

Minerals Local Plan 3rd Consultation Response from Bromsgrove District Council

1. Overview

- 1.1 Worcestershire County Council (WCC) is the Minerals Planning Authority in Worcestershire and is required to produce an up to date Minerals Local Plan. The emerging Minerals Local Plan (MLP) is at its third stage consultation and will replace the existing county of Hereford and Worcester Minerals Local Plan 1997 (MLP 1997).
- 1.2 Bromsgrove District Council (the Council) welcomes an updated Minerals Local Plan for the county, however, has some concerns with regards to the impact on existing and future development in the District.

2. Strategic Corridors

- 2.1 The Council finds the concept of strategic corridors an interesting and acceptable proposition. The strategic corridors are determined by the location of mineral resources and landscape character types and do not take into account constraints, such as heritage assets or existing built development or allocated sites.
- 2.2 The Council believes further emphasis of minerals development within the Green Belt should be further emphasised to ensure that it is understood that minerals extraction itself is not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt.

3. Development Management policies

- 3.1 The Council welcomes Policy MLP12: Adequate and Diverse Supply of Building Stone which allows for small local quarries to supply stone for the repair and maintenance of historic buildings. It encourages WCC to emphasise the importance of allowing small stone mining operations to open for relatively small amounts of local stone for use on historic buildings in the County.
- 3.2 Policy MLP23: Historic Environment explains that developments must have regard to the historic environment. However, the Council are concerned that the policy wording of part a) uses the phrase 'unacceptable harm'. This wording does not reflect the NPPF and the Council believes it should, as the NPPF wordings are established measures of the impact on heritage assets.

3.3 Policy MLP23 could also provide a distinction between nationally designated heritage assets and locally designated heritage assets as to the level of harm a particular heritage asset or its setting may sustain before being detrimental.

4. Mineral Safeguarding Areas and Mineral Resource Consultation Areas

4.1 The National Planning Policy Framework (NPPF) requires that Minerals Planning Authorities adopt appropriate policies as well as define MSAs and MRCAs. Paragraph 8.4 of the MLP explains the types of development which are exempt from Policies MLP27 and MLP28. The exempt development includes allocated sites in Local Plans and Neighbourhood Plans, minor development within the curtilage of existing buildings, demolition of buildings, replacement dwellings Certificates of Lawfulness and Listed Building consent among others.

- define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas;

National Planning Policy Framework (2012) Paragraph 143

4.2 The Council would suggest further exempt development from mineral safeguarding requirements to include rural exception sites and infill development of a small number of new dwellings to ensure these types of development remain viable.

4.3 The Council understands that the extents of the Mineral Safeguarding Areas (MSAs) are determined by the extent of mineral resources. The Mineral Resource Consultation Areas (MRCAs) are proposed to be determined through adding a 250m buffer from the boundary of the MSAs which alone is a crude tool, as it does not take into account other constraints and considerations.

4.4 There are a number of discrepancies which the Council will be happy to discuss with WCC to find a reasonable and mutually acceptable resolution. However, as drafted, the Council does not support the MSAs and MRCAs, especially with regards to some of the building stone MSAs and MRCAs and MRCAs for other types of minerals where they overlap with existing built development.

4.5 The Council would welcome further information as to how proposed future allocations may be located within MRCAs, and the steps and interactions WCC would wish to undertake to ensure that the MRCAs do not blight land for future development.