Herefordshire Council

Herefordshire Minerals & Waste Local Plan

Issues & Options Paper

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This document has been produced by:

hendeca

On behalf of:

Herefordshire Council

Contents

1. Introduction

Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. [1]

1.1 What is the Minerals and Waste Local Plan?

1.1.1 The development plan for Herefordshire is to be set out within a series of documents together referred to as the Local Plan. This is intended to guide development and change in the county up to 2031.

1.1.2 In October 2015, Herefordshire Council adopted the Core Strategy 2011-2031 (Core Strategy) the first document in the production of the Local Plan. The Core Strategy is an important element of the Local Plan because it shapes future development and sets the overall strategic framework for the county.

1.1.3 As shown in Figure 1.1 of the Core Strategy, the Minerals and Waste Local Plan (MWLP) will be another element of the Herefordshire Local Plan and will need to align with the principles and strategic direction set out in the Core Strategy. It will set out the strategic priorities for minerals and waste development in Herefordshire.

1.2 Why does Herefordshire need to plan for minerals and waste?

1.2.1 Minerals and waste management infrastructure are essential to support a modern economy.

1.2.2 Minerals gained from across the UK are required throughout the construction, manufacture, chemicals and energy industries; for example: sand and gravel are used to build houses; silica sand is used to make glass; and hydrocarbons are used to make energy. However, within Herefordshire minerals are primarily used in the construction industry, for example local building stone is used to repair historic buildings.

1.2.3 A network of waste management facilities is required to ensure that the appropriate infrastructure is in place to maximise its potential use as a resource and to avoid significant adverse impacts on the environment and communities. For example, there is a network of household waste recycling centres across Herefordshire, which enables householders to deposit items no longer required at a location where they can be recycled or disposed of safely.

1.2.4 Minerals and waste policy is currently contained in the Unitary Development Plan, adopted in 2007. Much of this Plan has been replaced by the Core Strategy. It is important to update the minerals and waste policies to ensure a modern policy framework is in place.

1.2.5 Whilst any minerals or waste development proposal would be subject to the Core Strategy, it does not specifically address these sectors. The Minerals and Waste Local Plan (MWLP) will provide the strategic direction and development management policies necessary to enable sustainable minerals and waste development.

[1] National Planning Policy Framework, paragraph 150

1.3 How is the Minerals and Waste Local Plan prepared?

1.3.1 The MWLP is prepared in the same way as the Core Strategy; Herefordshire Council: gathers relevant evidence; consults upon its ideas and policy proposals; develops the policy and supporting text; and subjects the resulting plan to Examination by the Planning Inspectorate.

1.3.2 This Issues and Options Report is the first stage of consultation on the MWLP. It has been prepared to:

- present the evidence gained so far and identify future evidence sources;
- identify the issues to be addressed within the Plan;
- set out the options that can be considered to address those issues;
- outline some principles for the MWLP; and
- consult on the matters discussed, seeking feedback from interested parties across the county.

1.4 How you can get involved

1.4.1 Throughout this Issues and Options Report there are markers for the questions that relate to the topic discussed in that section of the report.

1.4.2 You can respond to the questions in this consultation via the website at: www.herefordshire.gov.uk/mineralsandwaste during the consultation period from Monday 14 August to Friday 6 October 2017. Relevant documentation will also be available to view at information centres and libraries across the county.

1.4.3 **Please provide as much information as you can** in your answers and provide any other data or feedback that you think is important to the MWLP. We are at the start of the plan making process, and this is the best time to collate as much information as possible.

2. Preparation of the Minerals and Waste Local Plan

2.1 Introduction

2.1.1 This section focusses on key elements relevant to preparing the MWLP such as:

- considering how long it will last;
- the area that it will cover;
- the evidence to be used in preparing policy; and
- how Herefordshire should work with others.

2.2 The plan area

2.2.1 The plan area is the term given to the geographic area over which the MWLP has effect. In this case, it is the administrative area of Herefordshire.

2.2.2 The plan area is illustrated in Figure 2.1.

Figure 2.1 Herefordshire and surrounding counties

Reproduction of Figure 2.1, Herefordshire Core Strategy

2.2.3 Herefordshire Council has historically worked jointly with Worcestershire County Council on minerals and waste matters. However Worcestershire has adopted its own Waste Core Strategy and has already undertaken a significant amount of work to prepare its own Minerals Local Plan. Working with Worcestershire Council to prepare the MWLP is not a readily available option.

2.2.4 Similarly Shropshire and Gloucestershire County Councils have either adopted their own minerals and waste policy, or are significantly advanced in their preparation. In addition, there is no history of working jointly on plan preparation with these authorities.

2.2.5 Powys and Monmouthshire Councils also adjoin Herefordshire and consequently may be considered potential partners in plan making. However, Wales has a separate, and slightly different, planning system to England and this option is not pursued further.

2.2.6 In conclusion, there is not considered to be an alternative to the described plan area that would be reasonable, practicable or relevant in planning terms.

2.2.7 However, Herefordshire Council is interested in your view on this matter. If you feel strongly that an alternative plan area should be considered please respond to question 1.

The Plan area

Question 1. Do you agree that the administrative area of Herefordshire should be the plan area for the MWLP? If not, please state what you believe the plan area should be and your reasons for this.

2.2.8 To align with the Core Strategy, it is proposed that the MWLP will cover the period to 2031. This is the intention stated in the Core Strategy (at paragraph 1.10).

2.2.9 The National Planning Policy Framework[2] (NPPF) advises that local plans should be drawn up over an appropriate timescale, preferably a 15 year time horizon to take account of longer term needs.

2.2.10 The plan period proposed for the MWLP would be slightly shorter than 15 years from the expected date of adoption (2018); but at 13 years, this period is considered to be appropriate.

2.2.11 Not least, there are expected to be changes in technology for both minerals (for example new equipment that will enable greater recycling of construction waste to generate construction aggregates) and waste (for example new facilities that can re-use/recycle more waste products) such that the MWLP may benefit from a (slightly) early review.

2.2.12 Again, Herefordshire Council is interested in your view on this matter. If you feel strongly that an alternative plan period should be used, please respond to question 2.

[2] The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The Plan period

Question 2. Do you think that the MWLP should cover the period to 2031? If not, please state what period you consider to be more appropriate and why.

2.2.13 There may also be a need for a more regular review of the MWLP to refresh and update variable data such as known tonnages of waste arisings and to assess the implications for waste management of any new developments, such as significant housebuilding programmes or new employment developments. A five year period could be adopted for considering the necessity of a review of the MWLP, as for the Core Strategy.

Plan review period

Question 3. Do you think that the MWLP should be reviewed every five years to consider the need for an update to the MWLP? Please give your reasons.

2.3 Using the Core Strategy as key piece of the evidence base

2.3.1 All local plans should be developed from a robust and proportionate evidence base. Some new information is being gathered for the MWLP (see section 2.4). However, the Core Strategy is also considered to be a key evidence document, not least setting out context information in relation to the population, environment, industry, challenges and opportunities of the county.

2.3.2 In addition, the strategic policy of the Core Strategy must be delivered through the MWLP, so that constraints and opportunities identified in Core Strategy policy will also be relevant to minerals and waste development.

2.3.3 As the Core Strategy has been recently approved, the documents comprising its evidence base have been reviewed. Those considered to be particularly relevant to preparation of the MWLP are identified in Table 2.1.

2.3.4 It is further considered that many of these documents do not need to be updated; through making good use of documents that underpin the Core Strategy, the MWLP has access to an appropriate and proportionate evidence base.

Table 2.1 Core Strategy evidence base documents and how they relate to preparation of the Minerals and Waste Local Plan

Document Title	Reasoning why it is an evidence source directly relevant to the Minerals and Waste Local Plan	Update required?
Conservation and the historic environment		
Historic Townscape of Central Hereford 2010	For information in relation to suitable locations for development	No - the information is not considered to have changed materially since publication
Herefordshire Rapid Townscape Assessment 2010	For information in relation to suitable locations for development	No - the information is not considered to have changed materially since publication
West Midlands Farmsteads and Landscapes Project 2010	For information in relation to suitable locations for development	No - the information is not considered to have changed materially since publication
Employment and economy		
Herefordshire Employment Land Study 2012	For information on potentially suitable sites for development	No - the information is not considered to have changed materially since publication
Herefordshire Economic Vision 2016	For direction on Vision and Aims, to ensure that the Minerals and Waste Local Plan makes its full contribution to delivery of the Economic Vision	No – the information is not considered to have changed materially since publication
Environment		
Building Diversity into Herefordshire's Local Development Framework 2009	For information on biodiversity and key principles to be delivered through plan making	No - Herefordshire's Landscape and Biodiversity Team shall advise of any material changes since publication In addition, the Minerals and Waste Local Plan will be subjected to Habitats Regulation Assessment using latest biodiversity data
Green Infrastructure Strategy 2010	To enable the Minerals and Waste Local Plan to make a full contribution to delivering green infrastructure across the county	Any new Strategy published will be reviewed and incorporated into plan making as appropriate
Renewable Energy Study 2010	To enable the Minerals and Waste Local Plan to make a full contribution to delivering renewable energy at appropriate locations	Any new Strategy published will be reviewed and incorporated into plan making as appropriate

Document Title	Reasoning why it is an evidence source directly relevant to the Minerals and Waste Local Plan	Update required?
Urban Fringe Sensitivity Analysis 2010	For information in relation to suitable locations for development	No - the information is not considered to have changed materially since publication
Climate Change Background Paper 2009	To enable the Minerals and Waste Local Plan to make a full contribution to addressing climate change	No - the document contains useful local context National updates will be picked up through the review of national policy Local updates will be picked up through reference to the adopted Core Strategy
Herefordshire's Ecological Network Map Feb 2013	For information in relation to suitable locations for development	Potentially - Herefordshire's Landscape and Biodiversity Team shall advise of any material changes since publication
Malvern Hills AONB Management Plan 2009-2014	To ensure the Minerals and Waste Local Plan does not conflict with the AONB Management Plan	Yes - replaced by AONB Management Plan 2014-2019
Wye Valley AONB Management Plan 2009-2014	To ensure the Minerals and Waste Local Plan does not conflict with the AONB Management Plan	Yes - replaced by AONB Management Plan 2015-2020
Infrastructure		
Infrastructure Delivery Plan 2014	To ensure identified priorities for minerals and waste infrastructure are enabled through the Plan	No - the information is not considered to have changed materially since publication
Minerals and waste		
Minerals and Waste Study 2009	Reviewed as part of the longer term evidence base	Yes - updated by the minerals and waste needs assessments completed in 2017
Joint Municipal Waste Strategy for Herefordshire and Worcestershire 2004 - 2034 and Addendum 2016	To ensure identified priorities for municipal waste infrastructure are enabled through the Plan	No - the Strategy has been subjected to updates which shall be reviewed in preparing the MWLP Herefordshire's Waste Management Team shall advise of

Document Title	Reasoning why it is an evidence source directly relevant to the Minerals and Waste Local Plan	Update required?
		any other relevant updates
Transport		
Local Transport Plan 2013-2015	To ensure identified priorities for transport are enabled through the Plan	Yes - Local Transport Plan 2016-2031 is being prepared and will go to public consultation with the Hereford Area Plan in April 2017
Water		
Strategy Flood Risk Assessment 2009 and Water Cycle Study 2009	For information on water resources and flood risk, including the key principles to be delivered through plan making	No - Herefordshire's technical team shall advise of any material changes since publication In addition, the Minerals and Waste Local Plan will be subjected to Flood Risk Assessment using latest data
River Wye Nutrient Management Plan and Action Plan 2014	To ensure identified priorities for water quality are enabled through the Plan	No - the information is not considered to have changed materially since publication In addition the Environment Agency will be a statutory consultee of the emerging plan

2.3.5 The documents presented in Table 2.1 are considered to be important as they will provide evidence that is specifically relevant to preparation of the MWLP - for example the Employment Land Study is included because it provides information on sites beyond that provided in the Core Strategy text; this may be appropriate for minerals or waste development potential.

2.3.6 This exercise is not intended to suggest that the other Core Strategy evidence documents are not important, or may not be relevant reference sources for any future minerals or waste planning application. However, reference to them in preparing the MWLP is unlikely to provide any further information or direction than would be gained by following Core Strategy policy. As an example, the Hereford Streetscape Design Strategy 2009 will be a suitable reference document for any new proposal located within the street scene, but is not critical to minerals and waste policy preparation.

2.3.7 The Sustainable Communities Strategy is a document that is often part of the evidence base for minerals and/or waste policy. The Herefordshire Sustainable Community Strategy 2010-2011, the most recent such strategy that appears to be available, has been reviewed and does not appear to contain any information relevant to the MWLP that has not already been carried into the Core Strategy. Consequently it is not proposed to consider this document further, unless an up to date Sustainable Community Strategy is published.

2.3.8 Relying upon the Core Strategy and relevant documents within its evidence base is considered to be an appropriate, proportionate and reasonable approach to preparing the MWLP. Herefordshire Council is interested in your response to the identified documents set out above and any other data that you consider would be appropriate.

Using the Core Strategy as a key element of the evidence base

Question 4. Do you consider that the documents identified in Table 2.1 constitute the documents appropriate to consider in developing the MWLP?

Question 5. Are there any documents in Table 2.1 that should not be considered in their current form? Please give your reasons.

Question 6. Are there any other documents not listed in Table 2.1 that should be considered?

2.4 New evidence for the Minerals and Waste Local Plan

2.4.1 Herefordshire Council has both undertaken and commissioned several items of work so as to update key elements of the evidence base:

- In 2016, Herefordshire Council made a ‘call for sites’, asking minerals and waste site operators and landowners to put forward site proposals to consider for future minerals or waste development and to outline future aspirations for existing sites.
- British Geological Survey has been commissioned to prepare comprehensive mapping of the geology and mineral reserves across Herefordshire. This information became available in early 2017.
- Hendeca Ltd has been commissioned to prepare assessments of need for both mineral resources and waste management infrastructure. It is important to get this base information correct before preparing the policy.

2.4.2 The next stage of work will be to consider the information and conclusions set out in the evidence base overall (that of the Core Strategy and the new evidence gathered) and the responses received to this consultation in order to prepare draft policy of the Minerals and Waste Local Plan. The draft policy will be subject to a number of assessments including: flood risk assessment, sustainability appraisal; and habitats regulations assessment. This emerging policy document, including the supporting text, will be made available for further consultation prior to being finalised and submitted to the Planning Inspectorate for Examination.

2.4.3 Sections 4 and 5 of this report will pose questions relevant to the minerals and waste evidence base, including sites information. Herefordshire Council is interested to know if you consider any other information should be gained or documents reviewed in compiling the evidence base for the Minerals and Waste Local Plan.

Evidence base

Question 7. Are you aware of any other new information that should be considered as part of the evidence base for the MWLP that has not been identified elsewhere in this Issues and Options document?

2.5 Duty to Cooperate

2.5.1 Herefordshire Council, as with all plan making local planning authorities, has a legal duty to engage constructively to maximise the effectiveness of local plan preparation; this is known as the 'Duty to Cooperate'.

2.5.2 In regards to minerals resource, Herefordshire Council is a member of the West Midlands Aggregate Working Party (WMAWP). Other members are: Worcestershire County Council; Shropshire Council; Staffordshire County Council; Warwickshire County Council; and the West Midlands Conurbations.

2.5.3 In regard to waste management, Herefordshire Council is a member of the West Midlands Regional Technical Advisory Body (WMRTAB). Other members are: Worcestershire County Council; Shropshire Council; Staffordshire County Council; Warwickshire County Council; the West Midlands Conurbations; the Environment Agency; Veolia Waste Management Ltd; and Robert Hopkins Ltd.

2.5.4 These two groups provide an open forum for minerals and waste data and policy matters to be discussed, with information shared between members. In addition to attending the meetings, and providing updates and discussion matters for the Minerals and Waste Local Plan, Herefordshire Council will discuss specific matters as necessary with the relevant local authority or organisation.

2.5.5 Gloucestershire County Council lies adjacent to Herefordshire, on its southern boundary. It is not a member of either the WMAWP or the WMRTAB. Consequently, Herefordshire will seek to engage separately with Gloucestershire County Council to discuss and agree relevant matters of the Minerals and Waste Local Plan.

2.5.6 In addition, Herefordshire Council will be seeking to engage with the Marches Local Enterprise Partnership and regularly meet with adjacent local authorities in Wales, to discuss and agree relevant matters of the Minerals and Waste Local Plan. The relevant Welsh local authorities are Powys and Monmouthshire Councils.

The Duty to Cooperate

Question 8. Do you consider that Herefordshire Council has done enough to discharge its Duty to Cooperate with neighbouring authorities on minerals and waste matters?

Question 9. Are there any other neighbouring authorities, other bodies with which Herefordshire Council needs to cooperate, or any other methods of cooperation other than those described in section 2.5?

3. Principles of the Minerals and Waste Local Plan

3.1 Introduction

3.1.1 This section considers the principles of the Minerals and Waste Local Plan, including:

the vision for long term minerals and waste development;

objectives to be achieved through policy; and

the matters that should be addressed through policy.

3.2 Vision and Objectives

3.2.1 Having a vision and objectives gives direction to the policies of a plan, identifying the priorities that should be achieved through policy of the plan and focussing attention on how this should be achieved.

3.2.2 The vision and objectives will not stand alone; they should be complementary to those set out in the Core Strategy, providing a minerals and waste focus.

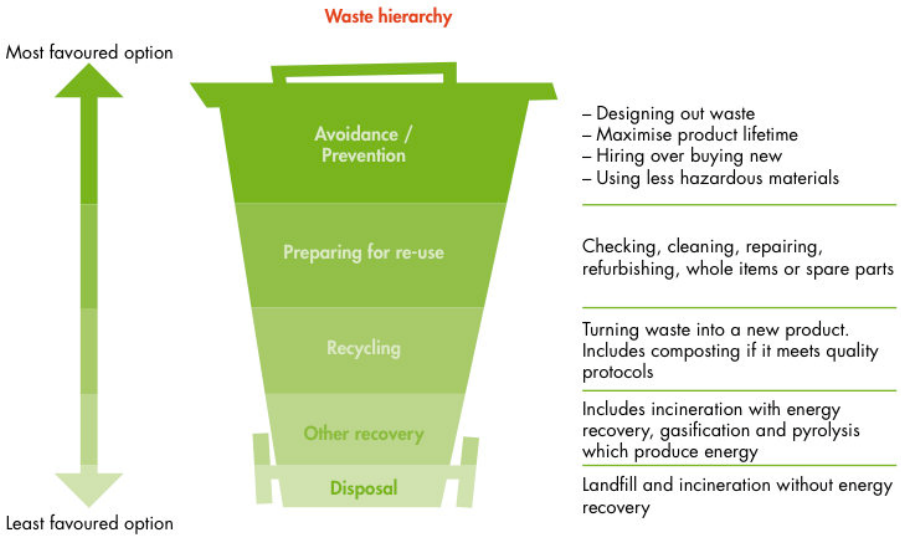
Vision

3.2.3 The Core Strategy has the following vision

Herefordshire will be a place of distinctive environmental, historical and cultural assets and local communities, with sustainable development fostering a high quality of life for those who live, work and visit here. A sustainable future for the county will be based on the interdependence of the themes of social progress, economic prosperity and environmental quality with the aim of increasing the county's self-reliance and resilience.

3.2.4 The Core Strategy vision is focussed on achieving sustainable development that is based upon success across society, economy and the environment; it also seeks to achieve self-reliance and resilience. These are all principles that are readily transferable to minerals and waste.

Figure 3.1 Waste Hierarchy



Graphic courtesy of WRAP/LOCOG

3.2.5 Key policy principles for minerals and waste include the following matters:

Efficient use of minerals

- ensuring mineral resources is not prejudiced by other development (for example building housing over an area that contains sand and gravel
- ensuring mineral is extracted and used efficiently, primarily achieved through the method of working and restoration

Effective minimisation and use of wastes

- the Waste Hierarchy - giving priority to preventing waste in the first place; when waste is created, giving priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill)[3]
- a Circular Economy - an alternative to a traditional linear economy (make, use, dispose) in which we keep resources for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life[4]
- Enabling self-sufficiency
- authorities are encouraged to be self-sufficient in the resources they require and in the provision of necessary infrastructure within their administrative area; this enables sustainable communities to be developed and avoids placing unnecessary demands on other authorities
- waste moves freely in the market according to the needs and characteristics of the sector and because of this, some of Herefordshire's waste is managed outside of the county. Herefordshire will therefore seek to deliver 'equivalent self-sufficiency' by providing waste management capacity for dealing with the amount of waste produced in Herefordshire, while recognising that some of the actual waste produced in the county may not be managed within the county's border.

3.2.6 The waste hierarchy (see Figure 3.1) is a key tenet of the Waste Framework Directive 2008 and remains a basic requirement for waste management. In recent years, thinking has evolved to develop the concept of the Circular Economy.

3.2.7 WRAP[5], formerly a government agency is now a charity that works with governments, businesses and communities to deliver practical solutions to improve resource efficiency.

It sets out why a circular economy is important for the UK:

- creating new opportunities for growth;
- reducing waste;
- driving greater resource productivity;
- delivering a more competitive UK economy;

[3] Guidance on applying the Waste Hierarchy, Defra, June 2011

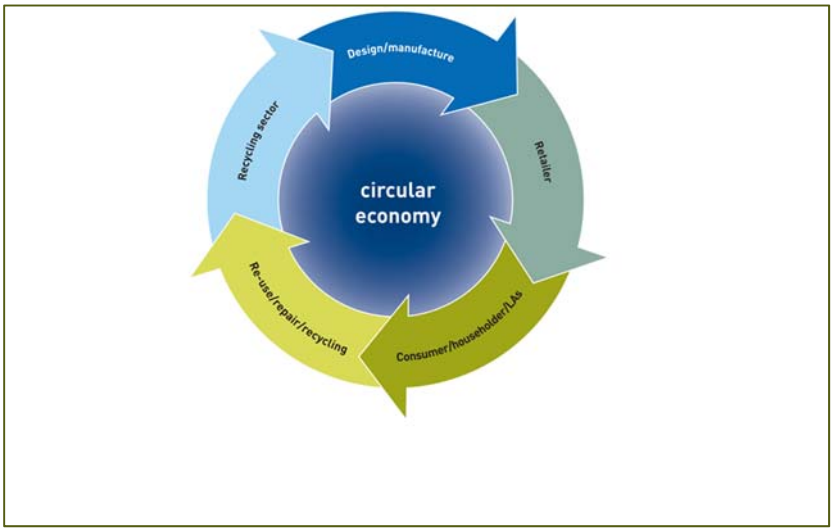
[4] http://www.wrap.org.uk/about-us/about/wrap-and-circular-economy [08.11.2016@14.42]

[5] Waste and Resources Action Programme

- positioning the UK to better address emerging resource security/scarcity issues in the future; and
- helping to reduce the environmental impacts of our production and consumption in both the UK and abroad.

3.2.8 WRAP has also prepared the graphic represented in Figure 3.2 to demonstrate what it means by a circular economy.

Figure 3.2 Circular Economy



Courtesy of WRAP

3.2.9 The concept of the circular economy is considered to incorporate the key priorities of the waste hierarchy and develop these to provide a positive environment within which new, innovative resource use and waste management solutions can be developed.

3.2.10 Self-sufficiency is an important principle but cannot always be delivered; for example, the minerals evidence base suggests that the county simply does not have all the types of minerals required to support all the development that is likely to occur over the plan period. This limitation can be counterbalanced by optimising those factors that can be influenced, for example through encouraging innovative solutions to maximise recycled products to replace virgin materials.

3.2.11 The minerals and waste sectors can contribute to resilience of the county in a number of ways, through: improved infrastructure provision; flood and water management opportunities (particularly minerals); renewable energy generation (particularly waste); improved air quality and climate change measures; and new opportunities for green infrastructure, public open space and recreation.

3.2.12 The vision of the MWLP should be aspirational, it is the point to be achieved several years from now, but ultimately deliverable. Starting with the Core Strategy vision and seeking to make it relevant to minerals and waste, a new vision for the MWLP has been drafted:

Over the period to 2031, Herefordshire will move towards a sustainable provision of minerals and waste management, balancing development needs whilst seeking to support the county's communities, protect and enhance environmental, historic and cultural assets and strengthen the local economy. Sustainable provision within

Herefordshire will be achieved through: efficient use of mineral resources; support for the circular economy; and optimising self-sufficiency and resilience.

The proposed vision for the Minerals and Waste Local Plan

Question 10. Do you support the vision for the MWLP set out in paragraph 3.2.12 or should it be amended in some way? Please give your reasons for any suggested changes.

Objectives

3.2.13 There are 13 objectives set out in the Core Strategy. These are set out in Table 3.1 and considered for their relevance to the Minerals and Waste Local Plan.

Review of the Core Strategy objectives

Question 11. Do you agree with the reasoning given in Table 3.1 for the review of the Core Strategy objectives? Please give your reasons.

Table 3.1 Review of Core Strategy objectives

Core Strategy Objective		Relevant to Minerals and Waste Local Plan	Minerals and Waste Local Plan Objective?
	Social Progress		
1	To meet the housing needs of all sections of the community (especially those in need of affordable housing), by providing a range of quality, energy efficient homes in the right place at the right time.	Not directly relevant Minerals and waste development will form part of the infrastructure around successful housing provision	No
2	To improve the health, well-being and quality of life of all residents by ensuring new developments positively contribute towards better access to, provision and use of, improved public open spaces, sport and recreation, education, cultural and health facilities, local food production and ensuring safer communities.	Yes Minerals and waste development can affect the health, well-being and quality of life of residents and restored sites can provide public opens space, sport and recreation opportunities	Yes See draft objectives
3	To support existing education, life-long learning and the retention of our young people through the provision and/or improvement of higher education, skills development and training facilities.	Not directly relevant The minerals and waste industries may contribute to skills development through existing policy	No
4	To reduce the need to travel and lessen the harmful impacts from traffic growth, promote active travel and improve quality of life by locating significant new development where access to employment, shopping, education, health, recreation, leisure and other services are, or could be made available by walking, cycling or public transport.	Yes Minerals and waste development can have significant traffic impacts	Yes See draft objectives
5	To improve access to services in rural areas and movement and air quality within urban areas by ensuring new developments support the provision of an accessible, integrated, safe and sustainable transport network and improved traffic management schemes.	Not directly relevant Addressed through considering Core Strategy objective 4	No

Core Strategy Objective		Relevant to Minerals and Waste Local Plan	Minerals and Waste Local Plan Objective?
	Economic Prosperity		
6	To provide more local, better paid job opportunities to limit out-commuting and strengthen the economy by attracting higher value-added, knowledge based industries and cutting-edge environmental technologies to new / existing employment land and enabling existing businesses to grow and diversify, facilitated by the universal provision of a high bandwidth broadband service.	Yes Minerals and waste development can contribute positively to the local economy	Yes See draft objectives
7	To strengthen Hereford's role as a focus for the county, through city centre expansion as part of wider city regeneration and through the provision of a balanced package of transport measures including park and ride, bus priority schemes and a relief road including a second river crossing.	Not directly relevant Minerals and waste development will form part of the infrastructure necessary to achieve the Core Strategy objective	No
8	To strengthen the economic viability of the market towns, rural settlements and their surrounding rural areas by facilitating employment generation and diversification, improving delivery and access to services through housing (including affordable housing) and improved ICT as well as realising the value of the environment as an economic asset.	Yes, partially Minerals and waste development can contribute positively to the local economy	Yes See draft objectives
8a	To support and encourage the development and diversification of the county's historic strength in land-based industries, including agriculture and food production, to provide for the maintenance of a thriving, productive, efficient, competitive and sustainable agricultural sector, recognising the high importance of this sector to the county's economy as a whole and to the rural economy in particular.	Yes, partially Minerals and waste development can impact upon agricultural land, and national policy seeks to avoid use of best and most versatile land. However, there is little specificity to add to this objective.	No However, policy should address the use of agricultural land in development proposals
9	To develop Herefordshire as a destination for quality leisure visits and sustainable tourism by enabling the provision of new, as well as enhancement of existing tourism infrastructure in appropriate locations.	Yes, partially Restored minerals sites have the potential to provide new tourism attractions; however, this is not likely to be an outcome desirable at all sites. The potential for open space and recreation are addressed through	No However, policy might contain a reference to encouraging sustainable tourism opportunities at

Core Strategy Objective		Relevant to Minerals and Waste Local Plan	Minerals and Waste Local Plan Objective?
		consideration of Core Strategy objective 2.	appropriate sites
	Environmental Quality		
10	To achieve sustainable communities and protect the environment by delivering well-designed places, spaces and buildings, which use land efficiently, reinforce local distinctiveness and are supported by the necessary infrastructure including green infrastructure	Yes Minerals and waste development can contribute positively to achieving sustainable development	Yes See draft objectives
11	To address the causes and impacts of climate change by ensuring new development: uses sustainable design and construction methods to conserve natural resources; does not increase flood risk to new or existing property; increases the use of renewable forms of energy to reduce carbon emissions; minimises waste and pollution; manages water supply and conservation; and conserves and protects biodiversity and geodiversity.	Yes Minerals and waste development can contribute positively to addressing the causes and impact of climate change	Yes See draft objectives
12	To conserve, promote, utilise and enjoy our natural, built, heritage and cultural assets for the fullest benefits to the whole community by safeguarding the county's current stock of valued heritage and significant environmental assets from loss and damage, reversing negative trends, ensuring best condition and encouraging expansion, as well as appropriately managing future assets.	Yes Minerals and waste development can have significant environmental impacts	Yes See draft objectives

3.2.14 The objectives also need to include the clear expressions of intent relevant to minerals and waste development, providing clarity to the vision and a framework to the emerging policy.

3.2.15 Considering the draft vision for the MWLP and relevant objectives from the Core Strategy, a draft set of objectives for the MWLP has been prepared and is set out in Table 3.2.

The draft objectives for the Minerals and Waste Local Plan

Question 12. Do you agree with the list of objectives for the MWLP set out in Table 3.2? If not, please state what amendments or additions you believe are needed and why.

Table 3.2 Draft objectives for the Herefordshire Minerals and Waste Local Plan

Objective		Explanation
Social Progress		These are principles fundamental to minerals and waste development as key elements of social infrastructure that underpin sustainable communities
1	To safeguard mineral and waste resources within Herefordshire and the associated transport infrastructure for the future	Minerals can only be worked where they exist, and related infrastructure can be costly and difficult to provide. Waste facilities are a key element of infrastructure underpinning sustainable communities and can struggle to find alternative locations. This objective seeks to avoid the future use of mineral resources, waste management facilities and related infrastructure being adversely affected or limited. Related infrastructure includes railheads and concrete plant. It is understood that there are no operational mineral wharves in Herefordshire.
2	To prioritise the long-term conservation of primary minerals through enabling provision of sustainable alternatives, effective use of mineral reserves, promoting efficient use of minerals in new development	Primary minerals are a finite resource and should be used efficiently. Sustainable alternatives include recycled construction materials (achieved through a circular economy) and secondary minerals. Minerals reserves can operate efficiently and efficient use of minerals can be achieved through good design and best practice construction techniques in delivering new development.
3	To enable the management of waste in accordance with the waste hierarchy and to promote a circular economy within Herefordshire	The sustainable management of waste brings many benefits to society through improved environment, job opportunities, renewable energy supply and stimulating the development of green technologies.
4	To enable minerals and waste development to make an appropriate contribution to improve the health, well-being and quality of life of residents, through best practice operations, open space provision, educational and cultural information and green infrastructure	Minerals and waste development are essential infrastructure, necessary to enable successful communities, but a balance can be struck whereby it makes a positive contribution to improve the natural and built environment bringing health and well-being benefits.
Economic Prosperity		
5	To plan for the steady and adequate supply of minerals present within Herefordshire to contribute to the county's economic growth, development, local distinctiveness and energy requirements	There are minerals available within Herefordshire that should be used to enable self-sufficiency in the county's growth and resilience and to ensure that heritage details are retained throughout the built environment. This is best achieved through identifying and maintaining appropriate supply requirements in line with national planning policy and the Local Aggregate Assessment, and

Objective		Explanation
		maintaining adequate landbanks.
6	To make adequate provision for the waste management infrastructure appropriate within Herefordshire	This is an element at the heart of self-sufficiency and resilience and an important objective for waste, ensuring that the waste management services necessary to achieve a sustainable Herefordshire are provided.
7	To identify suitable locations for minerals and waste development	Mineral extraction is limited to where the resource lies, but sites may be promoted for related uses such as secondary and recycled aggregate production. Locational policy can seek to direct waste related development to those places where most waste is generated and/or there are synergies with complementary industries, opportunities for energy use and economic growth potential. This objective can strengthen the economic viability of the market towns, rural settlements and their surrounding rural areas by facilitating employment generation and diversification.
8	To reduce the need to travel and lessen the harmful impacts from traffic growth, promote the use of alternatives to road transport and ensure that new development is served by suitable transport networks	Minerals and waste development can result in significant transport requirements, which has environmental impacts and can add substantial costs. This objective seeks to ensure that new proposals are located and designed so as to reduce traffic impacts for environmental and economic benefits. Sustainable transport modes include rail, water and pipeline and where these are not practicable, location for development should be well connected to suitable highway infrastructure.
Environmental Quality		
9	To achieve sustainable communities and protect the environment by delivering well-designed minerals and waste development that use land efficiently, reinforce local distinctiveness, and are supported by the necessary infrastructure including green infrastructure	This is Core Strategy objective 10 re-worked to be relevant to minerals and waste development. There is no reason why these sectors should not be expected to deliver best practice in terms of design and use of new sites. Minerals and waste sites may be extensive and operate for a number of years, green infrastructure should be expected to be provided at the earliest opportunity.
10	To address the causes and impacts of climate change relating to minerals and waste development activity, including using opportunities arising from minerals and waste operations and reclamation activity to mitigate and adapt to climate change and to leave a positive legacy	This objective includes: planning for more sustainable design and working practices, including those aimed at carbon reduction; considering opportunities for the delivery of renewable and low carbon energy; and taking a long-term view for sites to provide for flood alleviation, provision of ecosystem services and maintenance of agricultural capacity. This objective would also contribute

Objective		Explanation
		to reduce greenhouse gas emissions by 80% below 1990 levels by 2050.
11	To conserve, promote, utilise and enjoy our natural, built, heritage and cultural assets for the fullest benefits to the whole community by safeguarding the county's current stock of valued heritage and significant environmental assets from loss and damage, reversing negative trends, ensuring best condition and encouraging expansion, as well as appropriately managing future assets.	This is Core Strategy objective 12 directly applied as it is relevant to minerals and waste development. It includes developing policy to protect, conserve and where practicable enhance the Herefordshire's environment, including natural and historic assets, landscapes and habitats, biodiversity, geodiversity, ground and surface waters, green infrastructure and ecosystem services (including agriculture), recognising and protecting the special qualities of the AONB and supporting the use of local building stone to help maintain and improve the quality of the built environment and local distinctiveness. Applied to minerals development it would also support the utilisation of a strategic, landscape scale, approach to reclamation where this could help minimise overall impacts and deliver maximum benefits.

3.3 Matters addressed by policy of the Minerals and Waste Local Plan

3.3.1 It is intended that the Minerals and Waste Local Plan will be a complete policy document in that it will present:

- vision, objectives and spatial strategy relevant to minerals and waste;
- core principles for minerals and waste development, for example setting out the type and size of development preferred, and the expectation for restoration to be achieved at the earliest time;
- location specific policy in relation to where minerals and waste development should be developed; and
- development management policy, addressing specific issues that each development proposal should address, for example vehicle movements, or habitat protection.

3.3.2 The draft vision and objectives for the MWLP are discussed above, in section 3.2.

3.3.3 Policies in relation to core principles and specific locations will be developed from further work on the evidence base and using responses received to this consultation. They are a necessary part of the MWLP and will be presented in draft at the next consultation stage.

3.3.4 The need for and matters addressed by the development management policies is not clear cut. The Core Strategy includes some development management policies, called general policies. These are reviewed in Table 3.3.

3.3.5 Table 3.3 sets out the title of the policy, considers whether it is directly relevant to minerals and waste development and concludes whether additional, specific policy is required in the Minerals and Waste Local Plan.

Review of the Core Strategy general policies

Question 13. Do you agree with the reasoning given in Table 3.3 for the review of the Core Strategy general policies? Please give your reasons.

Table 3.3 Review of general policies from the Core Strategy

Policy Reference		Relevant?	Additional MWLP policy required?
H1	Affordable Housing - thresholds and targets	No	No - not relevant
H2	Rural exception sites	No	No - not relevant
H3	Ensuring an appropriate range and mix of housing	No	No - not relevant
H4	Traveller sites	No	No - not relevant
SC1	Social and community facilities	No	No - not relevant
OS1	Requirement for open space, sports and recreation facilities	No	No - not relevant
OS2	Meeting open space, sports and recreation needs	Yes	Yes This policy would apply to minerals and waste development, but additional policy is required to ensure opportunities for the provision of open space and public access at appropriate sites is made
OS3	Loss of open space, sports or recreation facilities	Yes	No - existing policy is sufficient
MT1	Traffic management, highway safety and promoting active travel	Yes	Yes This policy would apply to minerals and waste development, but additional policy is required to encourage non-road transport both on and off-site
E1	Employment provision	Yes	No - existing policy is sufficient
E2	Redevelopment of existing employment land and buildings	Yes	Yes This policy would apply to minerals and waste development, as employment generating uses but additional policy is required specifically to safeguard existing minerals and waste sites
E3	Homeworking	No	No - not relevant
E4	Tourism	Yes	No - existing policy is sufficient
E5	Town centres	No	No - not relevant

Policy Reference		Relevant?	Additional MWLP policy required?
E6	Primary shopping areas and primary and secondary shopping frontages	No	No - not relevant
LD1	Landscape and townscape	Yes	No - existing policy is sufficient
LD2	Biodiversity and geodiversity	Yes	No - existing policy is sufficient
LD3	Green infrastructure	Yes	No - existing policy is sufficient
LD4	Historic environment and heritage assets	Yes	No - existing policy is sufficient
SD1	Sustainable design and energy efficiency	Yes	No - existing policy is sufficient
SD2	Renewable and low carbon energy generation	Yes	No - existing policy is sufficient
SD3	Sustainable water management and water resources	Yes	No - existing policy is sufficient
SD4	Wastewater treatment and river water quality	Yes	No - existing policy is sufficient
ID1	Infrastructure Delivery	Yes	No - existing policy is sufficient

3.4 Constraints to locating new minerals and waste development

3.4.1 Mineral developments may be extensive in size and have far reaching impacts, although using robust assessment and modern conditions can actively manage much of the potential for harm to be caused.

3.4.2 Nowadays, many waste facilities are no longer considered to be 'bad neighbours', as their operations are clean, relatively quiet and do not create significant emissions of dust, odour and other airborne pollutants.

3.4.3 Indeed, the minerals and waste industries support a wide range of jobs and technology innovation. However, it remains the case that some types of development are considered to be inappropriate in certain locations that are subject to environmental constraints.

3.4.4 The types of constraint that apply will vary with the type of development proposed and the proximity of that project to the area of constraint. Table 3.4 sets out an initial list for consideration, showing the types of environmental constraint that *may* be relevant and the critical points at which some interaction might be considered likely. These distances have been identified using a combination of reference documents and guidance (including from the Environment Agency) and applying common sense. A project located beyond the distance identified might be considered acceptable if it otherwise complies with other development management policies.

Table 3.4 Environmental constraints and proximity of minerals and waste development

	Minerals	Composting	Other recycling	Other recovery	Landfill
SPA,SAC and Ramsar sites	15 km	1 km	1 km	15 km	1 km
SSSI	Within SSSI Impact Risk Zone				
AONB	Within or visible from AONB				
NNR	1 km	Adjacent	Adjacent	1 km	1 km
LNR	Adjacent				
Historic battlefield	Overlapping				
Listed building	Visible from listed building	Within setting		Visible from listed building	
Scheduled monument	Visible from monument	Within setting		Visible from monument	
Parks and gardens	Overlapping				
Ancient woodland	5 km	Adjacent		5 km	
PROW	Overlapping and/ or Adjacent				
National Trail	Overlapping and/ or Adjacent				
National Cycle Network	Overlapping and/ or Adjacent				
BAP priority habitat	1 km	Adjacent	Adjacent	1 km	1 km
Conservation Area	Visible from CA	Within CA		Visible from CA	
Flood risk zone	Overlapping				
Country park	500 m	Adjacent	Adjacent	500 m	500 m

Environmental constraints

Question 14 Are the environmental constraints listed in Table 3.4 correct and complete?

Question 15 Are the distances listed in Table 3.4 for each constraint and type of development appropriate?

Please give your reasons for both responses

4. Minerals

Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation.[6]

4.1 Introduction

4.1.1 This section of the issues and options report focuses on minerals; the available evidence and related issues and options. It explains the background to these issues and seeks to identify a number of potential options available for different directions that policy in the Minerals and Waste Local Plan could take to address those issues.

4.1.2 The key data sources for the issues and options identified are the:

- Call for sites, undertaken by Herefordshire Council during 2016; and
- Minerals Need Assessment, November 2016.

4.1.3 Relevant information gained from the call for sites is set out below, but you should refer to the Minerals Need Assessment in order to respond to the questions posed. In addition to responding to the questions, Herefordshire Council welcome comments on any part of the information contained or referenced within this section.

Minerals evidence base

Question 16 Do you have any alternative/additional information that should be considered in preparing policy in relation to minerals in Herefordshire?

4.2 Considering the Minerals Need Assessment

Evidence base

4.2.1 Section 1 of the Minerals Need Assessment presents the data sources used to understand current mineral resource in the county and past sales of the minerals won within Herefordshire.

4.2.2 Section 2 of the Minerals Need Assessment presents the information currently available regarding minerals within Herefordshire i.e. the resources within the ground and permitted and/or operational quarries.

4.2.3 Available data was collected on sales of primary aggregates and building stone. No information was available on sales of crushed rock within Herefordshire. For recycled aggregates, data was collected on the amount of construction, demolition and excavation waste arising within Herefordshire. No hydrocarbons are currently extracted in Herefordshire.

4.2.4 These are fundamental pieces of information relevant to understanding existing mineral reserve within the county and how it has historically been used. This data underpins future decisions about how much mineral will be needed, whether new quarries will be required and where these should be located.

[6] National Planning Policy Framework, March 2012, paragraph 142

The Minerals Need Assessment

Question 17 Are you aware of any other sources of data that the Minerals Need Assessment could use in order to improve the estimates for the supply of and demand for minerals?

Question 18 Is the information provided in the Need Assessment on quarries within Herefordshire accurate and complete to your knowledge?

Forecasting future demand

4.2.5 In sections 3 and 4, the Minerals Need Assessment considered those minerals that have a current and potential future commercial value within Herefordshire:

- primary aggregates, consisting of sand and gravel and crushed rock;
- recycled aggregates;
- building stone; and
- hydrocarbons.

4.2.6 For primary aggregates, various different forecasts were applied to the sales data to make a series of estimates of the potential future demand arising over the period of the MWLP and beyond. These were done by applying multipliers to current sales levels according to:

- economic growth forecasts as measured by Gross Value Added (GVA);
- population projections modelled by the Office for National Statistics (ONS); and
- housing growth projections as set out in the Core Strategy housing trajectory.

Data, methods of analysis and conclusions of the Minerals Need Assessment

Question 19 Does the Minerals Need Assessment provide an acceptable selection of forecasts for future demand for primary aggregates?

Question 20 Are there any other methods of forecasting that should be included?

Question 21 Are you aware of any other sources of data that the Minerals Need Assessment could use in order to improve the forecasts of future demand?

Please give your reasons

4.3 Sand and gravel

4.3.1 Table 4.1 summarises the estimates for sand and gravel calculated on the basis of the selected forecasts.

4.3.2 Table 4.1 shows that, depending on the scenario used, there may be sufficient permitted reserves of sand and gravel remaining for the lifetime of the Minerals and Waste Local Plan, or there may be an insufficient landbank remaining at the end of the plan period, or permitted reserves may have been exhausted before the end of the plan period.

Table 4.1 Forecast sand and gravel demand based on selected forecasts

Scenario	Demand in 2031	Ten-year annual average in 2031	Permitted reserves in 2031	Landbank in 2031
1. GVA growth (highest)	150,000	135,000	643,000	4.8 years
2. Population growth, demand at 4 tonnes of aggregate per head	105,000	103,000	1,036,000	9.9 years
3. Core Strategy housing trajectory	324,000	324,000	0	0 years

4.3.3 It is acknowledged that these forecasts have been produced using a number of assumptions, some based on data for single years and some on data now seven years old. However, if during the course of the development of the MWLP better data becomes available, this can be used to improve the forecasts produced wherever appropriate.

4.3.4 There is only one active sand and gravel quarry in Herefordshire, and current planning conditions require that the winning and working of minerals must cease by 31 December 2026. Therefore, regardless of which forecast most closely represents the real outcome for sand and gravel over the lifetime of the MWLP there will be a need for additional reserves of sand and gravel to be permitted to meet demand from 2027 onwards.

4.3.5 The following options have been developed for addressing the potential shortfall, or otherwise, in sand and gravel reserves for meeting the projected demand over the lifetime of the Minerals and Waste Local Plan:

- Option M1: Make no provision for additional permitted reserves of sand and gravel, on the assumption that demand will remain fairly low and sufficient landbank will remain at 2031 (scenario 2);
- Option M2: Make provision for some additional reserves of sand and gravel to be permitted, on the basis that demand will rise in line with the middle forecast and the landbank will fall below the minimum required by the NPPF before the end of the timeframe of the Core Strategy (scenario 1);
- Option M3: Make provision for significant additional reserves of sand and gravel to be permitted, on the basis that demand will rise in line with the Core Strategy housing trajectory and permitted reserves will be exhausted before the end of the MWLP timeframe (scenario 3).
- Option M4: Make no provision for additional permitted reserves of sand and gravel and adopt policy to meet any shortfall in demand through greater use of recycled aggregates and/or imports of sand and gravel.

Sand and gravel

Question 22 Do the three scenarios presented in Table 4.1 constitute an appropriate range of forecasts of future demand for sand and gravel? Are there any other forecasts that should be included?

Question 23 Are options M1 to M4 appropriate options to consider for addressing the future balance of supply and demand for sand and gravel?

Question 24 Are there any other options that should be considered?

4.4 Crushed rock

4.4.1 Although the current level of supply of crushed rock within Herefordshire is unknown, the total forecast demand using selected growth rates indicate a level of demand significantly below the 11.54 million tonnes of permitted reserves data for 2013, the most recent year for which figures are available for Herefordshire separately from other counties (see Minerals Need Assessment, Table 3.5). Two forecasts have been produced for projected level of demand in 2030/31:

- one of 193,000 tonnes per year, using a figure of 4 tonnes of aggregate demand per head, and
- the second of 583,000 tonnes per year, using the Core Strategy housing trajectory

4.4.2 It is acknowledged that these forecasts have been produced using a number of assumptions, some based on data for single years and some on data now seven years old. However, if during the course of the development of the MWLP better data becomes available, this can be used to improve the forecasts produced wherever appropriate.

4.4.3 Of the two operational quarries for crushed rock in Herefordshire, one is required to cease operations by 2027, and in those circumstances could not contribute to meeting demand after that date. The other quarry may continue operations until 2042. However, data is not available on the amount of permitted reserves at either quarry or the amount of annual sales currently achieved from either. There may therefore be a need for additional reserves of crushed rock to be permitted during the lifetime of the MWLP but there is no certainty about this.

4.4.4 The following options have been developed for addressing the potential shortfall, or otherwise, in crushed rock reserves for meeting the projected demand over the lifetime of the MWLP:

- Option M5: Make no provision for additional permitted reserves of crushed rock, on the assumption that reserves in the remaining operational quarry will continue to provide a sufficient landbank to meet demand over the period of the Minerals and Waste Local Plan;
- Option M6: Make provision for some additional reserves of crushed rock to be permitted, on the assumption that reserves in the remaining operational quarry will not provide a sufficient landbank to meet demand over the period of the Minerals and Waste Local Plan;
- Option M7: Make no provision for additional permitted reserves of crushed rock and adopt policy to meet any shortfall in demand through greater use of recycled aggregates and/or imports of crushed rock.

Crushed rock

Question 25 Do the forecasts in paragraph 4.4.1 constitute appropriate forecasts for future demand for crushed rock?

Question 26 Are options M5 to M7 appropriate options to consider for addressing the future balance of supply and demand for crushed rock?

Question 27 Are there any other options that should be considered?

4.5 Building stone

4.5.1 Clear data is held on the supply of building stone in Herefordshire, but no information is available on permitted reserves. There is a small and stable market for the sale of building stone which is important for retaining the local character of buildings and also has a market for quality construction in other parts of the country.

4.5.2 Some of the active quarries for building stone within Herefordshire are required to cease operations within the lifetime of the Minerals and Waste Local Plan. Therefore, there may be a need for policy to address the winning and working of building stone to enable supply to continue to meet demand.

4.5.3 The following options have been developed for addressing the potential shortfall, or otherwise, in building stone reserves for meeting future demand over the lifetime of the MWLP:

- Option M8: Make no provision for additional permitted reserves of building stone, on the assumption that the quarries remaining operational over the lifetime of the MWLP will provide sufficient stone to meet demand;
- Option M9: Extend some or all of the permissions for existing building stone quarries/delves so that extraction can continue beyond the current required closure date in order to meet future demand;
- Option M10: Make provision for additional permitted reserves of building stone in order to be able to continue to meet demand over the lifetime of the Minerals and Waste Local Plan.

Building stone

Question 28 Do options M8 to M10 present appropriate options for ensuring a sufficient supply of building stone to meet future demand?

Question 29 Is there any other information you are aware of that should be considered in assessing the likely future balance between supply of and demand for building stone?

4.6 Hydrocarbons

4.6.1 Herefordshire has two areas that have been worked in the past for coal. However, such conventional extraction of hydrocarbons has ceased in Herefordshire and shows little sign of recommencing.

4.6.2 Recently, new technologies have been developed for extracting hydrocarbons in an unconventional way, which may allow the extraction of resources from deposits which were previously considered uneconomic.

4.6.3 The UK has a long history of onshore gas exploration, and has developed a robust regulatory system to ensure that any such operations will be carried out to the highest standards of safety and environmental protection.

4.6.4 In December 2015, the Government announced a licensing round whereby 159 blocks of land were offered to applicants for onshore hydrocarbon exploration, appraisal and extraction, following scrutiny of the applicant's suitability and evidence regarding the reserve. One of these blocks, referred to as SO51a, included a small part of the south of Herefordshire around Whitchurch, Welsh Newton, Goodrich, Kerne Bridge, Hope Mansell and Marstow.

4.6.5 An article published in the Hereford Times (16 September 2016) reporting that the potential licensee had declined the offer of a licence for block SO51a. This was confirmed by the Oil and Gas Authority, which stated that a licence pertaining to this block, among others, will not be awarded.

4.6.6 The Government may issue further rounds of licensing in the future, and may offer blocks within Herefordshire. It is therefore still possible, although unlikely, that hydrocarbon operations will take place in Herefordshire in the foreseeable future, although this may depend on future developments in technology that could make the deposits more attractive.

4.6.7 The following options have been developed to address the uncertainty regarding the likelihood of any hydrocarbon activity taking place in Herefordshire within the lifetime of the Minerals and Waste Local Plan:

- Option M11: Adopt specific policies to provide a basis for determining proposals for hydrocarbon exploration, appraisal and extraction on the basis that this could become a possibility within the lifetime of the Minerals and Waste Local Plan;
- Option M12: Do not adopt specific policies for hydrocarbon exploration, appraisal and extraction on the basis that this is unlikely to occur within the lifetime of the Minerals and Waste Local Plan, relying instead on development management policies to determine future applications. This option recognises that associated policies may be added in a periodic review of the MWLP prior to 2031.

Hydrocarbons

Question 30 Do options M11 and M12 constitute appropriate options for the MWLP for dealing with the uncertainty over potential future hydrocarbon activity in Herefordshire?

Question 31 Are there any other options that should be considered?

Question 32 Is there any other information that you are aware of that needs to be considered in relation to potential future hydrocarbon activity within the county?

4.7 Allocating sites or areas for future mineral extraction

4.7.1 The Minerals and Waste Local Plan could take one or more different approaches to identifying and selecting sites for the winning and working of minerals. One approach would be to allocate specific sites where applications for permission for the winning and working of minerals will be looked on favourably. Another approach could be to identify areas of search within the county which are suitable in principle for minerals operation and where applications within these areas will be looked on

favourably. A third approach could be to allow proposals for sites to come forward regardless of the area in which they are located and to assess each proposal on its merits. Finally, a combination of two or more of these approaches could be adopted.

4.7.2 Earlier in 2016, Hereford Council issued a call for sites, asking mineral and waste site operators and landowners to put forward site proposals for consideration for minerals and/or waste uses. The process of site assessment will form an important part of the evidence for the MWLP and it is important that industry and landowners are engaged in the process.

4.7.3 Hereford Council also wished to know about site owners' or operators' aspirations for existing sites and any proposals to extend the site's operations or to widen the range of operations or facilities, and therefore included existing sites within the call for sites.

4.7.4 Table 4.2 lists those sites put forward for existing or new mineral uses in responses to the call for sites.

Table 4.2 Sites promoted in responses to the call for sites

	Mineral Type	Site	New or Extension
1.	Crushed rock	Leinthall Quarry, Leinthall Earls	Extension
2.	Crushed rock	Perton Quarry, Perton	Extension
3.	Sand and gravel	South Hide Farm and South End Farm, Mathon	Extension/New
4.	Sand and gravel	Land off A49, nr Wellington, Dinmore Manor Estate	New
5.	Sand and gravel	Upper Lyde Gravel Pit, Moreton Road, Upper Lyde	Extension

Potential future mineral sites

Question 33 Do you have any comments or information about any of the sites listed in Table 4.2 above that needs to be considered?

Question 34 Are there any other existing or potential new sites which Herefordshire Council should consider?

4.7.5 As the lifetime of the MWLP extends to 2031, it is quite likely that mineral sites could become available and economically viable during that time which have not been included within the recent call for sites. Therefore the Plan needs to allow for currently unidentified sites to be proposed for development and for these to be assessed against the relevant development management policies.

4.7.6 This could be done by identifying areas of search for such sites, where proposals for development would be preferred to proposals outside these areas as long as they are in accordance with development management policies. This would have the advantage of providing some degree of prior information about where in the county such developments are or are not likely to occur. However, it may serve to restrict developments in areas outside the areas of search that are nevertheless commercially and operationally viable.

4.7.7 In order to identify areas of search, it will be essential for Herefordshire Council to have accurate and up-to-date information about the geology of the county. The British Geological Survey (BGS) was commissioned to provide further detail on the mineral resource within Herefordshire and its viability for use. This was completed in February 2017 and will be used in the ongoing work of preparing minerals policy of the Minerals and Waste Local Plan.

4.7.8 Alternatively, the MWLP could refrain from identifying areas of search, instead allowing landowners or operators to choose and propose sites on the basis of commercial and/or operational considerations regardless of where the site is located, and to determine planning applications on the basis of development plan policies. While this would not provide any information on where future mineral developments might be likely to occur, it may provide more flexibility in allowing operators to promote sites that are considered viable and help to ensure sufficient reserves are available to meet future demand.

4.7.9 The following options are therefore proposed as different approaches to site identification:

- Option M13: Allocate suitable sites from those put forward by landowners and operators in the call for sites which comply with the policies in the Minerals and Waste Local Plan;
- Option M14: Do not allocate sites but identify areas of search within which applications for development will be looked upon favourably as long as they comply with the policies in the Minerals and Waste Local Plan;
- Option M15: Do not allocate sites and do not identify areas of search, but assess any applications regardless of location on the basis of compliance with policies in the Minerals and Waste Local Plan;
- Option M16: Allocate suitable sites from those put forward in the call for sites and identify areas of search within which applications for development will be looked upon favourably, but also allow for proposals for development to come forward regardless of location.

Future mineral site identification

Question 35 Do options M13 to M16 constitute appropriate options for different approaches to mineral site identification?

Question 36 Are there any other options that should be considered?

4.8 Safeguarding minerals sites

4.8.1 Long-term mineral resource areas and any associated storage or transportation facilities will need to be safeguarded as part of the plan-making process. The purpose of this is to ensure that these operations are not constrained or sterilised by other types of development within their locality. As part of the 2016 call for sites, Herefordshire Council requested operators to provide information on existing and proposed site details for the following types of facility:

- Construction aggregates (land-won sand and gravel and crushed rock)
- Mineral railheads (existing and proposed)

- Building stone for historic building restoration projects
- Clay extraction sites for brick or tile making
- Exploration for and possible extraction of energy minerals including coal, oil and gas
- Aggregate recycling and secondary aggregate processing facilities

4.8.2 The proposed extension of inert waste recycling operations at the Former Lugg Bridge Quarry is presented at section 5.9

4.8.3 The following option addresses the need for safeguarding existing mineral operations and associated processing and transport facilities:

- Option M17: Safeguard existing minerals sites and associated facilities, including transport facilities, from other development that may have the potential to constrain or prevent mineral operations at those sites, do not include a buffer around the site;
- Option M18: Safeguard existing minerals sites and associated facilities, including transport facilities, from other development that may have the potential to constrain or prevent mineral operations at those sites, including a buffer around the site.

Mineral site safeguarding

Question 37 Do options M17 and M18 constitute appropriate options for different approaches to safeguarding mineral sites?

Question 38 Are there any other options that should be considered?

5. Waste

Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. In preparing Local Plans, waste planning authorities should […] identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan. […] Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations.[7]

5.1 Introduction

5.1.1 This section of the issues and options report focuses on waste; the available evidence and related issues and options. It explains the background to these issues and seeks to identify a number of potential options available for different directions that policy in the Minerals and Waste Local Plan could take to address those issues.

5.1.2 The key data source for the issues and options identified is the Waste Need Assessment dated February 2017. It is recommended that you should refer to the Waste Need Assessment in order to respond to the questions posed. In addition to responding to the questions, Herefordshire Council welcome comments on any part of the information contained or referenced within this section.

Waste evidence base

Question 39 Do you have any alternative/additional information that should be considered in preparing policy in relation to waste management in Herefordshire?

5.2 Considering the Waste Need Assessment

Evidence base

5.2.1 Section 1 of the Waste Need Assessment presents a general overview of the document and introduces the policy context for the MWLP. Section 2 sets out key definitions for waste and the data sources used in the Waste Need Assessment.

5.2.2 Section 3 presents information on permitted facilities within Herefordshire and gives an overview of current waste management infrastructure operating within the county.

5.2.3 Data is set out in section 4, used to estimate waste arisings in 2015 for the different waste streams requiring management, as a baseline for predicting future arisings.

5.2.4 These are fundamental pieces of information relevant to understanding existing waste management capacity within Herefordshire and baseline arisings at 2015. From this data, the future capacity needs to manage forecast arisings over the timeframe of the MWLP can be calculated. This data underpins future decisions about how much waste management capacity will be needed, whether new types of facility will be required to manage the different waste streams, and where these should be located.

[7] National Planning Policy for Waste, October 2014, paragraphs 3 and 4

The Waste Need Assessment

Question 40 The existing waste sites are set out in the Waste Need Assessment 2016. Do you have any comment on existing operations that should be considered in preparing policy?

Question 41 Are you aware of any other currently operating sites that should be included? Please provide as much information as possible, including contact information for the site.

Question 42 Does the Waste Need Assessment make reasonable estimates for estimating the amount of waste arisings in 2015 (the baseline) for the different waste streams?

Forecasting future capacity needs

5.2.5 Section 5 of the Waste Need Assessment considers the principal waste streams that are likely to arise within Herefordshire, estimating future arisings of each and whether there may be a need to manage them within the county or elsewhere:

- local authority collected waste (LACW);
- commercial and industrial waste (C&I waste);
- construction, demolition and excavation waste (CD&E waste);
- agricultural waste; and
- hazardous waste.

5.2.6 To forecast likely future arisings, the Waste Need Assessment has used a range of data to underpin the assumptions that need to be made in order to derive data for potential future arisings. The main data used to apply multipliers to the derived 2015 baseline are:

- Household projections provided by the Department for Communities and Local Government, for LACW;
- Whole economy economic growth forecasts as measured by Gross Value Added (GVA), for C&I waste; and
- Construction sector economic growth forecasts as measured by GVA, for CD&E waste.

5.2.7 For agricultural waste and hazardous waste, it has not been possible for the Waste Need Assessment to derive any forecasts of future arisings using multipliers from available datasets, although these tonnages are relatively small in the context of total waste arisings.

5.2.8 Section 6 of the report then considers the need for new waste management capacity within the county in the light of predicted future arisings and current available capacity. This is considered further below.

Data, methods of analysis and conclusions of the Waste Need Assessment

Question 43 Does the Waste Need Assessment provide an acceptable selection of forecasts for future arisings of the five principal waste streams listed in paragraph 5.2.5?

Question 44 Are there any other methods of forecasting that should be included?

Question 45 Are you aware of any other sources of data that the Waste Assessment could use in order to improve the forecasts of future demand?

Please give your reasons

5.3 Types of technology

5.3.1 There is a range of different technologies available for the recycling, treatment and disposal of waste. Some technologies are more controversial than others, for a variety of reasons. It is not the role of planning policy to rule particular technologies in or out of consideration as possible solutions to waste management needs, not least because technologies develop and change. New technologies may well become available during the lifetime of the MWLP. The MWLP needs to remain flexible so as not to restrict new or improved technologies from being implemented simply because they are unforeseen at the time the MWLP is adopted.

5.3.2 Therefore, it is proposed not to consider options for different types of technology, in order to avoid prescription and to ensure that the MWLP remains flexible and open to facilitating the right type of waste management plant at the appropriate time.

Types of waste management technology

Question 46 Do you agree with the approach proposed for the WMLP in relation to different types of waste management technology?

Question 47 Is there an alternative approach that should be considered?

5.4 Local Authority Collected Waste (LACW)

5.4.1 To forecast waste from households up to 2031, the trends in the waste generated per household have been used to produce a number of waste growth scenarios, which are then combined with household projections provided by the Department for Communities and Local Government (DCLG) to predict annual arisings to 2031. Assumptions are also made about the generation of non-household waste included in the LACW waste stream.

5.4.2 Table 5.1 sets out the scenarios developed and briefly summarises the assumptions about household and non-household waste underpinning them.

Table 5.1 LACW growth scenarios

Scenario	Waste per household assumptions	Non-household assumptions
1	Static waste from households per household based on the average of annual arisings over the last three year of 0.937 tonnes/household.	Waste not from households remains static at 2015 level of 10,875 tonnes per annum.
2	Static waste from households per household based on the 12 months ending August 2016 of 0.95 tonnes per household.	Waste not from households remains static at the 12 months ending August 2016 level of 11,775 tonnes per annum.
3	To reflect the growth over the last 12 months, waste from households per household increases by 1.9% per annum from the 12 months ending August 2016 figure of 0.95 tonnes per household up to 2020, then static.	Waste not from households remains static at the 12 months ending August 2016 level of 11,775 tonnes per annum.
3a	Same as Scenario 3, but with waste from households per household continuing to increase beyond 2020 but at half the rate of the period up to 2020, i.e. 0.95% per annum.	Waste not from households remains static at the 12 months ending August 2016 level of 11,775 tonnes per annum.
4	This scenario, uses the waste generated by households (i.e. include CD&E wastes) and applies a waste per household figure of 1.01 tonnes to the CLG household projections, which is based on the average in annual arisings over the last three years.	Remaining non-household waste remains static at 4,650 tonnes per annum.
4a	Same as Scenario 4 but based on 12 months ending August 2016, using a figure of 1.03 tonnes per household.	Same as Scenario 4 but based on 12 months ending August 2016, with the remaining non-household waste static at 5,250 tonnes per annum.

5.4.3 Table 5.2 summarises the forecasts for future LACW arisings calculated on the basis of the forecasts for the selected scenarios.

Table 5.2 Forecast annual LACW arisings for selected years and scenarios

Scenario	2016	2021	2026	2031
1	87,700	91,000	94,100	96,800
2	89,600	93,000	96,100	98,900
3	91,100	101,000	104,500	107,500
3a	91,100	101,900	109,900	118,000
4	87,400	91,000	94,300	97,300
4a	89,700	93,300	96,700	99,700

5.4.4 Table 5.2 shows that if household waste generation rates do not increase, LACW could increase to between 96,800 to 99700 tonnes per annum (Scenarios 1, 2, and 4a), driven only by the increasing number of households.

5.4.5 However, if there is some growth in waste generated per household, total LACW could increase to between 107,500 to 118,000 tonnes per annum by 2031 (Scenarios 3 and 3a).

5.4.6 Key points from the Waste Need Assessment for LACW are as follows:

- There is no residual waste treatment or disposal capacity such as mechanical biological treatment (MBT), refuse derived fuel (RDF) production, energy from waste or landfill facilities for LACW in Herefordshire.
- Herefordshire Council has historically worked with Worcestershire County Council to manage effectively the authorities' LACW and this collaboration has resulted in the joint procurement of strategic waste management capacity. Whilst these facilities are not located in Herefordshire, long-term capacity is available to manage Herefordshire's LACW. However, the available capacity at these sites needs to be monitored during the Plan as there may be pressure on the current contracted capacity towards the end of the Plan period.
- In addition, if the separate collection of bio-waste for recycling becomes a requirement, capacity would be necessary to handle separately collected food and garden waste. There is currently significant capacity at biological treatment facilities in Herefordshire, which should be sufficient capacity to handle separately collected local authority collected bio-waste.

5.4.7 The following options have been developed for addressing the potential shortfall in capacity for managing LACW in the Minerals and Waste Local Plan:

- Option W1: Do not identify sites to manage LACW over the lifetime of the MWLP. Monitor quantities of LACW generated and keep forecasts of future generation under review. Include policy within the MWLP to allow proposals to come forward for new capacity to manage LACW in the event that this is required in the future.

LACW

Question 48 Do the scenarios presented in Tables 5.1 and 5.2 constitute an appropriate range of forecasts for future arisings of LACW? Do you prefer any one forecast? If yes, please state why.

Question 49 Are there any alternative forecasts that should be included?

Question 50 Is option W1 an appropriate approach for the WMLP to take in respect of future provision of new capacity for managing LACW?

Question 51 Are there any other options that should be considered?

5.5 Commercial & Industrial (C&I) waste

5.5.1 To forecast C&I waste arisings up to 2031, two forecasts for GVA growth have been used, one for the economies of Herefordshire and Worcestershire combined, obtained from Experian, and the second the 2031 target increase in GVA from the Herefordshire Economic Development Strategy averaged over the period to calculate an annual growth rate. These are applied to a lower and a higher estimate for the 2015 baseline arising figure.

5.5.2 Table 5.3 sets out the scenarios developed and briefly summarises the assumptions about household and non-household waste underpinning them.

Table 5.3 C&I waste growth scenarios

Scenario	Basis	Forecast Starting Point
1a	C&I waste growth in line with Hereford and Worcestershire GVA forecast	Lower 2015 C&I waste estimate (i.e. 115,000 tonnes)
1b	C&I waste growth in line with the Invest Herefordshire GVA growth target of 10% by 2031 (equivalent to an average annual growth of 0.65%)	
2a	C&I waste growth in line with Hereford and Worcestershire GVA forecast	Higher 2015 C&I waste estimate (i.e. 145,000 tonnes)
2b	C&I waste growth in line with the Invest Herefordshire GVA growth target of 10% by 2031 (equivalent to an average annual growth of 0.65%)	

5.5.3 Table 5.4 summarises the estimates for sand and gravel calculated on the basis of the forecasts for the selected scenarios.

Table 5.4 Forecast annual C&I arisings for selected years and scenarios

Scenario	2016	2021	2026	2031
1a	117,000	127,000	141,000	154,000
1b	116,000	120,000	123,000	128,000
2a	148,000	160,000	178,000	195,000
2b	146,000	151,000	156,000	161,000

5.5.4 Table 5.4 shows that C&I waste arisings could increase over the Plan period to between 128,000 tonnes and 195,000 tonnes by 2031, but this will depend on the actual change in GVA as compared to the forecast, *inter alia*.

5.5.5 Key points from the Waste Need Assessment for C&I waste are as follows:

- There is transfer with basic treatment, metal recycling and biological treatment capacity within Herefordshire, with the biological treatment facilities receiving over 25,000 tonnes of waste from the food and drink production sector in 2015.
- However, there is no residual waste treatment or disposal capacity such as MBT, RDF production, energy from waste or landfill facilities. The treatment/disposal of residual C&I waste is reliant on facilities outside Herefordshire.
- The assessment suggests that by 2030, 50,000 to 60,000 tonnes of residual C&I waste treatment/disposal capacity could be required, if the assumed targets are applied to the whole C&I waste stream. However, there is a notable degree of uncertainty in the C&I waste estimates and forecasts that makes assessing the future capacity need for C&I waste particularly difficult.
- Whilst the remaining potential capacity requirement is not insignificant, it is not particularly large; such capacity could be provided within a single facility or through a small number of facilities operating on an industrial estate.

5.5.6 The following options have been developed for addressing the potential shortfall in capacity for managing C&I waste in the MWLP:

- Option W2: Identify and allocate sites suitable for accommodating l C&I waste recycling/recovery/disposal capacity;
- Option W3: Do not allocate sites to provide new capacity to manage C&I waste over the lifetime of the MWLP. Monitor quantities of C&I waste generated and keep forecasts of future generation under review. Include policy within the MWLP to allow proposals to come forward for new residual C&I waste treatment/disposal capacity in the event that this is required in the future.

C&I waste

Question 52 Do the scenarios presented in Table 5.3 and 5.4 constitute an appropriate range of forecasts for future arisings of C&I waste? Do you prefer any one forecast? If yes, please state why.

Question 53 Are there any alternative forecasts that should be included?

Question 54 Do options W2 and W3 constitute appropriate alternative approaches for the WMLP to take in respect of future provision of new capacity for managing C&I waste?

Question 55 Are there any other options that should be considered?

5.6 Construction, Demolition & Excavation (CD&E) waste

5.6.1 To predict future CD&E waste arisings, a forecast obtained from Experian for the growth in construction sector GVA in Hereford and Worcestershire has been applied to two different figures for 2015 baseline arisings.

5.6.2 The resulting forecasts are presented in Table 5.5. The forecasts have been broken down into the key elements of the CD&E waste stream based on relative proportions estimated in 2014 and assuming that these remain constant:

- Scenario 1: Growth based on Hereford and Worcestershire construction sector GVA growth and a baseline figure of 357,000 tonnes in 2015 (based on UK waste per capita); and
- Scenario 2: Growth based on Hereford and Worcestershire construction sector GVA growth and a baseline figure of 379,000 tonnes in 2015 (based on England waste per capita).

Table 5.5 Forecast annual CD&E arisings for selected years and scenarios

Scenario		2016	2021	2026	2031
1	Non-hazardous C&D	160,000	167,000	184,000	**197,000**
	Hazardous C&D	2,000	2,000	2,000	2,000
	Excavation waste/ dredging spoils	189,000	197,000	217,000	232,000
	Total	**351,000**	**366,000**	**403,000**	**431,000**
2	Non-hazardous C&D	170,000	178,000	196,000	209,000
	Hazardous C&D	2,000	2,000	2,000	2,000
	Excavation waste/ dredging spoils	201,000	210,000	231,000	247,000
	Total	**373,000**	**390,000**	**429,000**	**458,000**

5.6.3 Table 5.5 shows that total CD&E waste arisings could increase over the Plan period to between 431,000 tonnes and 458,000 tonnes by 2031.

5.6.4 A significant amount of demolition waste is generated using mobile plant temporarily on sites where buildings are being demolished and therefore there is often no need for permanent waste management sites for CD&E waste. However, the Waste Need Assessment for CD&E waste concluded that it is likely that some thought will nevertheless need to be given to identifying strategic locations for the future management of non-hazardous CD&E waste. Based on this assessment the following capacity demand for CD&E waste should be considered:

- Recovery (including recycling and re-use): 140,000 to 170,000 tonnes per annum through permitted and exempt facilities/sites, although this is potentially covered by the existing facilities and exemptions;
- Landfill: 15,000 to 70,000 tonnes per annum, depending on the level of recovery achieved; and
- For any developments that will generate significant quantities of excavation waste, the developer would need to demonstrate that there is sufficient capacity to handle the proposed arisings e.g. through backfilling or quarry restoration.

5.6.5 The following options have been developed to make provision for new non-hazardous CD&E waste recovery within the Plan period:

- Option W4: Identify sites for allocation in the MWLP to provide new capacity for the management of non-hazardous CD&E waste.
- Option W5: Do not identify specific sites for allocation, but look favourably on proposals for new facilities to recover CD&E waste at the following types of site: extensions to existing waste management facilities; mineral voids.

CD&E waste

Question 56 Do the scenarios presented in Table 5.5 constitute an appropriate range of forecasts for future arisings of CD&E waste? Do you prefer any one forecast? If yes, please state why.

Question 57 Are there any alternative forecasts that should be included?

Question 58 Do options W4 and W5 constitute appropriate alternative approaches for the WMLP to take in respect of future provision of new capacity for managing CD&E waste?

Question 59 Are there any other options that should be considered?

5.7 Agricultural waste

5.7.1 Future waste arisings will be dictated by the nature of agricultural activity within Herefordshire, but it is not possible to forecast the likely amount of future arisings with any certainty.

5.7.2 The Waste Need Assessment assumed that the non-natural agricultural waste will remain in the range 6,000 to 8,000 tonnes as currently and that the amount of natural agricultural waste which is managed at permitted facilities will be dictated by the development of on-farm anaerobic digestion facilities. This recognises that, whilst agriculture is an important element of the Herefordshire economy, it is not expected that significant growth will be seen over the plan period. However, in order to enable a proactive approach, it may be appropriate to plan for the provision of additional facilities to manage agricultural waste.

5.7.3 In relation to agricultural waste, the Waste Need Assessment concluded that non-natural agricultural wastes should continue to be appropriately managed by the private sector and the MWLP does not need to identify strategic locations for its management.

5.7.4 On-farm anaerobic digestion provides a method of managing manures and slurries and the ongoing development of on-farm anaerobic digestion facilities should be considered in the Minerals and Waste Local Plan. Due to the extensive number of farms within Herefordshire, and little evidence to underpin a spatial strategy, it is proposed not to identify specific sites for development. It is recognised that sometimes the feedstock material is brought onto site from other farms. In principle, there need not be an objection to this, as each development proposal would be considered on its merits with reference to all relevant local plan policy.

5.7.5 It is recognised that agricultural units may get larger in the future, although the overall level of agriculture within may remain the same. Significant agricultural development will be subject to an Environmental Impact Assessment, but it may also be relevant to explicitly require environmental studies for all agricultural development, not least

recognising the sensitivities of local designated water bodies including the River Wye SAC.

5.7.6 Two options are being considered for policy addressing new agricultural waste facilities within Herefordshire:

- Option W6: Do not allocate any sites for the location of new facilities to meet agricultural waste, but allow proposals for anaerobic digestion or other types of biomass facilities on farms to be considered on their merits as they arise;
- Option W7: Include policy to require adequate provision for the management and disposal of waste materials, liquids and litter from agricultural activities.

Agricultural waste

Question 60 Are the assumptions about the future amount of natural and non-natural agricultural waste arisings reasonable?

Question 61 Is option W6 an appropriate approach for the WMLP to take in relation to agricultural waste?

Question 62 Is option W7 an appropriate approach for the MWLP to take in relation to the management of agricultural waste?

Question 63 Are there any other options that should be considered?

5.8 Hazardous waste

5.8.1 The analysis of hazardous waste arisings highlights that over the last couple of years generation levels of hazardous wastes have, on the whole, been relatively constant and that the trend in arisings is now mainly affected by the level of hazardous waste produced by the construction and demolition sector.

5.8.2 Therefore, based on this analysis, it is estimated that the annual hazardous waste arising in the future will be in the range 9,000 to 12,000 tonnes, with the actual tonnage being dependent on the quantity of contaminated soil and asbestos-containing waste generated by the construction and demolition sector.

5.8.3 In relation to hazardous waste, the Waste Need Assessment concluded that, in general, hazardous waste treatment and disposal facilities are considered at a national level because of the need to account for economies of scale. In addition, the generation levels of different waste streams are relatively small and are unlikely to warrant the development of specialist waste treatment capacity. Due to the location of the county, it is unlikely to be a destination chosen for a nationally significant infrastructure project, whilst smaller facilities should be capable of being accommodated on industrial estates and similar locations.

5.8.4 It is therefore concluded that there is only one option appropriate to provide for any future need for new hazardous waste facilities within Herefordshire:

- Option W8: Do not allocate any sites for the location of new hazardous waste facilities, but allow proposals on industrial sites to be considered on their merits as they arise.

Hazardous waste

Question 64 Is the estimate for future arisings of hazardous waste in paragraph 5.8.2 reasonable?

Question 65 Is option W8 an appropriate approach for the WMLP to take in relation to new capacity for hazardous waste?

Question 66 Are there any other options that should be considered?

5.9 Allocating sites or areas for new waste management capacity

5.9.1 The MWLP could take one or more different approaches to identifying and selecting sites for the provision of new waste management capacity. One approach would be to allocate specific sites where applications for permission for new facilities will be looked on favourably. Another approach could be to identify types of sites or locations within the county which are suitable in principle for waste uses and where applications within these areas will be looked on favourably. A third approach could be to allow proposals for sites to come forward regardless of the area in which they are located and to assess each proposal on its merits. Finally, a combination of two or more of these approaches could be adopted.

5.9.2 Table 5.6 lists those sites put forward for existing or new waste uses in responses to the call for sites.

Table 5.6 Sites promoted in responses to the call for sites

	Development Type	Site	New or Extension
1.	Inert waste recycling	Former Lugg Bridge Quarry, A465 from Little Lugg River to A4103, Lugg Bridge	Expansion
2.	Biomass treatment	MF Bennion (Potatoes Ltd), Dymock	Expansion

Potential future waste sites

Question 67 Do you have any comments or information about any of the sites listed in Table 5.6 above that needs to be considered?

Question 68 Are there any other existing or potential new sites which Herefordshire Council should consider?

5.9.3 As the lifetime of the MWLP extends to 2031, it is quite likely that sites could become available and economically viable for waste uses during that time which have not currently been identified. Therefore, the MWLP needs to allow for unidentified sites to be proposed for development and for these to be assessed against the relevant development management policies.

5.9.4 This could be done by identifying types of sites or locations for such sites, where proposals for development would be preferred to proposals on other types of site or other locations as long as they are in accordance with development management policies. This would have the advantage of providing some degree of prior information about where in the county such developments are or are not likely to

occur. However, it may serve to restrict developments in other areas or on other types of site that are nevertheless commercially and operationally viable.

5.9.5 The types of site on which waste development could be considered appropriate are existing industrial estates, extensions to existing waste sites, areas of brownfield land and mineral voids.

5.9.6 Waste facilities should be located near to the source of arisings, or near to sites which could be a potential market for outputs from the waste facility. This will provide the best opportunity for minimising the distance that waste has to travel, which has the dual benefit of minimising environmental impacts from waste transport and minimising transport costs. The optimum solution would be to locate waste facilities close to urban areas, as this will minimise the transport of a lower value commodity.

5.9.7 Another approach is to co-locate waste management facilities with other industrial processes which constitute either an important source of waste arisings or a market for processed waste materials, so that each industry benefits from the proximity and a 'circular economy' is enabled. Examples of such processes would be industries producing the waste to be treated, recyclers of outputs from those industries or from other waste facilities and residual treatment facilities providing energy which could potentially be used in the local area. Collections of such processes are known as Resource Recovery Parks (RRP). In order to facilitate the development of RRPs, priority could be given in the MWLP to locating waste development on larger industrial estates.

5.9.8 An additional consideration in minimising the environmental impacts of waste transport is access to adequate transport infrastructure. Most waste is transported by road and therefore it is important that sites have good access to the road network. Environmental impacts can be further minimised by transport waste by rail or water, although in reality opportunities for this are likely to be limited. Nevertheless, policy in the MWLP should promote rail and water transport to ensure any opportunities are captured where they are an economically viable prospect.

5.9.9 Instead of identifying types of sites or locations where waste facilities will be appropriate, the MWLP could allow landowners or operators to choose and propose sites on the basis of commercial and/or operational considerations regardless of where the site is located, and to determine planning applications on the basis of development plan policies. While this would not provide any information on where future waste-related developments might be likely to occur, it may provide more flexibility in allowing operators to promote sites that are considered viable and help to ensure sufficient facilities are available to meet future need.

5.9.10 The following options are therefore proposed as different approaches to site identification:

- Option W9: Allocate suitable sites from those put forward by landowners and operators in the call for sites which comply with the policies in the Minerals and Waste Local Plan;
- Option W10: Do not allocate sites but identify types of sites or types of location within which applications for development will be looked upon favourably as long as they comply with the policies in the Minerals and Waste Local Plan;

- Option W11: Do not allocate sites and do not identify types of sites or types of location, but assess any applications regardless of location on the basis of compliance with policies in the Minerals and Waste Local Plan;
- Option W12: Allocate suitable sites from those put forward in the call for sites and identify types of sites or types of location within which applications for development will be looked upon favourably, but also allow for proposals for development to come forward regardless of location.

Future waste site identification

Question 69 Do options W9 to W12 constitute appropriate options for different approaches to waste site identification?

Question 70 Are there any other options that should be considered?

5.10 Safeguarding waste sites

5.10.1 Operational standards at waste management facilities are much improved in recent times and rarely create problems for other types of land use nearby. Nevertheless, it is conceivable that new development could be proposed in proximity to existing waste sites such that the operation of the waste facility could create difficulties for the two different land uses.

5.10.2 In order not to constrain the operation of existing waste sites to ensure the continued availability of capacity, it will be important for proposals to demonstrate that new development in the proximity of waste sites will not constrain the operation of sites such that occupiers of new development will not be adversely affected by the waste site.

5.10.3 The following options address the need for safeguarding existing waste site operations and associated processing and transport facilities:

- Option W13: Safeguard existing waste sites and associated facilities, including transport facilities, from other development that may have the potential to constrain or prevent waste operations at those sites, do not include a buffer around the site;
- Option W14: Safeguard existing waste sites and associated facilities, including transport facilities, from other development that may have the potential to constrain or prevent waste operations at those sites, including a buffer around the site.

Waste site safeguarding

Question 71 Do options W13 and W14 constitute appropriate approaches for the WMLP to take in relation to safeguarding existing waste sites from other development?

Question 72 Are there any other options that should be considered?