

Hobson, Christopher

From: Admin [admin@coalpro.co.uk]

Sent: 12 April 2012 11:02

To: Hobson, Christopher

Subject: The Greater Manchester Minerals Plan Development Plan Document: EIP Hearing and National Planning Policy Framework

The Greater Manchester Minerals Plan Development Plan Document: EIP Hearing and National Planning Policy Framework

Dear Mr Hobson

I refer to your letter of 5 April 2012.

The main issue on the DPD raised by CoalPro, and discussed at the EIP on 23 February, relates to the extent of the mineral safeguarding area (MSA) for shallow coal resources in the DPD and CoalPro's view that this MSA should include urban areas underlain by shallow coal resources.

The NPPF reiterates existing policy on MSAs but does so in a way which is more succinct and which more clearly sets out the principles involved. Annex 2 also specifically includes a definition of a Mineral Safeguarding Area. It is CoalPro's view that this substantially strengthens the case for the inclusion of urban areas in the MSA for shallow coal.

Para 143, third bullet, requires MSAs to be defined so that known locations of specific minerals resources of local and national importance are not needlessly sterilised. Shallow coal is defined in Annex 2 as being a mineral of local and national importance. As shallow coal is known to be present in some urban areas in Greater Manchester, CoalPro is of the view that the MSA should include such areas. If it does not, the risk of needless sterilisation when urban redevelopment takes place will be significantly greater.

Para 143, fifth bullet, requires policies to be in place to *encourage* prior extraction. CoalPro is of the view that the exclusion of urban areas with shallow coal resources will *discourage* prior extraction when urban redevelopment takes place. The inclusion of separate prior extraction policies on their own will not be sufficient encouragement when urban redevelopment takes place if such areas are excluded from the MSA.

The definition of MSA in Annex 2 states that it should cover known deposits of minerals which are desired to be safeguarded from unnecessary sterilisation. If the MSA does not include shallow coal in urban areas, it can only be concluded that it is *not* desired that such resources be safeguarded. This cannot be right when set against para 143.

For the avoidance of doubt, CoalPro wishes to reiterate that there is no desire to prevent urban redevelopment because of the presence of shallow coal resources but that prior extraction should be considered as an option. That option can only be assured of being properly considered if the resources in question are within the designated MSA.

Regards

David Brewer
Director General

17/05/2012