

Statement on behalf of the **Mineral Products Association (MPA)**.

Independent Examination of the Herefordshire Minerals & Waste Local Plan.

Main Matter 6 - Safeguarding mineral resources, infrastructure and facilities

Issue: Whether the Plan is effective in safeguarding mineral resources, infrastructure and facilities.

Policy M2: Safeguarding of Minerals Resources and Associated Infrastructure from Sterilisation or Significant Adverse Effect

82 *Does the policy look to safeguard the known locations of all mineral resources of local and national importance in line with paragraph 210(c) of the NPPF?*

83 *Is the policy effective at safeguarding mineral resources together with the safeguarding of operational or permitted mineral extraction sites, along with the safeguarding of mineral infrastructure such as wharves? Would implementation be easier and effective if these matters were dealt with in two separate policies?*

Yes, and we suggested this in our response to the draft plan and suggested wording for such a condition. Such a condition also needs to include the *agent of change* principle.

84 *As the policy appears to be looking to safeguard existing and permitted mineral workings and potentially minerals infrastructure, how do plan users know which workings or infrastructure the policy applies to?*

85 *How does the policy specifically safeguard infrastructure such as the railheads?*

In our view it does not. See response to question 83

86 *Should the policy safeguard minerals infrastructure that is not located within Mineral Safeguarding Areas (MSAs) such as aggregates recycling and concrete manufacturing infrastructure?*

Yes, as this is required by national policy. Furthermore, the *agent of change* principle should be applied as further protection.

87 *Should the policy provide for buffer zones to be identified around specific sites or MSAs?*

Yes. Best practice is identified as including a buffer within the MSA to prevent proximal development impacting mineral resource. PPG references the BGS document *Mineral Safeguarding in England: good practice advice* on this topic.

88 *What is the justification for excluding urban areas plus a 500m buffer from the MSA?*

Urban areas should not be excluded, and cannot be justified. NPPF requires all known resources to be safeguarded. If there is regeneration within an urban area there might be an opportunity to exploit underlying mineral resources. There is no policy basis to exclude urban areas nor to place a buffer around urban areas. This debate was had at the Worcestershire EiP, and the Inspector determined that urban areas should not be excluded for the reasons stated above.

89 *Should the word ‘resource’ be substituted for ‘reserve’ in paragraph 6.1.12 and Figure 7?*

Yes, to be consistent with NPPF and to properly reflect the planning status of the mineral. Until all necessary permissions and permits are in place to allow mineral working the minerals are a resource.

90 *What is meant in criterion 1(d) by “the need for the non-mineral development is strategic”?*

M E North
Mineral Products Association
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