

Issue No: 15

Issue: Surface Coal Search Areas

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Representations

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Issue 15	Surface Coal Search Areas	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 2 Environmental Action	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
E1 CoalPro E4 The Coal Authority E27 Scottish Resources Group E47 Ayrshire Joint Planning Group E48 North Ayrshire Council E63 Hillhead Community Council		
Provision of the development plan to which the issue relates:	Diagram 15 (page 37)	
Planning authority's summary of the representation(s):		
<p>E1 CoalPro, E4 The Coal Authority, E27 Scottish Resources Group, Proposed Plan should more explicit with regard to the status of the area east of Shotts as a Search Area and that Diagram 15 should have the appropriate symbology to reflect that status.</p> <p>E4 The Coal Authority The number of Search Areas within the Proposed Plan should be expanded to include Renfrewshire and East Dunbartonshire.</p> <p>E47 Ayrshire Joint Planning Group, E48 North Ayrshire Council Additional investment in transport infrastructure in Ayrshire, including rail, sea and road, required to cater for the potential flows between source (Glasgow and Clyde Valley area) and point of consumption (Hunterston) in terms of carbon capture and storage and a focus on the potential for a proposed 'clean' coal power station.</p> <p>E63 Hillhead Community Council Opposition to further surface coal extraction in the city-region and/or the need for the Proposed Plan to be stricter in its content on how such extraction is to be controlled.</p>		
Modifications sought by those submitting representations:		
<p>E1 CoalPro, E4 The Coal Authority, E27 Scottish Resources Group The area to the East of Shotts should be identified as a broad area of search for surface coal with appropriate symbology and notation, include the words 'Shotts Area' after 'Slamannan Plateau, added to Diagram 15.</p> <p>E4 The Coal Authority Areas of Search to be identified within East Dunbartonshire and Renfrewshire with appropriate symbology added to Diagram 15.</p>		

E47Ayrshire Joint Planning Group, E48 North Ayrshire Council

Strategy Support Measure 9 should include consideration of the need for additional transport investment (road, rail, port) and the impacts on the environment, communities and existing transport infrastructure likely to be affected by supplies from the proposed areas of search to the point of consumption particularly to Hunterston.

E63 Hillhead Community Council

The Strategic Development Plan gives carte blanche to extraction in the future, against which there would be no appeal the text (paragraphs 4.56 to 4.59) should be amended so that this issue is less permissive.

Summary of responses (including reasons) by planning authority:**E1 CoalPro, E27 Scottish Resources Group**

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the proposed modifications:

Area East of Shotts as a Search Area on Diagram 15

- Diagram 15 is intended to set a framework of broad and indicative Search Areas.
- It is for the relevant local authority, through the local development process, to refine and define these areas. North Lanarkshire Council, as the relevant authority and as a constituent member of the Glasgow and the Clyde Valley Strategic Development Plan Authority, has confirmed that as part of refinement process, that the area east of Shotts will be encompassed within the broad indicative area illustrated on Diagram 15.

E4 The Coal Authority

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications for the following reasons:

Additional Search Areas in East Dunbartonshire and Renfrewshire

- East Dunbartonshire and Renfrewshire are densely populated parts of the city-region. It is argued that any remaining shallow and surface coal deposits in these areas are unlikely to be economic and to a significant extent, will have been sterilised by development.
- there is therefore a potential for significant impact upon existing communities if any such deposits are sufficiently economic to justify extraction.
- relevant infrastructure for sustainably transporting any remaining deposits, if capable of being extracted, is not in place and would be difficult to provide, placing a heavy reliance upon the existing pressurised road network.
- Search Areas should therefore avoid densely populated areas of the city-region particularly as this may adversely impact on the quality of their environment and living environment.
- Defining Search Areas where there is already a known comprehensive spread of development constraints e.g. East Dunbartonshire and East Renfrewshire would not meet the clarity and transparency values of the Strategic and Local Development Plans nor in any way would assist the

promotion of sustainable economic growth or indeed the future of the industry itself.

- Search Areas should therefore be targeted at parts of the city-region where account has already been taken of the
 - sensitivity of critical buffer zones around existing communities;
 - access and relevant sustainable transport infrastructure;
 - sensitivity of environmental resources e.g. flood plains, habitats;
 - potential to restore previously despoiled land.
- in consequence the Lanarkshire sub-region, with significant extant resources in less densely populated areas, an established long-term programme of extraction since the 1980s and with already significant investment in necessary infrastructure, remains the strategic priority for the city-region and which can be maintained to support the UK, Scottish and city-region economies with little impact upon existing communities.

E47Ayrshire Joint Planning Group, E48 North Ayrshire Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority. reject the proposed modification for the following reasons

Transport and Infrastructure Improvements in Ayrshire associated with a Potential Power Station at Hunterston

- the Strategic Development Plan is a strategic document focused on Spatial Vision and a Spatial Development Strategy to 2035.
- the submission is predicated on the future development of a 'clean' coal-fired power station at Hunterston. That proposal is the subject of an on-going legal challenge and remains uncertain.
- there are existing markets in both Scotland and the UK which draw upon surface coal extracted in the city-region. Such coals are already transported by a mix of infrastructure, including sustainable modes and relevant infrastructure exists throughout the Lanarkshire sub-region to meet the demands of the broad Search Areas illustrated on Diagram 15.
- It is by no means certain that Hunterston, if developed, will source its coal from the city-region. That will be a decision for the market and the private operators within that market.
- the level of detailed planning and the precision sought in respect of transport infrastructure is a matter for the relevant local planning and transport authorities and should not be sought in a strategic level document.
- it is not the mandate of the Glasgow and the Clyde Valley Strategic Development Planning Authority to identify and promote infrastructure investment priorities in Ayrshire. That issue is a matter for the relevant Ayrshire Authority and as applicable, for the Scottish Government.

E63 Hillhead Community Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority reject the proposed modification as considers the Proposed Plan does not accord 'carte blanche' to future surface coal extraction. It establishes broad indicative

search areas which will be defined and refined by the relevant local development plan authorities. As part of any future coal extraction within such areas, there are relevant regulatory provisions to control such workings.

Reporter's conclusions:

Reporter's recommendations: