

**Leicestershire Minerals Development Framework
Preferred Options Additional Consultation**

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Relating to: Document 1 – Minerals Spatial Strategy

Para. 3.10

The transport issue also applies in relation to higher priced minerals where there is competition from imports. For example, research has shown that the carbon emissions from transporting coal from Russia, the UK's largest overseas supplier, amount to some 10% of the carbon emissions from burning it. Carbon emissions from the transport of coal produced in the UK amount only to some 0.5% of the carbon emissions from combustion.

Para. 4.84

It is not clear why this paragraph is included. It does not relate to minerals planning issues generally, nor coal in particular, but to regeneration strategy. If it is intended to imply that coal extraction operations might impede the regeneration strategy, this is a claim often made but never substantiated. On the contrary, coal extraction operations frequently assist the regeneration process by dealing with problems associated with brownfield sites and by resolving ground stability issues (see para 4.90). They also provide high paid jobs in relatively disadvantaged areas.

Para. 4.92

The market for coal in the UK is strong with coal burn in 2006 being at its highest level for a decade. Moreover, the international price of coal has increased dramatically so that the competitive position of indigenous producers has improved significantly. Whilst no coal operators other than UK Coal have put forward any sites, the commercial position is such that it cannot be taken for granted that other operators will not bring forward other sites in due course. With respect to UK Coal's Minorca site, it may be true that the company has not provided any information to suggest that the original reasons for refusal can be overcome, but it can be reasonably expected that they will do so should an application for permission to extract be made.

Para 4.93

The first sentence in this paragraph prejudices the issue in an unwarranted fashion. Surface coal mining practices have improved significantly in recent years and continue to do so. Whether a particular site is environmentally acceptable or not should be judged on its merits when an application is made with its accompanying environmental impact assessment. The pattern of settlement in the exposed coalfield is not "particular" to the County; on the contrary it is the norm in the UK, and particularly in England. The whole approach of the first part of the paragraph in fact conflicts directly with the County's preferred option of drawing up criteria-based policies. This option is an acceptable approach, but not when read in conjunction with the prejudicial statements made earlier in the paragraph.