

Planning Inspectors (N Palmer & R Bust)  
By email, via Programme Officer

Directorate: Economy & Environment  
Team: Strategic Planning  
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Date: 30 January 2023

Dear Planning Inspectors,

**Ref: Examination of Herefordshire Minerals & Waste Local Plan (MWLP) – information relating to policy M2**

Further to your letter dated 20 December, the Council has collected countywide planning application information in support of the proposed list of exemptions to Policy M2 (at proposed para. 6.1.15). The data covers a three-year period: 2019 - 2021. This data and its analysis is contained within an Excel spreadsheet titled *Minerals Consultation 2019 - 2021\_24.01.23*, which is attached to this correspondence, for consideration.

When a specialist minerals planning development management officer is consulted on applications because sites are located within a Mineral Safeguarding Area (in the adopted Core Strategy), there are a number of considerations to be made when determining the need to prevent the sterilisation of the resource. However, it is the existing land use and the nature of the proposed development (in particular, its scale), which are often the first to be considered. A prime example of this is a householder application, where the site is part of an existing established residential curtilage and the development proposed is ancillary to the dwelling (e.g. a garage or extension). In this instance, existing development has already sterilized/compromised the mineral resource. This also applies to applications for extensions or additions to existing non-domestic buildings, where built form already exists and has already prejudiced the future extraction of the mineral resource beneath.

Looking at the proposed exemptions to Policy M2:

- Householder developments: over the three years (2019 - 2021), these comprise around 26% of the applications in Minerals Safeguarding Areas (MSAs) which were consulted upon with a specialist minerals development management officer. Of these, none resulted in requested for further information/conditions or were objected to.
- Alterations, extensions, changes of use of existing development (unless intensification), advertisement consent, tree works and prior notifications: out of the remainder 64 applications consulted on (which were not householder proposals), only two fell into any of these categories. Neither resulted in any requests for further information/conditions or were objected to.
- There are no other developments specified in the adopted Core Strategy as exempt.

If the exemptions set out in the proposed modifications to Policy M2 (and its preceding text) had been in place over the 2019 - 2021 period, it would have meant that the number of applications that a minerals officer was consulted on would have been reduced by between a quarter and a third. Of these, none would have had any negative consequences for minerals safeguarding. This

would also have been beneficial in terms of resource management within the development management section.

Please let me know if you require any additional information on this matter.

Yours faithfully,

Victoria Eaton  
(Senior Planning Officer)