Noted
Lancashire County Council	No comment	Noted
National Trust	No specific additional comments to make at this stage	Noted

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Mineral Product Association	See comments on question 18.	Noted
Horwich Vision	<p>It is noted that land which forms part of the proposed strategic mixed used allocation of the Horwich Loco Works (HLV) in the Draft Bolton Core Strategy is currently washed over as an Area of Search for Minerals. Whilst HVL do not raise objection to this continuing through the Minerals Plan, they would raise concern should this area be identified to be safeguarded for minerals extraction for any reason, as this may adversely affect the proposals for this site and therefore Bolton's Core Strategy. Therefore, please treat this representation as our proposal that the land concerned should continue as an Area of Search for Minerals</p>	<p>Areas of search are broader areas where knowledge of mineral resources may be less certain, but within which planning permissions for particular sites could be granted to meet any shortfall if suitable applications are made. Mineral safeguarding areas are designed to protect potentially viable mineral resources however, they do not preclude non-mineral development. A mineral safeguarding area means that the issue of minerals will be taken into account in any planning decision. The issue of how to deal with Core Strategy Strategic Sites will be considered in more detail during the next stage of the Minerals Plan.</p>
4NW	<p>RSS Policy EM8 requires mineral planning authorities to continue to work together to make provision for the agreed apportionment of land-won aggregate requirements. It is considered that Option 1d, combination of all three options including identifying existing sites, new sites and areas of search would seek to ensure that Greater Manchester meets its required contribution to aggregates apportionments and maintain a sufficient landbank.</p>	Noted

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	There are no other constraints or categories of land that we wish to suggest at this stage.	
Natural England	Natural England has no comment to make on the proposed method for identifying Areas of Search.	Noted

Response

4.22 The comments received in response to Question 20 have been noted and will be used to inform the next stage of the Minerals Plan.

Question 21

How should we identify coal resources that could be of future importance?

2a) Identify the extent of the shallow coalfield and the constraints within that area, using the latest information provided by the Coal Authority.

2b) Identify Areas of Search for coal, within which planning applications for mineral development are likely to be viewed favourably. Please provide information in relation to possible areas that could be considered.

2c) A different approach. Please provide information.

Table 41 Responses to Question 21

Responses Received	No. of Responses	Respondents
Support	3	CoalPro/UK Coal/Coal Authority

4 Method of Identifying and Protecting Mineral Resources

Responses Received	No. of Responses	Respondents
Observations	7	Ramblers Association/Lancashire County Council/Highways Agency/National Trust/GONW/4NW/Natural England

4.23 The comments relating to the proposed method for identifying coal resources are set out in the table below.

Table 42 Coal Resources Representations

Respondent	Representation	Comments
CoalPro	CoalPro agrees with the proposed approach.	Noted
UK Coal	We support Option 2b and wish to promote land to the south of Dicconson Lane near Westhoughton and Aspull for inclusion as a preferred area of search for future surface mining of coal.	Noted. This site will be assessed as part of the Minerals Plan.
Coal Authority	Option 2a is considered a reasonable and pragmatic approach. Nevertheless, the Coal Authority would also welcome option 2b in the event that information is available from the industry to enable the identification of Areas of Search. However, it should be noted that, if option 2b is pursued, Areas of Search should be used to provide greater certainty as to where planning applications for surface coal extraction are likely to be viewed favourably but NOT to restrict extraction to these areas only. In the event that this approach is taken, the Plan should still make provision for applications for surface coal extraction outside of the Areas of Search to be considered on their merits. Reason – To comply with the guidance in MPS1 (Planning & Minerals)	Noted. It is intended that the Minerals Plan will contain a policy on how planning applications for minerals development on unallocated sites will be dealt with which will encompass applications outwith areas of search.

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Ramblers Association	We have no knowledge about how coal resources that may be of future importance might be identified.	Noted
Lancashire County Council	2a but without constraint	Noted
Highways Agency	The Highways Agency has no comment to make	Noted
National Trust	<p>It is difficult to respond to this question without an indication of the extent of the coal resource identified by the Coal Authority. However, the prospect of adding in “substantial areas” above those previously identified, in the context of a low demand for coal in the plan area and the cessation of the one open cast site during 2010 (paras 3.27 and 3.28) appears illogical. From the information provided it also appears that there is currently an absence either of permissions not yet commenced or of sites being brought forward as planning applications.</p> <p>Option 2b is therefore preferred, but it is difficult to comment on the possible areas to be considered (as requested) in the absence of better information about a) the existing Areas of Search, and b) the latest information from the Coal Authority.</p>	Noted. Further clarity on this matter will be provided at the next stage of the Minerals Plan.
GONW	To use an approach based on the knowledge of the Coal Authority is the approach most likely to be consistent with national policy.	Noted
4NW	Given that the most-up-to-date information about shallow coal resources is prepared by the Coal Authority and the fact that the Greater Manchester	Noted.

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
	Councils do not hold technical or commercial information required it is considered that Option 2a is the most appropriate for identifying future coal resources at this stage. Whilst this may be the case, if additional information comes forward on potential future coal resources in the future, it may be necessary to consider the potential for Option 2b or even a combination of Options 2a and 2b.	
Natural England	Natural England has no comment to make on identification of coal resources	Noted

Response

4.24 The comments received in response to Question 21 have been noted and will be used to inform the next stage of the Minerals Plan. The favoured options were 2a) and 2d) and these will be taken forward to the next stage of the Minerals Plan.

Question 22

Do you agree that it is not appropriate to identify Areas of Search for clay and peat in the Minerals Plan? (Please give reasons)

Table 43 Responses to Question 22

Responses Received	No. of Responses	Respondents
Support	4	Ramblers Association/Highways Agency/National Trust/Natural England
Observations	2	Environment Agency/4NW

4.25 The comments relating to identifying Areas of Search for clay and peat are set out in the table below.

Method of Identifying and Protecting Mineral Resources

Table 44 Areas of Search for Clay and Peat Representations

Respondent	Representation	Comments
Ramblers Association	We agree that it is not appropriate to identify areas of search for clay and peat in the Minerals Plan.	Noted
Highways Agency	Yes as far as we are aware	Noted
National Trust	Agreed – for the reasons set out at paras 4.38 and 4.39 and having regard to the response above to Q.10.	Noted
Natural England	Natural England concurs with the reasoning for not identifying Areas of Search for clay and peat.	Noted
Environment Agency	See my response to Q10 with regard to peat.	Noted
4NW	It is acknowledged that there is limited information available for other mineral resources and that activity, albeit limited, has generally been limited to the extraction of clay and peat. RSS Policy EM7 requires plans and strategies to recognise the national significance of the Region’s reserves of clay and peat. In order to decide whether to allocate any new sites or extensions to existing sites for clay or peat extraction it will be necessary to consider future need, bearing in mind existing planning permissions, industry requirements and environmental considerations.	Noted. The minerals Plan will be developed in line with regional planning policy.

Response

4.26 The comments received in response to Question 22 have been noted and will be used to inform the next stage of the Minerals Plan.

4 Method of Identifying and Protecting Mineral Resources

Identifying Sites for Processing of Secondary and Recycled Aggregates

Question 23

Do you agree with the proposed approach to identifying sites for processing of secondary and recycled aggregates?

Table 45 Responses to Question 23

Responses Received	No. of Responses	Respondents
Support	4	Ramblers Association/Highways Agency/National Trust/Mineral Products Association
Support with Conditions	1	Peel Environmental
Observations	3	Environment Agency/4NW/Natural England

4.27 The comments relating to identifying sites for processing of secondary and recycled aggregates are set out in the table below.

Table 46 Sites for Processing of Secondary and Recycled Aggregates Representations

Respondent	Representation	Comments
Ramblers Association	We agree with the proposed approach to identifying sites for processing of secondary and recycled aggregates.	Noted
Highways Agency	Yes as far as we are aware	Noted
National Trust	Agreed	Noted

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Mineral Products Association	Agreed	Noted
Peel Environmental	<p>Peel agrees with the approach taken within the Minerals plan that will “not seek to identify sites for the processing of secondary and recycled aggregates but will instead reflect the approach taken in the Greater Manchester Waste Plan”.</p> <p>However, it is suggested that this approach be referred to within the subsequent stages of the Minerals Plan and that reference is made to the role of the Waste Plan within the Minerals Plan.</p>	<p>Noted. The link between the Greater Manchester Waste and Minerals Plans will be clarified in the next stage of the Minerals Plan.</p>
Environment Agency	<p>The sites processing secondary and recycled aggregates may not take full account of the potential for the crushing and processing of concrete, tiles, ceramics and bricks at the place of production or at a place where they will be used under a Local Authority exemption (to be known as T7 under the new exempt activities in Schedule 3 Part 1 of The Environmental Permitting Regulations 2010, due to come into force on the 6th April 2010). Also in the same regulations the exemption known as U1 will permit the use of this kind of waste in construction. In addition to these exemptions there is also the outputs of aggregates that are able to meet the terms of the WRAP Aggregate Quality Protocols that cease to be classed as waste.</p>	Noted.
4NW	<p>RSS Policy EM9 specifically mentions the need for plans and strategies to consider their contribution to the role played by secondary and recycled sources of aggregates. It will be necessary to ensure that the inclusion of sites within the Greater Manchester Joint Waste Development Plan Documents satisfies these requirements.</p>	<p>Noted. The Minerals Plan will be developed in line with regional planning policy.</p>

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Natural England	Natural England has no comment to make on the identification of sites for processing secondary and recycled aggregates, however, appropriate text should be included in the report to show the relationship with the GM Waste Plan in that respect.	Noted

Response

4.28 The comments received in response to Question 23 have been noted and will be used to inform the next stage of the Minerals Plan.

Identifying Sites for Wharfs/Depots

Question 24

Are minerals imported from anywhere else and if so, what method of transport is used? (Please specify)

Table 47 Responses to Question 24

Responses Received	No. of Responses	Respondents
Observations	5	Ramblers Association/Highways Agency/National Trust/Mineral Products Association/Natural England

4.29 Comments relating to transport methods are set out in the table below.

Method of Identifying and Protecting Mineral Resources

Table 48 Transport Methods Representations

Respondent	Representation	Comments
Ramblers Association	We have no knowledge of minerals imported into Greater Manchester from places other than those specified in the document.	Noted
Highways Agency	We cannot comment	Noted
National Trust	The National Trust does not have any specific detailed knowledge of the methods and routes used for minerals importation to Greater Manchester, the future potential of the ship canal, or specific opportunities for rail sidings. However, what is apparent is that there is a significant growth agenda for the plan area, in particular in the Regional Centre. Accordingly there are likely to be greater and more viable opportunities for non-road based transportation of minerals than in, for example, rural locations. It is considered that it is important that the opportunities are not only fully explored but also exploited.	Noted. The potential for transporting minerals by rail and canal will be explored as part of the Minerals Plan.
Mineral Products Association	The Association leaves the identification of sites to its members. However, in general we would remark that there is no doubt that as demand for aggregates increases there will be a continuing demand for importing aggregates by the most appropriate method. Road will still be the most viable method for imports from mineral sites too close to be considered for other modes, and for diffuse markets and for sites not linked to water or rail. However, since the overall supply of potential rail depots is locationally constrained it would be prudent in our view for the authorities to seek to identify all such sites with potential and to safeguard them for future use	Noted. The Minerals Plan will consider the safeguarding of wharfs and depots required for the transport of minerals along canal and rail.
Natural England	Natural England does not have knowledge of the importation of minerals into Greater Manchester.	Noted

4 Method of Identifying and Protecting Mineral Resources

Response

4.30 The comments received in response to Question 23 have been noted and will be used to inform the next stage of the Minerals Plan.

Question 25

What is the future for potential movement of minerals along the ship canal?

Table 49 Responses to Question 25

Responses Received	No. of Responses	Respondents
Support	2	Highways Agency/Peel Environmental
Observations	5	Ramblers Association/National Trust/Mineral Products Association/4NW/Natural England

4.31 Comments relating to potential movement of minerals along the ship canal are set out in the table below.

Table 50 Movement of Minerals along Ship Canal Representations

Respondent	Representation	Comments
Highways Agency	The Highways Agency welcomes any move to transfer mineral transportation from the road network though this does have the potential to create the “honeypot effect” around the rail depot/ canal wharf where the cargo has to be taken from that point to the end destination.	Noted. Highways concerns will be taken into account during the preparation of the Minerals Plan and will for part of the site assessment.

Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Peel Environmental	<p>Peel considers that the Manchester Ship Canal has significant future potential for the movement of minerals. It is suggested that the ship canal can be utilised for the transportation of minerals and the importation of raw materials (both primary and secondary aggregates), but that this clearly is dependant on capital costs for improvements required for infrastructure and the associated cost of moving minerals by other means. Supporting sites and land side infrastructure are required to support the function of the canal itself.</p> <p>There therefore should be policy support and recognition within the Plan document for the movement of minerals along the canal.</p> <p>Peel would welcome the inclusion of the Manchester Ship Canal as a key facilitator of minerals movement within the Greater Manchester Minerals Plan.</p>	<p>Noted. GMGU will contact Peel to seek further information about the potential use of the Manchester Ship Canal for transporting minerals into Greater Manchester.</p>
Ramblers Association	<p>We have no specialist knowledge about the future for the potential movement of minerals along the Ship Canal, but would have thought that the development of Port Salford would improve the prospects.</p>	<p>Noted. See comments above regarding the Manchester Ship Canal.</p>
National Trust	<p>The National Trust does not have any specific detailed knowledge of the methods and routes used for minerals importation to Greater Manchester, the future potential of the ship canal, or specific opportunities for rail sidings. However, what is apparent is that there is a significant growth agenda for the plan area, in particular in the Regional Centre. Accordingly there are likely to be greater and more viable opportunities for non-road based transportation of minerals than in, for example, rural locations. It is considered that it is important that the opportunities are not only fully explored but also exploited.</p>	<p>Noted</p>

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
Mineral Products Association	<p>The Association leaves the identification of sites to its members. However, in general we would remark that there is no doubt that as demand for aggregates increases there will be a continuing demand for importing aggregates by the most appropriate method. Road will still be the most viable method for imports from mineral sites too close to be considered for other modes, and for diffuse markets and for sites not linked to water or rail. However, since the overall supply of potential rail depots is locationally constrained it would be prudent in our view for the authorities to seek to identify all such sites with potential and to safeguard them for future use</p>	<p>Noted. The Minerals Plan will consider the safeguarding of wharfs and depots required for the transport of minerals along canal and rail.</p>
4NW	<p>The policy approach for the transportation of minerals set out in RSS Policy EM7 requires plans and strategies to include opportunities for the transportation of minerals by pipeline, rail or water, including the maintenance of existing wharves and railhead facilities, the provision of new ones, and of new facilities for on-shore processing and distribution of hydrocarbons.</p> <p>RSS Policies RT6 and RT 8 also encourage the use of ports and waterway assets as well as the transfer of freight from road to rail and/or water by the identification of sites for inter-modal freight terminals, and by encouraging greater use of existing terminals and private sidings. Consideration should be given to the potential movement of minerals along the Manchester ship canal.</p>	<p>Noted. The Minerals Plan will be prepared in line with regional planning policy.</p>
Natural England	<p>Natural England does not have knowledge of the movement of minerals via the Ship Canal.</p>	<p>Noted</p>

Response

Method of Identifying and Protecting Mineral Resources

4.32 The comments received in response to Question 25 have been noted and will be used to inform the next stage of the Minerals Plan. Further information will be sought from Peel regarding the potential for the Manchester Ship Canal to be used in the transportation of minerals.

Question 26

Do we need more rail sidings and if so, where? (Please specify)

Table 51 Responses to Question 26

Responses Received	No. of Responses	Respondents
Observations	5	Ramblers Association/Highways Agency/National Trust/4NW/Natural England

4.33 Comments relating to rail sidings are set out in the table below.

Table 52 Rail Siding Representations

Respondent	Representation	Comments
Ramblers Association	We do not know where rail sidings might be needed.	Noted
Highways Agency	The Highways Agency has no comment to make	Noted
National Trust	The National Trust does not have any specific detailed knowledge of the methods and routes used for minerals importation to Greater Manchester, the future potential of the ship canal, or specific opportunities for rail sidings. However, what is apparent is that there is a significant growth agenda for the plan area, in particular in the Regional Centre. Accordingly there are likely to be greater and more viable opportunities for non-road based transportation of minerals	Noted

4 Method of Identifying and Protecting Mineral Resources

Respondent	Representation	Comments
4NW	<p>than in, for example, rural locations. It is considered that it is important that the opportunities are not only fully explored but also exploited.</p> <p>The policy approach for the transportation of minerals set out in RSS Policy EM7 requires plans and strategies include opportunities for the transportation of minerals by pipeline, rail or water, including the maintenance of existing wharves and railhead facilities, the provision of new ones, and of new facilities for on-shore processing and distribution of hydrocarbons.</p> <p>RSS Policies RT6 and RT 8 also encourage the use of ports and waterway assets as well as the transfer of freight from road to rail and/or water by the identification of sites for inter-modal freight terminals, and by encouraging greater use of existing terminals and private sidings. Consideration should be given to the potential movement of minerals along the Manchester ship canal.</p>	Noted
Natural England	Natural England does not have knowledge of the movement of minerals into Greater Manchester by rail.	Noted

Response

4.34 The comments received in response to Question 26 have been noted and will be used to inform the next stage of the Minerals Plan.

Identifying Sites for Other Minerals Developments (Coating Plants etc.)

Question 27

Do you hold any information on whether future sites will be required for other minerals developments, including coating plants and batching plants?

Method of Identifying and Protecting Mineral Resources

Table 53 Responses to Question 27

Responses Received	No. of Responses	Respondents
Observations	6	Ramblers Association/Highways Agency/Mineral Products Association/Peel Environmental/National Trust/Natural England

4.35 Comments relating to future sites for other minerals developments are set out in the table below.

Table 54 Other Minerals Developments Representations

Respondent	Representation	Comments
Ramblers Association	We have no information on whether future sites will be required for other minerals development.	Noted
Highways Agency	No	Noted
Mineral Products Association	Our members will be best placed to suggest sites for future use.	Noted
Peel Environmental	There is the potential to utilise land adjacent to the canal for mineral uses such as for the manufacture of coated materials, concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material. These sites could potentially be fed by minerals from quarries from different parts of the UK that would otherwise be transported by road	Noted
National Trust	The National Trust does not hold such information	Noted
Natural England	Natural England does not have knowledge of whether future sites will be required for other mineral developments in Greater Manchester.	Noted

Method of Identifying and Protecting Mineral Resources

Response

4.36 The comments received in response to Question 26 have been noted and will be used to inform the next stage of the Minerals Plan.

5 Development Management Policies

This section sets out the Questions made available for public comment in relation to development management policies. A summary is provided of the responses received and recommendations for dealing with them.

Question 28

Are there any criteria or advice which such a policy should include to assist applicants or planning officers?

Table 55 Responses to Question 28

Responses Received	No. of Responses	Respondents
Observations	6	Ramblers Association /National Trust/Mineral Products Association/United Utilities/Highways Agency/Natural England

5.1 Comments relating to criteria or advice to be included within such a policy are set out in the table below.

Table 56 Criteria or Advice Inclusion Representations

Respondent	Representation	Comments
Ramblers Association	Regarding a policy to provide guidance to applicants on how planning applications for minerals development on unallocated sites might be assessed, we would suggest the presence of public rights of way, access land (as defined under the CROW Act) and the question of disturbance to recreational walking from dust and lorry movements	These issues will be covered by Development Management policies in other relevant Development Plan Documents, such as the Core Strategy. They will not be duplicated in the Minerals Plan.
National Trust	Yes...potentially quite a lot in terms of the impacts upon a range of environmental resources including ecological sites, protected species,	These issues will be covered by Development Management policies in

5 Development Management Policies

Respondent	Representation	Comments
	<p>heritage resources, tranquillity, soil, air and water. Consideration will also need to be given to the potential impacts upon residential amenity and the appropriateness of the access/egress facilities having regard to the method(s) of transportation to be utilised and the character of the relevant transport corridors.</p>	<p>other relevant Development Plan Documents, such as the Core Strategy. They will not be duplicated in the Minerals Plan.</p>
Mineral Products Association	<p>We believe that provided unallocated site proposals can show that the application can overcome constraints that might have excluded it from consideration as a Specific Site or Preferred Area and the applicant can show that the landbank is below the policy minimum, then permission should be granted.</p> <p>We also believe that there is no point in the development management policy restating policy that is available in other parts of the development plan. Consequently, we commend to the authorities the approach that Lancashire County Council has taken in its Site Allocations and Development Management DPD with its intention to bookmark such policies available elsewhere (whether in local or national policy documents) in order to reduce the complexity and plethora of local planning documents.</p>	<p>The policy on unallocated sites will be revised to ensure it is 'positive'. The approach taken by Lancashire County Council will be researched to identify whether it could be of benefit in Greater Manchester.</p>
United Utilities	<p>United Utilities Water is concerned that minerals extraction may be taking place or that planning permission may be granted without recognition of underground utility apparatus which could be affected.</p> <p>As we are not statutory consultees for development control planning application consultation, this concerns us greatly.</p>	<p>This issue will be considered in more detail at the next stage of the Minerals Plan to establish whether this is something that needs to be covered in the Minerals Plan.</p>

Development Management Policies

Respondent	Representation	Comments
	<p>Any ground disturbance caused by piling or blasting could have a major impact on our apparatus and we should be fully involved in managing these aspects in relation to minerals development. Experience has shown this has caused us great concern with our major aqueducts and we would usually insist on monitoring and control of ground movement, particularly near our critical apparatus.</p> <p>This planning consultation does not refer to protection of the integrity of utility apparatus and this should be addressed in future documents.</p>	
Highways Agency	Not as far as we are aware	Noted
Natural England	Once the “Industry Proposed / Preferred Sites have been submitted for consultation, we would be pleased to produce a Strategic Map indicating the likelihood of high quality land being a significant planning consideration in the localities concerned (e.g. this has already been provided for the Lancashire MWDF)	As suggested, GMGU will contact Natural England regarding Strategic Maps.

Response

5.2 The responses received in response to Question 28 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 29

Is the proposed approach for Mineral Safeguarding Areas appropriate? Please give details.

5 Development Management Policies

Table 57 Responses to Question 29

Responses Received	No. of Responses	Respondents
Support	3	Ramblers Association/Coal Authority/Highways Agency
Support with Conditions	1	Mineral Products Association
Observations	3	UK Coal/National Trust/Natural England

5.3 Comments relating to the approach for Mineral Safeguarding Areas are set out below.

Table 58 Approach to Mineral Safeguarding Areas Representations

Respondent	Representation	Comments
Ramblers Association	We agree that the proposed approach to mineral safeguarding areas is appropriate apart from peat (see our comments re Question 11).	Noted
Coal Authority	The Coal Authority welcomes the proposed Development Management policy approach for MSAs, which is considered consistent with the guidance in MPS1 and the BGS Guide to Mineral Safeguarding in England. Reason – The proposed approach is considered consistent with the guidance in MPS1 and the BGS Guide to Mineral Safeguarding in England.	Noted
Highways Agency	Yes as far as we are aware	Noted
Mineral Products Association	We support the intended criteria based management policy for MSAs with two caveats. First, that discussion about prior extraction should take place as early in the development planning process as possible to give adequate time for extraction	Noted. The need for early discussion of these issues will be

Development Management Policies

Respondent	Representation	Comments
	to be carried out. Once the application has been made it is usually too late to think seriously about minerals. This means that potential conflicts need to be addressed at the LDF stage. This is for three reasons; developers will benefit from the additional certainty that the potential for prior extraction needs to be built into their investigation and design of the site; developers will be able to factor in the revenue and valuation consequences in their acquisition strategies; and the economics of development can more easily accommodate the delay inherent in potential prior extraction of minerals. Second, that the proposed assessment of the potential impacts on underlying mineral resources will be more clearly specified for the assistance of developers who may not have the relevant expertise to evaluate mineral deposits. It is imperative for the local authorities to specify that investigation of the resource should be to the same standards that our members employ to evaluate a deposit	considered further at the next stage of the Minerals Plan.
UK Coal	Refer to our comments relating to mineral safeguarding areas above.	Noted
National Trust	Yes – nothing to add to the reasoning set out in the consultation document.	Noted
Natural England	Natural England has no comments to make on this matter.	Noted

Response

5.4 The responses received in response to Question 29 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 30

Is the proposed approach to Areas of Search appropriate? Please give details.

5 Development Management Policies

Table 59 Responses to Question 30

Responses Received	No. of Responses	Respondents
Support	3	Ramblers Association/Highways Agency/National Trust
Other	1	Mineral Products Association
Observations	1	Natural England

5.5 Comments relating to Areas of Search are set out in the table below.

Table 60 Areas of Search Representations

Respondent	Representation	Comments
Ramblers Association	We agree with the proposal not to develop a specific policy to safeguard areas of search	Noted
Highways Agency	Yes as far as we are aware	Noted
National Trust	Yes – nothing to add to the reasoning set out in the consultation document.	Noted
Mineral Products Association	We are not sure what point you are making in paragraphs 5.10 and 5.11. If the point is that Areas of Search will fall under the general MSA then we have no objection. However, if it is being suggested that Areas of Search need no safeguarding because they do not form part of the network of allocations for the plan period, then we strongly disagree. Clarification would be appreciated.	It is not proposed to safeguard areas of search because this would mean that non-minerals development would be precluded on this land. As areas of search are areas where knowledge about the mineral resource is less certain, it is not

Development Management Policies

Respondent	Representation	Comments
Natural England	Natural England has no comments to make on this matter.	Noted

Response

5.6 The responses received in response to Question 30 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 31

Is the proposed approach to the Other Minerals Plan allocations appropriate? Please give details.

Table 61 Responses to Question 31

Responses Received	No. of Responses	Respondents
Support	2	Ramblers Association/Highways Agency
Support with Conditions	3	National Trust/Mineral Products Association/Peel Environmental
Observations	1	Natural England

5.7 Comments relating to Other Minerals Plan allocations are set out in the table below.

5 Development Management Policies

Table 62 Other Minerals Plan Allocations Representations

Respondent	Representation	Comments
Ramblers Association	We agree that the proposed approach to other Minerals Plan allocations is appropriate.	Noted
Highways Agency	Yes as far as we are aware	Noted
National Trust	Attention is drawn to the response above to Q.15. In line with this it is considered that the list of 'other allocations' should include 'preferred areas'. Otherwise the approach is agreed and the Trust has no other comments to make.	Noted
Mineral Products Association	We agree with the general approach to safeguarding allocated sites including extensions. However, we strongly disagree with the proposed treatment of existing sites in para 5.19. This is because certain sites will be held on lease and not freehold. Landlords can (and have) terminated tenancies on such sites, particularly in regeneration areas in order to redevelop for alternative and more lucrative land uses. This has in many cases included local authorities. It is therefore imperative for you to safeguard all sites in this category whether existing or proposed. As outlined earlier in these representations, it would also be good practice in our view to seek to identify all potential rail depot and wharf sites since the total supply is undoubtedly limited and already known.	The need to safeguard existing minerals extraction sites due to leasehold contracts will be taken forward and considered at the next stage of the Minerals Plan.
Peel Environmental	Peel recognises the potential future importance of wharves and depots that receive and store minerals, for the sustainable transport of minerals in Greater Manchester. However, Peel wonders whether it is appropriate to safeguard such sites from non minerals development. Perhaps a more appropriate approach would be to identify such sites but not preclude other	Noted. Consideration of compatible uses at wharfs and depots will be taken forward and considered in more detail at the next stage of the Minerals Plan.

Development Management Policies

Respondent	Representation	Comments
	(non minerals) port related development, which would not constrain use for mineral purposes. It is likely that various uses could be compatible with mineral uses at such sites.	
Natural England	Natural England has no comments to make on this matter.	Noted

Response

5.8 The responses received in response to Question 31 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 32

Are there any alternative allocations which require protection in this way?

Table 63 Responses to Question 32

Responses Received	No. of Responses	Respondents
Observations	4	Ramblers Association/Highways Agency/National Trust/Natural England

5.9 Comments relating to alternative allocations are set out in the table below.

5 Development Management Policies

Table 64 Alternative Allocations Representations

Respondent	Representation	Comments
Ramblers Association	We are not aware of any alternative locations that require protection in this way.	Noted
Highways Agency	Not as far as we are aware	Noted
National Trust	None that the Trust has identified.	Noted
Natural England	Natural England has no comments to make on this matter.	Noted

Response

5.10 The responses received in response to Question 32 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 33

Are you aware of any minerals being transported via canal into/out of Greater Manchester? Please give details.

Table 65 Responses to Question 33

Responses Received	No. of Responses	Respondents
Observations	5	Ramblers Association/Highways Agency/National Trust/Peel Environmental/Natural England

5.11 Comments relating to minerals transportation via canal into/out of Greater Manchester are set out in the table below.

Development Management Policies

Table 66 Minerals Transportation Via Canal Representations

Respondent	Representation	Comments
Ramblers Association	We are not aware of any minerals being transported via canal into or out of Greater Manchester.	Noted
Highways Agency	Not as far as we are aware	Noted
National Trust	No	Noted
Peel Environmental	Peel is not aware of any minerals currently being transported via canal into or out of Greater Manchester, however dredged sand is transported elsewhere on the canal and is recovered to be used as an aggregate. Peel considers that enhancing this use of the canal could have significant potential in the future.	Noted
Natural England	Natural England has no knowledge of the transport of minerals by canal to answer this question.	Noted

Response

5.12 The responses received in response to Question 33 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 34

Do you agree with the proposal not to include a specific policy on transportation of minerals within the Minerals Plan? If not, please give details.

Development Management Policies

Table 67 Responses to Question 34

Responses Received	No. of Responses	Respondents
Support	2	Ramblers Association/Mineral Products Association
Object	4	National Trust/GONW/Peel Environmental/Highways Agency
Observations	3	4NW/CPRE (Cheshire Branch)/Natural England

5.13 Comments relating to a specific policy on the transportation of minerals are set out in the table below.

Table 68 Specific Policy on Minerals Transportation Representations

Respondent	Representation	Comments
Ramblers Association	We agree with the proposal not to include a specific policy on transportation of minerals within the Minerals Plan.	Noted
Mineral Products Association	Agreed	Noted
National Trust	The approach is not agreed. As indicated above it is considered that the Plan should seek to promote alternatives to transportation by road having regard to the range of issues associated with HGV movements and their environmental impacts. Such an approach is considered necessary to conform to Adopted RSS in terms of the overall Spatial Principles and Policies RT1, RT6, RT7 and RT8. Accordingly a Policy should be included within the Plan in relation to the transportation of minerals, for example to ensure that all planning applications include information on the alternative	The need to include a policy on the sustainable transport of minerals will be taken forward and considered at the next stage of the Minerals Plan.

Development Management Policies

Respondent	Representation	Comments
GONW	<p>means of transportation that have been assessed and any specific justification for proposals that have not encompassed non-road modes.</p> <p>It is an objective of national policy “to promote the sustainable transport of minerals by rail, sea or inland waterways.” (MPS1 paragraph 9). Paragraph 16 also refers to transport, and not only in the context of safeguarding terminals and railheads. We do not accept that the presence of transport policy in Core Strategies obviates the need for this plan to take a strategic overview of minerals transportation, and suggest that this be given more consideration.</p>	<p>The need to include a policy on the sustainable transport of minerals will be taken forward and considered at the next stage of the Minerals Plan.</p>
Peel Environmental	<p>Whilst Peel appreciates that policy on wharves and depots could be included within the policy section for Safeguarding Other Minerals Plan allocations and that the Greater Manchester Transport Strategy and Core Strategies will consider issues surrounding road transportation, it is still felt that a specific policy on sustainable transportation of minerals is required in the plan. This should be specific to minerals transportation and promote sustainable transportation by rail or canal, where appropriate. This will consequently aim to achieve one of the proposed objectives of the plan which aims to “encourage the sustainable transportation of minerals”.</p>	<p>The need to include a policy on the sustainable transport of minerals will be taken forward and considered at the next stage of the Minerals Plan.</p>
4NW	<p>The policy approach for the transportation of minerals set out in RSS Policy EM7 requires plans and strategies include opportunities for the transportation of minerals by pipeline, rail or water, including the maintenance of existing wharves and railhead facilities, the provision of new ones, and of new facilities for on-shore processing and distribution of hydrocarbons.</p>	<p>Noted. The need to include a policy on the sustainable transport of minerals will be taken forward and considered at the next stage of the Minerals Plan.</p>

5 Development Management Policies

Respondent	Representation	Comments
	<p>RSS Policies RT6 and RT 8 also encourage the use of ports and waterway assets as well as the transfer of freight from road to rail and/or water by the identification of sites for inter-modal freight terminals, and by encouraging greater use of existing terminals and private sidings.</p> <p>It is acknowledged that the Greater Manchester Transport Strategy and emerging Core Strategies across Greater Manchester will consider issues surrounding road transportation, including for minerals. Depending on outcomes arising from the preparation of the Minerals DPD and feedback from industry on the opportunities referred to in RSS Policy EM7 above it may be necessary to consider the inclusion of a specific policy guiding the transportation of minerals.</p>	
Highways Agency	<p>As this document already points out the importance of other means of transportation other than road and the potential increase in carbon monoxide due to road transportation, the Highways Agency would like to see some sort of policy regarding transportation. Also we would suggest that it may be more effective to have one policy rather than rely on the potentially differing policies of the emerging individual core strategies.</p>	<p>The need to include a policy on the sustainable transport of minerals will be taken forward and considered at the next stage of the Minerals Plan.</p>
CPRE (Cheshire Branch)	<p>We think there should be a specific policy promoting ship and rail transport of minerals into Greater Manchester.</p>	<p>The need to include a policy on the sustainable transport of minerals will be taken forward and considered at the next stage of the Minerals Plan.</p>
Natural England	<p>Natural England notes that in 5.25 it is your intention to ensure that opportunities for sustainable transport of minerals are maximised, yet the</p>	<p>The need to include a policy on the sustainable transport of minerals will</p>

Development Management Policies

Respondent	Representation	Comments
	question states that the proposal is to NOT include a specific policy on transportation. We would welcome a broad policy to facilitate sustainable transport modes for movement of minerals from source to secure this opportunity.	be taken forward and considered at the next stage of the Minerals Plan.

Response

5.14 The majority of those who responded to Question 34 considered that the Minerals Plan should include a policy on the sustainable transport of minerals. Given that this is a theme of one of the proposed objectives of the Minerals Plan, the Plan will need to set out (through a policy) how this objective will be achieved. Therefore, the need for such a policy will be taken forward to the next stage of the Minerals Plan.

Question 35

Is the proposed approach to reworking colliery spoil tips appropriate? Please give details.

Table 69 Responses to Question 35

Responses Received	No. of Responses	Respondents
Support	7	Ramblers Association/CoalPro/UK Coal/Highways Agency/National Trust/4NW/Natural England
Observations	1	GONW

5.15 Comments relating to reworking colliery spoil tips is are set out in the table below.

5 Development Management Policies

Table 70 Reworking Colliery Spoil Tips Representations

Respondent	Representation	Comments
Ramblers Association	We agree that the proposed approach to reworking colliery spoil tips is appropriate	Noted
CoalPro	CoalPro agrees with the proposed approach.	Noted
UK Coal	The approach is in accordance with national planning policy guidance and is therefore appropriate.	Noted
Highways Agency	Yes as far as we are aware.	Noted
National Trust	This approach is supported. It is noted that in effect this is a 'secondary' resource and potentially should take precedence over primary extraction. However, it will be essential to ensure that such proposals will result in demonstrable environmental benefits, especially in the long term, in particular having regard to considerations such as landscape character/ landform, ecology and future land use (especially as where situated close to existing communities this will be a second imposition of the adverse impacts associated with extraction).	Noted. Any policy on the reworking of colliery spoil tips would consider environmental issues.
4NW	The reference to the reworking of colliery spoil tips which could potentially recover coal from previous workings is supported. RSS Policy EM9 specifically mentions the need for plans and strategies to consider the contribution that substitute, secondary or recycled sources should make.	Noted. The Minerals Plan will be developed in line with regional planning policy.
Natural England	Natural England agrees that there should be a policy covering reworking of colliery spoil tips, and that it would be appropriate to consider any application for such in the same manner as any application for primary coal extraction.	Noted

Development Management Policies

Respondent	Representation	Comments
GONW	<p>Any impact on the environment, positive or negative, would need to be assessed.</p> <p>In addition to coal extracted from spoil tip reworking, residual material may have value as secondary aggregates. You may wish to consider the implications of that when assessing if dealing with such proposals “in the same way as any application for coal extraction” is sufficient, as reworking may have broader implications in terms of processing and transportation.</p>	Noted. The implications of materials other than coal being extracted will be taken forward and considered at the next stage of the Minerals Plan.

Response

5.16 The responses received in response to Question 35 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 36

Is the proposed approach to unallocated sites appropriate? Do you feel there is any specific information to be supplied by applicants in relation to:

- Demonstrating the viability of mineral resources; and/or
- Development at an unallocated site

Please give details.

Table 71 Responses to Question 36

Responses Received	No. of Responses	Respondents
Support	4	Ramblers Association/National Trust/4NW/Peel Environmental

5 Development Management Policies

Responses Received	No. of Responses	Respondents
Support with Conditions	1	Mineral Products Association
Observations	2	Highways Agency/Natural England

5.17 Comments relating to the approach to unallocated sites are provided in the table below.

Table 72

Respondent	Representation	Comments
Ramblers Association	We agree that the proposed approach to unallocated sites is appropriate	Noted
National Trust	The approach is appropriate. The response above to Q.28 is relevant in terms of some of the areas where applicants would need to supply information to support proposals on unallocated sites.	Noted
4NW	It is considered appropriate to ensure applicants understand what matters need to be addressed when an unallocated site is the subject of a development proposal.	Noted. The supporting text to this policy will include information on what other policies will be relevant when planning applications for minerals related developments on unallocated sites are assessed.
Peel Environmental	Peel considers that the proposed approach to unallocated sites is appropriate, as it recognises the rigorous methodology to identifying sites throughout the plan process. It requires the relevant level of detail to assess any further proposed development on unallocated sites. As specified, this should include the provision of borehole data to demonstrate a viable	Noted

Development Management Policies

Respondent	Representation	Comments
<p>Mineral Products Association</p>	<p>mineral for extraction, demonstration that none of the allocated sites in the plan are suitable and/or available for development, and that the unallocated site has fewer or less harmful impacts than the allocated site.</p> <p>We agree that such a policy is necessary and that full disclosure of information should be requested and that proof of a viable deposit is essential. In this respect applications should be accompanied by a report compiled by a professional geologist which includes borehole data, borehole locations, cross sections, and quality testing results.</p> <p>However, in terms of the proposed criteria to be used, we believe that a requirement that applicants demonstrate that “none of the allocated sites in the Minerals Plan are suitable and/or available for development” is too onerous. Since it is impossible to prove a negative, it will be beyond an applicants’ ability to prove that sites are unavailable or unsuitable. In addition, an unallocated site should be able to show that site constraints can be overcome but it should not be required to show that the proposed site is better than an allocated site. After all, its identification may follow the availability of better information, or innovation in mitigation, or a reappraisal of an applicant’s needs. However, we believe that maintaining the landbank should be a more important consideration than sticking to a list of allocated sites if landbanks are falling significantly below policy levels. The policy should include sufficient flexibility so that acceptable non allocated sites are given a fair chance to prove their worth, but not at the expense of shutting out continuity of reserves at existing sites. In practice this means being flexible about the level of the landbank.</p>	<p>Noted. Consideration will be given at the next stage of the Minerals Plan as to whether the requirement for applicants to demonstrate “none of the allocated sites in the Minerals Plan are suitable and/or available for development” is too onerous. Development Management is intended to be a positive approach to planning and this policy should provide flexibility to the Minerals Plan.</p>

5 Development Management Policies

Respondent	Representation	Comments
Highways Agency	From a transport perspective the Highways Agency would want to see consideration given to the traffic impacts, the accessibility and the sustainability of unallocated sites. There should also be consideration given as to whether the appropriate transport infrastructure is in place or if it is needed and if it is, how this will be delivered	Traffic and highways issues will be assessed as part of any planning application on an unallocated site.
Natural England	Natural England has no comment to make on this matter.	Noted

Response

5.18 The responses received in response to Question 36 are noted and will be used to inform the development of the next stage of the Minerals Plan.

Question 37

Is the proposed approach to restoration and aftercare appropriate?

Table 73 Responses to Question 37

Responses Received	No. of Responses	Respondents
Support	7	Ramblers Association/UK Coal/Highways Agency/National Trust/Mineral Products Association/Coal Authority/Natural England
Observations	1	4NW

5.19 Comments relating to restoration and aftercare are set out in the table below.

Development Management Policies

Table 74 Restoration and Aftercare Representations

Respondent	Representation	Comments
Ramblers Association	We agree that the proposed approach is appropriate, as the approach places a strong emphasis on restoration for recreational use with increased public accessibility.	Noted
UK Coal	Supported	Noted
Highways Agency	Yes as far as we are aware	Noted
National Trust	yes	Noted
Mineral Products Association	Agreed	Noted
Coal Authority	<p>The Coal Authority welcomes and supports the proposed approach to securing high standards of restoration and aftercare to ensure that mineral workings do not lead to future land stability or other public safety hazards.</p> <p>However, in more general terms, it is considered that the Joint Minerals DPD could helpfully make reference to the legacy of former coal mining activities within Greater Manchester and the potential land stability and other public safety issues that this can lead to. In particular the Joint Minerals DPD should make policy provision to ensure that this is taken into account and, if necessary, mitigated as part of the development process (including by making reference to the fact that this issue should also be taken into account for non-minerals developments).</p> <p>Reason – To comply with the guidance in PPG14 (Development on Unstable Land).</p>	Noted. Stability issues will be taken into account and used to inform preparation of the Minerals Plan.

5 Development Management Policies

Respondent	Representation	Comments
	<p>CONCLUSION</p> <p>The Coal Authority welcomes the opportunity to make these early comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of our concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.</p>	
Natural England	<p>We are pleased that the Plan will not limit potential after uses. Any restoration can contribute to other plans and strategies. We agree that restoration can contribute to green infrastructure and flood water storage. It can also contribute to biodiversity targets and to conserve and enhance landscape character and quality (5.39).</p> <p>We suggest an additional criterion should be added to the bulleted list under paragraph 5.36, as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proposals for the longer-term management of land restored to non-profit generating after uses; e.g. nature conservation or amenity etc 	The additional criterion suggested will be taken forward to the next stage of the Minerals Plan.
4NW	The proposed approach would be in line with RSS Policy EM7 which requires plans to ensure sensitive environmental restoration and aftercare, including improved public access where they are of amenity value.	Noted

Response

5.20 The responses received in response to Question 37 are noted and will be used to inform the development of the next stage of the Minerals Plan.

6 Monitoring and Implementation

This section sets out the Questions made available for public comment in relation to monitoring and implementation of the Minerals Plan. A summary is provided of the responses received and recommendations for dealing with them.

Question 38

What other areas should we be addressing through implementation? Who should be involved in delivery?

Table 75 Responses to Question 38

Responses Received	No. of Responses	Respondents
Observations	5	Ramblers Association/Highways Agency/National Trust/GONW/Natural England

6.1 Comments relating to other areas to be addressed through implementation are set out in the table below.

Table 76 Implementation Representations

Respondent	Representation	Comments
Ramblers Association	We have no suggestions about other areas that could be addressed through implementation.	Noted
Highways Agency	The Highways Agency has no comment to make	Noted
National Trust	No specific roles/responsibilities identified other than the need to consider restoration and more particularly long term after use	Noted

6 Monitoring and Implementation

Respondent	Representation	Comments
GONW	Deliverability is a key focus of the post-2004 planning system, as well as having always been at the heart of strategic minerals planning. Aspects of this plan which may go beyond normal delivery issues include the relationship with potential recycled aggregate providers (mentioned in Table 4 noted), and the achievement of more sustainable transport approaches such as use of the Ship Canal. Relevant agencies and companies will need to 'buy in' to the plan and it will be beneficial if the implementation framework shows how that is being achieved. Another aspect may be that of bodies with responsibilities in recreation or natural heritage protection, who might benefit from being involved in planning for the aftercare and management of restored sites.	Noted
Natural England	Natural England has no comments to make concerning implementation and delivery.	Noted

Response

6.2 The comments received in response to Question 38 are noted and will be used to inform the next stage of the Minerals Plan.

Question 39

Are these indicators appropriate? What other indicators could be used to monitor the plan?

Table 77 Responses to Question 39

Responses Received	No. of Responses	Respondents
Support	1	National Trust
Object	1	UK Coal
Observations	3	Ramblers Association/Highways agency/Natural England

Monitoring and Implementation

6.3 Comments relating to indicators are set out in the table below.

Table 78 Indicator Representations

Respondent	Representation	Comments
National Trust	Generally these indicators are considered to be appropriate. No additional indicators have been identified.	Noted
UK Coal	We have some concerns with the Monitoring and Implementation section. The indicators seem appropriate, as do the forms of monitoring, but without any targets or clear direction as to what actions will occur should they be triggered the Monitoring and Implementation section is meaningless.	Monitoring targets will be developed and included in the Minerals Plan.
Ramblers Association	We are pleased to see that under Table 8 (Indicators and monitoring method for Objective 4) a target of zero is given for the number of applications permitted which result in loss of public rights of way. We would add an indicator: "Number of applications permitted where agreed restoration plans are not implemented". (e.g. this looks likely to be the case at the Cutacre site, where an agreed restoration plan may not now be carried out).	Noted
Highways Agency	The Highways Agency is satisfied with the indicators for Proposed Objective 5.	Noted
Natural England	We would welcome inclusion of indicators to monitor sites restored with public access secured; and sites restored with an aim to conserve and enhance biodiversity, GI or landscape character and quality.	Noted

Response

6.4 The comments received in response to Question 39 are noted and will be used to inform the next stage of the Minerals Plan.

Monitoring and Implementation

General Comments

7 General Comments

7.1 This section sets out the general responses made to the Issues and Options Report and recommendations for dealing with them.

Network Rail

7.2 Chapter 2 outlines an objective to encourage sustainable transportation of minerals, Network Rail would like to stress that it is prepared to meet with developers and site operators to discuss the feasibility of proposals for transporting minerals by rail.

7.3 Chapter 4 sets out the Council's methodology for identifying and protecting mineral resources, designating Areas of Search and potential rail served sites where associated operations could be located, i.e. batching plants. Although Network Rail has no comment on these aspects at this stage, Network Rail request that it is consulted when such sites are identified. This will alert Network Rail to potential mineral operations adjacent to railway infrastructure and property.

Response

7.4 GMGU will contact Network Rail regarding the transportation of minerals by rail and will continue to consult with Network Rail during preparation of the Minerals Plan.

4NW

7.5 4NW welcome the suggested aim and strategic objectives, which reflect RSS policy. RSS Policy DP1 sets out the spatial principles underpinning RSS which includes measures for reducing emissions and ensuring effective adaptation to the impacts of climate change. Other regional, sub-regional and local plans and strategies and all individual proposals, schemes and investment decisions should adhere to these principles.

Response

7.6 Noted. The Minerals Plan will be developed in line with regional planning policy.

Coal Authority

7.7 The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In instances where this may be the case, the Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers' website at www.coalpro.co.uk/members.shtml.

7 General Comments

Response

7.8 Mineral safeguarding areas will be developed as part of work on the Minerals Plan, including safeguarding areas for coal.

Green Park Energy Company (Euan Brown)

7.9 Green Park Energy advise that given the relatively benign environmental impacts of CBM extraction, the list of constraints (as mentioned in Paragraph 3.33) that are likely to affect the production of CBM will need to be carefully considered.

Response

7.10 Noted. The list of constraints will be developed in consultation with interested parties.

Croal & Irwell Valley Volunteer Ranger Service (David Carter)

7.11 The Croal & Irwell Valley Volunteer Ranger Service patrol past the Montcliffe site off George's Lane, Bottom o'th Moor, Horwich, on a well used public footpath leading up onto Winter Hill. The area is generally one of beauty and as part of the West Pennine Moors the Ranger Service would strongly object to any expansion of this site, which is already an eyesore.

7.12 Response

7.13 Noted. All sites nominated for consideration in the Minerals Plan will be subject to an assessment of environmental, social and economic impacts. There will be an opportunity to comment on any specific sites that have been assessed at the next stage of the Minerals Plan.

CoalPro

7.14 CoalPro would like to make it clear that it does not accept that the extraction of surface coal resources or coal production from reworking coal spoil tips has any likely potential to have a negative impact on climate change. UK coal demand exceeds UK coal production to a very significant extent resulting in large scale imports. Carbon emissions associated with the transport of imported coal exceed those associated with the transport of coal produced in the UK many times over. Whilst ever UK coal demand exceeds UK production, which is likely to be the case for the foreseeable future, producing coal in the UK represents the lowest carbon option of the available alternatives.

Response

7.15 Noted.

National Grid

General Comments

7.16 The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

7.17 National Grid's gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. They believe that their long-term success is based on having a constructive and sustainable relationship with our stakeholders. Their transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

7.18 National Grid therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect their assets including policies and plans relating to the following issues:

- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations
- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines
- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations
- Any policies relating to the diverting or undergrounding of overhead transmission lines
- Other policies relating to infrastructure or utility provision
- Policies relating to development in the countryside
- Landscape policies
- Waste and mineral plans

7.19 In addition, they would also like to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Their aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

Response

7.20 Noted. The National Grid will continue to be included in consultation on the Minerals Plan.

Lancashire County Council (LCC)

7 General Comments

7.21 In relation to paragraph 3.11, LCC advise that production figures for these materials would help but details of sites producing secondary or recycled aggregates would help if no production figures are available.

7.22 In relation to paragraph 3.6, LCC advise that the quarrying at Fletcher Bank is now entirely taking place in Lancashire and this should be acknowledged and the figures taken account of in any revised apportionment.

Response

7.23 GMGU recognise that Fletcher Bank straddles the border between Greater Manchester and Lancashire, with access in Greater Manchester and the working part of the quarry in Lancashire. Production figures are currently reported as part of Greater Manchester's sub-regional aggregate apportionment.

Private Individual

7.24 A private individual advised that the following facts are matters of public record. Pilkington ceased to be an active quarry at the end of 2005 with all equipment being removed and IPC permits being rescinded. At this time the quarry had completely worked the reserves within the area that currently benefits from planning approval. A buttress created at Pilkington Quarry has been found to be unstable and contain large amounts of contaminated waste. The contamination and the instability of the buttress effectively sterilise the remaining mineral resources. The removal of these reserves is highly likely to cause further land slips and therefore the release of contaminants. The contaminated buttress rests against the land identified between Montcliffe Quarry and Pilkington quarry.

Response

7.25 Noted. Sites nominated for consideration in the Minerals Plan will be assessed against environmental, social and economic factors.

The Emerson Group- (Land to the east and west of the M61 at Gibb Farm, Horwich, Blackrod)

7.26 The Emerson Group advise that the surveys of the site by the owners show the main deposit to be approximately 2 million metric tonnes of sand and pea gravel at Gibb Farm, not predominantly coal as identified in the Bolton UDP.

7.27 The Emerson Group is a Joint Venture Partner on the Loco Works nearby and have a potential land interest in the site. Indeed should the Loco Works be developed this site would be ideally suited to provide sand and gravel for the development. The Minerals Plan encourages local provision of resources.

7.28 The site does not conflict with the requirements proposed in 4.13 of the proposed Issues and Options for suitable sites.

General Comments

7.29 The Emerson Group would like to make it clear that the representations are to continue the sites designation as an area of search, as in the past. The Emerson Group are not proposing that it should be allocated as safeguarded land. Over the coming months the investigations to establish the extent of deposit in the area will take place.

Response

7.30 Sites nominated for consideration in the Minerals Plan will be assessed against environmental, social and economic factors. GMGU will contact The Emerson Group regarding information on this site.

UK Coal

7.31 In relation to paragraph 3.24 and 3.25 UK Coal support the recognition that is given to the need to secure an indigenous supply for the UK energy needs.

Response

7.32 Noted

CPRE (Cheshire Branch)

7.33 CPRE (Cheshire Branch) agree that this plan must strive to reduce road traffic. A high proportion of mineral imports should use the Manchester Ship Canal to Salford. In particular it is possible and desirable for marine sand from the Irish Sea to be dredged straight into ships bound for Salford. Sea transport is of course infinitely cheaper than road transport. This could also apply to crushed rock from the North Wales coast, where there are facilities for both rail and marine loading.

7.34 CPRE also advise that they are entirely in agreement with paras 4.41 to 4.45.

Response

7.35 Noted. The issue of the sustainable transport of minerals will be considered at the next stage of the Minerals Plan.

National Trust

7.36 National Trust seek clarification on the following point:

7.37 Paragraph 1.3 - 1.4: Elsewhere in the document the plan area is referred to as 'Greater Manchester' so as, for instance, to distinguish it from the City of Manchester local authority area. Presumably the two references here are also meant to be to "Greater Manchester" rather than "Manchester."

7.38 In relation to paragraph 4.8, National Trust presume that the reference should be to the British Geological Society.

Response

7 General Comments

7.39 Reference to 'Manchester' in paragraphs 1.3 and 1.4 should be to 'Greater Manchester and this will be clarified during the next stage of the Minerals Plan.

7.40 Paragraph 4.8 will be amended to refer to the British Geological Society.

SITA

7.41 The Company's comments are restricted to paragraphs 5.12 to 5.21. It seems from these paragraphs that the Authorities do have a commitment to protecting existing rail fed rail depots from development that would have a detrimental impact on their operation, but that this is not unequivocally stated in the consultation document. As the operator of the Hope Street, Salford rail depot and asphalt plant the Company urges the Authorities to review the above paragraphs and devise an unambiguous policy statement which will protect such facilities from encroachment by incompatible development. Such a policy would, in the Company's view, require a map identifying the facilities to be safeguarded.

Response

7.42 Noted. This point will be clarified at the next stage of the Minerals Plan where the issue of safeguarding rail depots will be considered in detail.

Manchester Airport

7.43 Manchester Airport highlight that civil aerodromes are licensed under an Air Navigation Order made under Section 60 of the Civil Aviation Act 1982. The Civil Aviation Authority (CAA) are responsible under the Air Navigation Order, for being satisfied that the licensed aerodrome is safe for use by aircraft, having regard to its physical characteristics and its surroundings. A requirement is placed on the licensee to take all reasonable steps to ensure that the aerodrome and its surrounding airspace are safe at all times for use by aircraft.

7.44 In addition to this, certain civil aerodromes, on the basis of their importance to the UK air transport system are officially safeguarded, to ensure that no buildings, structures, erections or works infringe protected surfaces and inhibit their operation and development. Manchester Airport is an officially safeguarded aerodrome, and under ODPM Circular 1/2003 (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage areas: The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage areas) Direction 2002), there is an obligation on a local planning authority to consult with the Airport on certain planning applications.

7.45 The consultation process includes a means to address potential bird attractant developments within a 13km radius circle of the aerodrome. Safeguarding maps are used to define the 13km radius circle and are lodged with local planning authorities. The 13km circle is based on the fact that 99% of birdstrikes occur below a height of 2000 ft, and that aircraft on a normal approach would descend into this circle at approximately this distance from the runway.

General Comments

7.46 Waste sites and the restoration and after use of minerals sites are activities that have the potential to increase levels of bird activity around the Airport. This is set out in greater detail in Civil Aviation Publication (CAP) 772 - Birdstrike Risk Management for Aerodromes. There are parts of Trafford, Manchester, Stockport and Salford that fall within this zone. As such aerodrome safeguarding should be of importance when considering the restoration and after care of mineral extraction sites.

7.47 Manchester Airport explain that to ensure that relevant planning applications consider aerodrome safeguarding, Circular 1/2003 states that local development plans and UDPs "should include a policy stating that officially safeguarded areas have been established for a particular airport or technical site, that certain planning applications will be the subject of consultation with the operator of that aerodrome or technical site and that there may be restrictions on the height or detailed design of buildings or on a development which might create a 'bird' hazard. The outer boundary of the safeguarded areas should be indicated on proposals maps accompanying local plans and UDPs. A plan should state why an area has been safeguarded and that it is neither the responsibility nor the proposal of the LPA".

7.48 Manchester Airport continue to explain that "In accordance with Circular 1/2003 we strongly advise reconsideration of the decision not to include an aerodrome safeguarding policy within the emerging GMJM DPD.

7.49 While mineral extraction itself does not attract birds, the large voids created sometimes fill with water either during working (wet extraction) or, when they are worked out, are allowed to flood and restored as amenity lakes or nature reserves. Nature reserves and restoration schemes for sand and gravel quarries often aim to fulfil nature conservation and biodiversity objectives and may cause an increase in bird strike risk if located close to an airport (Le. within the 13km safeguarding consultation zone), as they provide potential feeding, loafing or roosting locations for birds. Gulls, large waterfowl, corvids, pigeons and starlings are the most hazardous species in terms of the bird strike risk to aircraft.

7.50 Conflicts between conservation and the bird strike hazard can often be resolved at an early stage by design modifications and the development of management plans that control hazardous species whilst protecting those of conservation importance. Safeguarding assessment at an early stage is vital if costly re-designs are to be avoided. For example, the design of a restoration plan for a sand and gravel quarry is crucial if hazardous birds are not to be attracted.

7.51 Manchester Airport explain that It is quite clear that early consideration of bird strike risk is extremely beneficial in order to save both time and money when designing a restoration scheme, which does not increase the risk of bird strike. As all applications for minerals extraction should be accompanied by proposals for site restoration and aftercare, developers/applicants need to be aware of bird strike hazards when submitting a planning application for mineral extraction. It is for this reason that we

7 General Comments

believe the development management policy for restoration and aftercare should state that bird strike risk should be considered for all proposals within 13km of Manchester Airport.

Response

7.52 Noted. Aerodrome safeguarding will form part of the assessment of sites for the Minerals Plan and Manchester Airport will continue to be consulted.

Natural England

7.53 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.

7.54 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).

7.55 Natural England welcome the supporting text in 1.5, although it would be of particular relevance to cite the wealth of sites in Greater Manchester that are designated for their International, National and Local value. We would also welcome references here to recreation, and the range of spaces, sites and paths available across the sub-region.

7.56 In relation to paragraph 1.8 Natural England acknowledges the references to peat and its 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. We would welcome additional supporting text to conserve and enhance peat resources in the sub-region.

General Comments

7.57 Natural England welcome the references to supporting the reuse and recycling of aggregates in order to facilitate best use of resources (1.11).

7.58 Natural England recommend inclusion of specific text to highlight that part of Oldham lies within the Peak District National Park, however, for the purposes of 'planning' the role of Local Planning Authority for that part lies with the Peak District National Park Authority.

7.59 Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function (Planning Policy Statement 1, Delivering Sustainable Development, 2005). Natural England considers that sustainable development is the core principle underpinning planning and spatial plans are statutorily obliged to contribute to the achievement of sustainable development. The planning system also has a key role to play in mitigating and adapting to the impacts of climate change as well as helping to deliver the Government's place-shaping, environmental, health and well-being agendas. It also provides opportunities to deliver an ecosystem services approach.

7.60 Natural England supports an integrated approach to sustainable development, Natural England will, in line with our general purpose, focus our effort on the environmental aspects of spatial planning. In contributing to sustainable development we will seek solutions which, while achieving environmental benefits also provide long-term economic and social benefits and avoid untoward economic and social impacts. Whilst there is a continuing incremental decline in the quality of the natural environment, the environmental quality of new development is generally improving. Further scope exists, though, to provide a better environmental context for new development through enhancement measures and the provision of multi-functional green infrastructure. It is important that environmental quality is not sacrificed during difficult economic times.

7.61 Spatial plans should set out a clear vision and delivery framework for the enhancement of the natural environment. This should include the use of planning obligations, the Community Infrastructure Levy and other mechanisms to deliver maximum benefits for the natural environment in the most appropriate locations. Development and infrastructure should secure proposals (including land allocations) for habitat creation and Biodiversity Action Plan delivery, landscape restoration and enhancement and opportunities to access and enjoy the natural environment. Proposals should link and complement the existing environmental resource. Overall, plans should aim for a net gain for the natural environment and should expand the environmental capacity of an area. Climate change is the most serious long-term threat to the existing natural environment and the impacts of climate change should be fundamental to decision-making within spatial planning. The spatial planning system has a key role in delivering the measures needed both to mitigate and adapt to the impacts of climate change.

7.62 Response

7 General Comments

7.63 The assessment of sites nominated for consideration through the Minerals Plan will include a general soil assessment. A detailed soil assessment and soil management plan would form part of a planning application for minerals development. National, regional and local environmental designations will be considered as part of any assessment of sites nominated for consideration through the Minerals Plan. The issue of peat will be considered in detail at the next stage of the Minerals Plan. The other comments are noted.

Next Steps

8 Next Steps

8.1 The results of the Issues and Options consultation and the outcomes of the Stakeholder Event held during February 2010⁽¹⁾ will be used to inform the next stage of the Minerals Plan. This will be the 'Preferred Option' stage and public consultation on the Preferred Option will take place during Autumn 2010.

1 The Minerals Plan Issues and Options Stakeholder Event Outcomes Report is available at www.gmineralsplan.co.uk

Next Steps