



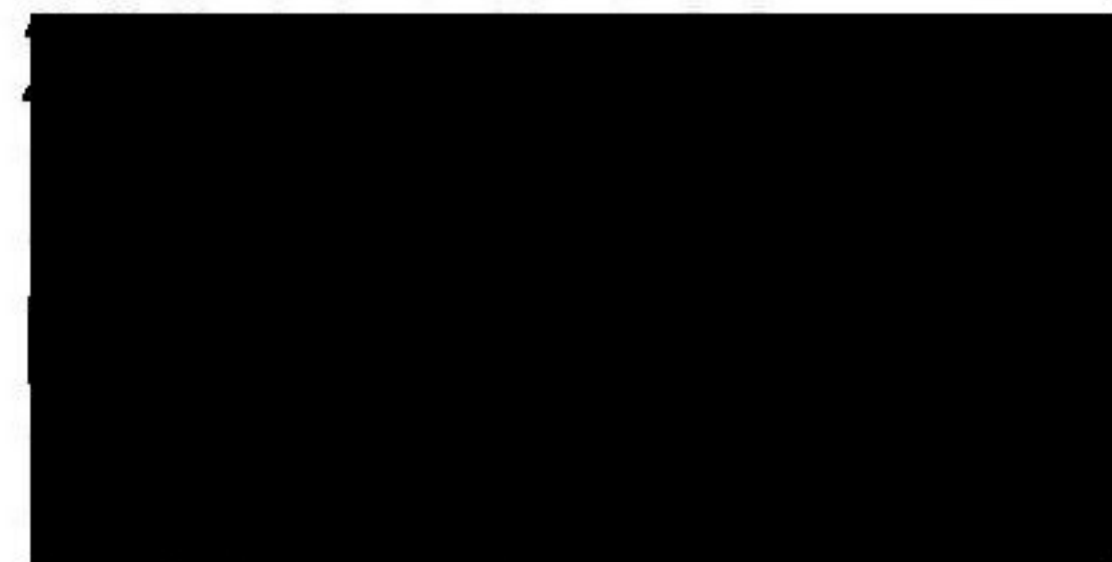
**The Coal  
Authority**

## **Bradford City Centre Area Action Plan (Publication Draft)**

**Consultation Deadline – 5 February 2016**

### Contact Details

Planning and Local Authority Liaison Department  
The Coal Authority



NG18 [REDACTED]

Planning Email: [REDACTED]  
Planning Enquiries: [REDACTED]

### Person Making Comments



Consultant Planning Advisor to The Coal Authority

### Date of Response

21 January 2015

### **Background on The Coal Authority**

The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales;
- the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales; and
- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales.

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.



## **Background on Coal Mining Issues in Bradford City Centre**

### **Surface Coal Resources, Development and Prior Extraction**

As you will be aware, the Bradford City Centre area contains coal resources which are capable of extraction by surface mining operations. These resources cover the entire City Centre.

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. 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.

### **Coal Mining Legacy**

As you will be aware, the City Centre area has been subjected to limited 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.

Within the AAP area there are no recorded mine entries, but one coal mining related hazards has been reported to The Coal Authority. Two areas of unrecorded probable shallow coal workings exist in thick coal outcrops as follows:

East (Little Germany) – Upper Park Gate and Scoresby Street  
South-East – Caledonia Street

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 always 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.

## **Specific Comments on The Bradford City Centre Area Action Plan (Publication Draft)**

The specific comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:

### **Representation No.1**

**Site/Policy/Paragraph/Proposal** – Little Germany – Sites CH1.5 & CH/1.6

**Comment** – Sites CH/1.5 (Burnett Street Car Park) and CH/1.6 (Olicana House, Chapel Street) in Little Germany are allocated for residential use. These sites are underlain by unrecorded probable shallow coal workings exist in thick coal outcrops as follows and it is suggested that this fact would be identified as a site specific issue in the schedule for each site on pages 38 and 39. Policy EN8 of the Core Strategy sets out an overall framework for addressing land instability.

**Reason** – To aid the recognition of constraints to potential developers

## **CONCLUSION**

The Coal Authority welcomes the opportunity to make these comments.  
Thank you for your attention.

**For and on behalf of**

  
**Chief Planner / Principal Manager**