

Greater Manchester Minerals Plan

**Outcomes from Preferred Approach  
Consultation**

January 2011

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# Contents

# Introduction

# 1 Introduction

## 1 Introduction

### Introduction

**1.1** The Joint Minerals Development Plan Document (Minerals Plan): Preferred Approach set out the preferred approach 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 they will be used to inform future stages of the **Minerals Plan**.

### Background

**1.2** The Preferred Approach was issued for public consultation from Friday 15th October to Friday 26th November 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 consultation was to seek comments on the preferred approach uses the agreed site selection methodology to identify preferred site allocations in line with the requirements in Greater Manchester, it also includes development management policies to guide future mineral development.

**1.4** Responses were received from the following organisations:

- Confederation of UK Coal Producers
- Network Rail
- Natural England
- Lancashire County Council
- National Trust
- Environment Agency
- National Grid (c/o Entec)
- Warrington BC
- Salford CC
- Cheshire East Council
- Mineral Products Association
- Lancashire Wildlife Trust
- Cemex (UK)
- Ramblers Association (Manchester & High Peak Area)
- Cheshire West and Chester Council
- Manchester Airport
- Peak District National Park
- English Heritage
- The Emerson Group
- Arcon Village Residents Group
- Coal Authority
- Peel Environmental

## Introduction

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- Bolton and Horwich Environmental Action Group
- Individuals x 5

# Introduction

# Aim and Objectives

## 2 Aim and Objectives

### 2 Aim and Objectives

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

#### Question 1

**2.2** Do you agree with the aim as expressed in the Preferred Approach? Is there anything else that should be included?

**Table 1**

Response received	No. of responses	Respondents
Support	5	Natural England, Warrington BC, Cheshire East, Lancashire Wildlife Trust, The Emerson Group
Support with conditions	6	The Natural Trust, Mr David Warr, Ramblers Association, Cheshire West and Chester, English Heritage, Peel
Object	0	
Other	2	Mineral Products Association, Coal Pro

**2.3** The comments relating to the aim are set out below:

## Aim and Objectives

**Table 2**

Respondent	Representation	Commentary
Ramblers Association	We agree with this aim, except that we do not agree that peat should be included in the “steady and sustainable supply of minerals” as mining of peat is not sustainable.	The aim does not explicitly identify mining of peat, however it is a mineral therefore excluding peat in the plan from the aim of the minerals plan as referenced within this representation is not supported by national planning policy. The Minerals Plan has identified a specific Preferred Approach to peat- which is not to identify additional extraction site or areas of search, and to define a Mineral Safeguarding Area for peat to protect the resource from non-mineral development. This approach is in line with national policy and will also meet the needs of Greater Manchester.
English Heritage	The suggested aim seeks to deliver a steady and sustainable supply of minerals, it is not clear if the use of the word “sustainable” here means that this supply will be delivered within an environmentally sustainable context. It is suggested that the aim should make clear the intention to first avoid and then mitigate any harm or loss to environmental assets. This would provide the context for objective 3 and the spatial strategy of avoiding places with a sensitive built environment. The objectives should also allow for the exploitation of natural building stone where this can contribute towards maintaining the character of historic buildings and places.	Comments noted and will be considered in development of the final aim and objectives.

## 2 Aim and Objectives

Respondent	Representation	Commentary
Lancashire Wildlife Trust	The Trust welcomes the move to facilitate the use of recycled mineral aggregates and secondary mineral products. As peat is considered to be a mineral rather than a soil, then it would also be prudent to support the increased use of non-peat based products within the horticultural industry and support and aid the facilitation of local composting schemes.	Comments noted. The JMDPD has no control of the market for the horticultural industry and this would be hard to influence as this is outside the remit of the plan. However the plan does recognise an increasing use of alternatives to peat which has led to the plan not seeking to promote new extraction sites for peat.
Warrington BC	The stated aim is supported.	Noted
Mineral Products Association	We agree with the stated aims.	Noted
The Emerson Group	Agree	Noted
Coal Pro	CoalPro considers that the Aim set out at para. 3.1 should include reference to the need to make an appropriate contribution to regional and national needs (i.e. not just those of Greater Manchester). This is fully recognised elsewhere in the Preferred Approach and the document overall would benefit by including it within the overall Aim.	Comments noted and will be used to inform the development of the final aim.

## Aim and Objectives

Respondent	Representation	Commentary
Cheshire West and Chester	<p>The aim of the Minerals Plan should be to ensure, not only an adequate and steady supply of minerals to meet the needs of Greater Manchester but also contribute efficiently to the sub-regional apportionment for the North West region and therefore support the economic needs of the region.</p> <p>The aim should be broadened as per previous comments to include contribution to the sub-regional apportionment. Greater Manchester should recognise the pivotal role in providing aggregates for the Greater Manchester /Merseyside/Halton and Warrington sub-region. There are no operational sites in Merseyside or Halton and only one operational site in Warrington, therefore placing the emphasis for supply on Greater Manchester.</p>	<p>Comments noted. GMGU are aware of Greater Manchester requirement to contribute to the sub-regional apportionments and this will be reflected in the final aim</p>
Peel	<p>Peel is largely in agreement with the aim, in particular the reference to it providing a spatial planning framework to deliver a steady and sustainable supply of minerals. However, the aim only makes reference to meeting the minerals needs of Greater Manchester, yet the minerals within this area should also contribute to meeting regional and national needs. Peel suggests that the aim should include reference to delivering a steady and sustainable supply of minerals to meet regional and national needs, as well as Greater Manchester's needs.</p>	<p>Comments noted and will be used to inform the development of the final aim and objectives</p>
Mr David Warr	<p>It is difficult to object with the Aim, however there has to be more evidence included within the Aim of the examination of each site as to the suitability regarding the effects of the pollution of the areas surrounding the proposed extraction. This pollution to include the</p>	<p>The minerals plan is a strategic planning document covering a wide area and therefore it is not possible for the aim to cover the detail commented upon. The</p>

## Aim and Objectives

Respondent	Representation	Commentary
	<p>leakage of Fuel from all transport and extraction plant. Each area has its own particular environment and a blanket strategy cannot be satisfactorily applied. Each proposed site MUST be individually examined using the very latest techniques with regard to the potential pollution, from all sources, of each site and its surrounding areas</p>	<p>aim is intended to give an overall context to what Greater Manchester is seeking to achieve in relation to minerals planning. The aim and supporting objectives will be looked at in terms of comments made on protection of the wider environment</p>
Cheshire East	<p>The overall aim of providing a spatial planning framework which allows Greater Manchester to meet its own mineral supply needs is supported, as is the facilitation of greater use of recycled aggregates and secondary mineral products. These aims are consistent with sustainable minerals development as set out in MPS1.</p>	<p>Noted</p>
Natural England	<p>We support the recognition that the supply of minerals within Greater Manchester needs to be balanced with sustainability concerns. We also welcome the aim to facilitate increased use of recycled aggregates and secondary minerals products. However, we would like to see the wording of the aim amended slightly to recognise more clearly the need to balance environmental concerns with economic development. For example, it could read to provide a spatial planning framework to deliver a steady and sustainable supply of minerals to meet Greater Manchester's needs, particularly for economic development, whilst giving due regard to the potential environmental impacts of minerals developments, and facilitate greater use of recycled aggregates and secondary mineral products.</p>	<p>Comments noted and will be used to inform the development of the final aim and objectives</p>

## Aim and Objectives

Respondent	Representation	Commentary
The National Trust	It is considered that the overall aim should also include the directly related considerations in respect of the potential impacts of minerals developments, i.e. as per the earlier consultation document which included the following sentence: 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. The residential and environmental considerations remain significant factors having regard to the Greater Manchester Spatial Portrait and its wide range of important environmental assets. It is requested that this sentence is reinserted in the Aim. The other aspects of the Aim are agreed, including their detailed wording.	Comments noted and will be used to inform the development of the final aim and objectives

### Question 2

**2.4** Do you agree with the objectives as expressed in the Preferred Approach? Is there anything else that should be included?

**Table 3**

Response received	No. of responses	Respondents
Support	7	Natural England, Warrington BC, Cheshire East, Lancashire Wildlife Trust, Ramblers Association, The Emerson Group, The Coal Authority
Support with conditions	3	National Trust, Cheshire West and Chester, Peel
Object	0	
Other	1	Mineral Products Association

## Aim and Objectives

**2.5** The comments relating to the objectives are set out below:

**Table 4**

Respondent	Representation	Commentary
Ramblers Association	We agree with these objectives, especially the objective to facilitate the re-use of secondary and recycled segregates, the objective to promote and ensure the achievement of effective reclamation once operations have ceased, and the objective to promote, where practicable, the sustainable transport of minerals	Noted
Lancashire Wildlife Trust	The Trust welcomes and supports the exclusion of peat from developing local energy minerals. The Trust would also like to point out that the objective to protect and enhance the natural environment is clearly failing in the peat extraction industry. The Wildlife Trust has catalogued a continual neglect in enforcing planning conditions within Greater Manchester. This has led to the loss and continued degradation of our peatland resource, especially in relation to the lowland raised mire habitat. Peat extraction has proved to be damaging to our peatlands and the lack of enforcement has led to an overall loss of the extent and quality of the habitat. Clearly, greater planning control and enforcement needs to be exerted to protect our last remaining fragments of this internationally important habitat. The Trust supports and welcomes the objective to promote reuse and recycling of secondary aggregate products and would suggest that this should also include local composting schemes and the use of non-peat based products within the horticultural industry.	Noted. Past enforcement issues are of concern but are not under the control of the emerging Mineral Plan. The Plan is forward looking and can only influence new planning permissions. Support is noted for the preferred approach which excludes the identification of peat as an energy mineral.
Warrington BC	WBC support the objectives.	Noted

## Aim and Objectives

Respondent	Representation	Commentary
<p>Mineral Products Association</p>	<p>Mineral Products Association disagree with the reworded first objective and its justification in paragraph 2.5. There appears to be a misunderstanding of national policy in this section. It is national policy as set out in MPS1 paras 15 and 18 to aim to source mineral supplies indigenously; before considering the extraction of primary materials to take account of the contribution that substitute or recycled materials, mineral products and marine dredged aggregates can make to supply; to maximise the potential for minerals waste to be used for recycling or in-site restoration and to ensure, so far as practicable, the use of acceptable substitute or recycled materials in place of primary minerals.</p> <p>MPS Annex1 para 2.1 then lists three ancillary policy objectives for aggregates</p> <ul style="list-style-type: none"> <li>● to encourage the use, where practicable, of alternative aggregates in preference to primary aggregate;</li> <li>● to encourage the supply of marine-dredged sand and gravel to the extent that environmentally acceptable sources can be identified and exploited, within the principles of sustainable development;</li> <li>● to make provision for the remainder of supply to be met from land-won sand and gravel and crushed rock.</li> </ul> <p>The hierarchical approach advocated by MPS1 takes place at the national level where regional apportionments of primary materials are made following consideration of alternative supplies. From this, the sub regional apportionments are made by regions and local authorities are obligated to provide for their apportionments unless testing in LDDs shows that this is impracticable. At the same time local authorities are to encourage the supply of alternative materials by permitting acceptable applications for production and distribution facilities, leaving the actual pattern of consumption to commercial forces. The local</p>	<p>Comments noted and will be reviewed through the development of the final aim and objectives.</p>

## Aim and Objectives

Respondent	Representation	Commentary
	<p>authorities can also promote the greater use (rather than just supply) of alternatives aggregates by changes to public contract specifications, plus planning control of private development aggregates use. It is not, on this analysis, open to local authorities to adopt the hierarchical approach locally, even if this is accompanied by a commitment to provide for the apportionment, principally because they have no power to alter the quantum of imports to their areas which will be determined by market forces.</p> <p>Thus we cannot see how the authorities are going to be able to demonstrate that this objective is achievable. In addition, the objectives still do not refer to the all important policy objectives of providing for the sub regional apportionment of aggregates or for the maintenance of minimum policy landbanks. These aspects should be at the forefront of local polices but receive no mention at all in these objectives.</p> <p>We therefore suggest that the first objective reworded as follows (additions in bold; deletions in strikethrough), 1. <del>Reduce the importation of aggregates into Greater Manchester by:</del> <b>Ensuring a steady and adequate supply of aggregates existing sources within Greater Manchester, if suitable, and by i. Ensuring provision of an appropriate proportion of the subregional apportionment, and gravel and ten years for crushed rock, and</b> iii. Facilitating the re use of secondary and recycled aggregates. This objective is now achievable, feasible and entirely within the control of the local authorities and will be sound.</p> <p>We have no objection to objectives 2-5.</p>	

## Aim and Objectives

Respondent	Representation	Commentary
The Coal Authority	The Coal Authority supports the stated objectives. Objective 2 (safeguard potentially economically viable mineral resources from sterilisation and encourage the appropriate use of high quality materials) and Objective 5 (support the development of local energy minerals [excluding peat] where required to supplement the energy mix nationally and regionally) are particularly welcomed.	Noted
The Emerson Group	Agree	Noted
Cheshire West and Chester	The objective of the Minerals Plan should also be to ensure an adequate supply of future resources in Greater Manchester. It is not sustainable to solely rely upon those resources already identified. The landbank for the Greater Manchester sub-region for crushed rock is only 10.5 years based upon current apportionment figures. This will result in a deficit at the end of the apportionment period and therefore a primary objective of the Minerals Plan should be to ensure future resources are identified.	Comments noted. The Minerals Plan does seek to achieve its apportionment, however following a number of call for sites exercises only the 3 preferred areas proposed within the plan have been brought forward by industry, and as these are only preferred areas no known information on the quantity and quality of the deposit has been provided. It is anticipated that these sites together with the AoS present the only option for meeting future supply needs at present. GMGU are also aware that the minerals found in Greater Manchester tend to be of lower quality which has resulted in

## Aim and Objectives

Respondent	Representation	Commentary
		reduced demand for such materials over the past 10 years, and an increasing reliance on imports. This is also mirrored by a lack of industry interest in the area.
Peel	Peel agrees with the objectives as expressed in the Preferred Approach. However, an objective relating to the sustainable supply of minerals to meet national and regional needs should also be included, if this is not to be included within the aim (see comments above). Peel welcomes the ambition for sustainable transportation of minerals as set out in Objective 4.	Comments noted and will be used to inform the development of the final aim and objectives
Cheshire East	The importation of aggregate minerals from other authority areas including Cheshire has been acknowledged in the Plan. Whilst it is accepted that cross boundary movement of minerals is largely determined by the market, ensuring an adequate supply of aggregates from suitable local sources whilst facilitating re-use and recycling can reduce the need for importation. Promoting sustainable methods of mineral transportation (where practicable) is supported as this can limit the impacts of importation. Greater Manchester's key role in contributing towards its sub regional aggregate apportionment is acknowledged in paragraphs 1.11, 2.22 and detailed further in paragraphs 3.4-3.15. This could be included or incorporated into the objectives.	Noted. The Objectives will be reviewed in light of the comments recieved
National Trust	Yes, the Objectives are endorsed it is welcomed that they have reflected comments made in response to the previous consultation. National Trust is now content with them.	Noted

## Aim and Objectives

Respondent	Representation	Commentary
Natural England	<p>We support the wording of Objective 3 which recognises the need to both protect and enhance the natural environment from the potential impacts of minerals developments, and Objective 4 which supports the promotion of sustainable transport usage which will help to reduce the contribution of the minerals industry to climate change. Where Objective 3 highlights the importance of ensuring effective restoration of minerals sites, we would welcome some reference to the potential for positive effects on biodiversity and other benefits to the natural environment to be achieved through site restoration, e.g. through habitat creation.</p>	<p>Comments noted and latter points on biodiversity will be considered through the development of the final set of objectives.</p>

## Aim and Objectives

# Planning for Minerals in Greater Manchester

## 3 Planning for Minerals in Greater Manchester

### 3 Planning for Minerals in Greater Manchester

**3.1** This section sets out the questions made available for public comment in relation to the planning for minerals in Greater Manchester, a summary of the responses received and recommendations for dealing with them.

#### Question 3

**3.2** Do you agree with the Preferred Approach to brick clay set out above? Do you know of any other information that should be considered?

**Table 5**

Response Received	No. Of Responses	Respondents
Agree with the Preferred Approach	3	The Emerson Group, Warrington BC, National Trust
No comment	2	Mineral Products Association, Natural England

**3.3** The comments relating to brick clay are set out below:

**Table 6**

Respondent	Representation	Commentary
Mineral Products Association	No Comment	Noted
The Emerson Group	Support	Noted
Warrington BC	Support	Noted
Natural England	No Comment	Noted

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Respondent	Representation	Commentary
National Trust	Support	Noted

**Question 4**

**3.4** Do you agree with the Preferred Approach to natural building stone set out above? Do you know of any other information that should be considered?

**Table 7**

Response Received	No. Of Responses	Respondents
Agree with the Preferred Approach	3	Warrington BC, The Emerson Group, The National Trust
Disagree with the Preferred Approach	1	English Heritage
No comment	2	Mineral Products Association, Natural England

**3.5** The comments relating to building stone are set out below:

**Table 8**

Respondent	Representation	Commentary
English Heritage	The report states that the Minerals Plan will need to establish whether there is a need to safeguard old quarries for conservation purposes and that the Minerals Plan will need to accommodate information from the EBSPits database which should be available early in 2011. However	Noted. The need to safeguard former or inactive quarries that could have a future role in producing stone for the repair of historic buildings will be

## 3 Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
	<p>the report then goes on to close the door on identifying sites for natural stone and including a policy in the Minerals Plan on the basis that no information came forward on specific sites. It would seem premature to determine that there is no need to include a policy on building stone in the plan and in any event it is possible that information on historic quarries may become known over the period of operation of the plan and this should be accommodated with policy appropriate wording.</p> <p>It is suggested that you look at the Black Country CS policy of the working of natural building stone. "Proposals for the working of natural building stone on a small scale, and on a time-limited basis, may be supported where this would assist the conservation and repair of historic buildings or structures built of the same or similar materials. Proposals should be supported by evidence that the stone to be worked will be used in a specific conservation project, that this material makes a significant positive contribution to the character of the building, structure or area, and that the working process would not have unacceptable impacts on neighbouring uses."</p> <p>My very swift researches indicate that Fletcher Bank quarry provides building stone for the local area, the propose extension to Pilkington Quarry would produce some dimension stone and extensive information will be available from the current building stone survey work.</p>	<p>considered further during preparation of the Publication Minerals Plan.</p> <p>Whilst the GM Minerals Plan has identified the access to Fletcher Bank Quarry within the Preferred Approach, it is important to note that the quarry void is within Lancashire County Council. Therefore it would be useful if English Heritage submit similar comments to that Council.</p>
Warrington BC	Support	Noted
Mineral Products Association	No Comment	Noted

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Respondent	Representation	Commentary
The Emerson Group	Agreed	Noted
Natural England	No Comment	Noted
The National Trust	Agreed. Not aware of any other information to add to that submitted at the Issues and Options stage.	Noted

### Question 5

**3.6** Do you agree with the Preferred Approach to peat set out above? Do you know of any other information that should be considered?

**Table 9**

Response Received	No. Of Responses	Respondents
Disagree with the Preferred Approach	5	Ramblers Association, Lancashire Wildlife Trust, Mineral Products Association, Environment Agency, Salford CC
Agree with the Preferred Approach	1	The Emerson Group
Support with Conditions	2	Natural England, The National Trust
Other	1	Warrington BC

**3.7** The comments relating to peat are set out below:

## 3 Planning for Minerals in Greater Manchester

**Table 10**

Respondent	Representation	Commentary
Ramblers Association	<p>We do not agree with the Preferred Approach to peat. We agree with the approach not to identify additional peat extraction sites or areas of search but would also want there to be no extensions of existing permissions when these expire. We are aware of applications in Salford and Wigan to extend permissions that expire at the end of 2010 and we would object to these being approved. As stated in paragraph 3.51, the main use of peat extracted in Greater Manchester is as a growing media for the horticultural market and, given that some existing planning permissions for peat in North West England run until 2042 (paragraph 3.53) and that alternatives are increasingly becoming available, there should be no need to extend existing permissions.</p>	<p>Noted. Further work on the Minerals Plan approach to peat will be undertaken as part of the development of the Publication version of the Plan.</p> <p>The current planning application for extension of time at peat extraction sites in Salford/ Wigan is being decided through a separate process. However, any decision made will be used to inform the Publication Minerals Plan.</p>
Lancashire Wildlife Trust	<p>Whilst the Trust broadly supports the decision not to identify further peat extraction sites, we strongly objects to the suggestion that approval of further development proposals on some degraded areas of peat may present opportunities to fund additional restoration of lowland raised bog. This section has been included in response to the assertion that the peat extraction at Chat Moss still has peat reserves available once the current licence expires and that the only way to restore to bog habitat as an afteruse will be to condition this as part of an application to extend the time available for peat extraction. However, the Trust would point out that the current permission for peat extraction at Chat Moss already has adequate conditions to restore to bog. The only issue here</p>	<p>Noted. Further work on the Minerals Plan approach to peat will be undertaken as part of the development of the Publication version of the Plan.</p> <p>The current planning application for extension of time at peat extraction sites in Salford/ Wigan is being decided through a</p>

## Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
	<p>is a failing to meet those conditions. This failure to meet planning conditions has been an on-going problem with peat extraction within Greater Manchester. The Wildlife Trust has catalogued a continual neglect in enforcing planning conditions, leading to the loss and continued degradation of our peatland habitats. Since the 1850s there has been a 95% loss of lowland raised mire within Greater Manchester. This loss is continuing despite the objectives within the minerals plan to protect and enhance the natural environment. These objectives are patently not being met by the peat extraction industry. The Trust strongly believes that continuing peat extraction at Chat Moss will be damaging to both the peatland ecology of adjacent mossland habitat and on the ability of the site itself to be restored. Whilst it is acknowledged in the minerals plan that any future applications will be judged on its merits, we feel that the paragraph itself adds weight to any future application and gives a distorted bias in favour of continued peat extraction and the Trust strongly urges the removal of this paragraph. The Trust agrees that highly effective peat alternatives have become widely available in the last few years, and in 2010 for the first time, were shown in independent research (March 2010 Gardening Which trials) to perform better than peat based composts. This year the top three performing composts in the Gardening Which trials were all peat free, and ironically the worst performing composts was 100% peat. It is clear that non-peat based alternatives have come of age, and the use of peat should therefore be phase out at the earliest opportunity, in line with Government targets. Whilst the plan recognises that existing planning permissions for peat extraction in the North West are sufficient to meet demand until 2042, we feel that this provision is still too high. It is very clear that using the Government's own figures, there is a currently a vast over-production of peat and that peat extractors are producing far more than the government has decided is necessary. The Government target is for 90% of the materials used in growing media and soil improvers to be non-peat by</p>	<p>separate process. However, any decision will be used to inform the Publication Minerals Plan.</p>

## 3 Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
	<p>2010 (target in the lowland raised bog HAP) and more recently to stop the use of peat altogether by 2020. The aim of these targets was to dramatically reduce and stop peat production. The latest Defra peat monitoring data (ADAS and Enviro Report for Defra 2007) show that the total market volume for Growing Media and Soil Improvers is 6.61 million m<sup>3</sup>. So 10% of that is 661,000 m<sup>3</sup>, which is the total volume of peat that Government stipulates, should be used in the UK after 2010. Furthermore, the same report also shows that only 43% of the peat used in the UK comes from UK bogs - 54% from the Republic of Ireland, and 3% from northern Europe. This effectively sets the total volume requirement for UK sourced peat to approx 285,000 m<sup>3</sup>. Yet the Defra report also shows that in 2007, there was 1,308,400 m<sup>3</sup> of UK-extracted peat in the market. So we are currently massively overproducing, by roughly 4.5 times, over Government requirements for domestic peat production. In the circumstances, there is clearly no case, based on need, for continuation of extraction at Chat Moss beyond the current agreement. The Trust firmly believes that the only clear way forward to protect mossland habitat is to include a ban on peat extraction once current licences have expired. The Sustainability Appraisal appears to suggest that only areas of high biodiversity value will receive protection from peat extraction. As outlined above peat extraction has already had a devastating effect on our mossland resource. The Sustainability Appraisal also appears to have underplayed the importance of bare peat. Bare peat meets the criteria for Annex 1 habitat within the European Habitats Directive. The Interpretation Manual of European Habitats states "Degraded raised bogs only includes examples which are capable of natural regeneration, i.e. "where the hydrology can be repaired and where, with appropriate rehabilitation management, there is a reasonable expectation of re-establishing vegetation with peat-forming capability within 30 years". The guidance then goes on to say that this can include areas of bare peat. It is the potential for bare peat areas to be restored to bog that</p>	

## Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
	<p>gives then such importance. This habitat is now so rare, in a large part due to the peat extraction industry that even these non-vegetated fragments are of upmost importance. The Trust feels strongly that all the peatland resource should be protected from further peat extraction and that no new licenses should be granted.</p>	
Warrington BC	<p>Warrington BC is proposing to incorporate spatial policies for minerals within the emerging Borough Core Strategy. It is anticipated that the Borough will promote a similar approach to that proposed within the GM Minerals Plan with regard to the protection peat resources. GM is encouraged to promote strict development management policies for the control of peat extraction.</p>	Noted
Mineral Products Association	No Comment	Noted
The Emerson Group	Agree	Noted
Natural England	<p>Natural England welcome the fact that the Preferred Approach to peat has been informed by the findings of the SA, which recognise its potential biodiversity and climate change benefits. We particularly welcome the reference in paragraph 3.52 to the Natural England report on the current threats to peatlands and the recognition of the climate change impacts of peat degradation. Natural England would welcome the opportunity for joint working with the planning authority to ensure that its ongoing work in this area can be used to inform the development of the relevant policy within the Plan. We support the fact that the Preferred Approach is not to identify additional peat extraction sites but to safeguard sites from non-minerals development. However, we have some concerns that the</p>	<p>Noted. Further work on the Minerals Plan approach to peat will be undertaken as part of the development of the Publication version of the Plan.</p>

## 3 Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
Environment Agency	<p>peat may still be extracted if non-minerals development is allowed in areas of peat resource.</p> <p>Although Natural England has concerns about the impacts of peat extraction for uses such as horticulture and the loss of the peat resource, we acknowledge that a blanket ban on peat extraction would not be in line with minerals planning policy (MPG13). As such, we would welcome opportunities to secure genuinely sustainable development, a modern planning consent (with appropriate conditions, including time limit and restoration) and restoration of an agreed amount/percentage of the resource within the applicants' ownership/control to protect and conserve part of the country's "critical natural capital" for the benefit of future generations.</p>	
Environment Agency	<p>Environment Agency have no objection to the Preferred Approach, ie not identifying additional peat extraction sites but identifying a Mineral Safeguarding Area for peat. We also have no objection to a planning application being judged on its own merits in line with the criteria and carbon implications on a site by site basis as described in Para 3.55.</p> <p>However the reasoning and justification for this approach is flawed:- Paras 3.50 to 3.53 appear to support the case for an overall ban on peat extraction through the Minerals Plan. Para 3.54 bullet point 1 - this point appears to support the case for an overall ban. Para 3.54 bullet point 2 - 'Local considerations also influence....' - As well as what? See above, it is not clear what the other reasons are. - 'Approval of further development....may....fund additional restoration of lowland raised bog' - this sentence appears to be a very specific action but has been arrived at with little justification. Is additional funding through extraction</p>	<p>Past permission for peat may not have been submitted with adequate restoration schemes or funding secured to achieve this. The main focus of the stance on peat is to prevent new developments on previously untouched peatlands to preserve their ecological and biodiversity value. However it has been noted that some previously worked areas may benefit from future work in order that they can be worked to allow effective</p>

## Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
The National Trust	<p>needed to fund restoration? Restoration should have formed part of an original planning permission. Are there any other options for achieving restoration which don't require additional development?</p> <p>No additional information to provide at this point. In line with its previous submissions the Trust believes that the Preferred Approach could, and should, go further having regard to the amount of extraction that has planning permission compared with forecast demands; i.e. 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>	<p>restoration, and this would be considered on a site by site basis by the districts involved.</p> <p>The only minerals for which a national need is identified is aggregates. There is no such figure for peat and therefore there is no basis for the Minerals Plan setting a reduced level of extraction against existing permissions. The plan is not seeking new planning permissions for peat extraction.</p> <p>Where the information relates to aggregates, sites which contribute to the lanbank but which are inactive will be examined as it is recognised that this does not help market development in this area and provides false impressions of the ability to meet Greater Manchester's apportionment.</p>

## 3 Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
Salford City Council	<p>Currently, all the peat extraction in Greater Manchester takes place in the Mosslands which lie between Salford, Wigan and Warrington. There are three active peat extraction sites in Salford, two of which lie partly within Wigan. This area has been the subject, over many years, of a number of strategies aimed at restoring lowland raised bog in the area. In recent history, this includes the 'Mosslands Vision' (2007), which was commissioned by a partnership including both Wigan MBC and Salford City Council. The Mosslands are also one of the projects identified in the Wildlife Trusts Living Landscapes initiative and as such the area is recognised by the Wildlife Trusts at a national level as a priority for habitat re-creation. Although there are extant planning permissions in the area which run until 2042, this has not prevented further applications coming forward, particularly time extensions on existing sites. A robust policy approach is therefore needed to deal with such applications. Given the potential that exists on Chat Moss for large scale habitat re-creation (and consequent creation of a carbon sink), it is important that the existing peat resources in the area are protected and not subject to further unnecessary extraction beyond the existing permissions, either in depth or time. The more peat is removed from the peat extraction sites, the harder it will be to restore the lowland raised bog habitat in the future. For this reason, the city council considers that there should be special mention made of Chat Moss within the Minerals DPD, stating that there will be no further permissions for peat extraction (including no time or depth extensions to existing permissions) in this area. The area used could be the area of Chat Moss as identified in Salford's Draft Core Strategy. However, the city council would prefer to protect a larger area including areas within Wigan, reflecting the ecological and hydrological links across the district boundary and the history of joint working in this area. In regard to peat, there is an inaccuracy in the Sustainability Appraisal which currently states that "by not identifying extraction sites or areas of search for peat, the preferred approach is likely to ensure that</p>	<p>Noted. Further work on the Minerals Plan approach to peat will be undertaken as part of the development of the Publication version of the Plan.</p> <p>The current planning application for extension of time at peat extraction sites in Salford/ Wigan is being decided through a separate process. However, any decision will be used to inform the Publication Minerals Plan.</p>

# Planning for Minerals in Greater Manchester

Respondent	Representation	Commentary
	<p>any peat bogs of high biodiversity value are protected from extraction". This displays a lack of understanding of the biodiversity value of current peat extraction sites. Due to the rare nature of bog habitat and the importance of the peat substrate to the habitat, the peat itself is of vital importance, with or without bog vegetation communities. The bare peat which can be found on current peat extraction sites can be classed as Annex 1 habitat (Degraded lowland raised bog capable of restoration within 30 years) under the European Habitats Directive. As such, it is of international importance for biodiversity. The preferred approach does not protect such sites from continued extraction and is therefore unlikely to ensure that all bogs of high biodiversity value are protected from extraction.</p>	

## 3 Planning for Minerals in Greater Manchester

# Future Minerals Developments

## 4 Future Minerals Developments

### 4 Future Minerals Developments

**4.1** This section sets out the questions made available for public comment in relation to future mineral developments, a summary of the responses received and recommendations for dealing with them.

#### Question 6

**4.2** Do you think that the Preferred Areas nominated as part of the 'call for sites' exercise referred to above should be allocated as extensions to existing quarries in the Minerals Plan? (Please state the reasons why you do or do not consider them to be acceptable)

**Table 11**

Response Received	No. Of Responses	Respondents
Support the Preferred Approach	1	The Emerson Group
Object to the Preferred Approach	6	Lancashire Wildlife Trust, Mr Warr (individual), Mr Reveley (individual), Mr Halls (individual), Mr Warner (individual), Mineral Products Association
Support with conditions	1	Peel
Other	3	Natural England, The National Trust, Warrington BC, Ramblers Association

**4.3** The comments relating to Question 6 are set out below:

## Future Minerals Developments

**Table 12**

Respondent	Representation	Commentary
<p>Ramblers Association</p>	<p>To answer this question, we have consulted our Bury and Bolton Groups and they have responded as follows:</p> <p>a. <b>Preferred Area of extension to Fletcher Bank Quarry, Bury.</b> There are concerns about this extension, which we would need to see addressed before we could support this allocation. The original quarry severed Bury Old Road (illegally), which resulted in an alternative route being put in place along the south and east of the existing quarry. This was about 20 years ago; this path is popular with both walkers and cyclists. If the extension eats into the red area on the map, then this link would be broken and an alternative must be provided. There would also be a risk of breaking the distinctive skyline to the east of Ramsbottom.</p> <p>b. <b>Preferred Area of extension to Pilkington Quarry.</b> Proposed extension to existing sandstone quarry/ Preferred Area of extension to Pilkington Quarry (Land between Pilkington and Montcliffe Quarries) - proposed extension to existing sandstone quarry. We are aware of the need for building stone, but we have concerns about:</p> <ul style="list-style-type: none"> <li>• The destruction of Footpath Horwich 54 by the previous owners of the quarry</li> <li>• The poor working practises of the current quarry owners which result in serious annoyance to local residents and walkers in the area - mud and debris and excessive water on the roads</li> <li>• The visual and environmental impact on an area of green belt much used by walkers</li> </ul>	<p>Noted. The potential extension to Fletcher Bank is located in Lancashire and therefore cannot be allocated in the Greater Manchester Minerals Plan. The landowner should ensure they notify Lancashire CC of the potential extension.</p> <p>Access to Fletcher Bank is in Bury and if any extension proposed is within the existing time limit of the current permission, then the access is not an issue.</p> <p>Concerns relating to M1 and M2 noted.</p> <p>At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and the decision made will influence the final Plan.</p>

## 4 Future Minerals Developments

Respondent	Representation	Commentary
Lancashire Wildlife Trust	<ul style="list-style-type: none"> <li>The additional 125 lorry journeys each day and 80 on Saturdays, increasing the danger and annoyance of heavy traffic and an even greater amount of mud and debris on the roads</li> <li>The time scale envisaged which makes it difficult to ensure that restoration of the site will take place as promised</li> </ul> <p>Should this site be allocated, we trust that very strict conditions for the operation and afteruse of the site will be imposed and will be monitored on a regular basis.</p>	
	<p>The proposed extension of the area known as Land between Pilkington and Montcliffe Quarries would directly impact upon Winter Hill and Smithills Moor Grade A SBI. The Sustainability Report "indicates that the disruption within the SBI would be significant but temporary and would be mitigated for by the restoration and biodiversity enhancement works following extraction. However, the Trust feels that the significant disruption outlined in the sustainability report would be enough to cause considerable concern, especially as the disruption would be over many years. The Trust therefore wishes to object to the proposed extension of the quarry into the SBI. If the decision is made to extend the quarry, then the Trust would also advise that simply restoring the site at the end of the extraction period would not be sufficient to fully compensate for the years of disruption. Additional biodiversity gain must be shown.</p> <p>Pilkington quarry extension is adjacent to an SBI that is important for its collection of bird species. Again the effects on breeding birds would need to be evaluated before permissions are granted.</p>	<p>Comments regarding the proximity of M2 (Land between Montcliffe and Pilkington Quarries) to the Grade A SBI have been noted.</p> <p>Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
Warrington BC	WBC has no comments to make on this specific GM issue.	Noted
Mr Reveley	The proposals for Pilkington Quarry would definitely result in "unacceptable environmental and social impacts" for the following reasons : (a) the quarry is too close to residential areas (when the original permission was granted it was only ever meant to be a small scale operation ), (b) the quarry is within a part of the West Pennine Moors Recreational & Conservation area well used by walkers, horse-riders & bikers, (c) access to the site is through residential areas and is via the very dangerous junction of Chorley Old Road & Georges Lane (this junction is on a sharp bend in Chorley Old Road and almost opposite the busy junction of New Chapel Lane & Chorley Old Road; these hazards are often compounded by water cascading down Georges Lane and across these junctions) (d) the quarry is on a flank of the moorland and extending it down this flank will considerably worsen the scar on the landscape that has already been created & is visible for miles around. At least two applications to extend this quarry have already been comprehensively rejected for reasons similar to the ones above. One was rejected by Greater Manchester Council in the '80s and the other by Bolton Council in November last year.	Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.  The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.
National Grid	A number of the Proposed Areas of Search for sandstone, gravel and sand, are crossed by National Grid's high voltage overhead electricity transmission lines. National Grid does not object to the proposals outlined, however the following points should be taken into consideration: <ul style="list-style-type: none"> <li>National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential operators of the sites should</li> </ul>	Noted. Such detailed considerations would be pursued at the planning application stage by any applicant. Information on these constraints will be included within the site profiles in the Minerals Plan.

## Future Minerals Developments

Respondent	Representation	Commentary
	<p>be aware that it is National Grid policy to seek to retain our existing overhead lines in-situ because of the strategic nature of our national network. We advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment.</p> <ul style="list-style-type: none"> <li>National Grid must ensure that all statutory safety clearances from its overhead power lines are maintained. These distances are outlined at the following web page: <a href="http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devsearch_infra/pdofstructure.htm">http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devsearch_infra/pdofstructure.htm</a></li> </ul> <p>A number of the Proposed Areas of Search for gravel and sand, are also crossed by National Grid's high pressure gas transmission pipelines.</p> <p>Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:</p> <ul style="list-style-type: none"> <li>Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties <a href="http://www.nationalgrid.com/uk/CA/VED/2641A91FA8363A8202391F5SSM2_537_Revised.pdf">http://www.nationalgrid.com/uk/CA/VED/2641A91FA8363A8202391F5SSM2_537_Revised.pdf</a></li> <li>Gas Transmission Underground Pipelines – Guidance <a href="http://www.nationalgrid.com/uk/Files/4009FA8B54E1B9FE4450D57DD67665A7C8G/Date2.pdf">http://www.nationalgrid.com/uk/Files/4009FA8B54E1B9FE4450D57DD67665A7C8G/Date2.pdf</a></li> </ul>	

## Future Minerals Developments

Respondent	Representation	Commentary
<p>Mr Halls</p>	<p>(Summary of response)</p> <p>Objection to the inclusion of Pilkington Quarry (both land to the south of the existing Pilkington Quarry and land between Pilkington and Montcliffe Quarries) as allocations within the Minerals Plan because of detrimental impacts relating to:</p> <ul style="list-style-type: none"> <li>• Local residential amenity (dust, noise)</li> <li>• Tourism and recreational visitors such as walkers, runners, cyclists and horse riders</li> <li>• Wildlife</li> <li>• Hydrology</li> <li>• Access to moorland</li> <li>• Traffic and access, including mud on highway</li> </ul> <p>Additional concerns include whether there is an identified need for the allocations.</p>	<p>Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>
<p>Mr Warner</p>	<p>(Summary of response)</p> <p>Object to M1 (Preferred Area of extension to Pilkington Quarry) and M2 (Preferred Area of extension to Pilkington Quarry) because of detrimental impacts relating to landscape, traffic through Bolton and Horwich, noise and dust (local amenity). These were considerable issues when the quarries were last being worked. This cannot be justified in the Green Belt.</p>	<p>Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p>

## 4 Future Minerals Developments

Respondent	Representation	Commentary
Mineral Products Association	<p>You nowhere in your analysis, calculate the future requirement for aggregates, the quantity of mineral available from the proposed Preferred Areas, or the shortfall, if there is one. It is therefore impossible to tell if you are actually providing for aggregate needs and therefore whether you are meeting your declared aims and objectives, and fulfilling national and regional policy.</p> <p>We appreciate that the sub regional apportionment is under review and will ultimately be incorporated into the Plan but as it stands, the plan is unsound because it fails to demonstrate that provision has been made.</p> <p>We would have preferred you to have calculated provision based on the existing apportionment, which still represents regional policy. We trust that this omission will be remedied, sufficient provision demonstrated and consulted upon before the plan is progressed to the next stage.</p>	<p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p> <p>It is anticipated the revised sub-regional apportionment will be available before Publication. These figures will be used to inform the development of the Publication Minerals Plan. The Minerals Plan will be in line with national policy and the requirement to contribute to the aggregate apportionment, although it is recognised that the subregional apportionment for Greater Manchester is combined with Warrington, Halton and Merseyside and any future calculation of provision would be based on that area to protect commercial confidentiality. The proposed extensions have not provided details of the amount of aggregate which may be extracted, further work will be undertaken on this. In terms of meeting the apportionment, the sub-region has been working together to review information on existing permissions and reserves in light of the revised regional apportionments and this has included a review of the current landbank, sites which contribute to this and the impact</p>

## Future Minerals Developments

Respondent	Representation	Commentary
The Emerson Group	Yes	this has on the areas ability to meet the apportionment.
Blackrod and Horwich Environmental Action Group	<p>(Summary of response)</p> <p>M1 Pilkington Quarry - The Proposal should not be adopted for the following reasons: Impact on landscape; land is in Green Belt; no need for the proposal in terms of the landbank; environmental impacts (noise, dust, traffic)</p> <p>M2 Land between Montcliffe and Pilkington Quarries - The Proposal should not be adopted for the following reasons: The location does not lay within the area for search for sandstone / gritstone, but it is in the green belt and is part of a site of biological importance (Winter Hill &amp; Smithills Moor); contaminated material in buttress at Pilkington means that Montcliffe should be isolated from Pilkington; landscape impact; proposed site is within the green belt and there are no “very special circumstances” to support the proposal; environmental impacts (dust, noise and traffic).</p> <p>The buttress was put in place to stabilise one of the quarry faces. Unfortunately it was not engineered to the appropriate standard and it is considered to be unstable. Any further quarrying in the current Pilkington quarry must therefore be dependant on the buttress being reworked. The Environment Agency have stated that the contamination in the buttress should be left were it is as it would caused more harm being moved than it currently presents.</p>	<p>Noted</p> <p>Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>

## 4 Future Minerals Developments

Respondent	Representation	Commentary
Peel	Peel considers that the preferred areas, in particular Fletcher Bank Quarry, should be designated within the Minerals Plan. The proposed designation will contribute towards the required minerals of the plan area and given that the proposal is an extension of an existing quarry, should pose fewer environmental and social constraints.	<p>Noted. The potential extension to Fletcher Bank is located in Lancashire and therefore cannot be allocated in the Greater Manchester Minerals Plan. The landowner should ensure they notify Lancashire CC of the potential extension.</p> <p>Access to Fletcher Bank is in Bury and if any extension proposed is within the existing time limit of the current permission, then the access is not an issue.</p>
Natural England	Natural England have no particular comment to make about the sites that have been nominated as Preferred Areas, although it is noted that all three sites either include or are adjacent to sites of biodiversity interest. Therefore it will be necessary to ensure that any proposals for development that come forward at these sites have regard to this and seek to preserve and where possible enhance biodiversity interests, including through restoration proposals. We welcome the fact that the three sites have been subject to Sustainability Appraisal; however it is not clear from either the Plan or the accompanying SA report whether alternative Preferred Areas have been considered and why these may not have been taken forward.	Noted. Proposals to extract material from any allocations in the Minerals Plan will require planning permission and will be subject to assessment against the policies in the Minerals Plan and any other relevant LDF policies.
Mr Warr	The area of land between Pilkington and Montcliffe Quarries is the only remaining Public Right of Way remaining giving access from Georges Lane to the moorland above, since the removal some years ago of two other footpaths. At that time we were "guaranteed" that this remaining footpath would be left untouched provided we, the local residents, did	Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of

## Future Minerals Developments

Respondent	Representation	Commentary
	not oppose the removal of these two pathways to facilitate the then expansion of Montcliffe Quarry. We were also "guaranteed" that the quarry would be landscaped and returned to nature from 2011 as an amenity for the people. The footprint is in daily use and should be preserved.	Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.  The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.
The National Trust	No specific comments to make on these locations.	Noted

### Question 7

**4.4** Do you know of any other land that should be considered through the Minerals Plan as Specific Sites or Preferred Areas? (Please give details)

### Table 13

Response Received	No. Of Responses	Respondents
No suggestions	4	Natural England, Mineral Products Association, The Emerson Group, Warrington BC

**4.5** The comments relating to Question 7 are set out below:

## 4 Future Minerals Developments

**Table 14**

Respondent	Representation	Commentary
Natural England	Natural England do not wish to suggest any other particular areas of land that should be considered as Specific Sites or Preferred Areas	Noted.
Mineral Products Association	No Comment	Noted.
The Emerson Group	No	Noted.
Warrington BC	No	Noted

### Question 8

**4.6** Do you agree with the Preferred Approach set out in Policy Direction 1? Do you know of any other information that should be considered?

**Table 15**

Response Received	No. Of Responses	Respondents
Support the Preferred Approach	1	Peel
Support with conditions	1	National Grid
Object to the Preferred Approach	10	Mr Warr (individual), Mr Reveley (individual), Mr Halls (individual), Mr Warner (individual), Mrs Benson (individual), Mineral Products Association, The Emerson Group, Lancashire County Council, Bolton

## Future Minerals Developments

Response Received	No. Of Responses	Respondents
		and Horwich Environmental Action Group, Arcon Village Residents Group
Observations	4	Warrington BC, Environment Agency, The National Trust, Natural England

**4.7** The comments relating to allocations for primary aggregate extraction are set out below:

**Table 16**

Respondent	Representation	Commentary
Warrington BC	WBC does not wish to comment on this issue	Noted
Mr Reveley	The surrounding area for Pilkington Quarry is not suitable due to the ongoing pollution problems within that quarry. Due to the network of aquifers, old mine workings, connectivity issues etc., the pollution problems will only escalate. This proposal is wholly unnecessary and foolhardy.	Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.  The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.
English Heritage	The site profiles highlight a number of heritage assets close to the preferred areas for future minerals developments. The minerals plan	The Minerals Plan will seek to protect heritage assets and their settings. Applications for minerals

## 4 Future Minerals Developments

Respondent	Representation	Commentary
Natural England	<p>should provide detail on how these heritage assets will be conserved and not harmed by the development.</p> <p>Natural England have no particular comment to make about the sites allocated within Policy direction 1. We welcome the reference to the need to meet the criteria included within the remainder of the Minerals Plan and have made comments where appropriate regarding our views on these policies that will shape development at the three allocated sites.</p>	<p>development will be assessed against the policies in the Minerals Plan and other relevant DPDs, including policies on heritage assets and their settings.</p> <p>Noted.</p>
Mr Warr	<p>The surrounding area for Pilkington Quarry is not suitable due to the ongoing pollution problems within that quarry. Due to the network of aquifers, old mine workings, connectivity issues etc., the pollution problems will only escalate. This proposal is wholly unnecessary and foolhardy.</p>	<p>Concerns relating to M1 and M2 noted. At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>
Mineral Products Association	<p>You imply, but nowhere state, that the reason you have opted for an Area of Search approach for sand and gravel is because you have had no nominated sites put forward. If so, we would appreciate a statement to that effect for clarification.</p> <p>See above for comments on Question 6 which apply to this question.</p>	<p>Noted. This will be clarified in the Publication Minerals Plan.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
The Emerson Group	Yes	Noted
Lancashire County Council	Policy Direction 1 iii & section 4.11 Objection to Fletcher Bank Quarry Part iii relates to, 'The access provisions in Bury, Greater Manchester for the proposed extension of Fletcher Bank Quarry in Lancashire' There has been no submission to the Joint Lancashire Minerals and Waste Planning Authorities for an extension to Fletcher Bank Quarry, consequently it gives the incorrect impression to refer to a proposed extension for Fletcher Bank quarry in Lancashire. Moreover, Policy CS3 of the adopted Lancashire Minerals and Waste Core Strategy states 'No additional land will be made available for the extraction of gritstone for aggregate use before 2021, unless it is of a special quality not available from elsewhere.'	Comments noted. Discussion have been held between Lancashire CC and GMGU and further meetings will be sought with the proposers, Peel, to ascertain what they propose from the development and why this was not submitted to Lancashire CC following advice from GMGU.
Peel	Peel agrees with the Preferred Approach set out in Policy Direction 1 (see comments above) and does not know of any other information that should be considered at this time.	Noted
Environment Agency	In regards to the identified extension of the Fletcher Bank Quarry, Bury, this is located directly within the Harden Moor and Cross Bank Brook County Biological Heritage Site (CBHS) and within a Regionally Important Geological Site (RIGS) reference R/2/005, and may have significant environmental and ecological constraints. Therefore any such proposed extension would need to undertake appropriate environmental assessment to ensure compliance with relevant core strategy policies, River Basin Management Plan objectives etc. and consult with relevant bodies i.e., Natural England, Biological Heritage Sites project in regards to any proposed quarry extension here. Policy Direction 1 Based on comments above and with the Fletcher Bank Quarry extension identified as having both category 1 (County	Only the access to Fletcher bank exist within Greater Manchester and any other consideration raised would be dealt with by Lancashire CC as the extraction takes place within this area. Historically Bury have supported the stance taken by Lancashire CC in considering any applications and it is likely this would continue. GMGU notified Lancashire CC of the submission and proposed extension which is within the existing redline boundary, however any extension would need to consider the points which have been made.

## 4 Future Minerals Developments

Respondent	Representation	Commentary
The National Trust	Biological Heritage Site - local wildlife site) and category 2 (river valley), the current list of constraints does not seem to have been fully considered in such quarry extension proposals.	Noted
National Grid	No objections to make. No other information to add.	Noted. Such detailed considerations would be pursued at the planning application stage by any applicant. Information on these constraints will be included within the site profiles in the Minerals Plan.
National Grid	A number of the Proposed Areas of Search for sandstone, gravel and sand, are crossed by National Grid's high voltage overhead electricity transmission lines. National Grid does not object to the proposals outlined, however the following points should be taken into consideration: National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential operators of the sites should be aware that it is National Grid policy to seek to retain our existing overhead lines in-situ because of the strategic nature of our national network. We advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment. National Grid must ensure that all statutory safety clearances from its overhead power lines are maintained. These distances are outlined at the following web page: <a href="http://www.nationalgrid.com/uk/LandandDevelopment/DDCdevsearch_infra/bolfranchise.htm">http://www.nationalgrid.com/uk/LandandDevelopment/DDCdevsearch_infra/bolfranchise.htm</a>	Noted. Such detailed considerations would be pursued at the planning application stage by any applicant. Information on these constraints will be included within the site profiles in the Minerals Plan.
National Grid	A number of the Proposed Areas of Search for gravel and sand, are also crossed by National Grid's high pressure gas transmission pipelines. Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from	Noted. Such detailed considerations would be pursued at the planning application stage by any applicant. Information on these constraints will be included within the site profiles in the Minerals Plan.

## Future Minerals Developments

Respondent	Representation	Commentary
<p>Mr Halls</p>	<p>uncontrolled development in the vicinity of the pipeline please read the following guidance: Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties  <a href="http://www.rat.gov.uk/Portals/0/COA/ED26/147917/8163/820723/019355/M2_537_Rev007.pdf">http://www.rat.gov.uk/Portals/0/COA/ED26/147917/8163/820723/019355/M2_537_Rev007.pdf</a>                      Gas Transmission Underground Pipelines “ Guidance  <a href="http://www.rat.gov.uk/Portals/0/COA/ED26/147917/8163/820723/019355/M2_537_Rev007.pdf">http://www.rat.gov.uk/Portals/0/COA/ED26/147917/8163/820723/019355/M2_537_Rev007.pdf</a></p> <p>(Summary of response)</p> <p>Objects to the Preferred Areas M1 and M2 and is concerned that the allocations would have an adverse impact on the following:</p> <ul style="list-style-type: none"> <li>• Access and traffic and road users</li> <li>• Local residential amenity, including dust and mud</li> <li>• Tourism and leisure pursuits in the area</li> <li>• Wildlife</li> <li>• Water table</li> <li>• Access to moorland</li> <li>• Landscape</li> </ul>	<p>Concerns relating to M1 and M2 noted.</p> <p>At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>
<p>Bolton and Horwich Environmental Action Group</p>	<p>M1- area of extension of Pilkington Quarry - The land proposed to be quarried currently softens the impact of the current Pilkington quarry workings. After the quarry is restored the exposed face at the north of the quarry, together with the currently exposed workings at</p>	<p>At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p>

## 4 Future Minerals Developments

Respondent	Representation	Commentary
	<p>Pilkington quarry, will appear as a single and very large working. This proposal will have a dramatic impact on the landscape, as it will be visible for miles around. It would therefore dramatically alter the appearance of the West Pennine Moors, and therefore the proposal should not be adopted. The proposed site is within the green belt and as such any in appropriate developments will only be permitted in very special circumstances. The proposed extension will primarily be for the extraction of dimension stone with a significant amount of aggregate produced as a by product. The regions landbank for aggregate from crushed rock is in a very healthy position being more than 3 times the required level, and no requirement exists for dimension stone. Therefore no special circumstances exist and there is no need to draw on these reserves at this time. The increasing use of aggregates produced from recycled materials may even remove the need to ever quarry in this highly visible location. The proposal will have a dramatic impact on the noise, dust, and traffic movements in the area. At first glance this seems to be an extension to a working quarry. In fact no stone has been removed from the quarry since 2006, and with the running down of the adjacent Montcliffe quarry over the last 2 years the whole area has benefited from a period of relative calm. This proposal together with the potential use of Montcliffe quarry as a waste facility will have a dramatic impact on the area. Roads in the area will not be able to cope with the combined effects of the proposed developments.</p> <p>The location does not lay within the area for search for sandstone / gritstone, but it is in the green belt and is part of a site of biological importance (Winter Hill &amp; Smithills Moor). These facts suggest the proposal should not be adopted.</p>	<p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p> <p>The Minerals Plan must look beyond the end of the plan period in relation to the landbank. Currently, the landbank includes a number of sites which are inactive which presents a false impression of the amount of resources available in Greater Manchester. Additional work will be undertaken relating to this point and used to inform the Publication Minerals Plan.</p> <p>However we are aware that such a proposal would have an impact locally, and these considerations have been raised in respect of the application currently pending decision. The comments relating to the future extraction will be taken in to account when developing a final policies in the minerals plan.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
	<p>A letter from the Environment Agency suggests that any minerals contained in the existing Pilkington void should be considered to be sterilised until such time as the issue of contamination in the buttress has been addressed. The letter also states that the proposed extension to Pilkington Quarry should be kept isolated from the existing quarry void. Although the letter does not consider Montcliffe quarry it is reasonable to consider that isolation from Montcliffe quarry will also be required. The buttress was put in place to stabilise one of the quarry faces. Unfortunately it was not engineered to the appropriate standard and it is considered to be unstable. Any further quarrying in the current Pilkington quarry must therefore be dependant on the buttress being reworked. The Environment Agency have stated that the contamination in the buttress should be left were it is as it would caused more harm being moved than it currently presents.</p> <p>This proposal will impact on the landscape. It will be visible for miles around, and would therefore dramatically alter the appearance of the West Pennine Moors, and therefore the proposal should not be adopted. Landbank The proposed site is within the green belt and there are no very special circumstances to support the proposal. Environmental Impacts - The proposal will lead to an increase in noise, dust, and traffic movements in the area.</p>	
Mr Warner	<p>(Summary of response)</p> <p>Objects to the Preferred Areas M1 and M2 and is concerned that the allocations would have an adverse impact on the following:</p> <ul style="list-style-type: none"> <li>• Landscape, particularly the West Pennine Moors</li> </ul>	<p>Concerns relating to M1 and M2 noted.</p> <p>At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land</p>

## 4 Future Minerals Developments

Respondent	Representation	Commentary
	<ul style="list-style-type: none"> <li>● Green Belt</li> <li>● Traffic</li> <li>● Local residential amenity - dust and noise</li> </ul>	<p>to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>
Arcon Village Residents Group	<p>(Summary of response)</p> <p>Objects to the allocation of Preferred Areas M1 and M2 and is concerned that the allocations would have an adverse impact on the following:</p> <ul style="list-style-type: none"> <li>● Green Belt</li> <li>● Landscape, particularly the West Pennine Moors</li> <li>● Tourism and visitors to West Pennine Moors, including walkers, cyclists and horse riders</li> <li>● Need for allocation</li> <li>● Traffic and access, particularly junction of Georges Lane with Chorley Old Road</li> <li>● Local residential amenity including dust, mud, flies, odours, noise</li> <li>● Health of local residents</li> <li>● Hydrology</li> <li>● Pollution - impact on local fisheries</li> </ul> <p>Additional concerns include:</p>	<p>Concerns relating to M1 and M2 noted.</p> <p>At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
Mrs Benson	<p>(Summary of response)</p> <p>Objects to the Preferred Areas M1 and M2 and is concerned that the allocations would have an adverse impact on the following:</p> <ul style="list-style-type: none"> <li>● Local residential amenity - noise from machinery and blasting, dust, mud on highway</li> <li>● Hydrology</li> <li>● Traffic and access</li> <li>● Tourism and visitors, including walkers, cyclist horse riders</li> <li>● Green Belt</li> </ul>	<p>Concerns relating to M1 and M2 noted.</p> <p>At present the site operator is pursuing an appeal against refusal of a planning application by Bolton Council (this application boundary includes 'M1 Land to the south of Pilkington Quarry). The applicant has also submitted an additional planning application which is being considered by the Council.</p> <p>The outcome of these two processes will be decided during the preparation of the Minerals Plan Publication DPD and will influence the final Plan.</p>

### Question 9

**4.8** Do the lists of constraints set out under paragraphs 4.14 and 4.19 include the most important designations?

**Table 17**

Response Received	No. Of Responses	Respondents
Support with conditions	3	Natural England, Lancashire Wildlife Trust, The National Trust

## 4 Future Minerals Developments

Response Received	No. Of Responses	Respondents
Observations	4	Warrington BC, The Emerson Group, Environment Agency, Mineral Products Association,

**4.9** The comments relating to Question 9 are set out below:

**Table 18**

Respondent	Representation	Commentary
Lancashire Wildlife Trust	Category 1 constraints should also include searches for protected species and UK BAP species and habitats.	Consider protection of UK BAP species and habitats through identification as a Category 1 constraint for Area of Search methodology as part of work on Publication Minerals Plan.
Warrington BC	WBC considers that the list is sufficiently comprehensive.	Noted.
Natural England	Natural England generally support the list of constraints and support the inclusion of a number of biodiversity designations within the list of Category 1 constraints. However, we would also note that biodiversity assets can exist in non-designated sites as well, and although we recognise that it is more difficult to quantify or map these assets as constraints in the same way as designated sites, due consideration should be given to the potential for valuable biodiversity to exist in non-designated areas.	Concerns regarding biodiversity in non-designated areas are noted. Biological conservation, including in non-designated areas, would be used as a criterion for assessing any planning application for minerals development within an Area of Search.

## Future Minerals Developments

Respondent	Representation	Commentary
Mineral Products Association	In view of the restricted area of the Area of Search for sand and gravel what evidence is there that it contains sufficient mineral to provide for sand and gravel needs for the plan period? What assessment of potential yield has been carried out? Until these questions are answered it is impossible to say whether the list of constraints is correct or that some relaxation should be carried out in order to accommodate needs. In other words, this information is needed in order to fully test the apportionment at the local level.	Noted. Knowledge of mineral resources within an Area of Search is less certain but it is intended that they could meet any shortfall that arises. Additional work will be undertaken on apportionment an used to inform the Publication Minerals Plan.
The Emerson Group	No. Areas allocated for alternative purposes should be included, such as housing and employment. If they need to come forward in the first five years of the U.D.P. period working them may not achieve those aims.	<p>The response to this comment assumes that the consultee is referring to the LDF rather than the UDP. Sites allocated for uses, such as housing, by a district will still require planning permission. Therefore, minerals could be considered during the planning application process.</p> <p>The purpose of MSAs is to protect the resource and there is no presumption that the resources will be worked. The presence of an MSA does not preclude other forms of development. MSAs simply provide an alert to the fact that minerals may be sterilised by the proposed development and that this should be taken into account by the planning process.</p>
Environment Agency	River Valleys should be listed under Category 1 Constraints. The Water Framework Directive now applies to the majority of	Whilst impacts on waterbodies covered by the Water Framework Directive is a consideration for the Minerals Plan, it remains that Sand and Gravel deposits in Greater Manchester

## 4 Future Minerals Developments

Respondent	Representation	Commentary
The National Trust	<p>waterbodies in Greater Manchester. Works affecting waterbodies, and their potential to achieve Good Ecological Potential, or Good Ecological Status or that cause a deterioration in condition are contrary to the requirements of this directive. We therefore believe that river valleys may offer a more significant constraint and their category should be changed. All Public Bodies have a duty to consider, and work with the requirements of the Water Framework Directive. Refer to Annexe C of the North West River Basin Management Plan</p>	<p>are generally located in river valleys. Therefore excluding them as part of the Category 1 absolute constraints would severely constrain this resource.</p> <p>Where impacts on the water environment are identified through the Minerals Plan this will be made clear through policies and supporting text. However detailed consideration of impacts can only be examined through the planning application stage, at which point relevant statutory bodies will be consulted.</p>
	<p>Category 1 constraints should include Registered Historic Parks and Gardens. Furthermore PPS5 has now introduced the concept of heritage assets that are undesignated but of local importance these could include locally important archaeological sites and historic parks/gardens; it is considered that these should be added to the list of constraints, albeit potentially within Category 2. Whilst it would not be relevant to establish a standard buffer around designated sites it is important to also recognise that issues are likely to arise if minerals developments are proposed in the vicinity of such sites, e.g. affecting the setting</p>	<p>The possibility of referring specifically to Historic Parks and Gardens under Category 1 exclusions will be carefully examined with a view to referring to them specifically in the Publication version of the Minerals Plan.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
	of the Peak District National Park or imposing upon a designed vista relating to a Historic Park or Garden.	

### Question 10

**4.10** Do you think that the Areas of Search identified in Map 3 should be allocated in the Minerals Plan in order to meet any shortfall in provision during the Minerals Plan period should a suitable planning application be made? (Please state the reasons why you do or do not consider them acceptable)

### Table 19

Response Received	No. Of Responses	Respondents
Support	2	Warrington BC, Peel
Support with conditions	3	The National Trust, Cheshire West and Chester, Peak District National Park
Observations	3	The Emerson Group, Natural England, Mineral Products Association

**4.11** The comments relating to Question 10 are set out below:

## 4 Future Minerals Developments

**Table 20**

Respondent	Representation	Commentary
Warrington BC	WBC would suggest that the Areas of Search should be allocated subject to the determination of acceptable planning applications for development being submitted which need to be judged against the potential for environmental impact and need to meet the sub regional apportionment targets.	Noted.
Mineral Products Association	In view of the restricted area of the Area of Search for sand and gravel what evidence is there that it contains sufficient mineral to provide for sand and gravel needs for the plan period? What assessment of potential yield has been carried out? Until these questions are answered it is impossible to say whether the list of constraints is correct or that some relaxation should be carried out in order to accommodate needs. In other words, this information is needed in order to fully test the apportionment at the local level.	Noted. Knowledge of mineral resources within an Area of Search is less certain but it is intended that they could meet any shortfall that arises. Addition work will be undertaken on apportionment an used to inform the Publication Minerals Plan.
The Emerson Group	No. Given the extent of existing commuted provision and the Government move towards carbon reduction and sustainability the existing resources should last longer	Potential Areas of Search have been identified were it is known that minerals exist but where there is no specific information on the quantity and quality. Although there is a move towards more sustainable use of resources, there is still a requirement for

## Future Minerals Developments

Respondent	Representation	Commentary
Peak District National Park	<p>and alternative sustainable products be encouraged by restricting minerals provision. The areas are too widely drawn.</p> <p>The Authority welcomes the identification of areas of search for sandstone in areas to the north west of the National Park boundaries. The Authority would also support the inclusion of areas of search and a policy direction for future building stone quarries.</p>	<p>primary minerals, particularly for construction needs. Secondary and recycled products do not meet all of the required standards at this time. In addition, Government has tasked Greater Manchester to provide a specific amount of aggregate and in order to do this and maintain a landbank, additional resources will be required. However the final extent of the Area of Search is yet to be defined and any proposed changes to the boundaries will be considered as the Publication Minerals Plan is developed.</p> <p>Noted</p>
Cheshire West and Chester	<p>The Areas of Search for sand and especially gravel appear to be minimal in comparison to the resources identified under the MSA and therefore the BGS resource maps. Given the small number of operational sand and gravel quarries in Greater Manchester it would be beneficial for both the industry and Greater Manchester to identify larger areas of search, therefore providing a level of certainty with regards to meeting the future supply needs of both Greater Manchester and the North West region as a whole.</p>	<p>Areas of Search are limited to the Green Belt, however MSAs include the urban area to encompass any development with may come forward there. It would not be useful to identify Areas of Search within the urban area. The Minerals Industry have been involved in developing the Areas of Search presented and they have not offered any extended areas. With limited resources available to local authorities to assess potential for minerals extraction, it is unlikely these will be extended further.</p>

## 4 Future Minerals Developments

Respondent	Representation	Commentary
Peel	Peel considers that the Area of Search identified in Map 3 for aggregates should be allocated within the Minerals Plan. This Area of Search provides clarification to the industry on where it is likely to be appropriate to submit a planning application for minerals related development.	Noted
The National Trust	No specific comments to make having regard to the Trust's specific interests.	Noted
Natural England	We have no particular comment to make about the Areas of Search identified.	Noted

### Question 11

**4.12** Do you agree with the Preferred Approach set out in Policy Direction 2? Do you know of any other information that should be considered?

**Table 21**

Response Received	No. Of Responses	Respondents
Support	3	Warrington BC, The National Trust, Peel
Support with conditions	1	Natural England
Observations	3	The Emerson Group, Environment Agency, Mineral Products Association

## Future Minerals Developments

**4.13** The comments relating to Areas of Search for aggregates are set out below:

**Table 22**

Respondent	Representation	Commentary
Warrington BC	<p>Arising from work undertaken into mineral resources within Warrington there would appear to be potential areas for sand and gravel and in the event that Areas of Search are identified in the WBC Core Strategy or subsequent Allocations DPD a similar policy direction would be formulated to control potential development of these resources subject to minimising environmental impact and necessity for the resource to be exploited to meet sub regional apportionment targets.</p>	<p>Support noted</p>
Mineral Products Association	<p>We are not yet able to determine whether the Area of Search is adequate because it is not known what the possible yield from it might be. However, if this is verified, the policy approach appears to be acceptable.</p>	<p>Noted. Additional work is required on Areas of Search and this will be used to inform the Publication Minerals Plan.</p>
The Emerson Group	<p>It should be added in Policy Direction 2 that development for alternative purposes will not be precluded in these areas and there will be no requirement to investigate minerals deposits or demonstrate these areas cannot be worked for minerals before alternative development applications can be permitted. The safeguarding of an area in this way will affect the deliverability of regenerative and development proposals. It should also be added that development for minerals extraction will only be permitted provided it does not prejudice the bringing forward of allocated development in the Core Strategy.</p>	<p>The allocation of a Mineral Safeguarding Area in Greater Manchester does not preclude none mineral development in such locations. This will be made clear within the Minerals Plan.</p> <p>Fundamental to the function of the MSA allocation is the requirement to investigate mineral deposits in terms of quality and quantity and requiring developers to demonstrate</p>

## Future Minerals Developments

Respondent	Representation	Commentary
		<p>that the resources cannot be worked prior to the granting of any planning permission. This approach prevents the sterilisation of mineral resources, which is not only set out in national planning guidance (MPG1) but is especially important in an area such as Greater Manchester where quality mineral resources are in demand. For this reason allocations within a Core Strategy are not exempt from the requirements of the MSA policy, as such mineral investigations as required by the policy are not considered to prejudice the final development.</p>
Peel	<p>Peel agrees with policy direction 2 which states that applications for minerals development within the Areas of Search identified for aggregates will be permitted. Peel does not know of any other information that should be considered at this time.</p>	Noted
Environment Agency	<p>A number of the preferred options (*Q8,9,11) seem to fail to protect water resource dependencies at all sites including allocated sites and perhaps fail to recognise them as a significant constraint on development at policy level. This is at variance with the approach taken in the case of unconventional Gas developments where water resource impacts are specifically addressed</p>	<p>Noted and will be considered in more detail as Publication Minerals Plan is developed.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
	<p>in Paragraph 4.41. Policy Direction 6 does address protection of controlled waters, but only in respect of unallocated sites. It is important to recognise that in Greater Manchester there are many water resource dependencies such as large scale licensed abstraction of water for commercial or domestic use etc, and smaller scale private (unlicensed) drinking water supplies which may be drawn from groundwater sources or watercourses in areas that may also provide potential for mineral development. Although a small percentage of the groundwater abstractions (Typically for major public water supplies) do have the benefit of formally designated Groundwater Source Protection Zones, these are a pollution prevention tool and inappropriate and inadequate to the purpose of protecting the aquifer from derogation by passive or active dewatering caused by large excavations. As such, there is no formal protected status designation available that could be used to clearly define areas where mineral working would not be a viable prospect without adversely affecting water resources or their dependencies. It is suggested therefore that as a matter of policy addendum for all surface and underground mineral workings: Any mineral development that would adversely affect a significant water resource or its dependents should only be allowed to proceed if the adverse impact is either agreeable to the Planning Authority or adequately mitigated. This would be a matter of site specific assessment, and should cover both surface water and groundwater resources. REASON: In the greater Manchester Area there are numerous abstractions for water supply made from a variety of aquifers including the Permo-Triassic and Carboniferous age sandstones and siltstones, and to a lesser degree from former mine-workings and the peat, sands and gravels of the superficial deposits. Surface water flows and abstractions from them can also be affected. The extent to which mineral exploitation may affect any of these dependencies is heavily controlled by the proposed depth, extent and duration of proposed</p>	

## 4 Future Minerals Developments

Respondent	Representation	Commentary
	working compared to the depth of the abstraction point and extent and relative water levels of the aquifer concerned. The potential impact can therefore only be assessed by site specific risk assessment on a case by case basis. Sometimes, but not always, some form of protective mitigation or provision of an alternative source of supply may be possible. Because it is not always possible to mitigate, and this may apply to allocated sites this matter should be addressed as policy and may not just be something to deal with under the heading Development Management This requirement should not exclude the related aquifers from inclusion in mineral safeguarded areas.	
The National Trust	No objections to make. No other information to add.	Noted
Natural England	We welcome the reference to the need to meet the criteria included within the remainder of the Minerals Plan and have made comments where appropriate regarding our views on these policies that will shape development at the three allocated sites.	Noted

### Question 12

**4.14** Do you agree with the Preferred Approach to surface coal set out above and shown in Map 4? Do you know of any other information that should be considered?

### Table 23

Response Received	No. Of Responses	Respondents
Support	2	Warrington BC, The Coal Authority,

## Future Minerals Developments

Response Received	No. Of Responses	Respondents
Support with conditions	1	The National Trust
Object	1	The Emerson Group
Observations	2	Natural England, Mineral Products Association

**4.15** The comments relating to identifying future coal resources are set out below:

**Table 24**

Respondent	Representation	Commentary
Warrington BC	WBC agree with the preferred approach.	Support noted
Mineral Products Association	No comment	Noted
The Coal Authority	The Coal Authority welcomes and supports the overall approach to surface coal, which aims to identify the extent of the coalfield and the constraints within that area in accordance with MPG3, and to assess any proposals for coal extraction on their merits against development management policies and other relevant planning documents. This is considered to represent an appropriate approach in the event that no industry submissions are subsequently made to propose Areas of Search or Specific Sites.	Noted

## 4 Future Minerals Developments

Respondent	Representation	Commentary
The Coal Authority	<p>The Coal Authority does, however, have some concerns regarding the depiction of the coal resource area on Map 4. It is recognised that Map 4 is based on BGS data. However, it is considered that the categorisation of coal resources on this Map introduces more complexity than is required and, therefore, has the potential to confuse. It is understood that the main purpose of Map 4 is to show: the extent of the surface coal resource area, in which planning applications may come forward for surface coal mining activities; and the extent of the deeper coal resource area, in which applications may come forward for other operations such as Coal Bed Methane (CBM) exploration/production. However, given that Map 4 shows four coal resource categories, it is currently unclear as to which types of operation/application might be expected in which area. The definitions used could also make the relationship with the MSAs defined elsewhere unclear. For instance, the term Inactive Coalfield is misleading and could cause readers to conclude that there are no workable resources in this area. This would be entirely inappropriate - The Coal Authority has evidence of a number of coal prospect areas within the inactive coalfield area. Similarly, the term Worked Shallow Coal could be interpreted by the reader to mean that there are no remaining workable resources in this area,</p>	<p>Noted and will be looked at as the maps are finalised for publication.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
	<p>which would again be inappropriate. As such, The Coal Authority considers that Map 4 should be simplified by using our Surface Coal Resource data to depict, as a single category, the area in which workable surface coal resources exist and where applications might therefore come forward for surface mining. This should be used in place of the BGS Inactive Coalfield and Worked Shallow Coal categories. As far as the deeper resource area is concerned, MPS1 requires the extent of the coalfield with reserves at depths of 200-1,500m to be shown in order to identify the area in which CBM applications might come forward. It is understood that the BGS data for Shallow and Deep coal identifies resources at depths of 50-1,200m and more than 1,200m respectively. The use of these two BGS resource categories is therefore appropriate for the purpose of showing where CBM operations might take place, although it would perhaps be helpful to include the definitions of Shallow and Deep coal resources for clarity. Change requested That Map 4 be simplified by using The Coal Authority's Surface Coal Resource data to depict, as a single category, the area in which workable surface coal resources exist and where applications might therefore come forward for surface mining.</p>	

## 4 Future Minerals Developments

Respondent	Representation	Commentary
The Emerson Group	<p>Reason To provide clarity in depicting the surface and deeper coal resource areas in line with MPG3 and MPS1.</p> <p>No. The area set out is still too broad and will have significant impact on the delivery of sites in the current economic climate and in a time when the dependency on natural resources should be discouraged. It should be set out that there is no requirement in an Area of Search to investigate the potential working of minerals.</p>	<p>There appears to be some confusion here as to what Map 4 represents and also the difference between Areas of Search and Mineral Safeguarding Areas.</p> <p>This issue may be clarified as follows:</p> <p>Map 4 identifies the entire coal resource in Greater Manchester as this is a nationally important energy mineral. It also identifies the location of the PEDL licences granted in relation to Greater Manchester. This information does not constitute an Area of Search or Mineral Safeguarding Area.</p> <p>Map 9 indicates the extent of the coal resource to be allocated as a Mineral Safeguarding Area, it includes only the shallow coal resources across Greater Manchester. No Area of Search is proposed for Coal resources.</p> <p>As a result of The Emerson Groups comments, the definitions of Mineral Safeguarding Areas and Areas of Search will be further clarified as the Publication DPD is developed.</p> <p>Under the Area of Search allocations there is no requirement to investigate the potential working of minerals, however as the Area of Search lie within the Mineral Safeguarding Area allocations there will be a requirement under the Mineral</p>

## Future Minerals Developments

Respondent	Representation	Commentary
		Safeguarding Area allocation to carry out such investigations prior to the granting of none mineral permissions, as set out with this Mineral Safeguarding Area Policy.
The National Trust	No objections to the Preferred Approach as set out at paragraphs 4.25 to 4.32. However, it would be preferable for Map 4 to only identify the shallow coalfield resources and a separate Map be produced in respect of unconventional gas resources (the inclusion of other coal resources [i.e. deep coal] is confusing).	Noted. This point can be used to inform the Publication Minerals Plan to ensure the maps are as user friendly as possible.
Natural England	We have no comment to make with regards to the Preferred Approach to surface coal.	Noted

### Question 13

**4.16** Do you agree with the Preferred Approach to unconventional gas resources set out above and shown in Map 4? Should any other constraints be included?

**Table 25**

Response Received	No. Of Responses	Respondents
Support	2	Warrington BC, The Coal Authority
Support with conditions	1	The National Trust
Observations	2	Lancashire Wildlife Trust, Natural England

## 4 Future Minerals Developments

Response Received	No. Of Responses	Respondents
Other	2	The Emerson Group, Mineral Product Association

**4.17** The comments relating to identifying future unconventional gas resources are set out below:

**Table 26**

Respondent	Representation	Commentary
Lancashire Wildlife Trust	The area of search includes the Chat Moss "lowland raised mire (UK Priority Habitat) restoration areas. It should be shown that any drilling and extraction of the unconventional gas resources should not have any impact on either the hydrology or air quality within this area. The Trust notes that the plan directs that particular attention to be given to the abstraction of ground water and its impacts. The effects on restoration works (the success of which is maintaining sufficiently high water levels) should be a material consideration of any application and applications should be rejected if shown to adversely affect water levels within the mossland area.	Noted. This will be taken into consideration as Policy Direction 3 is developed during preparation of the Publication Minerals Plan.
Warrington BC	With increased emphasis on the need for alternative energy sources the	Support noted

## Future Minerals Developments

Respondent	Representation	Commentary
	<p>exploitation of UCR is likely to become more significant over the plan period and the principle of utilising the resource is supported.</p>	
Mineral Products Association	<p>No comment</p>	<p>Noted.</p>
The Coal Authority	<p>The Coal Authority also welcomes and supports the overall approach to unconventional gas resources, which again aims to identify the full extent of the resource area in which CBM operations might take place and to deal with any such proposals on their merits against a separate policy.</p>	<p>Noted</p>
The Coal Authority	<p>The Coal Authority does, however, have some concerns regarding the depiction of the coal resource area on Map 4.</p> <p>It is recognised that Map 4 is based on BGS data. However, it is considered that the categorisation of coal resources on this Map introduces more complexity than is required and, therefore, has the potential to confuse.</p>	<p>Noted. Comments will be used to inform development of Map 4 for the Publication Minerals Plan to ensure it is user-friendly.</p>

## Future Minerals Developments

Respondent	Representation	Commentary
	<p>It is understood that the main purpose of Map 4 is to show: the extent of the surface coal resource area, in which planning applications may come forward for surface coal mining activities; and the extent of the deeper coal resource area, in which applications may come forward for other operations such as Coal Bed Methane (CBM) exploration/production. However, given that Map 4 shows four coal resource categories, it is currently unclear as to which types of operation/application might be expected in which area.</p> <p>The definitions used could also make the relationship with the MSAs defined elsewhere unclear. For instance, the term 'Inactive Coalfield' is misleading and could cause readers to conclude that there are no workable resources in this area. This would be entirely inappropriate - The Coal Authority has evidence of a number of coal prospect areas within the 'inactive coalfield' area. Similarly, the term 'Worked Shallow Coal' could be interpreted by the reader to mean that there are no</p>	

## Future Minerals Developments

Respondent	Representation	Commentary
	<p>remaining workable resources in this area, which would again be inappropriate. As such, The Coal Authority considers that Map 4 should be simplified by using our Surface Coal Resource data to depict, as a single category, the area in which workable surface coal resources exist and where applications might therefore come forward for surface mining. This should be used in place of the BGS 'Inactive Coalfield' and 'Worked Shallow Coal' categories.</p> <p>As far as the deeper resource area is concerned, MPS1 requires the extent of the coalfield with reserves at depths of 200-1,500m to be shown in order to identify the area in which CBM applications might come forward. It is understood that the BGS data for 'Shallow' and 'Deep' coal identifies resources at depths of 50-1,200m and more than 1,200m respectively. The use of these two BGS resource categories is therefore appropriate for the purpose of showing where CBM operations might take place, although it would perhaps be helpful to include the definitions of 'Shallow' and 'Deep' coal resources for clarity.</p>	

## 4 Future Minerals Developments

Respondent	Representation	Commentary
	<p>Change requested –</p> <p>That Map 4 be simplified by using The Coal Authority's Surface Coal Resource data to depict, as a single category, the area in which workable surface coal resources exist and where applications might therefore come forward for surface mining.</p>	
The Emerson Group	No Comment	Noted
The National Trust	No objection to the Preferred Approach; however, as set out above in response to Q.12 it is considered that it would be preferable for a separate Map to be produced to identify the location of unconventional gas resources.	Noted. This point can be used to inform the Publication Minerals Plan to ensure the maps are as user friendly as possible.
Natural England	We have no comment to make with regards to the Preferred Approach to unconventional gas resources. We support the recognition that international and national environmental designations will comprise constraints; however we would like to see confirmation that	Noted. Comments will be considered and used to inform work on the Publication Minerals Plan.

## Future Minerals Developments

Respondent	Representation	Commentary
	local level designations and non-designated biodiversity assets will be given due consideration.	

### Question 14

**4.18** Do you agree with the Preferred Approach to unconventional gas resources set out in Policy Direction 3? Do you know of any other information that should be considered?

### Table 27

Response Received	No. Of Responses	Respondents
Support	3	The National Trust, The Coal Authority, Peel
Support with conditions	1	Warrington BC
Observations	2	Lancashire Wildlife Trust, Natural England
Other	2	The Emerson Group, Mineral Products Association,

**4.19** The comments relating to identifying future unconventional gas resources are set out below:

### Table 28

Respondent	Representation	Commentary
Lancashire Wildlife Trust	As for Question 13: The area of search includes the Chat Moss lowland raised mire (UK Priority Habitat) restoration areas. It	Noted. This will be taken into consideration as Policy Direction 3 is developed during preparation of the Publication Minerals Plan.

## 4 Future Minerals Developments

Respondent	Representation	Commentary
	should be shown that any drilling and extraction of the unconventional gas resources should not have any impact on either the hydrology or air quality within this area. The Trust notes that the plan directs that particular attention to be given to the abstraction of ground water and its impacts. The effects on restoration works (the success of which is maintaining sufficiently high water levels) should be a material consideration of any application and applications should be rejected if seen to adversely affect water levels within the moorland	
Mineral Products Association	No Comment	Noted
The Coal Authority	The Coal Authority welcomes the inclusion of a specific policy relating to unconventional gas resources, including CBM. The proposed Policy Direction is considered consistent with the guidance in MPS1.	Noted
The Emerson Group	No Comment	Noted
The National Trust	Agreed	Noted
Peel	Peel agrees with the preferred approach to unconventional gas resources in that planning applications for exploration, appraisal and production wells should be	Noted

## Future Minerals Developments

Respondent	Representation	Commentary
Warrington BC	<p>permitted. The points set out within this policy seem appropriate in the context of the resource. Peel is not aware of any other information that should be considered within this policy. It is important that there is sufficient flexibility in relation to this policy due to the potential for new technologies to come forward.</p> <p>Although an area of search is not being designated for unconventional gas resources including coal bed methane, map 4 is a useful resource to be able to allow for such applications to come forward.</p> <p>WBC has an operational CBM installation which has recently been granted permission to drill additional wells to extend the site into full CBM appraisal and long term production. Two other sites have permission for exploratory drilling. All sites are located in the green belt and whilst the most significant impact is that of 24/7 drilling involving a rig some 30 meters in height for approximately 30 days each well it is a fact that the operational site is extensive. Within a green belt location the impacts arising from an extensive compound can be</p>	<p>Noted. Comments will be used to inform development of the Publication Minerals Plan.</p>

## 4 Future Minerals Developments

Respondent	Representation	Commentary
Natural England	<p>intrusive. GM is recommended to encourage the development of such CBM wells into an industrial or brownfield setting.</p> <p>We have no comment to make with regards to the Policy Direction 3.</p>	Noted

# Defining Mineral Safeguarding Areas

## 5 Defining Mineral Safeguarding Areas

### 5 Defining Mineral Safeguarding Areas

## Defining Mineral Safeguarding Areas

**5.1** This section sets out the questions made available for public comment in relation to defining Mineral Safeguarding Areas, a summary of the responses received and recommendations for dealing with them.

### Question 15

**5.2** Do you agree with the Preferred Approach to Mineral Safeguarding Areas set out in Policy Direction 4? (Please give details) Do you agree with developments as listed under paragraph 5.41 to be exempt from this policy is comprehensive? Do you think any developments need to be added/removed from this list?

**Table 29**

Nature of response	No. Of Responses	Respondents
Support	3	Natural England, National Trust, Ramblers Association,
Support with conditions	2	Salford City Council, English Heritage
Objection	4	Warrington BC, The Emerson Group, Peak District National Park, Peel
Observations	3	Warrington BC, Cheshire East, Emerson Group, Coal Authority.
Other	2	Mineral Products Association, Cheshire West and Chester

**5.3** The comments relating to defining Mineral Safeguarding Areas are set out below:

**Table 30**

Respondent	Representation	Commentary
Ramblers Association	We agree with the preferred Approach to Mineral Safeguarding Areas. Although we think there should be no need to mine peat other than in areas with existing planning permission, we do not object to	The purpose of including peat resources in Greater Manchester within the Mineral Safeguarding Area is to ensure such

## 5 Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
English Heritage	<p>Adding wording to the suggested mineral safeguarding area policy could cover the need to safeguard “heritage quarries” and include the suggested wording outlined within the response to question 4.</p>	<p>resources are considered in landuse planning decisions, to prevent needless sterilisation. There is no presumption that peat resources identified through the MSA will be worked for minerals. Additional extraction of peat, beyond the current permitted operations, is not promoted through the Minerals Plan, and indeed no sites are allocated for peat extraction within the Plan.</p> <p>The purpose of identifying an MSA is to notify the presence of mineral resources and make specific local planning policies applicable. It does not aim to safeguard minerals for extraction purposes. The comments received in relation to the preferred approach to MSAs will be used to develop an appropriate policy to be included with the Publication DPD, this will include the consideration of heritage quarries in line with the comments from English Heritage.</p>
Warrington BC	<p>WBC generally supports the preferred approach but would question if the wording 'any form of development' is appropriately phrased. Whilst not an issue for WBC the wording of 5.41 would appear unlikely</p>	<p>Noted, it is anticipated that the Policy Direction will be amended during development of the Publication document and will take account of this comment.</p>

## Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
Mineral Products Association	<p>to be comprehensive in terms of the variety of development control issues which may arise.</p> <p>Paragraph 5.18-19 Safeguarding Options: We cannot agree that Option 2 or any variation of it is practicable because discussion of prior extraction of minerals at the application stage is far too late. This would also be contrary to your suggestion that sites allocated for development in an adopted plan would be excluded from safeguarding. Discussion about prior extraction should take place as early in the development planning process as possible to give adequate time for extraction to be carried out. Once an 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 provides when 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 the earlier it is considered.</p>	<p>It is not clear how the respondent would like the plan to be changed, further discussions with this consultee are planned to clarify the approach required.</p>
Mineral Products Association	<p>Question 15 Policy Direction 4: We agree with the policy. However, we would like you to add more detail to criterion ii, or include additional explanatory text. The approved method of assessment of the potential value of underlying mineral resources should 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</p>	<p>These comments will be considered in detail in seeking to retain a proportionate approach to facilitating development and avoiding sterilisation of minerals.</p>

## 5 Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
The Coal Authority	<p>authority to specify that investigation of the resource should be to the same standards that our members employ to evaluate a deposit.</p> <p>For the reasons set out above, and in our previous submissions on the emerging Greater Manchester Minerals Plan, The Coal Authority welcomes and supports the definition of the MSA for coal, as set out in Map 9. The inclusion of the entire surface coal resource area, including urban areas, is particularly supported and, as identified within our previous submissions, this is considered entirely consistent with MPS1 and Good Practice Guidance on defining MSAs.</p> <p>Proposed Policy Direction 4, which sets out mechanisms to implement mineral safeguarding is welcomed. The proposed policy criteria, which include reference to prior extraction, are consistent with guidance and good practice advice on mineral safeguarding and are, therefore, also supported in principle.</p> <p>The proposal to exempt certain types of development from these requirements represents a reasonable approach, is consistent with good practice guidance and is, again, supported in principle. The types of development currently listed as 'exempt' within paragraph 5.41 are considered reasonable and appropriate. It is noted, however, that the list at paragraph 541 is not intended to be exhaustive and this leaves some uncertainty as to the other types of development that might be exempted from the policy requirements. The Coal Authority would accept that additional forms of development could reasonably be</p>	<p>Comments noted.</p> <p>A range of additional exempt developments have been suggested through responses received to question 15. It is anticipated that additional work on the policy wording and dialogue with relevant stakeholders in seeking to retain a proportionate approach to facilitating development and avoiding sterilisation of minerals will be undertaken in preparing the Publication DPD.</p> <p>It is the opinion of the Planning Authorities that a suitable threshold must be included within the Minerals Plan for coal extraction on MSA sites within the urban area. We will work with the Coal Authority and other stakeholders to refine the final approach to defining the mineral safeguarding area for coal.</p>

## Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	<p>exempted from the safeguarding requirements. These could include developments/applications such as Conservation Area Consent, Prior Notifications, Advertisement Consent, works to trees, and development and extensions within the curtilage of existing buildings. However, we would have concerns if other larger-scale development proposals were to be exempted from safeguarding at a subsequent stage.</p> <p>The Coal Authority also has some concerns regarding the final criterion in Policy Direction 4, which proposes to exempt development already allocated in a statutory plan from safeguarding requirements. Whilst this will be appropriate in some cases, it should be noted that such sites may have been allocated for some time and the allocation process may not, therefore, have taken into account safeguarding principles. For this reason, it is considered that the policy wording should be amended to read:</p> <p>“vi. Demonstrating that the development constitutes an ‘exempt’ development, namely</p> <p>householder applications; development already allocated in a statutory plan where the site</p> <p>allocation process took into account safeguarding principles; infilling in existing built up areas.”</p> <p>On a more fundamental level, and as set out in our previous submissions, The Coal Authority</p>	

## 5 Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	<p>maintains that the prior extraction of coal can be undertaken even at a small-scale within urban areas. Whilst the Local Planning Authorities' need to achieve a proportionate and pragmatic approach to mineral safeguarding in urban areas is appreciated, The Coal Authority maintains that the selection of a 5ha threshold for implementing the safeguarding policy within urban areas appears to be arbitrary and, in the face of the information previously supplied by The Coal Authority, not evidence led. The Coal Authority therefore seeks removal of this threshold, to be replaced by a requirement for developers to prove to the Local Planning Authority as part of the planning application that prior extraction of coal is not viable on smaller urban sites.</p> <p>Reason –</p> <p>To fully comply with the guidance and good practice advice on mineral safeguarding</p>	
The Emerson Group	<p><b>Map 5</b></p> <p>The scale for the maps makes it difficult to establish where the boundary of the area is. The areas on the map for the MSA should exclude the Horwich Loco Works designation in the Bolton Core</p>	<p>Digital data used to inform the maps is available to view by appointment at GMGU's offices during normal working hours.</p>

## Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	<p>Strategy. If necessary it should be identified as an Area of Search to conform with the Core Strategy objectives of bringing forward Horwich Loco Works for housing and employment development.</p> <p>In the area of Gibb Farm, Horwich, the area of mineral safeguarding should exclude the Horwich Loco Works proposals as a whole as it could impact on its deliverability. Though it is recognised and supported in the text that allocations in development plans are exempt developments.</p> <p><b>Map 5</b></p> <p>This map is not referred to in the text near Policy Direction 4 and it should be.</p>	<p>MPS1 requires Mineral Planning Authorities to identify minerals of potential economic importance for safeguarding from non-minerals development which could otherwise result in its sterilisation. This is particularly important in Greater Manchester the area is not rich in minerals and is therefore increasingly reliant on imports to support development.</p> <p>The geological information used to inform the MSA allocations is based on the geological maps and borehole data maintained by the British Geological Society. Whilst this information is the most up to date available, it is possible that additional borehole information/geological site surveys could provide better information on the quality and quantity of minerals and this could be used to better define the boundary of the Mineral Safeguarding Area. Therefore we would be pleased to receive such data on the geology at Horwich Loco Works.</p> <p>A range of additional exempt developments and locations have been suggested through responses received to question 15. It is</p>

## 5 Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
The Emerson Group	<p>Do not agree with preferred approach to MSA. It does not reflect the views of the consultation outcomes report responses. The areas are too broad without firm knowledge that a mineral is viably workable there.</p> <p>It will sterilise development coming forward, particularly the coal, sandstone, sand/gravel and peat MSA's.</p> <p>The developments that should be exempt in paragraph 5.41 should include developments already allocated in a statutory plan at the time of the application being made (to tally up with the note vi in PD4). Criteria iv in PD4 is supported as it recognises the importance of development other than minerals (housing and employment).</p> <p>Policy Direction 4 should add criteria:-</p>	<p>anticipated that additional work on the policy wording and dialogue with relevant stakeholders in seeking to retain a proportionate approach to facilitating development and avoiding sterilisation of minerals will be undertaken in preparing the Publication DPD.</p> <p>Reference to the MSA maps will be updated within the policy text at the next drafting of the Minerals Plan.</p> <p>MSAs are broad areas of known minerals resources and the intention of designating an MSA is to protect the resource from non-minerals development. However, there is no presumption that the resources defined in the MSA will be worked and they do not preclude other forms of development.</p> <p>Noted. These will be considered in reviewing the Plan and seeking to retain a proportionate approach to facilitating development and avoiding sterilisation of minerals will be undertaken in preparing the Publication DPD.</p>

## Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	<p>1. Where it is not viable to provide the development and work the minerals;</p> <p>2. Where it would prejudice allocated proposed developments coming forward in a required timescale;</p> <p>3. Where the mineral works would make a development planning permission/allocation unviable. The policy should also state that not all those criteria need to be met.</p> <p>The list of exempt development in PD4 should be extended to say it is not exhaustive is not enough. It should go further and include some of the designations listed in Category 1 and 2 of the Area of Search section in paragraph 4.14.</p> <p>In relation to peat and the Red Moss area in Bolton, the national agenda has moved away from peat extraction, designating such a large area for safeguarding is unnecessary. The area at the Red Moss should not be designated as a large part is an SSSI and is dependent on water flows etc remaining unchanged. This peat designation also overlaps on the Horwich Loco Works proposal and could impact on its deliverability. It is welcomed in PD4 that allocations in development plans are recognised as being exempt development.</p>	<p>The purpose of identifying a Mineral Safeguarding Area is to notify the presence of mineral resources and make specific local planning policies applicable. It does not aim to safeguard minerals for extraction purposes.</p> <p>Within PD4, the exclusion of 'development already allocated within a statutory development plan' is not consistent with national guidance and will be removed from the final drafting of the Policy at the next stage of the Plan.</p>
Peak District National Park	The Authority objects to Proposed Sandstone Safeguarding areas being identified within the boundaries of the Peak District National Park Area, as shown on Map 6 Proposed Mineral Safeguarding Area	Agreed, the inclusion of the MSA within the Peak District National Park was included to illustrate the extent of the resources, this will not appear in the final Plan.

## 5 Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	for Sandstone, and with reference to Policy Direction 4 Mineral Safeguarding Areas. It is the Peak District National Park Authority responsibility to identify areas of search within its own jurisdictional boundaries	In the development of the Publication DPD communication with neighbouring authorities will be undertaken to encourage cross boundary linkages on mineral issues including the important issue of MSA allocations.
Cheshire West and Chester	The approach to setting out MSA should not exclude the urban areas and specific areas of land. They can be interpreted as preferred areas or areas of search. The purpose of an MSA is broad brush approach to protecting any existing resource. The policy direction should be robust enough to allow appropriate developments in areas where a resource is identified but is no longer viable for whatever reason i.e. already built upon, not accessible etc. MSAs should not be seen as another hurdle for developers rather than a check against the unnecessary sterilisation of mineral resources.	Noted,
The National Trust	No specific observations to make.	Noted.
Salford City Council	The city council is concerned that the approach to Mineral Safeguarding Areas set out in the Preferred Approach may be unnecessarily onerous to put into practice. Further consideration should be given to this issue before publication stage in order to ensure that this is a proportionate and workable approach. Unless there is a realistic prospect of prior extraction taking place, this could pose an unnecessary constraint on regeneration and development, serving to	We will consider these comments in detail in seeking to retain a proportionate approach to facilitating development and avoiding sterilisation of minerals.

## Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
Peel	<p>increase uncertainty for some of our most vulnerable communities without making a significant contribution to the plan's aim to deliver a steady and sustainable supply of minerals.</p> <p>Peel does not agree with the Preferred Approach to MSAs due to the reasons set out below in detail. Generally, the policy as specified within this document seems to go beyond and set more stringent requirements than those set out in paragraph 13 of MPS1 and the British Geological Survey guidance document 'A guide to mineral safeguarding in England'. Within this guide, it is recognised that 'MSAs simply provide an alert to the fact that minerals may be sterilised by the proposed development and that this should be taken into account by the planning process'; this purpose needs acknowledging within the Minerals Plan.</p> <p>The policy states that planning permission will be granted for any form of development within a Minerals Safeguarding Area where the applicant demonstrates to the satisfaction of the Local Planning Authority that it is compatible with safeguarding the mineral. However, Peel would suggest that some forms of development may sterilise the safeguarded mineral, yet this would not necessarily be contradictory to the approach to MSA's as detailed in MPS1. As such, Peel suggests that the wording of the policy be amended to state "Planning permission will be granted for any form of development within a Mineral Safeguarding Area where the applicant demonstrates to the reasonable satisfaction of the Local Planning Authority that proven resources will not be needlessly sterilised."</p>	<p>The purpose of defining an MSA is to ensure that minerals are not needlessly sterilised, and this will not preclude other forms of development coming forward. The blanket exclusion of 'major regeneration schemes' is therefore not appropriate in policy terms, instead all comments pertaining to question 15 will be considered in detail in seeking to retain a proportionate approach to facilitating development and avoiding sterilisation of minerals.</p>

## 5 Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	<p>It should also be noted that it is not clear within the policy whether all the requirements at points 1 to 6 need to be met for planning permission to be granted. It is suggested that the policy should include the following phrase prior to the list of requirements; “at least one of the following” .</p> <p>We would also make comments on the specific requirements of the policy as follows;</p> <p>I. It is not clear what it meant by the phrase “demonstrating that the proposal meets the requirements of the Minerals Plan” and this should be further clarified within the policy and / or related text.</p> <p>II. Along with demonstrating that the mineral is no longer of any value or potential value, this point should be drafted as follows; “the mineral is no longer of any value or potential value and / or extraction is not viable or feasible” .</p> <p>V. This point refers to demonstrating ‘an overriding need’ for the incompatible development; however, it is unclear how this ‘overriding need’ is to be measured and this should be clarified.</p> <p>Peel would also suggest that the policy seems to go further than the ‘justification’ for the policy. For example, paragraph 5.40 refers to encouraging extraction where practicable, something which is not reflected in the policy itself. There also appears to be inconsistencies between what is considered ‘exempt development’ at point VI of the policy and what is detailed in paragraph 5.41 of the justification. It</p>	

## Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	<p>would be preferable if the two lists of exempt development were consistent. The inclusion of such a short list also means that most forms of new development will be required to comply with the policy. Peel asks that 'major regeneration projects' also be included within the list.</p> <p>Within paragraph 5.42 there should also be reference to the 'feasibility' and 'viability' of extraction within the list of matters the LPA will take into account when considering whether prior extraction is suitable. An additional paragraph should also be included to indicate that the LPA should be reasonable in its approach to assessing the suitability of non-minerals development and that in some instances the overriding need for the development may outweigh the need for the mineral.</p>	
Natural England	<p>We have no comment to make with regards to the Preferred Approach to Mineral Safeguarding Areas. We support the confirmation within paragraph 5.42 that the environmental impacts will be considered when assessing the suitability of prior extraction.</p>	<p>Noted</p>
Cheshire East	<p>It is recognised that mineral resources lie across authority boundaries. Map 9 indicating the proposed mineral safeguarding area for coal identifies areas outside of the Greater Manchester boundary (including Cheshire East) however this does not appear to have been done for other mineral types. Cheshire East as neighbouring Minerals Planning Authority is responsible for mineral safeguarding policies within its</p>	<p>Noted. In the development of the Publication DPD communication with neighbouring authorities will be undertaken to encourage cross boundary linkages on mineral issues including the important issue of MSA allocations.</p>

## 5 Defining Mineral Safeguarding Areas

Respondent	Representation	Commentary
	<p>boundaries and will be preparing its own policies concerning minerals safeguarding in due course. As such it will take into account the approach taken by Greater Manchester.</p>	

# Development Management

## Development Management

### 6 Development Management

**6.1** This section sets out the questions made available for public comment in relation to development management policies, a summary of the responses received and recommendations for dealing with them.

#### Question 16

**6.2** Do you agree with the Preferred Approach to unallocated sites set out in Policy Direction 6? Is there anything else that should be included?

**Table 31**

Type of response	No. Of Responses	Respondents
Support	3	Warrington BC, Coal Authority, Peel
Support with conditions	3	Natural England, National Trust, English Heritage
Other	2	Mineral Products Association, Emerson Group

**6.3** The comments relating to unallocated sites are set out below:

**Table 32**

Respondent	Representation	Commentary
English Heritage	Policy Direction 6 refers to criteria in relation to the historic environment and built heritage. It will be important for the purposes of clarity and interpretation that these criteria are clearly explained in the Minerals Plan and reference could be made to PPS5.	Noted. Additional reference to built heritage will be included within the Plan insofar as it is reasonable and relevant to the aim and objectives of the Plan.

## Development Management

Respondent	Representation	Commentary
Warrington BC	Support for preferred approach to unallocated sites	Noted
Mineral Products Association	Support for the preferred approach to unallocated sites	Noted
The Coal Authority	Support for the preferred approach to unallocated sites	Noted
Emerson Group	No comment	Noted
National Trust	Agreed (however, it is unclear why the bullet points at para 6.9 do not include impact on heritage/historic environment).	The comments will be used to inform any update to the list of criteria included within Policy Direction 6, with a final policy included within the Publication DPD.
Natural England	We generally support the list of features to be considered at unallocated sites; however we would suggest a number of minor amendments. Although the list is comprehensive, it could be structured in a more logical manner, for example amenity, noise and vibration and odours are listed separately at different points in the list, but this could be re-worded as amenity e.g. noise and vibration and odours so as to ensure that all potential amenity issues are covered. Although the list includes biological and geological conservation as well as a specific reference to birds, we would welcome the inclusion of the term biodiversity. Potential land use conflicts should make specific reference to the potential conflicts between developments and existing public open spaces. The list should include reference to soils and good quality agricultural land. As stated in our letter	The comments will be used to inform any update to the list of criteria included within Policy Direction 6, with a final policy included within the Publication DPD.

## 6 Development Management

Respondent	Representation	Commentary
Peel	<p>dated 24th August 2010 responding to the consultation on Minerals Safeguarding Areas, the Minerals Development Plan Document should give appropriate weight to the roles performed by the areas soils. The amendments to the list within Policy Direction 4 that we have suggested should also be reflected in the list of criteria for allocated sites within Paragraph 6.6.</p> <p>Peel is in agreement with the preferred approach to unallocated sites and considers that it offers sufficient flexibility to enable such sites to come forward during the plan period. We do not consider that any further criteria should be included in the policy and welcome the reference to aviation safety.</p>	Noted.

### Question 17

**6.4** Do you agree with the Preferred Approach to the transport of minerals set out in Policy Direction 7? Is there anything else that should be included?

**Table 33**

Type of response	No. Of Responses	Respondents
Support	3	National Trust, Warrington BC, Ramblers Association
Support with conditions	2	Natural England, Peel
Object	1	Emerson Group
Other	1	Mineral Products Association

## Development Management

**6.5** The comments relating to the sustainable transport of minerals are set out below:

**Table 34**

Respondent	Representation	Commentary
Ramblers Association	We agree with the Preferred Approach to the transport of minerals. When road transportation is used, agreements with applicants should include avoidance of dust from lorries and avoidance of spillage of debris on the roads used.	Support for the Policy Direction 7 noted. Planning permissions for mineral developments have conditions attached which set the requirements associated with site operation, this extends to requirements for sheeting of lorries and access road maintenance.
Warrington BC	Support for preferred approach to transport of minerals.	Noted.
Mineral Products Association	Agreed	Noted.
Natural England	We welcome the inclusion of this Policy Direction, and the criteria included such as the need to ensure no adverse impact from minerals transport on the environment or local residents. We would like to see more specific information included within the Policy Direction with regards to the nature and location of the sustainable transport modes that are likely to be most viable.	Noted. Detailed consideration of transport modes for transport of minerals as set out within this response is outside the scope of the Minerals Plan. It likely that information will come forward on a site by site basis and therefore the
National Trust	Support for preferred approach to transport of minerals.	Noted
Emerson Group	No comment	Noted
Peel	Peel agrees with the preferred approach to transport of minerals as set out in Policy Direction 7. It is important to try and encourage	Noted and agreed.

## Development Management

Respondent	Representation	Commentary
	the sustainable transportation of minerals wherever possible and this is included within the preferred approach. However, it also acknowledges that the transportation of minerals by sustainable transport means is often difficult and therefore it is inevitable that transportation is likely to take place via road. Nevertheless, applications for new or extended mineral operations should be assessed for their potential to utilise sustainable transport means, such as water transport.	

### Question 18

**6.6** Do you agree with the Preferred Approach to the reworking of colliery spoil tips set out in Policy Direction 8? Is there anything else that should be included?

### Table 35

Type of response	No. Of Responses	Respondents
Support	3	National Trust, Warrington BC, Rambler Association
Support with conditions	1	Natural England
Object	0	
Other	2	Emerson Group, Lancashire Wildlife Trust

**6.7** The comments relating to the reworking of colliery spoil tips are set out below:

## Development Management

**Table 36**

Respondent	Representation	Commentary
Ramblers Association	We agree with to the Preferred Approach to the reworking of colliery spoil tips set out in Policy Direction 8.	Noted.
Lancashire Wildlife Trust	The Trust welcomes the use of ecological surveys on colliery spoil sites. The analysis of the survey data should include the makeup of the plant, bird and invertebrate communities and the particular importance of the occurring habitat type. Colliery spoil often tends towards supporting acid grassland and sometimes heathland habitats. Restoration proposals should be aimed at reproducing these habitat types. Within the sustainability appraisal there is a reference to development only being permitted, if the spoil area has not become an established, attractive landscape feature. The Trust would caution that the attractiveness of the landscape feature sometimes has little correlation with its biodiversity interest and that the biodiversity interest would need to be assessed objectively.	Noted. Key to this response is the fact that established habitats may not reflect a high biodiversity interest. This concern will be used to develop the policy for the Publication DPD, taking account of these comments.
Warrington BC	Support for preferred approach to the reworking of colliery spoil.	Noted
Mineral Products Association	No comments	Noted
The Emerson Group	No comment	Noted
National Trust	No comment	Noted

## 6 Development Management

Respondent	Representation	Commentary
Natural England	We support the criteria within the Policy Direction which aim to conserve landscape and wildlife interests at colliery spoil tips and the recognition that such sites can harbour biodiversity interests. However, we have concerns about the use of the term unacceptable environmental impact as this appears to indicate that some level of adverse environmental impact will be considered acceptable. We would like to see the wording of point ii amended to read: 'any adverse environmental impact will be appropriately mitigated'	Noted. Comments received will be considered in detail when developing the Publication DPD.

### Question 19

**6.8** Do you agree with the Preferred Approach to protecting Minerals Plan allocations and existing minerals infrastructure as set out in Policy Direction 9? (Please give details)

**Table 37**

Type of response	No. Of Responses	Respondents
Support	2	National Trust, Warrington BC,
Support with condition	2	Peel, Cemex
Object	0	
Other	3	Mineral Products Association, Emerson Group, Natural England

**6.9** The comments relating to protecting Minerals Plan allocations and existing minerals infrastructure are set out below:

## Development Management

**Table 38**

Respondent	Representation	Commentary
Warrington BC	Support for preferred approach to protecting Minerals Plan allocations and existing minerals infrastructure.	Noted
Mineral Products Association	Mineral Products Association agree with the wording as far as it goes, but as explained elsewhere, we believe that all potential rail depots and wharves should be identified and safeguarded for future use.	Noted.
The Emerson Group	No comment	Noted
Natural England	We have no comment to make with regards to the Policy Approach to Protecting Minerals Plan Allocations and Existing Minerals Infrastructure.	Noted
Cemex	The Company is supportive of the aim of the policy to safeguard existing mineral infrastructure from inappropriate development but feels that the test of "unacceptable impact" established by the policy is not the correct one. Any proposed development in the vicinity of existing mineral infrastructure should be subject to a test to determine if the presence of that development would materially impact upon the continued lawful undertaking of the business to which the minerals infrastructure relates. It should also be clear from the supporting text that the extent of the 'vicinity' will be flexible, relating to both the nature of the minerals infrastructure and any non-mineral development proposed. This is because some types of development will be more sensitive to being located in the vicinity of minerals infrastructure than others, and different infrastructure will be more or less sensitive to different issues.	Noted. Comments received will be considered in detail when developing the Publication DPD.

## 6 Development Management

Respondent	Representation	Commentary
National Trust	Support for preferred approach to protecting Minerals Plan allocations and existing minerals infrastructure.	Noted
Peel	Peel agrees with Policy Direction 9 which protects minerals plan allocations and existing minerals infrastructure. However, it is not clear whether this policy direction includes safeguarding existing minerals operations, as shown on map 1 and described on page 15 of the DPD.	Noted. Clarity regarding what is included within this policy will be provided in the Publication DPD.

### Question 20

**6.10** Do you agree with the Preferred Approach to restoration and aftercare set out in Policy Direction 10? Is there anything else that should be included?

### Table 39

Type of response	No. Of Responses	Respondents
Support	2	Warrington BC, Ramblers Association
Support with conditions	4	Natural England, National Trust, English Heritage, Coal Authority
Object		
Other	4	Mineral Products Association, The Emerson Group, Environment Agency, Lancashire Wildlife Trust.

**6.11** The comments relating to restoration and aftercare are set out below:

## Development Management

**Table 40**

Respondent	Representation	Commentary
Ramblers Association	We agree with the Preferred Approach to restoration and aftercare set out in Policy Direction 10. We would like to see increased public accessibility (as mentioned in paragraph 6.35) included in the body of the Policy.	Noted. Comments received will be considered in detail when developing the Publication DPD. However, it should be noted that policies must be read in the context of the whole Plan including text included as justification outside of main policy wording.
English Heritage	Policy Direction 10 covers restoration and aftercare and we welcome the provision for the enhancement of the setting of heritage assets. In addition there may be occasions where there is some historic interest associated with the past mineral extraction activities and this could be incorporated into the restoration of the site and help with its later interpretation.	Noted. Comments received will be considered in detail when developing the Publication DPD.
Warrington BC	Support for preferred approach to restoration and aftercare.	Noted
Lancashire Wildlife Trust	The Trust welcomes the inclusion of phased restoration schemes and/or the retention of a restoration bond. As the Trust has outlined in Question 5, Section 106 agreements and conditions are not necessarily being enforced. The detailing of final restoration schemes prior to development will hopefully avoid the situation at Chat Moss, where peat extraction was conditioned to an amenity afteruse with restoration to bog being central to the restoration works. The term amenity was used as Mineral Planning Guidance 13 did not have a biodiversity option. This lack of detail in the	Noted

## 6 Development Management

Respondent	Representation	Commentary
Mineral Products Association	<p>MPG13 is now being used to argue that the current restoration proposals are to amenity and that to secure restoration to bog as an afteruse then further peat extraction would have to be granted. This is clearly contrary to the ethos of MPG13 and the Greater Manchester Minerals Plan and is the basis for the Trusts objection to the inclusion of the text within the peat section inferring that approval of further development proposals on degraded areas of peat presents an opportunity to fund additional restoration of lowland raised bog.</p> <p>We cannot agree that criterion iv of the policy because it is contrary to national policy (MPG7 paras 86 and 94).</p> <p>Our members take part in a £1Million Restoration Guarantee Fund run by the Association and make a substantial contribution to nature conservation, creating varied and often rare habitats which often have a greater value to biodiversity than the habitats removed by quarrying.</p> <p>The work of the Minerals and Nature Conservation Forum directly contributes to the improved understanding of this issue . Surveys indicate that MPA members operations were associated with 219 sites with statutory designations such as SSSIs, NNRs, SPAs or RAMSARs. The aggregates industry is also one of the major tree planters in the UK.</p> <p>Para 86 of MPG7 sets out that planning conditions should be able to secure restoration, aftercare and after-use of minerals sites. Policies in development plans should not state that a local authority will require or seek bonds other financial guarantees to underpin planning conditions.</p>	Noted. Comments recieved will be considered in detail when developing the Publication DPD.

## Development Management

Respondent	Representation	Commentary
	<p>Paragraph 94 sets out the exceptional circumstances that might require some form of guarantee but goes on to say, "...However, it is the Government's view that where an operator is contributing to an established mutual funding scheme, such as the SAGA Restoration Guarantee Fund, it should not be necessary for an MPA to seek a guarantee against possible financial failure, even in such exceptional circumstances."</p> <p>It would appear therefore, that if there is any doubt that reclamation can be achieved either for technical or financial reasons, the proper course is to refuse permission, not to seek guarantees.</p> <p>In the case of longer term funding, the most sustainable course of action is for an element of income generation to be included in nature conservation restoration (say, for grazing or hay production) whereas most other afteruses should be self sustaining. However, in cases where this is unrealistic long term funding can take many legitimate forms.</p> <p>We therefore see the proposed requirement for a bond as unduly inflexible and contrary to government policy. In addition, the text makes no reference to the responsibility of the landowner who should properly take on the burden of long term support. In this respect, paragraph 6.37 is misleading and should not be included in the text of the plan. We therefore suggest that criterion iv is amended as follows (additions in bold; deletions in strikethrough), iv. Information on the requirement for phased restoration <del>and/or the supply of a restoration bond</del> prior to the granting of planning permission;</p> <p>All other criteria in this policy are acceptable.</p>	

## Development Management

Respondent	Representation	Commentary
The Coal Authority	<p>The Coal Authority welcomes and supports the proposed Policy Direction, which seeks to secure 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 and for the reasons set out above, it is considered that the Minerals Plan should make reference to the existing legacy that is present due to former coal mining activities within Greater Manchester, and the potential land stability and public safety issues that this can lead to. This will help to draw attention to the need for non-mineral developments within the Greater Manchester area to take account of and address these issues in line with the guidance in PPG14 (Development on Unstable Land).</p> <p>Reason –</p> <p>To comply with the guidance in PPG14 (Development on Unstable Land).</p>	<p>Noted. Comments received will be considered in detail when developing the Publication DPD.</p>
The Emerson Group	No comment	Noted
Environment Agency	<p>In regards to effective and appropriate restoration quarry sites, this can offer significant nature conservation, as well as agricultural and landscape ones, possibilities after extraction particularly when these sites adjoin existing wildlife sites; but frequently these opportunities are lost or not pursued. The after minerals website (<a href="http://www.afterminerals.com/index.aspx">http://www.afterminerals.com/index.aspx</a>) provides a useful information source in guiding sensitive restoration and aftercare, to ensure such opportunities are not lost in the borough.</p>	<p>Noted. Comments received will be considered in detail when developing the Publication DPD.</p>

## Development Management

Respondent	Representation	Commentary
Natural England	The wording of this policy could be amended to more positively recognise the potential biodiversity benefits that may be achieved through the appropriate restoration and aftercare of minerals workings. For example, bullet point at the end of the policy should include specific reference to biodiversity as the term 'local environment' is somewhat vague.	Noted. Comments received will be considered in detail when developing the Publication DPD.
National Trust	Generally agreed; but currently the Policy Approach drafting appears to be saying that permission will granted for any minerals development provided that there is an appropriate restoration/aftercare scheme; that is only one of the considerations, the other Policy Approaches will also need to be satisfied. Wording such as Mineral extraction schemes that comply with the other Policies in this Plan will also be required to demonstrate that they incorporate suitable restoration and aftercare proposals <i>prior to permission being granted</i> would be more appropriate.	Noted. Comments received will be considered in detail when developing the Publication DPD.

## Development Management

# Monitoring and Implementation

## 7 Monitoring and Implementation

### 7 Monitoring and Implementation

**7.1** A single comment was received, from the Environment Agency, in relation to the monitoring and implementation section of the Preferred Approach report.

#### **Environment Agency**

**7.2** Page 62, Bullet point 3: The Environment Agency has a regulatory role to protect and conserve water resources (both groundwater and surface water). This is mainly done by using direct regulatory control in the form of permits to control active abstraction of water; the deposit of wastes and discharges of effluent. At present the Agency provides advice to developers and other regulators in areas where it does not have direct control over certain exempt activities such as both active and passive dewatering. These two currently remain the direct responsibility of the Planning Authority under the planning permission.

#### **Response**

**7.3** Noted. The comments received will be used to amend the monitoring and implementation chapter of the Publication DPD.

# General Comments

## 8 General Comments

### 8 General Comments

#### Network Rail

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

#### Response

**8.2** Network Rail will be retained as a key consultee during the remaining stages of the Minerals Plan to ensure they are aware of the the final allocations and policies.

#### English Heritage

**8.3** The report identifies constraints and states that all designated heritage assets have been taken into account. Annex 2 of PPS5 Planning for the Historic Environment includes helpful definitions which could usefully be included in a footnote or glossary to the Minerals Plan. It is also important to consider the setting of heritage assets and PPS 5 policy HE10 addresses this matter and this should be accommodated in the Minerals Plan.

**8.4** The site profiles highlight a number of heritage assets close to the preferred areas for future minerals developments. The minerals plan should provide detail on how these heritage assets will be conserved and not harmed by the development.

#### Response

Consideration of these comments and how they can be effectively used to inform the development of the Publication DPD will be carried out in due course.

#### Natural England

**8.5** Natural England strongly support the joint working by the 10 Greater Manchester Authorities (paragraph 1.2) that enables a strategic approach to minerals development across the whole of Greater Manchester and the consideration of cross boundary issues.

**8.6** Natural England welcome the specific recognition in Paragraph 1.5 of the Government's objectives for sustainable development, prioritising environmental conservation and enhancement alongside other social and economic concerns. They particularly welcome the reference within the paragraph entitled 'Peat', which highlights early on in the Plan the issues that exist with regards to the environmental impacts of peat extraction and the need to have regard to this issue.

## General Comments

**8.7** Natural England have provided detailed comments in relation to the Sustainability Appraisal and Habitats Regulations Assessment reports prepared alongside the Preferred Approach document.

### Response

**8.8** These comments will be used to inform the development of the final versions of these reports and fed into the development of the Minerals Plan Publication.

### Mineral Products Association

#### *Paragraph 4.45 – Rail Depots and Wharves*

**8.9** We are disappointed that no sites have been identified for rail or water distribution of aggregates. Although no sites have come forward now, it does not mean that sites will not be needed in future. The potential supply of rail depots and wharves is limited and known with some precision, especially in a heavily urbanised area such as Greater Manchester. The plan should seek to identify all potential rail depots and wharf sites irrespective of current interest in them by the industry, and to safeguard them since the potential to increase the supply may be adversely affected by future alternative development proposals or changes to land use in the immediate vicinity.

### Response

**8.10** Policy Direction 9 Protecting Minerals Plan Allocations and Existing Minerals Infrastructure seeks to protect existing minerals infrastructure which includes wharfs and depots as it is recognised that these facilities are important to maintaining the supply of minerals in to Greater Manchester. Consultation with Network Rail has included discussion on railheads and this has been used to inform the development of the Minerals Plan.

### The Coal Authority

**8.11** Surface Coal Resources and Prior Extraction. As you will be aware, the Greater Manchester area contains substantial coal resources which are capable of extraction by surface mining operations. Information on the extent of these resources is available to Mineral Planning Authorities free of charge from the Coal Authority, and has been provided to the Greater Manchester Councils.

**8.12** The current Energy White Paper, published in May 2007, estimated that “by 2020 fossil fuels are expected to supply the great majority of UK energy needs and 14% of primary energy demand will be met by coal.”

**8.13** In March 2008, the Rt. Hon. John Hutton MP, Secretary of State for Business Enterprise and Regulatory Reform, stated that “...Fossil fuels will continue to play an important role in ensuring the flexibility of the electricity generation system as well. Electricity demand fluctuates continually, but the fluctuations can be very

## 8 General Comments

pronounced during winter, requiring rapid short term increases in production. Neither wind nor nuclear can fulfil that role. We therefore will continue to need this back up from fossil fuels, with coal a key source of that flexibility....”

**8.14** The UK Low Carbon Transition Plan White Paper, which builds on the 2007 White Paper and was published in July 2009 to set out the national strategy for climate and energy, suggests that by 2020 clean coal will contribute 22% to the overall energy mix. This is actually an increase on the level predicted in the 2007 Energy White Paper. The 2009 White Paper re-confirms that “coal and gas will remain important to ensure our electricity supply is reliable and secure as we move towards greater dependence on intermittent sources like wind...The UK needs to maintain security of supplies of fossil fuels, which will remain an essential input to our electricity supplies for many years to come. Around a third of this is supplied by the UK coal industry.”

**8.15** In February 2010, Lord Hunt reiterated the role for coal within the UK’s future energy mix and stated 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% [of the UK’s total electricity supply]. ... Coal has been fundamental to UK energy needs for more than two centuries, and will continue to be so. Providing that its carbon by-products can be managed. Fossil fuels are abundant and relatively cheap, are able to respond flexibly to variations in demand, and are likely to remain an important part of our energy supply for some time to come.”

**8.16** The Coal Authority is therefore 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](http://www.coalpro.co.uk/members.shtml).

**8.17** As the Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.

### Response

The comments raised and information supplied are gratefully received. Shallow coal has been identified as an area for which an MSA is required and this along with PD4 and PD9 should address the issues raised. In addition a further map identifying all coal resources in GM has also been developed to assist with future coal and coal related development.

*Coal Mining Legacy*

## General Comments

**8.18** As you will be aware, the Greater Manchester area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

**8.19** Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas. The Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.

**8.20** The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.

**8.21** Within the Greater Manchester area there are approximately 6,900 recorded mine entries. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure site allocations and other policies and programmes will not lead to future public safety hazards.

**8.22** Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

**8.23** As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

### Response

## 8 General Comments

The Minerals plan can only influence minerals developments. As mining legacy affects more than just minerals developments it is important that such information is also considered by the ten Greater Manchester Districts, as such this information will be forwarded to relevant officers.

### The Emerson Group

**8.24** Generally, the MSA's are still too widely drawn given the comments of objectors pursuing Option 4 in the consultation outcomes report.

**8.25** If the Horwich Loco Works goes through in the Bolton Core Strategy and becomes an allocated site, it should be clear that the MSA for sandstone, coal, sand/gravel and peat designations will not prevent development of the Loco Works in the desired timescales or deter investment in the project by ensuring it is clear in PD4 that allocated sites are exempt development.

### Response

**8.26** The allocation of a site in a Core Strategy does not mean that it has planning permission, therefore the MSA policy would be relevant to any proposals that did come forward for non-minerals development and a developer will need to consider whether prior extraction is practical. The MSA policy is not restricted to a particular district but covers all of Greater Manchester.

#### *Box 1, Page 6*

**8.27** It is welcomed in the consultations outcomes report that you recognise that the designation as Minerals Safeguarding Areas is simply to alert developers to the presence of minerals and the need to adequately consider extraction prior to other development. Emerson have focused on MSA's as a proposal for mineral development because that is how it will be seen by developers and investors when seeking permission for other uses on that land. A large amount of information and investigation will need to be carried out before a planning application for an alternative use to mineral extraction in these areas is submitted. That is both costly and time consuming and in many instances will be to no avail.

**8.28** This will have significant implications for economic development at a time when developers are struggling to achieve viable developments. It will deter investment. The areas should not be so widely drawn, as commented on by four of the six respondents on this issue, in the last stage of representations.

**8.29** The changes nationally away from the use of finite resources in the interests of sustainability should also be adequately reflected and surely the areas safeguarded in the past should be reduced to reflect this shift and reduced need.

**8.30** In the Areas of Search definition it should be reflected and added that there is no requirement to investigate any mineral deposit in an application for non mineral development on the sites. There is no presumption in those areas that a resource will be worked.

## General Comments

### Response

**8.31** MPS1 requires Mineral Planning Authorities to identify minerals of potential economic importance for safeguarding from non-minerals development which could otherwise result in its sterilisation. This is particularly important in Greater Manchester as we are not rich in minerals and therefore find ourselves increasingly reliant on imports to support development. Therefore, if a development comes forward on land which is known to have economical viable minerals, the policy will seek to ensure these are extracted prior to the non-minerals development. Any changes proposed to the MSA areas will be looked at as the publication DPD is developed and discussion will be undertaken with relevant authorities and organisations as necessary.

### Manchester Airport

**8.32** We are grateful for the inclusion of aviation safety, as one of the suggested pieces of information Local Planning Authorities should include in their check lists, for supporting material to be submitted as part of a planning application. However we feel in order for this to be effective, it is necessary to provide some context within the minerals plan as to why aviation safety should be a consideration in determining the afterlife of any mineral extraction site.

**8.33** Development Management policies contained in Local Planning Authority LDFs should ensure that the Airport is consulted on proposals with the potential to have an impact on aircraft safety. However, the specific issue surrounding the afterlife of mineral sites will not be contained in any planning policy unless it is contained within the minerals plan itself.

**8.34** 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 have been safeguarded and that it is neither the responsibility nor the proposal of the LPA.

**8.35** In accordance with Circular 1/2003, we strongly advise that you reconsider your decision not to include more content as to why the afterlife of a site may have an impact on aviation safety within the emerging Minerals Plan. While mineral extraction itself does not attract bird, the large voids created sometime fill up 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.

### Response

## 8 General Comments

**8.36** It is important to note that once adopted, the minerals plan will form part of each of the ten districts LDFs. As the LDFs have developed, GMGU have worked closely with officers to ensure that issues such as this which affect minerals developments are picked up. Having said this, in line with national policy, the Minerals Plan should not seek to duplicate policies developed elsewhere, therefore it is considered that the points raised will be picked up through Core Strategies and/or Development Management DPDs produced by the Greater Manchester Districts.

### Peel

**8.37** Box 1 – Mineral Safeguarding Areas definition (page 6), paragraph 5.5 (page 41), paragraph 5.12 (page 42). Notwithstanding the comments expressed above in relation to Policy Direction 4, Peel welcomes the recognition within the above paragraphs to there being no presumption that the resources defined in Mineral Safeguarding Areas will be worked, in line with MPS1 (paragraph 13).

**8.38** Sustainable transportation of minerals and Virtual Quarry (page 39). Peel welcomes the reference to the concept of the ‘virtual quarry’ and would like to see the concept being taken forward throughout the plan period. Opportunities to develop such a concept will be sought and there appears to be sufficient provision within the plan to support such an approach. Policy Direction 7 would appear to be the main policy against which such an approach could be tested.

**8.39** Peel supports the concept of sustainable transport means and welcomes reference to the Manchester Ship Canal for the sustainable transportation of minerals and would like to promote this use. However, this should only be sought where it can be feasibly achieved and should not pose a barrier to new forms of minerals development coming forward.

### Response

**8.40** Comments noted.

### Peel- Maps

**8.41** Unfortunately, the maps provided are at such a scale that it has proved difficult to determine the precise impact upon Peel’s landholdings and therefore we cannot provide site-specific comments on the plans provided. We continue to review the plans and reserve the right to comment in further detail in due course.

### Response

**8.42** GMGU are aware of the concerns Peel raised and have offered opportunities for Peel employees to come in a view digital versions of the maps at GMGU's offices. As the plan develops we will address the concerns raised and seek to present more user friendly maps in the Publication DPD.

### Steering Group Comments

## General Comments

**8.43** Following the close of the consultation period, the Minerals Plan Steering Group met on 7th December 2010. At the meeting, Oldham MBC's representative requested that Policy Direction 4 should specify that it relates to non-minerals development. They also requested that the list of criteria on page 51 of the Preferred Approach (Policy Direction 5) contains 'Landscape Character' as this is an important issue in Oldham.

### Response

**8.44** The next stage of the Minerals Plan will specify that Policy Direction 4 relates to non-minerals development and 'Landscape Character' will be added to the list of Criteria within Policy Direction 5.

## General Comments