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Spatial Context and Sites Report

HEREFORDSHIRE MINERALS AND WASTE LOCAL PLAN DRAFT PLAN

Hendeca
MARCH 2018

Contents

Annex

1. Introduction

1.1 Purpose of this report

1.1.1 Paragraph 157 of the National Planning Policy Framework (NPPF) identifies a number of items that local plans should include. The following are particularly relevant to the spatial element of plan making and site identification:

- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate; and
- identify land where development would be inappropriate, for instance because of its environmental or historic significance.

1.1.2 In addition, Planning Policy Guidance[1] advises that *'mineral planning authorities should plan for the steady and adequate supply of minerals in one or more of the following ways (in order of priority)*:

- *Designating Specific Sites – where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;*
- *Designating Preferred Areas, which are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or*
- *Designating Areas of Search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply*.'

1.1.3 This report has been prepared to consider the spatial context of Herefordshire and to identify sites or areas that are considered appropriate for development, and those that are not. This report presents both development of the spatial strategy for the Minerals and Waste Local Plan (MWLP) and consideration of specific sites.

1.2 Evidence Base

1.2.1 There are four key elements of evidence considered in this report:

- the Herefordshire Local Plan Core Strategy, 2011 – 2031 (the Core Strategy);
- the underlying geology, the natural and built environments of Herefordshire;
- existing and proposed minerals and waste sites in Herefordshire; and

[1] Paragraph: 008, Reference ID: 27-008-20140306. Revision date: 06.03.2014. https://www.gov.uk/guidance/minerals

- other inputs, the Sustainability Appraisal, Habitats Regulation Assessment Scoping Report and responses to the Issues and Options Report.

1.2.2 Each of these are considered in more detail within this report as they set the baseline for developing a spatial strategy and identifying strategic locations for minerals and waste development.

1.2.3 The identified sites are referred to throughout this report, with minerals locations identified by the prefix 'M' and waste sites by the prefix 'W'. Details of all the site considered are provided in Annexes A and B, whilst section 3 of this report presents the site analysis that has been undertaken.

Other plan making assessments

1.2.4 The analysis of the sites and locations considered in this report has been informed by high level Geographic Information System (GIS) data, which has enabled the key sensitivities within Herefordshire to be identified and preferred areas for development shortlisted. It is recognised that local plans, including those with site allocations, need also to be subject to other assessments, not least habitats regulations assessment and strategic flood risk assessment. The other plan making assessments are being undertaken alongside preparation of the MWLP.

2. The Evidence Base

2.1 Core Strategy

Overarching spatial strategy and key strategic decisions

2.1.1 The overarching spatial strategy for Herefordshire is set out at section 3 of the Core Strategy (paragraphs 3.17 to 3.24). It was developed through robust consideration of the evidence base, iterative consultation and wide-ranging analysis under Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulations Assessment. The Core Strategy was adopted in 2015 and remains a relevant source of evidence in preparing the Minerals and Waste Local Plan.

2.1.2 Figure 3.2 of the Core Strategy sets out the key strategic decisions that have been taken. The first two of these are particularly relevant to waste development and should underpin the spatial strategy for waste:

- focussing the majority of development to Hereford and the market towns; and
- focussing the largest strategic allocation (after Hereford) to Leominster.

2.1.3 The third key strategic decision commits to promoting a western relief road as part of the transport package for Hereford. This is relevant to both minerals and waste development as thought is given to how those materials will be transported around the county.

2.1.4 The fourth and fifth key strategic decisions focus upon housing; they are not directly related to the spatial strategy for either minerals or waste, albeit the three development types do interact. Relevant to minerals and waste is an understanding that some development may be appropriately located in the rural areas. Indeed, paragraph 3.19 recognises that the decision not to accommodate all development within the county's urban areas is based on the recognition of Herefordshire's dispersed settlement pattern. However, this is to be balanced with the intention to focus most development within and adjoining the urban areas.

2.1.5 These principles are therefore the starting point of the spatial strategy for the MWLP.

Core Strategy policy

2.1.6 Core Strategy policy SS4 establishes principles for movement and transportation that will also be relevant to minerals and waste development. Minerals infrastructure includes rail sidings that enable freight to be moved from road to rail and former workings provide opportunities for improved access to the outdoors. Transport will be an important matter for both minerals and waste development. In addition, internal transport arrangements, within mineral sites, should be considered as an element of operational infrastructure.

2.1.7 Core Strategy policy SS5 presents new strategic employment land provision at Hereford, Leominster, Ledbury and Ross-on-Wye. It also identifies the Hereford Enterprise Zone at Rotherwas and proposals for employment land at Bromyard and Kington. Waste management is a technology-led sector and would appropriately be included within the description of '*knowledge intensive industries*' and '*environmental technologies' that are intended to be 'facilitated where they do not have an adverse impact on the community or local environment*.'

2.1.8 These types of locations are considered to be appropriate, in principle, for the development of waste management facilities.

2.1.9 '*The strategy for improving environmental quality will support the creation of sustainable communities through protecting existing built, heritage and natural environment assets, the better use of resources and addressing the causes and effects of climate change.*' This strategy is directly applicable to both minerals and waste development, which can also provide opportunities for green infrastructure delivery.

2.1.10 The approach of addressing issues at a landscape scale is also relevant, particularly to minerals development which can be extensive and influential within the landscape in which it is located.

2.1.11 Paragraph 3.94 recognises that greenfield land will need to be used in delivering the scale of development set out in the Core Strategy. This is particularly important for new mineral workings, which invariably requires the development of land that is greenfield. Policy SS6 provides an appropriate approach to considering new development locations.

2.1.12 Addressing climate change remains a global priority; both minerals and waste development has the opportunity to make significant contribution locally. Policy SS7 provides a structure for the MWLP, which should further consider the role to be played by minerals and waste sites.

The difference between minerals and waste

2.1.13 It is a fact that minerals can only be worked (extracted) where they exist. Consequently, any spatial strategy for minerals extraction must be driven by the underlying geology of an area; it is not possible to start with the Core Strategy.

2.1.14 However, where there is a broad expanse of mineral resource, it is possible to consider prioritising one area over another, an exercise which should be expected to draw upon the Core Strategy in terms of identifying key constraints to and drivers for development (eg landscape designations and growth centres).

2.1.15 Waste development should be located so as to provide a network of facilities that would allow waste to be treated in one of the nearest appropriate installations. Put simply, one might expect waste facilities to be located within, or close to, settlements. As built development, waste facilities are subject to the spatial strategy set out in the Core Strategy.

Conclusions

2.1.16 The Core Strategy presents a comprehensive spatial portrait and establishes principles that are relevant to the spatial strategy for minerals and waste development. This should be relied upon as the starting point for the MWLP. It need not be repeated but any specific change from it should be made clear within the new plan.

2.1.17 The overarching spatial strategy and policies SS4, SS5 and SS7 are all relevant to the MWLP and should form the backbone to its spatial strategy. Consequently, waste development will be focussed at Hereford, Leominster and the market towns.

2.1.18 As has already been observed, minerals extraction can only take place where it occurs, consequently this urban focus cannot generally be followed for minerals development. The review of the underlying geology and natural and built environment of Herefordshire has identified both key areas of search for minerals development and those areas that should be

constrained from future development. Not surprisingly these also generally follow the approach to development set out in both the NPPF and the Core Strategy, such as giving great weight to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty.

2.1.19 As set out in Table 3.3 of the Issues and Options Report, the Core Strategy contains a number of development management policies that would apply to proposals for minerals and waste development. There are few matters that require new policy to be presented in the MWLP; this is not surprising as there are few development management matters that are inherently different for minerals and waste developments than for any other development type.

2.1.20 Application of these Core Strategy policies will generally provide an appropriate level of development management for minerals and waste development (although some additional provisions are required such as in relation to site reclamation). There is no evidence to suggest that a table of environmental constraints, such as those presented in Table 3.4 of the Issues and Options Report, are required.

2.2 The Underlying Geology and the Natural and Built environments of Herefordshire

2.2.1 It has already been demonstrated that the spatial strategy of the Herefordshire Core Strategy is appropriate to waste management. This section consequently focusses on minerals reserves, their safeguarding and identifying preferred areas of search. However, some of the matters considered are also relevant to waste and comment is made as appropriate.

Underlying geology

2.2.2 The British Geological Survey (BGS) has mapped the underlying geology of Herefordshire, which provides the starting point for understanding where mineral lies within the county. BGS data is not provided to a level of detail that enables us to understand the quality or depth of the mineral; this is only identified through mineral exploration activities such as taking borehole samples, which is beyond the remit of plan making.

2.2.3 Figure 2.1 presents the BGS data for Herefordshire with identified minerals sites mapped. The term 'identified' is used as not all the sites are active. Figure C.1 in Annex C presents just the BGS data mapping, without the sites.

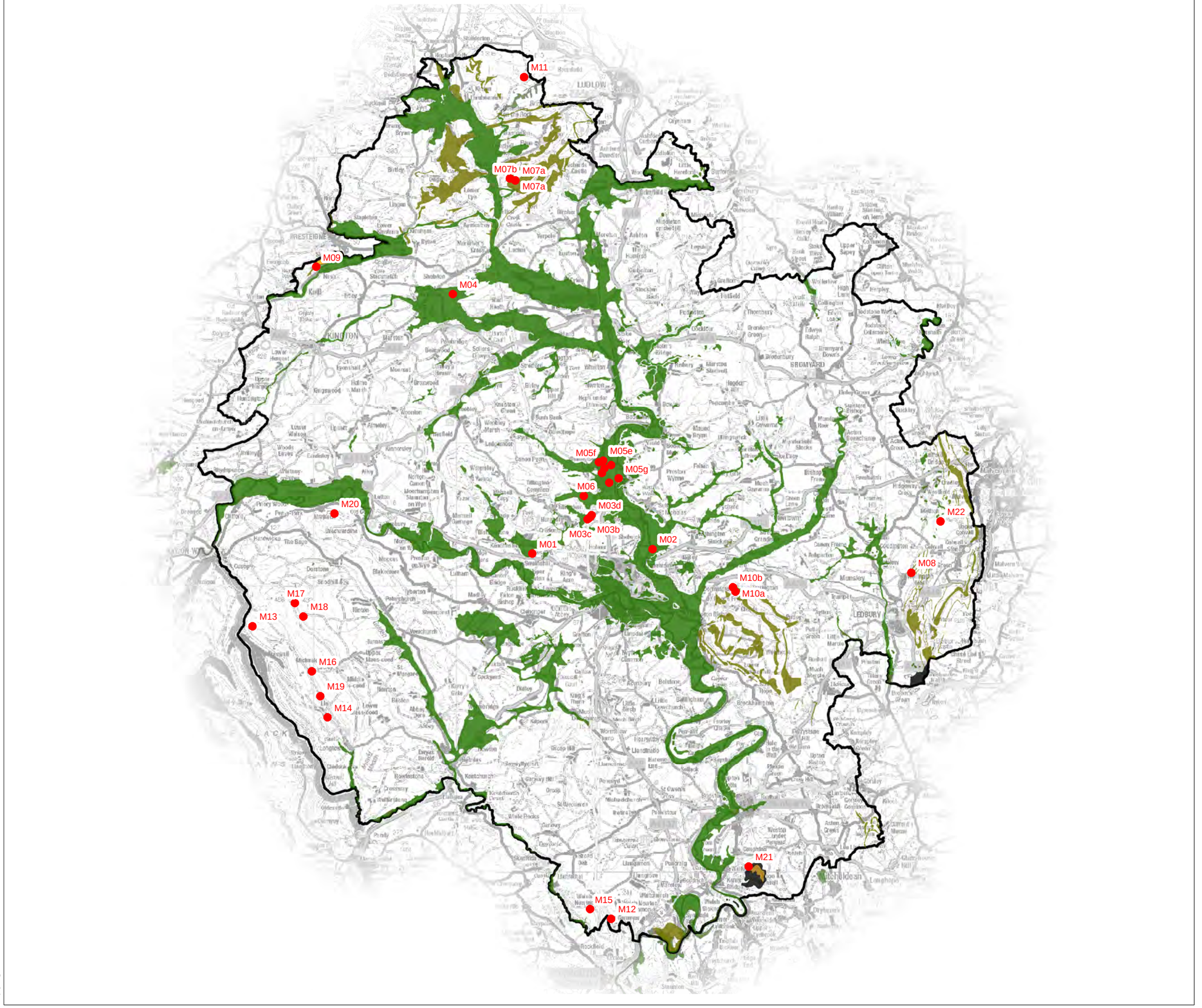
2.2.4 Whilst, superficial **sand and gravel reserves** are present across much of the county, the more significant resources generally follow the river corridors as these deposits are generally made by fluvial activity. The permitted sand and gravel quarries and associated proposal areas are all located within the significant areas of reserve: Sites M03 Upper Lyde and M05 Wellington, to the north of Hereford; and Site M04 Shobdon, located in the north-western corner of the county.

2.2.5 **Limestone** (in Herefordshire this is crushed and used as an aggregate) deposits lie to the north, south and east of the county. The active limestone quarries are located in these reserves: Site M07, Leinthall Quarry is located to the north; whilst Site M10, Perton Quarry is located just south east of Hereford.

2.2.6 The BGS data indicates that there are reasonably extensive reserves of sand and gravel and limestone, such that preferred areas of search and identified sites should be presented within the MWLP.

Herefordshire Minerals and Waste Local Plan

Figure 2.1
Mineral resources in Herefordshire with identified sites



Mineral Reserves

- Brick clay
- Coal
- Limestone (including dolomite)
- Sandstone: Pre-Cambrian, Ordovician, Silurian Greywacke
- Superficial sand/gravel
- Identified Sites

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2.2.7 The BGS data only shows a small resource of **sandstone**, located to the north west of the county, adjacent to the boundary with Wales and just south of Presteigne. However, there are a number of active sandstone delves located elsewhere in Herefordshire:

- Site M20, Westonhill Wood is situated in the west of the county, west of Hereford, just south of the junction between the A4112 and the A438;
- Sites M13 Black Hill, M16 Llandraw, M17 Pennsylvani, and M18 Sunnybank are situated in the south west of the county; and
- Site M12 Callow is in the very south of Herefordshire, just north of Monmouth.

2.2.8 The BGS data indicates that there are limited reserves of these minerals and it would be difficult to identify preferred areas of search for sandstone. In addition, within Herefordshire sandstone is worked as small delves, small working areas that are more appropriately considered on a site by site basis. Consequently, preferred areas of search are not identified.

2.2.9 Small deposits of **building clay and coal** are shown in the BGS data, located in the very south of the county, just south of Ross-on-Wye and Ledbury, including Site M22 Howle Hill. The lack of clay deposits is important in terms of waste management; there are no non-inert landfill sites in Herefordshire, reflecting the lack of a suitable geology for such facilities.

2.2.10 There is no evidence of building clay having been worked in Herefordshire. Whilst there is some evidence of coal extraction in the past, it is also extremely unlikely that this mineral will be worked in Herefordshire in the future. Existing reserves will be safeguarded, but no preferred areas of search will be promoted within the MWLP.

The natural and built environments of Herefordshire

2.2.11 GIS data relevant to the natural and built environments of Herefordshire has been layered over the BGS data. This approach uses relevant constraints and opportunities to identify the preferred areas for future mineral development.

2.2.12 Figure 2.2 shows all the data layers applied to the minerals resource mapping with the identified sites also mapped. The data sets selected have been informed by the spatial strategy policy of the Core Strategy, which incorporates the natural and built environment priorities for the county. Figure C.2 at Annex C presents the data layers without the identified sites.

2.2.13 As this exercise applies across the county, it has been undertaken at a high level and focussed on some key constraints: National Park; Area of Outstanding Natural Beauty; Natura 2000 sites; UK ecological designations; groundwater source protection zones; and urban areas. These criteria are explained at Table 2.1. They are considered appropriate to establish those areas where minerals development would not be encouraged.

2.2.14 Sites M08, M21 and M22 are located within, or on the boundary of, an Area of Outstanding Natural Beauty (AONB, Malvern Hills and Wye Valley). Sites M08 and M21 are restored and need not be considered further. However, Site M22 is an area proposed to be worked in Mathon; this location, within the Malvern Hills AONB, and the lack of substantial mineral reserve showing from the BGS data means that this area is not preferred for future mineral extraction.

2.2.15 None of the sites are located within a Natura 2000 (European level) or national level ecology designation, although Site M13 is very close to the eastern edge of the Black Mountains, a

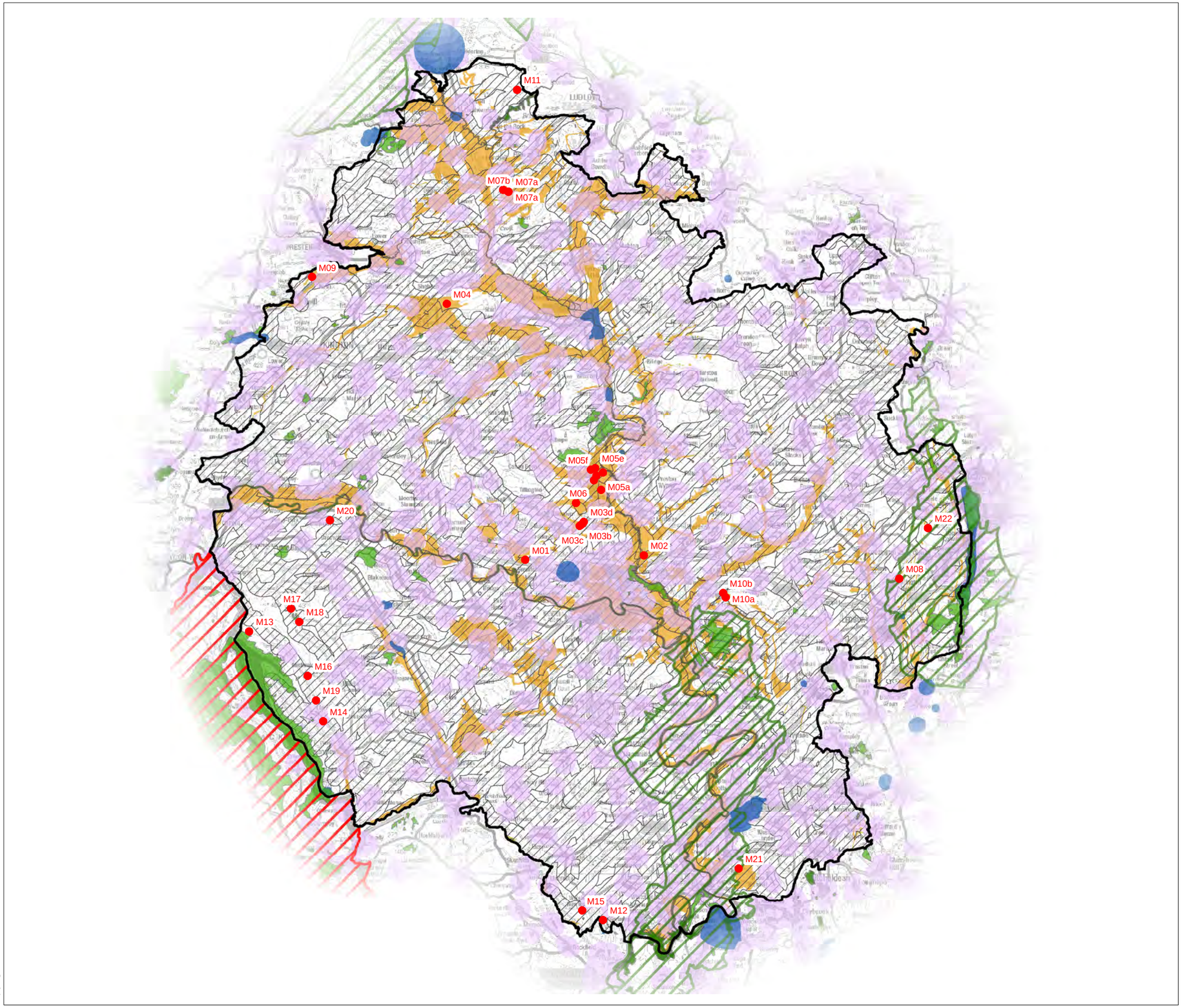
Site of Special Scientific Interest. Sites M05d and M05g are adjacent to the River Lugg SSSI. Sites M02, M17, M18 and M20 are also close to SSSI. Sites M10a and M10b have a SSSI within the site, designated for its geological and fossil interest.

2.2.16 Similarly, none of the sites lie within a source protection zone. Some sites do appear to lie within built-up areas. These may lie within the 50m buffer or simply be a result of the data and mapping used, as a fine level of detail is not available at this scale of mapping.

2.2.17 GIS road data has been used to indicate areas of search. Instead of being applied as a constraint, it is used as an opportunity. Herefordshire is a very rural county and there is very little opportunity for transport modes other than road. The GIS data set OS Open Roads (see Table 2.1) has been used to identify all the roads across Herefordshire. In assessing the discrete sites, this criterion has focussed on the 'A' and 'B' classified roads. However, the roads across the north of Herefordshire are predominantly unclassified. Consequently, in identifying preferred search areas the criterion considers proximity to all and any road, not only those that are 'A' or 'B' classified.

Herefordshire Minerals and Waste Local Plan

Figure 2.2
Constraints data applied to mineral resource, with identified sites



- Identified Sites
- Mineral Reserves (BGS Geology)
- Brecon Beacons National Park
- AONB
- Natura2000 Sites
- UK Ecological Designations
- Source Protection Zones
- Built Up Areas 500m Buffer
- Road Access

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Identifying preferred areas of search

2.2.18 Planning Policy Guidance[2] advises three ways that authorities should plan for the steady and adequate supply of minerals; with the third tier being to identify areas of search, '*where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply*.' The BGS mapping with constraints applied provides a good starting point from which to identify preferred areas of search; however, at this scale the data should be carefully reviewed to finalise the areas to be allocated in policy.

2.2.19 The mapping indicates a significant amount of sand and gravel reserve across the northern two-thirds of Herefordshire. Consequently, the **sand and gravel** reserves will be further considered to identify those areas that are preferred to be worked throughout the plan period.

2.2.20 Sites M02, M03, M05 and M06 are all located within the large expanse of reserve that wraps around the northern and eastern sides of Hereford. Site M04 is located to the north-west, on the edge of another substantial area of reserve. These reserves lend themselves to be identified as preferred areas of search: the area around Sites M02, M03, M05 and M06 are well located to supply aggregate for the growth proposed in Hereford; the area around Site M04 provides an alternative location within the county, bringing resilience to supply.

2.2.21 Focusing future sand and gravel workings within these areas provides the industry with access to a large area of reserve, but means that policy can avoid a proliferation of minerals development across the county. Optimal extraction can be promoted at these areas before new reserves are opened.

2.2.22 However, there also needs to be a local balance to focusing development. There are active quarries and new working proposals at both Sites M03 and M05. As with all areas where there is the potential for multiple sites to be worked in close proximity to each other, a proliferation of infrastructure should be avoided, to minimise and manage the adverse effects from quarrying.

2.2.23 The remaining areas of reserve will be identified as areas of search. There are no current, permitted workings in these areas and there have been no submissions from the industry to work them.

2.2.24 Both **limestone** Sites M09 and M10 are located in the preferred areas of search. However, access into Site M09 is known to be less than ideal and there appears to be limited options to access this reserve. This is not a preferred location for future mineral extraction and will be identified as an area of search only.

2.2.25 There are several reserves of limestone in the north of Herefordshire. Site M07 lies just outside the identified preferred area, however this is due to the urban areas data identifying the local settlement as an urban area, rather than an environmental constraint. Limestone extraction is successfully undertaken in this location currently and there is no evidence currently available to suggest it would not be appropriate to work the area further.

[2] Paragraph: 008, Reference ID: 27-008-20140306. Revision date: 06.03.2014 https://www.gov.uk/guidance/minerals

2.2.26 As there are only two working limestone quarries within Herefordshire, the remaining areas of reserve (apart from that around Site M09) will be identified as preferred areas of search; a third quarry would bring additional resilience to crushed rock supply.

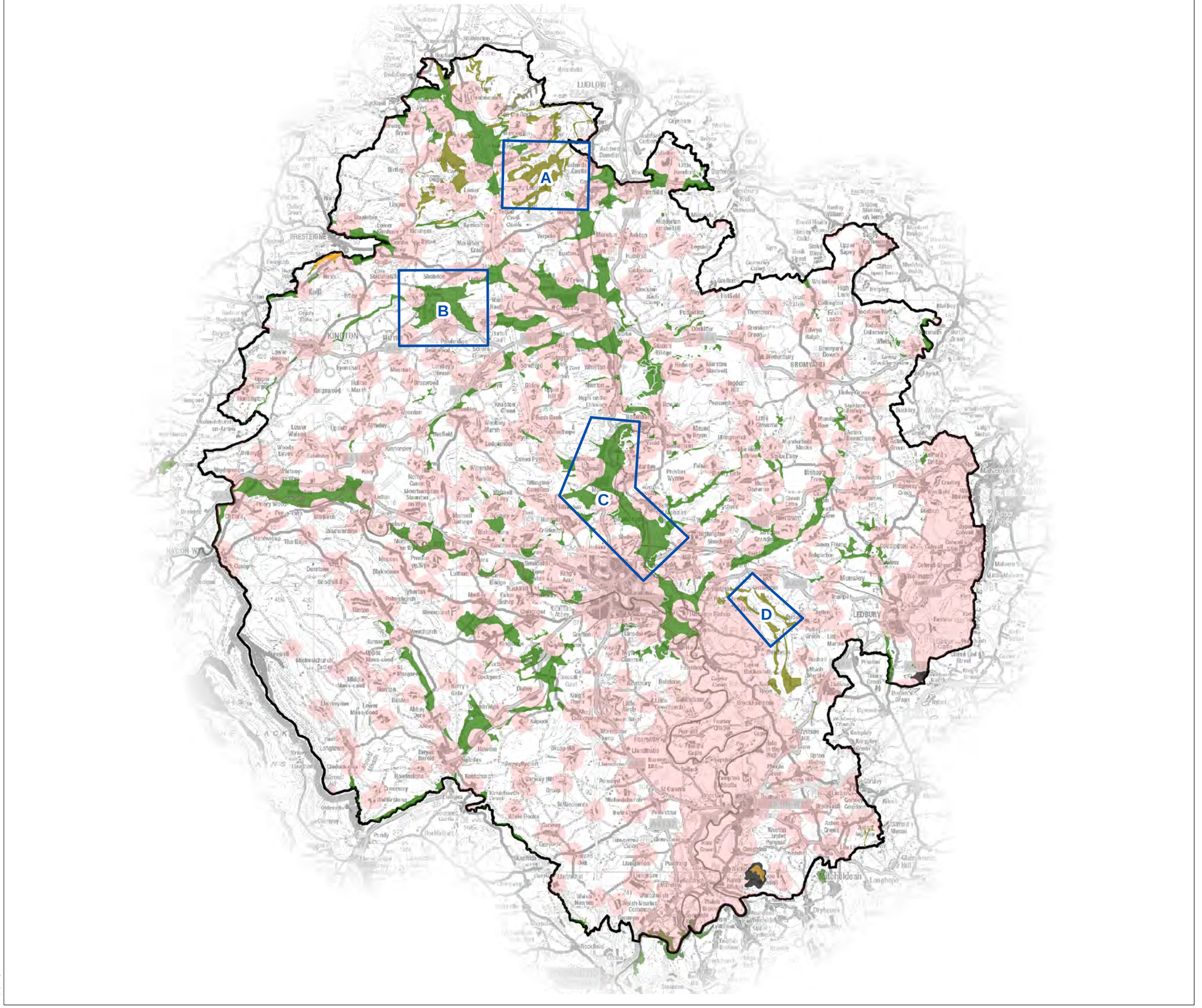
2.2.27 As previously discussed, preferred areas of search are not identified for **sandstone, clay** or **coal**.

2.2.28 Figure 2.3 presents the areas of search for minerals development, i.e. those areas lying outside the identified constraints, distinguishing between those that are preferred and those that are not.

2.2.29 This mapping does not show the identified sites, that detail is presented on Figure C.3 at Annex C. This change in approach has been used here because this would be the basis of mapping for inclusion in the Draft MWLP where it would be inappropriate to show all the identified sites, i.e. including those that would have little or no impact through the plan period.

Herefordshire Minerals and Waste Local Plan

Figure 2.3
Preferred Areas of Search



- Preferred Areas of Search

Mineral Reserves

- Brick clay
- Coal
- Limestone (including dolomite)
- Sandstone: Pre-Cambrian, Ordovician, Silurian Greywacke
- Superficial sand/gravel
- Constrained Areas

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Safeguarding

2.2.30 Paragraph 143 of the NPPF requires authorities to '*define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas*.'

2.2.31 Guidance from the BGS suggests that safeguarding should extend beyond the known resource boundary, to create a buffer to reduce the risk of incompatible development occurring in close proximity to the mineral resource. The extent of these boundaries varies depending upon the type of mineral and the extraction method.

2.2.32 Responses to the Issues and Options Report indicate a preference for the MWLP to safeguard mineral facilities and to include a buffer around the site (Option M18). However, there is no distance or area for safeguarding mineral reserves, and associated infrastructure set down in policy and so it is for each authority to determine the appropriate area.

2.2.33 The response from Tarmac, a significant sand and gravel operator within Herefordshire, proposed a preference for minerals consultation areas, rather than a buffer zone around each site. This is also the approach set out in the NPPF (paragraph 143) and is presented by Worcestershire County Council in its emerging Minerals Local Plan, which proposes Mineral Consultation Areas up to 250m around each site/area.

2.2.34 Herefordshire is a unitary authority, and there is no evidence to suggest this will change to a two-tier authority over the plan period. Consequently, a Minerals Consultation Area is rather superfluous, as the authority would be consulting itself, a centralised planning team.

2.2.35 Instead, the focus for safeguarding in the MWLP should be on ensuring the longevity of the reserve that exists. The approach to be carried into policy will be to safeguard all the mineral reserve identified in the BGS mapping (excluding that covered by the urban areas criterion and 500m buffer) and the preferred sites/areas identified through the sites analysis. This approach safeguards a maximum amount of mineral in a realistic manner, recognising that some land will already have been developed and is not available for mineral extraction, but also that the economic growth for Herefordshire to come from urban development needs to be balanced with minerals development.

2.2.36 The urban areas criterion was based on the OS 'Strategi' open mapping products, using the 'Urban' layer. 'Urban' in this product is described as 'a*n area containing a concentration of buildings and other structures'.*

2.2.37 The safeguarded areas also means that all potential areas of search will be presented; they may not all be appropriate or even preferred areas for development, but they will be recognised as areas of mineral reserve.

2.2.38 Paragraph 143 of the NPPF also encourages local authorities to safeguard:

- 'existing, planned and potential rail heads, rail links to quarries, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials; and
- existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.'

2.2.39 Transport modes other than road are very limited in Herefordshire. There is one branch rail line in Herefordshire associated with mineral facilities, at Moreton-on-Lugg. This line has two end points: an active railhead adjacent to Wellington Quarry; and inactive track, laid within the Moreton Business Park.

2.2.40 The Moreton-on-Lugg railhead is operated by Tarmac, who state that it is used extensively for the purposes of storage, loading and distribution by rail of hard stone minerals, principally to London and the south east of England. The stone originates from Tarmac quarries in Wales, principally Dolyhir and Gore and is delivered to Wellington by road. Tarmac identifies the potential to export sand and gravel by rail from this location and regard the railhead as an important piece of infrastructure.

2.2.41 There are rail tracks running into the Moreton Business Park. Whilst any former railhead has been removed and the tracks do not appear to have been used for some time, they could be reinstated in the future. Located within the Business Park, these tracks provide the potential for a range of freight items to be moved by rail.

2.2.42 Rail tracks and heads are difficult and expensive items of infrastructure to develop and their key usefulness comes from being in the vicinity of where the mineral resource is located. Both these items are proposed to be safeguarded.

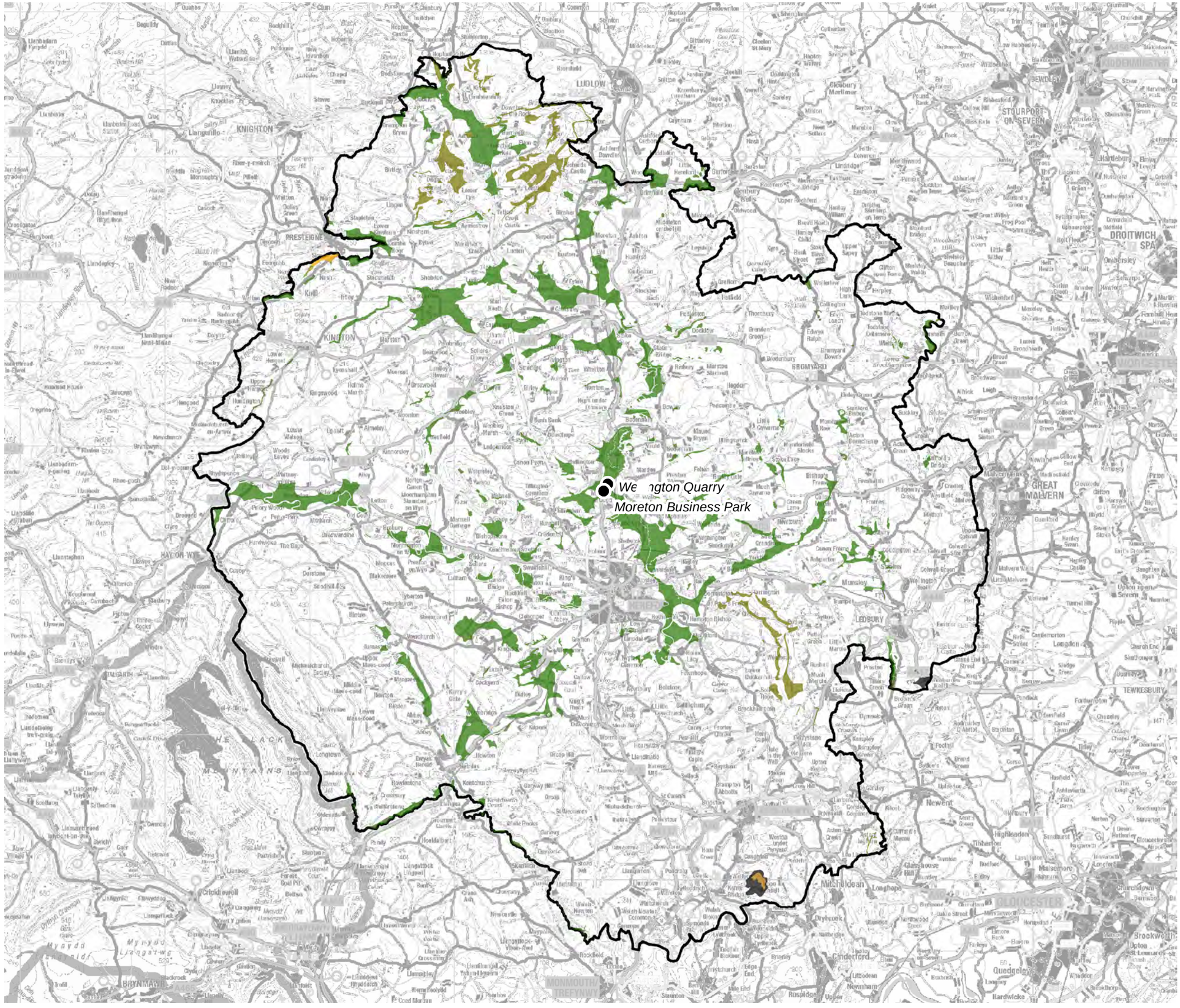
2.2.43 There are a number of facilities across Herefordshire that undertake concrete batching, stone coating, block production and the handling, processing and distribution of recycled aggregates. These plant are located within existing mineral workings, on industrial estates and at sites within the preferred areas of search. Those facilities that operate on an existing or proposed site would be safeguarded by association with the identified mineral reserve and safeguarding policy.

2.2.44 That such facilities operate on industrial estates across Herefordshire, and that they have been developed recently, indicates that they are reasonably unconstrained in terms of where they are located and that further safeguarding may not be required within Herefordshire. Consequently, such facilities are not proposed to be separately safeguarded. Again, this matter is simplified by Herefordshire being a unitary authority, considering all development proposals in a single planning team.

2.2.45 The areas and facilities proposed to be safeguarded are shown on Figure 2.5.

Herefordshire Minerals and Waste Local Plan

Figure 2.4
Safeguarded Minerals Resource Areas and Rail Heads



Mineral Reserves

- Brick clay
- Coal
- Limestone (including dolomite)
- Sandstone: Pre-Cambrian, Ordovician, Silurian Greywacke
- Superficial sand/gravel
- Rail Heads

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2.3 Existing and Proposed Minerals and Waste Sites in Herefordshire

Overview

2.3.1 An element of the MWLP is to identify individual sites and/or locations that can make a contribution to meeting the need within Herefordshire for mineral production or waste management. This section of the report sets out the approach used in the analysis of existing and proposed minerals and waste sites in Herefordshire.

2.3.2 Information relevant to each site is provided at Annexes A (minerals) and B (waste). This provides the key features considered at each location in identifying its future role within the MWLP. The conclusions from the sites analysis are presented at section 3 of this report.

2.3.3 The initial approach set out to use desk-based analysis to shortlist the number of sites to be taken through a detailed assessment. However, due to a number of uncertainties arising through this first phase of analysis (such as level of operation, site boundary etc) the decision was made to visit all of the sites identified and to undertake a more qualitative assessment of the potential future role.

2.3.4 It is important to be clear that site assessment to the level of detail that would be expected to accompany a planning application has not been undertaken; this would be excessive for plan making purposes. The analysis has been undertaken at a level appropriate to identify key constraints and opportunities at each location and to inform policy development, i.e. concluding whether, in principle, a site would be appropriate for further development and whether the combination of sites would be sufficient to enable key aims of the plan to be achieved.

Criteria

2.3.5 A number of criteria have been deployed in analysing the sites and their potential future role. The criteria are wide ranging and seek to consider relevant matters as set out in the National Planning Policy Framework (NPPF) and Core Strategy.

2.3.6 GIS has been used for criteria that can be effectively assessed through the use of spatial data. This analysis has incorporated a number of criteria suggested through the responses to the Issues and Options Report, including the agricultural land classification and source protection zones. In undertaking this initial site assessment, the Environment Agency recommended use of: EA Flood Map for Planning; Council SFRA work; Source Protection Zone (SPZ) maps; and aquifer maps. It also recommended consideration of Air Quality Management Areas (AQMA) water supply, and watercourses. GIS data for flooding, SPZ, AQMA and major rivers has been utilised in the site assessment. The GIS data sets used are those that are publicly available, not least to ensure the work can be replicated by any other party. Information on aquifers and water supply were not readily available. A strategic flood risk assessment (SFRA) is being undertaken separately.

2.3.7 Table 2.1 presents the criteria and scoring matrix used for each of the GIS based criteria.

2.3.8 Consideration has also been given to the viability, availability and deliverability of each site, incorporating matters such as its potential role in economic growth, including rural prosperity and a supported tourism industry. The conclusions of this analysis are presented in Annexes A and B.

Table 2.1 Criteria and scoring matrix for each of the GIS based criteria

Criteria	Scoring Approach		
	Red	**Amber**	**Green**
Site size	<3.5ha	3.5-4ha	> 4Ha
Natura 2000 designated sites	<5km	5km - 15km	>15km
Nationally designated ecology sites/ancient woodland	<250m	250m - 5km	>5km
National Park and AONB designations	<1km	1km - 5km	>5km
Agricultural Land Classification	On Grade 1 or 2	On Grade 3	On Grade 4, Non-Agricultural or Urban
Local ecology records or local wildlife site	Designated site or protected species on site	n/a	No protected species or designation
Air Quality Management Areas	<250m	250m - 1km	>1km
Road access ('A' and 'B' roads), railheads and wharves	>500m	250m – 500m	< 250m
Sensitive buildings (schools/hospitals)	< 500m	500m – 1km	>1km
Cultural and Historic designated sites	<250m	250m - 1km	>1km
Aerodrome/airfield safety	<5km	5km - 15km	>15km
MOD Danger Areas and No Fly zones (Amber Low Fly Zones)	<5km	5km - 15km	>15km
Major rivers[1]	< 250m	250m – 500m	>500m
Flood Zone[1]	In Flood Zone 3	In Flood Zone 2	In Flood Zone 1
Source Protection Zones (SPZ)	In SPZ Zone 1	In SPZ Zone 2	In SPZ Zone 3 or no Zone
Designated national walking/cycling trails	<250m	n/a	>250m

Notes

1. Taking into account that mineral sites can be water-compatible development and that waste development can be identified as 'less vulnerable'.
2. Greenbelt was initially considered but on examination there was found to be no Greenbelt designation in Herefordshire.

2.4 Other Inputs

Sustainability Assessment/Strategic Environmental Assessment

2.4.1 The Issues and Options Report was subjected to a Sustainability Appraisal. This was undertaken on behalf of Herefordshire Council by Land Use Consultants and the results published in a report 'Sustainability Appraisal of the Herefordshire Minerals and Waste Local Plan' issued in August 2017 (the SA Report). The proposed vision and strategic objectives for the MWLP and the options considered for minerals and waste were appraised against a set of sustainability objectives to assess whether there are likely to be positive or negative effects on those sustainability objectives.

2.4.2 The MWLP Vision was found to have a largely positive effect on a range of sustainability objectives, but was found to give rise to negative effects on transport and restoration. Policy of the MWLP can require high standards of site restoration to be achieved, seeking net gains where appropriate; this approach would lessen long term negative effects of quarrying. A recommendation was made that the Vision could be updated to refer to the use of sustainable transport modes for minerals and waste which would reduce road traffic, congestion and pollution. As has already been recognised, there is little realistic alternative to road transport within Herefordshire.

2.4.3 The strategic objectives were generally found to have positive effects, although some negative effects are identified for strategic Objectives 5 and 7 because they seek to support the extraction of primary resources. No recommendations are made to address these negative effects.

2.4.4 The SA Report notes that the options lack detail and therefore are subject to greater uncertainty than will be the case at the Regulation 19 Publication stage, once policy wording has been drafted and potential development sites are identified. However, in general, the options have been found to have a wide range of positive and significant positive effects on the Sustainability Assessment objectives, although a number of potentially minor and significant negative impacts are also associated with some options.

2.4.5 In particular, the SA Report identified Option M3[3] as having significant negative effects on mineral resources because it was considered to support the significant provision of additional permitted sand and gravel reserves, which it believed would considerably increase the rate of extraction of mineral resources. The MWLP preparation team recognises that mineral extraction can have some negative impacts; however, it is a recognised purpose of the plan to enable new operations to occur in appropriate locations.

2.4.6 Options W1[4] and W3[5] are identified as having significant negative effects on the waste hierarchy, climate change and pollution because they would not identify sites for managing

[3] 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.

[4] 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.

[5] 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

municipal and commercial and industrial wastes within Herefordshire, resulting in waste not being managed at high levels of the waste hierarchy and impacts on traffic and greenhouse gas emissions through the export of waste. No recommendations are made in the SA Report to address these negative effects. This matter will be addressed by identifying sites and locations in the MWLP to manage a range of wastes, including LACW and C&I waste. An objective of the MWLP is to achieve net self-sufficiency within Herefordshire enabling waste to be managed in accordance with the hierarchy.

Habitats Regulations Assessment

2.4.7 The Issues and Options Report was subjected to a Habitats Regulation Assessment. This was undertaken on behalf of Herefordshire Council by Land Use Consultants and the results published in a report 'HRA Scoping Report for the Herefordshire Minerals and Waste Local Plan issued in August 2017.'

2.4.8 The HRA Scoping Report identifies the European sites to be included in the HRA for the MWLP and describes the key issues for the HRA to consider.

2.4.9 It also reflects on the HRA of the Herefordshire Local Plan Core Strategy, concluding that the Local Plan's policies would not lead to likely significant effects either alone or in combination on European sites within 15km of Herefordshire, although the sensitivity of the River Wye SAC is identified.

2.4.10 The HRA Scoping Report identifies the potential policies of the Core Strategy that may have an adverse impact on the European sites, concluding that these impacts are appropriately managed through other policies within the Core Strategy and an emerging Nutrient Management Plan; further these policies are not directly relevant to the HRA of the MWLP.

2.4.11 However, the HRA Scoping Report does highlight the sensitivity of the River Wye SAC to development, advising that (paragraph 2.8):

'*The sensitivity of the River Wye SAC to minerals or waste development, either alone or in combination with other plans (including the Core Strategy) will be assessed within the HRA*.'

2.4.12 The HRA Scoping Report makes no recommendations for the MWLP as yet. It does set out the method to be used in undertaking the HRA of the MWLP when it is drafted and seeks comment from Natural England on the approach set out.

Issues and Options Report

2.4.13 This section of the report does not seek to address all comments raised in response to the Issues and Options Report – only those that are relevant to spatial matters and site location within the MWLP, and which are not addressed elsewhere, i.e. in the reports titled: Preparing the Draft Plan (March 2018); Minerals Need Assessment (Update 2018); and Waste Need Assessment (Update 2018).

2.4.14 **Ataghan Limited Stoke Edith Estate** (Ataghan) supports the approach to safeguarding mineral resource and co-location of recycling activities on minerals sites, whilst recognising that permanent facilities might also be required. The MWLP will be developed to provide a range of options for the recovery of construction, demolition and excavation wastes. Ataghan

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.

does not consider it appropriate for the MWLP to introduce '*more prescriptive guidelines than would otherwise appear in guidance and legislation*.'

2.4.15 Support is given to Option M16, and it is recognised to offer the most flexibility for mineral resources. Preference seems to be given to Option M18[6] in relation to safeguarding, although it recognises that this approach has its flaws and requires further detail. In the 2016 Call for Sites, Ataghan promoted an extension to Perton Quarry (Site M10) which has been considered as part of the sites analysis.

2.4.16 Lichfields responded on behalf of **Bourne Leisure Ltd**. The focus of this response was on ensuring that protection was provided for residents, businesses and visitors against the adverse amenity impacts that can arise from minerals and waste developments. Bourne Leisure considers that the thresholds presented in Table 3.4 were unclear and insufficient, and suggests that '*all minerals and waste proposals should be assessed based on the type and nature of the proposal and the specific impact(s) on the identified receptor*'. This is a principle well-established within planning and consequently will be found in the emerging MWLP. Specific responses are made in relation to heritage assets and Registered Parks and Gardens; these are considered within the detailed site analysis.

2.4.17 The **Campaign to Protect Rural England Herefordshire** (CPREH) raises concerns about some of the evidence base documents that are referred to and that impact upon the spatial approach to be developed within the MWLP. Their concerns are noted, however these documents have been through their own preparation process, including examination and concerns have not been raised by the statutory consultees. The BGS data is discussed at section 2.2 of this report. A strategic flood risk assessment, and habitats regulations assessment, of the MWLP are being undertaken separately.

2.4.18 The CPREH seeks to avoid excessive haulage, in terms of both volume and distance across the county when or if a non-Herefordshire source is readily available; policy should seek to minimise the transport of heavy/bulky materials by road. The road network is considered in the site analysis and alternative modes of transport will be considered in preparing the MWLP, albeit they are limited within Herefordshire.

2.4.19 Matters in relation to agricultural land quality, green infrastructure, flood risk and the natural and historic landscape are considered in the sites analysis and will be addressed further in preparing the MWLP. Table 3.4 is considered to be arbitrary with little practical application.

2.4.20 A compromise between Options M11[7] and M12[8] is recommended. The CPREH would like to see firm policy guiding decision making on any fracking proposal.

[6] 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 zone around the site.

[7] 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 MWLP.

[8] 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 MWLP, 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.

2.4.21 CPREH also promotes a new/additional household waste site to be located to the north/north west of Hereford City. CPREH supports Option W7[9] to require adequate provision for the management of agricultural wastes.

2.4.22 The **Coal Authority** has responded that: Options M11[7] and M12[8] are appropriate for dealing with the uncertainty over potential future hydrocarbon activity in Herefordshire; and that Options M17[10] and M18[6] constitute appropriate options for safeguarding mineral sites. Further, the Coal Authority expects the whole extent of the Surface Coal Resource area within Herefordshire to be identified in any Mineral Safeguarding Area designation; this has been done.

2.4.23 **Dinmore Aggregates Ltd** promotes new locations for sand and gravel extraction; these have been considered in the detailed site analysis (sites M05c and M05d).

2.4.24 The **Environment Agency** raises the need to consider the following matters: strategic flood risk; Water Framework Directive and the Severn River Basin Management Plan; and ground water resources. A strategic flood risk assessment of the MWLP is being undertaken separately. The Water Framework Directive and Severn River Basin Management Plan have been reviewed; these are recognised to be important documents but not integral to this stage of policy development. Ground water resources are included in the criteria used to review each of the sites and locations being considered.

2.4.25 The Environment Agency has also provided comment on the proposed extension sites identified in the Issues and Options Report. These comments have been incorporated into the detailed sites analysis.

2.4.26 **Gladman Development Ltd** considers that the need for the prior extraction of minerals should be '*suitably balanced against competing development needs.' Consequently, 'the defined Mineral Safeguarding Areas, should exclude existing urban areas, and areas on the edge of existing settlements, where residential and/or employment development is considered appropriate and sustainable.*' The approach discussed above, at section 2.2, seeks to avoid urban areas in identifying the preferred areas of search, but there may be some overlap with the Mineral Consultation Areas. This is because safeguarding necessarily needs to be appropriate for a future timeframe beyond the plan period. Those areas that are identified for residential and/or employment development but are currently greenfield with a viable mineral reserve in situ can be worked prior to the built development.

2.4.27 The **Green Party** supports the plan area as proposed, but does not consider it is appropriate to have waste facilities located adjacent to Ancient Woodland. Options M11[7] and M12[8] are not supported and a ban on hydrocarbon extraction is promoted. There is no evidence to support a complete ban on hydrocarbon extraction and this option is not pursued further.

2.4.28 **Historic England** supports the general reliance upon the Herefordshire Core Strategy, but requests more focussed policy in relation to restoration principles for mineral sites, including recognition of what might be appropriate in the context of heritage assets and historic landscape. Historic England finds Table 3.4 somewhat confusing and recommends that all

[9] Option W7: Include policy to require adequate provision for the management and disposal of waste materials, liquids and litter from agricultural activities.

[10] 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.

heritage assets are included, making reference to its advice note. It supports reference to the continued need for building stone in heritage projects. Heritage assets are included as a criterion in the site analysis and will be considered further in preparing the MWLP.

2.4.29 McLoughlin Planning made representations on behalf of **John Jones Civil Engineers Ltd** (JJCE) not least supporting the plan area as proposed and promoting land at disused railway cutting near Woods End (Site W41). This site has been considered in the sites analysis. JJCE considers that the environmental constraints identified in Table 3.4 are broadly correct but do not include groundwater source protection zones, archaeologically sensitive sites, agricultural land classifications, access to roads or residential properties. Further, they are unclear how the distances would translate into policy and recommend that they are used to highlight potential constraints.

2.4.30 The **Minerals Products Association** (MPA) '*does not accept that most if not all the list in table 3.4 are necessarily constraints to mineral working*' and again refers to the NPPF as the principal guide for dealing with such matters. Table 3.4 is considered to exceed the requirements of this national policy, whilst the distances are considered to be '*arbitrary and not based on any evidence or policy*'.

2.4.31 The MPA considers that a criteria-based approach should be taken to ensure that building stone is available throughout the plan period.

2.4.32 The MPA supports the proposed safeguarding of minerals and associated infrastructure, supporting Option M18[6] and so encouraging the use of buffer zones to prevent inappropriate development encroaching on these resources; it does not provide any suggestions on how to define this buffer zone.

2.4.33 **Natural England** requested that topics of soil, agricultural land quality, reclamation and nature improvement areas are considered in preparing the MWLP. The agricultural land classification is one of the elements used in the site analysis and the other elements will be considered in preparing policy of the MWLP.

2.4.34 **Councillor Newman** raises concerns that fracking, or the associated infrastructure, may be enabled within a '*most precious landscape and environmental asset*' including AONB, SSI and SAC, with a protected water aquifer located under Ross on Wye. These designations are considered in the site analysis and the impact on tourism will be addressed in further developing the MWLP.

2.4.35 **Kingsland Parish Council** raised a number of views and concerns including support for safeguarding and protecting existing waste sites and associated facilities.

2.4.36 The **River Wye Preservation Trust** (RWPT) agrees with the plan area as set out, but considers it unfortunate that joint working with Worcestershire County Council is not continued. The merits of this approach are recognised, but joint working is not appropriate at this time due to the different stages of plan making reached within the two authorities. Various reference documents that might impact upon spatial matters are identified by RWPT and these have been considered in preparing the MWLP. In response to Table 3.4, the RWPT suggests watercourses, National Nature Reserves and Local Nature Reserves are all included. In addition, the RWPT proposes a 1km constraint zone between all development types and identified designations. The criteria identified by the RWPT are used in the site analysis and buffer zones are being considered; a distance of 1km is likely to be excessive in many instances.

2.4.37 All options for minerals supply are generally considered appropriate; however, the RWPT also suggests that supply may be more appropriately met by sources outside of Herefordshire and these options should be explored. In accordance with national policy expectations, the MWLP is based on the premise of achieving net self-sufficiency across both minerals and waste. This is considered to be the most appropriate starting point for policy, however it should be achieved through sustainable development.

2.4.38 The RWPT promotes a ban on permitting hydrocarbon exploration or exploitation. There is no evidence to support a complete ban on hydrocarbon extraction and this option is not pursued further.

2.4.39 In relation to waste, the RWPT promotes development of more biological treatment plant at locations close to where the waste is generated. This would fit with the spatial approach being developed. The RWPT also promotes provision of mixed waste management sites within a location that has potential to serve farming districts. This will be considered further in preparing policy of the MWLP; however Herefordshire is a very rural county and there is little to suggest a clear spatial strategy for such an approach.

2.4.40 The RWPT promotes the Lugg Bridge Quarry site as a recreational/conservation facility and considers that additional recycling here is not desirable. The site is already operating as both a concrete batching plant and construction, demolition and excavation waste recovery plant. The response from statutory consultees is that the site is appropriate for its current uses and extensions may also be permissible. The MWLP is unlikely to promote the site for a recreation/conservation facility whilst the current uses are in operation.

2.4.41 **Staffordshire County Council's** response included recognition that planned provision should be in line with NPPF paragraph 145 and that other supply options may need to be considered if there is uncertainty about the continuity of supply from sources outside of Herefordshire. The Council also suggested that mineral safeguarding areas should be defined in accordance with NPPF paragraph 143 and taking into account the data from the BGS.

2.4.42 Heaton Planning has responded on behalf of **Tarmac Trading Ltd** (Tarmac) and made specific representations about sites at: Wellington Quarry (Sites M05a, M05b and M05c); Moreton-on-Lugg Railhead; Shobdon Quarry (Site M04); and Nash Scar Quarry (Site M09). These comments have been incorporated into the detailed sites analysis and the proposed extensions have been considered.

2.4.43 In response to question 4[11], Heaton Planning comments upon the scarcity of some mineral resource within Herefordshire and so cautions against utilising environmental constraints too rigidly. Similarly, in response to question 14[12], Heaton Planning considers it is not appropriate to consider all the identified historic and environmental assets as definite constraints to minerals development, instead relying upon the test set out in the NPPF. The criteria used to review each of the sites and locations under consideration has been developed so as to reflect the NPPF.

2.4.44 Heaton Planning concludes that it is often more sustainable to extend existing or permitted operations and states that Tarmac would support this approach above giving priority to new

[11] Question 4: Do you consider that the documents identified in Table 2.1 constitute the documents appropriate to consider in development of the MWLP?

[12] 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.

green field sites. Option M16[13] is considered to be the most appropriate. A minerals consultation area (in accordance with NPPF, paragraph 143) is preferred over a buffer zone.

2.4.45 **Welsh Water** has responded with specific comments made in relation to individual sites. These have been incorporated into the detailed site analysis.

2.4.46 The **Woodland Trust** agrees with the list of objectives set in Table 3.2, strongly supporting environmental objectives which commit to protecting, restoring and enhancing the natural environment. Table 3.4 is considered correct and complete, with a further recommendation to also recognise ancient trees outside woodland and veteran trees as environmental constraints. However, the distances presented in Table 3.4 are not agreed with; ancient woodland should be considered an environmental constraint for waste facilities even if they are located further away than adjacent to a proposed development site. Further, it is proposed that a planted buffer of 50m should be required between all minerals extraction and ancient woodland.

2.4.47 **Worcestershire County Council** (WCC) made wide ranging comments, including recognition of the need for safeguarding mineral and waste sites, and storage, handling and processing infrastructure. A number of designations and assets were promoted to be considered as part of Table 3.4. These have been incorporated into the site analysis where practicable and considered as part of developing the MWLP generally.

2.4.48 Options M13[14] to[15],[16] M16[13] are all considered appropriate, with Option M13 the most closely aligned with guidance in relation to mineral site identification. The County Council also suggests that '*sufficient flexibility should be incorporated to enable additional reserves to be permitted regardless of, rather than limited to, whether the reserves at the remaining operational quarry prove to be insufficient*.' WCC considers Option M18[6] as the most appropriate in regard to buffer zones around sites. This is the approach currently being developed in its emerging Minerals Local Plan, including a 250m buffer to define the Mineral Consultation Area.

2.4.49 In relation to the location of waste facilities, WCC notes that much of Herefordshire's municipal waste is treated through facilities located in Worcestershire. '*Should additional facilities be required to manage LACW, the plan should make provision to enable this to take place in Herefordshire, should this be appropriate. In addition, much of Herefordshire's LACW is currently managed at facilities in Worcestershire, but we consider that (in line with our earlier comments) the MWLP should seek to achieve self-sufficiency in waste management capacity overall. We therefore consider that any site allocations should be as flexible as possible and should not unnecessarily limit the waste stream which can be managed on any individual site*.'

2.4.50 Under the current municipal waste management contract, much of Herefordshire's LACW is transferred to two plants located in Worcestershire for materials and energy recovery:

[13] 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.

[14] 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 MWLP.

[15] 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 MWLP.

[16] 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 the policies in the MWLP.

EnviroSort (a materials recovery facility located in Norton); and EnviRecover (an energy from waste facility located on the Hartlebury Trading Estate). Any remaining residual wastes are then deposited to landfill at Pershore, also in Worcestershire. This contract is live until early 2024, with the potential for a five year extension. At the end of the contract period, the facilities revert to the two authorities. Consequently, it considered unlikely that any other treatment capacity will be required for the majority of Herefordshire's municipal waste throughout the plan period. A new Household Waste Recycling Centre became operational in 2016 at Kington, near Ledbury. A flexible approach is being pursued in preparing the MWLP, with the intention to enable Herefordshire to be net self-sufficient in waste management capacity and providing opportunities to manage the range of waste arisings.

2.4.51 Option W12[17] is favoured as the approach to waste site identification, with Option W14[18] preferred for safeguarding.

2.4.52 Many of WCC's comments were also made in the response from **Wychavon District Council, Worcester City Council and Malvern Hills District Council**, who are working together to prepare the South Worcestershire Development Plan.

2.4.53 A number of **online responses** were made, many of which did not give detailed responses and which only responded to the first few questions.

2.4.54 Generally it can be concluded that:

- the plan area following the administrative boundary of Herefordshire is supported;
- respondents would like the MWLP to contain the greatest flexibility for enabling new minerals development. The approach to be taken in the MWLP will be to allocate those proposed areas that are considered appropriate in principle and to develop a policy framework that will identify preferred areas of search and so enable other proposals for development to come forward;
- respondents would like to see greatest flexibility within the MWLP for enabling new waste development. The approach to be taken in the MWLP will be to allocate discrete sites that are considered appropriate in principle and develop a policy framework that will identify enable other proposals for development to come forward.
- there is an equal level of support for Options M11[7] and M12[8], although there are also some strong petitions to ban the extraction of hydrocarbons altogether. The available evidence indicates that there is little likelihood of either conventional or unconventional hydrocarbon extraction occurring within the plan period. A criteria-based approach will be pursued in the MWLP, with no sites or preferred areas identified.

2.4.55 An element of the Issues and Options Report that perhaps received most response was Table 3.4. The distances set out in Table 3.4 of the Issues and Options Report were presented in order to gain reaction from consultees to inform the policy position. The table prompted a wide range of views, although generally responders were not supportive of it or found it confusing. In addition, the review of the Core Strategy found that the development

[17] 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 application for development will be looked upon favourably, but also allow for proposals for development to come forward regardless of location.

[18] 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.

management principles are generally applicable and appropriate to minerals and waste development. Consequently, Table 3.4 is not intended to be developed further and is dismissed from inclusion in the MWLP.

2.4.56 In addition, Planning Policy Guidance[19] indicates that separation distances/buffer zones '*should be established on a site-specific basis and should be effective, properly justified, and reasonable. It should take into account:*

- *the nature of the mineral extraction activity;*
- *the need to avoid undue sterilisation of mineral resources,*
- *location and topography;*
- *the characteristics of the various environmental effects likely to arise; and*
- *the various mitigation measures that can be applied*.'

2.4.57 Consequently, policy will make clear that buffer zones/separation distances may be required in specific circumstances, but the nature and extent of these areas will be based on site specific assessments and other forms of mitigation measures (such as working scheme design and landscaping) that will be expected to be available at the time of considering a development proposal.

[19] Paragraph: 018, Reference ID: 27-018-20140306. Revision date: 06.03.2014 https://www.gov.uk/guidance/minerals

3. Existing and Proposed Minerals and Waste Sites

3.1 Introduction

3.1.1 This section presents the key conclusions drawn for each site assessed and how that has informed the approach to allocating sites/locations in the MWLP.

3.1.2 The approach to the site analysis and the criteria used are presented at section 2.3 of this report. Full details of each of the sites are provided at Annexes A (minerals) and B (waste).

3.2 Minerals

3.2.1 The Minerals Need Assessment of February 2017 identified 21 sites. A number of new areas for development, generally adjacent or close to existing quarries were proposed in the Call for Sites undertaken in 2016 and 2017, along with a suggestion to recommence sand and gravel extraction in the vicinity of Mathon.

3.2.2 In December 2017, a further proposal was made for mineral extraction near Wellington Quarry. This has been incorporated into the sites analysis.

3.2.3 Each of these sites has been considered in order to understand its current role and future potential, and to inform a general understanding of minerals and waste development within Herefordshire. Table 3.1 presents the conclusions from the minerals sites analysis. It should be noted that there are some sub-divisions within the site references, for example Site M05 is assessed as seven discrete sites (labelled a to g).

Table 3.1 Conclusions of minerals sites analysis

Site Reference	Site Name	Site Description	Role in MWLP
Sand and Gravel			
M01	Stretton Sugwas Quarry (Hereford Quarry)	Closed site, restored	None
M02	Lugg Bridge Quarry	Closed site, used for waste recycling and concrete plant	None at site Preferred area of search
M03	Upper Lyde Quarry	Inactive, due to re-open in 2018 and proposed extensions	Allocate new areas Preferred area of search
M04	Shobdon Quarry	Inactive, partially worked site Due to re-open during the plan period	Allocate new areas Preferred area of search
M05	Wellington Quarry	Active site and proposed extensions	Allocate new areas (excluding M05f) Preferred area of search
M06	St Donat's Quarry	Closed site, restored	None at site Preferred area of search
M22	Land at South Hide Farm and South End Farm, Mathon	Proposed areas close to former extraction area now restored	None Remaining resource not a priority due to ANOB highway and amenity constraints.
Limestone			
M07	Leinthall Quarry	Active site and proposed extension	Allocate new areas Preferred area of search
M08	Loxter Ashbed Delve	Closed site, restored	None
M09	Nash Scar Quarry	Mothballed site, unlikely to be re-opened due to poor stability of the rock face	None

Site Reference	Site Name	Site Description	Role in MWLP
M10	Perton Quarry	Active site and proposed extension	Allocate new areas
Sandstone			
M11	Brakes Farm Delve	Closed, to be restored	None
M12	Callow Delve	Active site	Time extension
M13	Black Hill Delve	Active site	Size extension
M14	High House Delve	Closed site, unsuccessful delve	None
M15	Hunters Post Delve	Closed site, restored	None
M16	Llandraw Delve	Active site	Size extension
M17	Pennsylvani Delves	Active site	Time extension
M18	Sunnybank Delve	Active site	Time extension
M19	Tybubach Delve	Closed, to be restored	None
M20	Westonhill Wood Delves	Active site	Size extension
Coal			
M21	Howle Hill Quarry	Closed site, restored	None

Sites dismissed from further consideration

3.2.4 The following sites have been discounted from further consideration: M01 Stretton Sugwas; M02 Lugg Bridge Quarry; M06 St Donat's Quarry; M08 Loxter Ashbed Delve; M11 Brakes Farm Delve; M14 High House Delve; M15 Hunters Post Delve; M19 Tybubach Delve; and M21 Howle Hill. These sites have been inactive for mineral workings for some time and have been restored, are currently being restored, or have been put to some other use.

3.2.5 Site M22 Land at Mathon is not considered suitable for new quarry working. The area promoted is located in the Malvern Hills Area of Outstanding Natural Beauty, a designation that provides the highest status of protection in relation to landscape and scenic beauty in Herefordshire. In addition, whilst Herefordshire is an agricultural county, the area around Mathon seems particularly rural with narrow, twisting country lanes and tight-knit villages where housing abuts the public highway. There is no discernible, efficient highway route out of this area for sand and gravel to reach market. There are other sites within the identified preferred areas of search able to provide a suitable level of sand and gravel resource throughout the proposed plan period.

3.2.6 Site M09, Nash Scar is not considered likely to be re-opened. It has been mothballed for nearly 30 years, over which time the site has become very overgrown, there are likely considerable ecology/biodiversity matters which would need to be addressed. The access lane to Nash Scar Quarry involves a very sharp turn off the public highway and is a single lane track that leads directly past housing. The working faces of the quarry are extremely high and unstable, with no benching, and there would be serious health and safety constraints to making this a practicable working site again.

Sand and gravel – M03 Upper Lyde

3.2.7 Site M03a is due to open in 2018, following the completion of local highway improvements. Site M03b would appear to be a logical extension and is considered acceptable in principle.

3.2.8 Site M03c extends westward and would open up a new field, which appears to drop away also in a westward direction. Some care would therefore be needed to ensure that the workings did not result in unacceptable impacts, particularly visual impacts. For these reasons, this site is least preferred, and is not intended to be allocated. If working this location was demonstrated to be achievable without unacceptable impacts, then it might be more logical to work this field prior to moving onto site M03d.

3.2.9 Site M03d is located on the other side of the local access road, but is at a lower land level than the other M03 sites and is reasonably well contained. The sand and gravel won at this site is proposed to be taken to the Former Lugg Bridge Quarry for processing and consequently a proliferation of plant can be avoided. The site is appropriately located to make use of the local highway network improvements implemented as part of working site M03a.

3.2.10 Within the submissions made in response to the Call for Sites 2016, the reserve across sites M03b, M03c and M03d total c.700,000 tonnes and is proposed to be worked at 50,000tpa over a period of 14 years.

Sand and gravel – M04 Shobdon

3.2.11 No new area of working has been proposed at Shobdon. However, the existing quarry has processing plant on site and benefits from reasonable road access. In principle, the land around Shobdon Quarry would be appropriate for further mineral extraction and is proposed as a preferred area of search.

3.2.12 There is no information on the amount of mineral available at this location. However, further working here would provide some flexibility to the MWLP and robustness to the continuity of sand and gravel supply.

Sand and gravel – M05 Wellington

3.2.13 Numerous new working areas have been proposed for sand and gravel workings in the vicinity of Wellington Quarry. In principle, they appear to be acceptable, although they all have matters that will require comprehensive assessment in conjunction with any planning application, for example the proximity of site M05d and M05g to the River Lugg and aquifer.

3.2.14 Whilst the area appears in principle to be suitable for mineral extraction, it would be undesirable for there to be a proliferation of associated infrastructure, including processing plant. Policy should seek to avoid this occurring; it is anyway unnecessary, with established plant operating at site M05a. Further, there are known to be highway concerns in relation to the junction with the A49 and the local route travelling east. Consequently, it is considered necessary to phase the order of working in this area.

3.2.15 At November 2017 there remained around 2 years of permitted reserve in site M05a[20]. Tarmac is currently pursuing an application to work mineral from an area of the consented site that was originally intended to remain as a noise buffer. The consented areas should be worked out first, with progressive restoration. Either of sites M05b and M05c might then be worked, followed by M05g. These are all on the same side of the A49 and local access road as site M05a and can readily access the existing plant operated within site M05a. Both sites M05b and M05c appear to be logical extensions to site M05a. Due to its proximity to the River Lugg and railway, M05g might take longer to prepare for working.

3.2.16 Either of sites M05d and M05e might then be worked, as a second phase within the MWLP. Both these sites will be constrained in the available working area due to the need to leave buffers, with: the River Lugg; Green Farm; the A49; and the railway. Consequently, whilst they are located on the other side of the local access road, it would make sense for mineral extracted at these sites to be processed at the plant located at site M05a. This would minimise any further constraint on the working area and avoid a proliferation of processing plant. Further, it would mean that the secondary access through the Moreton-on-Lugg Business Park would be available at times of flood.

3.2.17 Site M05f is the least preferred location; it is not a logical extension to the existing workings, situated on the opposite side of the A49 and beginning to wrap around Wellington Village. It is not clear where mineral extracted at this site would be processed. The MWLP should seek to avoid a proliferation of processing plant, leaving the sand and gravel to be moved to plant at the other sites, on the other side of the A49. The A49 is a busy road and frequent HGV crossings would be hazardous. An option of installing conveyors under the A49 is likely to be too costly. Consequently site M05f is not proposed to be allocated.

[20] Pers.Comm. David Sycamore, Tarmac, 02.11.2017

3.2.18 Within the submissions made in response to the Call for Sites 2016, the reserve across sites M05c and M05d is estimated to be 2,250,000 tonnes. It is proposed to be worked at an annual rate of 100,000 to 150,000 tonnes, therefore the total area would supply mineral, year on year, for a period of approximately 20 years. The other areas proposed to be allocated would supplement that landbank.

Sand and gravel conclusions

3.2.19 There are three permitted quarries for sand and gravel, all of which should be working within the plan period. Whilst their working dates cannot be confirmed, having three separate quarrying areas provides an element of flexibility and robustness to the continuity of supply.

3.2.20 Much of the proposed sand and gravel extraction areas are located close to these permitted sites, and most are considered appropriate to allocate for future working. Using information provided in the Call for Sites submissions there is a minimum of nearly 3 million tonnes of sand and gravel resource available across these areas. In addition, there are further preferred areas of search and new operations in these areas of search would add to the robustness of sand and gravel supply within Herefordshire.

Crushed rock

3.2.21 Extensions to both Leinthall (M07a) and Perton (M10a) Quarries have been proposed. In principle, both these sites appear to be appropriate for further mineral working. It is not intended to prioritise one site over the other; they both have planning merits and disadvantages that will need to be considered in detail in preparing any subsequent application. Having both sites allocated within the MWLP and operating at the same time will give some robustness to continuity of supply.

3.2.22 Within the submissions made in response to the Call for Sites 2016, the reserve across Site M07b is around 7 million tonnes. Information has not been provided to date on the reserve at Site M10b. In addition, preferred areas of search have been identified for working limestone reserves within Herefordshire.

Building stone

3.2.23 Discussions with those working the delves visited generally indicated that there is enough sandstone resource permitted within the delve they were working to last through the plan period. However, some of the delves were stated to be running out of stone, but identified suitable reserve close by, and some delves have time limited consents that may need to be extended to enable working to continue through the plan period.

3.2.24 All the active sandstone delves appeared suitable in principle to be able to gain an extension of time for mineral working. This applies to sites: M12 Callow Delve; M13 Black Hill Delve; M16 Llandraw Delve; M17 Pennsylvani Delves; M18 Sunnybank Delve; and M20 Westonhill Wood Delves.

3.2.25 In principle sites: M13 Black Hill Delve; M16 Llandraw Delve; and M20 Westonhill Wood Delves seem also to be appropriate for an extension in size of the working area.

Clay, coal and unconventional hydrocarbons

3.2.26 There are minimal deposits of clay, coal and unconventional hydrocarbons in Herefordshire, with no evidence to suggest that these will be worked in Herefordshire within the plan period.

3.2.27 No site is proposed to be allocated for the extraction of clay, coal or unconventional hydrocarbons.

3.3 Waste

3.3.1 The Waste Need Assessment of February 2017 identified 35 waste facilities operating in Herefordshire. The expansion of two existing sites was proposed in the Call for Sites 2016, and one new waste site is proposed in response to the Issues and Options Report. The Waste Need Assessment Update 2018 has been prepared to incorporate 2016 data; this has identified an additional four sites that have gained an environmental permit. Sites numbered W01 to W41 are the 41 existing and proposed waste facilities.

3.3.2 Sites W42 to W57 are the mineral sites selected to be considered for waste uses, principally the recovery of construction, demolition and excavation wastes and the deposit of waste. This list excludes sites:

- M02 Former Lugg Bridge Quarry, as it is separately recognised as a waste site (W13);
- M06 St Donat's, as it was recognised to be a mothballed site and has been confirmed to be restored;
- M08, M11 and M21 as these were confirmed to have been restored; and
- M22 as this area is not appropriate to be worked, due to the AONB designation and highway constraints.

3.3.3 Sites W58 to W66 are the locations identified in Herefordshire Core Strategy policy E1 and the strategic employment sites. Most of these lie within Hereford and Leominster, with one each identified in Ledbury and Ross-on-Wye.

3.3.4 Each of these sites has been considered in order to understand its current role and future potential, and to inform a general understanding of minerals and waste development within Herefordshire. Table 3.2 presents the conclusions of the waste sites analysis.

Table 3.2 Conclusions of waste sites analysis

Site Reference	Site Name	Site Description	Conclusions for MWLP
Waste Sites			
W01/W17	Eastside Recycling Facility	Eastside 2000 Ltd: Hazardous and non-hazardous WTS 40,824 tonnes	Note – located on strategic employment site
W02	Quickskip (Hereford) Transfer Station	Non-hazardous WTS 37,780 tonnes	Note – located on strategic employment site
W03	Wye Valley Skips	Non-hazardous WTS 2016 new site 296 tonnes	Note – not preferred location for development
W04	Marlbrook Farm	Non-hazardous WTS 9,847 tonnes	Note – not preferred location for development
W05	Leominster HWS and HWRC	Municipal non-hazardous WTS and HWRC 25,718 tonnes	Allocate
W06	Rotherwas HWS and HWRC	Municipal non-hazardous WTS, MRF and HWRC 56,103 tonnes	Note – located on strategic employment site
W07	Ledbury HWRC	HWRC 2,585 tonnes	Allocate
W08	Ross-on-Wye HWRC	HWRC 4,753 tonnes	Note – located on industrial estate
W09	Bromyard HWRC	HWRC 2,066 tonnes	Note – located on industrial estate

Site Reference	Site Name	Site Description	Conclusions for MWLP
W10	Kington HWRC	HWRC 2016 new site 850 tonnes	Allocate
W11	H C D Ltd	Material Recycling Facility 2016 new site 2,950 tonnes	Note – located on industrial estate/not preferred location for development
W12	Land adjacent to Unit 3, Balfour Beatty	Physical Treatment 3,345 tonnes	Note – located on strategic employment site
W13	Former Lugg Bridge Quarry	Physical Treatment Intensification proposed 50,956 tonnes	Allocate
W14	Kingspan Insulation Ltd	Physical Treatment 205 tonnes	Note – not appropriate for waste uses beyond existing/not preferred location for waste uses
W15	Quickskip Chapel Road	Physical Treatment 2016 new site 6,825 tonnes	Note – located on strategic employment site
W16	Quickskip Fir Tree Lane	Physical Treatment Site cleared at site visit 2,200 tonnes	Note – located on strategic employment site
W17/W01	Eastside Recycling Facility	Avalon Metals: Car breakers 24,340 tonnes	Note – located on strategic employment site
W18	J & R Recovery	Car Breaker Site cleared at site visit 76 tonnes	Dismiss - site cleared and not preferred location for waste uses

Site Reference	Site Name	Site Description	Conclusions for MWLP
W19	City Spares MRS	Car Breaker Site cleared at site visit 30 tonnes	Allocate
W20	P & T Moore Vehicle Dismantlers	Car Breaker 1,478 tonnes	Dismiss – not preferred location for development
W21	Streamhall Garage	Car Breaker 201 tonnes	Note – located on industrial estate
W22/23	R Smith Metals	Car Breaker 792 tonnes	Note – located on industrial estate
W23/22	Former EMR Facility	Car Breaker 1,607 tonnes	Note – located on industrial estate
W24	Cobhall Cottage	Car Breaker 216 tonnes	Dismiss – not preferred location for development
W25	Yaidon Farm	Biological Treatment 28,590 tonnes	Note – not preferred location for development
W26	Much Fawley Farm	Biological Treatment 12,432 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W27	Court Farm	Biological Treatment 5,977 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W28	Eign Waste Treatment Centre	Biological Treatment 30,714 tonnes	Note – not appropriate for waste uses beyond existing
W29	Gelpack Excelsior	Non-hazardous Waste Transfer/Treatment	Note – located on strategic employment site

Site Reference	Site Name	Site Description	Conclusions for MWLP
		Company in administration 19 tonnes	
W30	County Hospital	Clinical Waste Transfer 23 tonnes	Note – not appropriate for waste uses beyond existing, associated with healthcare
W31	Two Hoots Farm	Anaerobic Digestion (farm waste) 4,477 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W32	Bowley Court	Anaerobic Digestion (farm waste) 3,807 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W33	Penllan Farm	Anaerobic Digestion (farm waste) 4,466 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W34	Herefordshire Biogas	Anaerobic Digestion (farm waste) 12,155 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W35	The Biogas Facility	Anaerobic Digestion (farm waste) 11,810 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W36	Trevase Farm	Anaerobic Digestion (farm waste) 1,468 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W37	Eardisley Park Farm	Anaerobic Digestion (farm waste) 1,475 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding

Site Reference	Site Name	Site Description	Conclusions for MWLP
W38	The Leen Digester	Anaerobic Digestion (farm waste) 16,712 tonnes	Note – not appropriate for waste uses beyond existing, associated with agricultural holding
W39	Land at Lower Vern	Deposit of waste to land (recovery) 9,108 tonnes	Dismiss – not preferred location for development
W40	MF Bennion (Potatoes) Ltd Rose Farm, Dymock	Proposed for increase in current activity: 25,000 Open windrow composting facility for processing green waste 25,000 In-vessel composting facility for the processing of green and food waste 25,000 Anaerobic Digestion	Dismiss – located in Gloucestershire
W41	Disused railway cutting near Woods End, Stanford Bishop	Proposed site for inert waste disposal. Estimated 35,000 tonnes of waste per year, over a five-year period	Dismiss – not preferred location for development
Minerals sites			
W42	Stretton Sugwas Quarry	Closed site, restored	Dismiss – site restored
W43	Upper Lyde Quarry	Active site and proposed areas	Identify – potential for inert waste disposal
W44	Shobdon Quarry	Inactive, partially worked site	Identify – potential for inert waste disposal

Site Reference	Site Name	Site Description	Conclusions for MWLP
W45	Wellington Quarry	Active site and proposed areas	Identify – potential for inert waste disposal
W46	Leinthall Quarry	Active site and proposed area	Dismiss – site to be restored with on-site overburden and soils
W47	Nash Scar Quarry	Mothballed	Dismiss – site to be restored with on-site overburden and soils
W48	Perton Quarry	Active site and proposed area	Dismiss – site to be restored with on-site overburden and soils
W49	Callow Delve	Active site	Dismiss – site to be restored with on-site overburden and soils
W50	Black Hill Delve	Active site	Dismiss – site to be restored with on-site overburden and soils
W51	High House Delve	Closed site, unsuccessful delve	Dismiss – site closed
W52	Hunters Post Delve	Closed site, restored	Dismiss – site closed
W53	Llandraw Delve	Active site	Dismiss – site to be restored with on-site overburden and soils
W54	Pennsylvani Delve	Active site	Dismiss – site to be restored with on-site overburden and soils
W55	Sunnybank Delve	Active site	Dismiss – site to be restored with on-site overburden and soils
W56	Tyubach Delve	Being restored	Dismiss – site to be restored with on-site overburden and soils
W57	Westonhill Wood Delves	Active site	Dismiss – site to be restored with on-site overburden and soils
Strategic Employment Sites			
W58	Rotherwas Industrial Estate	Strategic Employment Site	Identify – good potential for co-location and strategic facility
W59	Westfields Trading Estate	Strategic Employment Site	Identify – good potential for co-location, likely small scale facility
W60	Three Elms Trading Estate	Strategic Employment Site	Identify – good potential for co-location, likely small scale facility
W61	Holmer Road, Hereford	Strategic Employment Site	Identify – though recognise little immediate potential

Site Reference	Site Name	Site Description	Conclusions for MWLP
W62	Leominster Enterprise Park	Strategic Employment Site	Identify – good potential for co-location and strategic facility
W63	Southern Avenue, Leominster	Strategic Employment Site	Identify – good potential for co-location and strategic facility
W64	Land between Little Marcle Road and Ross Road, Ledbury	Strategic Employment Site	Identify – good potential for co-location and strategic facility
W65	Model Farm, Ross-on-Wye	Strategic Employment Site	Identify – good potential for co-location and strategic facility
W66	Moreton Business Park, Moreton-on-Lugg	Strategic Employment Site	Identify – good potential for co-location and strategic facility

Notes

MRF – materials recovery facility

HWRC – household waste recycling centre

HWS – household waste site

WTS – waste transfer station

Sites dismissed from further consideration

3.3.5 Sites W18, W20, W24, W39, W40 and W41 are all dismissed from further consideration and are not preferred locations for future waste management:

- Site W18 J&R Recovery had been cleared at the time of the site visit. It is located in Hereford and so within the spatial strategy preferred areas, but it has poor access. It forms part of an industrial area and new waste development may be brought through using policy on industrial estates; however, it is not a preferred location to promote for new waste development.
- Both sites W20 P&T Moore Vehicle Dismantlers and W24 Cobhall Cottage are located outside of the spatial strategy preferred areas. Site W20 has very poor road access, whilst the route to Cobhall Cottage leads directly past a number of houses. These are not preferred locations at which to promote new waste development.
- Site W39 Land at Lower Vern is located outside of the spatial strategy preferred areas.
- Site W40 Rose Farm, Dymock is located in Gloucestershire. MF Bennion (Potatoes) Ltd is receiving municipal wastes from Herefordshire, but it is not appropriate for the MWLP to allocate this site for further development as it lies outside the plan area.
- Site W41 Disused railway cutting near Woods End is located outside the spatial strategy preferred areas and has poor access.

3.3.6 All of the former or previous minerals sites are dismissed, apart from sites W43, W44 and W45, which are discussed below. Sites W42, W51, W52 and W56 are closed sites, either already restored or being restored. The remaining minerals sites may be currently active, but their restoration plans foresee reclamation through using on-site soils and overburden. Due to the nature of these sites, none of them appeared to be appropriate to promote for waste management development.

Strategic employment sites and industrial estates

3.3.7 All of the strategic employment sites apart from sites W59 and W60 are concluded to be appropriate locations for new waste management development, including that of a strategic nature. Site W61 was fully occupied at the time of the site visit and may not become available over the plan period; nevertheless, it would be appropriate for strategic waste development should the site be vacated.

3.3.8 At the time of the site visits, sites W59 and W60 were observed to be rather sprawling industrial estates, with congested internal roads and small, tightly packed, plots. Waste management development would be appropriate at these locations, but facilities are likely to be smaller in nature.

3.3.9 There are many benefits of co-locating waste management facilities in urban areas and alongside manufacturing/employment/industrial sectors. This arrangement is a key element to achieving the circular economy within Herefordshire, as resources can readily be shared between businesses. The term 'resources' is used here to cover: materials and wastes; heat and power; and intellectual property, or ideas development and realisation.

3.3.10 Located on the Rotherwas Industrial Estate, Site W01/17, operated by the Wye Valley Group, is already achieving the circular economy within its operations; waste materials are brought to site and separated ready for re-use; extracted fuels are used within the Group's fleet of

vehicles; some of the more domestic items are repaired and/or upcycled by in-house craftsmen and sold on site.

3.3.11 Skylon Park, the Hereford Enterprise Zone located within Rotherwas, provides particular opportunities to develop effective working relationships across the engineering, manufacturing and waste sectors.[21] Businesses also benefit from the University of Wolverhampton's Business Solutions Centre and the Herefordshire Growth Hub, co-located at Skylon Court and offering a wide range of support and advice to businesses.

3.3.12 Skylon Park has four key sectors, including sustainable technologies. The overview[22] for this sector recognises that:

'*Many of our advanced engineering businesses are providing innovative, low carbon solutions to businesses in a host of other sectors. Clustering sustainable technology businesses on Skylon Park will maximise the potential to develop beneficial connections and trade in the wider local area.*'

3.3.13 Waste management is a key element of the sustainable technologies sector, and should be encouraged to fulfil the Enterprise Zone's ambition for renewable energy supply to deliver heat and power to new businesses on Skylon Park.

3.3.14 There are a number of industrial estates/employment sites/business parks distributed across Herefordshire. Similar benefits can be gained from co-locating waste management facilities at industrial estates; however, unlike the strategic employment sites, many are also located outside of the spatial strategy preferred areas. These are unlikely to be appropriate for all waste management development, though they may fulfil a local function.

3.3.15 Waste sites that are located on a strategic employment site or industrial estate will not be allocated in the MWLP. The MWLP will contain policy to promote waste management development, including that of a strategic nature, at the identified strategic employment sites and will recognise that industrial estates will in principle be appropriate for waste related development. It is therefore not necessary to allocate the discrete sites that are located on strategic employment sites or industrial estates. Furthermore, these types of locations experience a reasonably high level of plot turnover; recognising this level of potential for change over the lifetime of the MWLP, it would be inappropriate to allocate discrete sites within the estates.

Sites that are noted but not allocated in the MWLP

3.3.16 There is a substantial number of waste facilities operating on a range of location types. These are providing a waste management function currently, but it is either unnecessary or inappropriate to promote them within the MWLP for the following reasons:

- Sites W01, W02, W06, W12, W15, W16, W17, and W29 are all located on a strategic employment site.
- Sites W08, W09, W11, W21, W22 and W23 are all located on industrial estates. All of these, apart from Site W11 HCD Ltd, are located within the spatial strategy preferred areas.

[21] http://enterprisezones.communities.gov.uk/enterprise-zone-finder/hereford-enterprise-zone/

[22] http://www.skylonpark.co.uk/case-studies/jenks-associates-ltd.aspx#.Wk-FFd9l-Uk

- Sites W03, W04 and W25 are all located outside of the spatial strategy preferred areas. They may be performing a useful waste management function and could rely on that planning history to enable future development. However, they are not preferred locations at which to promote waste management development.
- Sites W26, W27, W31, W32, W33, W34, W35, W36, W37 and W38 are all anaerobic digestion or biological treatment facilities, generally associated with the agricultural holding on which they are located. They generally fall outside of the spatial strategy preferred areas and are considered inappropriate for further development, except potentially some expansion in the capacity provided.
- Site W14 Kingspan is a manufacturing plant for a range of building materials, using waste materials to recover heat and power for the manufacturing process. The site is not expected to become available over the plan period and is not situated within the spatial strategy preferred areas.
- Sites W28 Eign Waste Treatment Centre and W30 County Hospital are both situated in Hereford and therefore satisfy the spatial strategy. However, they are not proposed to be promoted for future waste management development, because they both perform a function that is unlikely to cease throughout the plan period and the sites are unlikely to become available. It might be physically possible to undertake additional waste management operations at the Eign Waste Treatment Centre, but it has very poor road access and better sites are available within Hereford.

Minerals sites to be identified for inert waste disposal in restoration

3.3.17 Sites W43, W44 and W45 are all current, permitted sand and gravel quarries. In principle, they are considered appropriate locations for the disposal of inert wastes in order to recover the land for beneficial purposes. These sites will be allocated for this purpose in the MWLP.

Sites to be allocated in the MWLP

3.3.18 **Sites W05, W07 and W10** are all currently used for the LACW and may not become available during the plan period. However, they are all appropriate locations for the management of waste and may be used for different wastes or different technologies than are currently present. They are all located within the spatial strategy preferred areas.

3.3.19 Site W10 Kington HWRC is in close proximity to Site W25 Yaidon Farm, which is not intended to be allocated in the MWLP. There is little to distinguish between the sites but this decision was made on the basis of two factors. Site W10 falls within the settlement boundary of Kington, whereas Site W25 lies outside of it. Site W25 is used for biological waste management operations, using structures not dissimilar to those that might otherwise be seen as part of agricultural activities. Being located close to one of the smallest market towns in Herefordshire, it is not considered an appropriate location for further waste management development, except modest extensions to the activities currently undertaken. The evidence base does not indicate that a significant increase of this infrastructure is required and a modest expansion of existing activities would not benefit significantly from allocation in the MWLP.

3.3.20 **Site W19** had been cleared at the time of the site visit; the former operator had deceased and his estate has sold the site. It is located on the southern edge of Hereford, falling within Core Strategy policy HD6 and satisfies the spatial strategy. It is in close proximity to the Rotherwas Industrial Estate and forms part of the area identified for Skylon South.

3.3.21 Whilst not large, the site provides an ideal opportunity to pursue energy recovery infrastructure, either biological (such as anaerobic digestion) or combustion (such as incineration or gasification).

3.3.22 The former City Spares site currently occupies a relatively rural area surrounding Hereford; in the future, with the allocated expansion plans, this area will include employment and housing. Consequently, this use of this site should be focussed on those technologies that will deliver energy. Principally this focus will deliver a key objective of the Enterprise Zone and Skylon Park; it is also the type of facility more likely to support the investment necessary to deliver a high quality, well designed development that would complement the southern expansion.

3.3.23 **Site W13 Former Lugg Bridge Quarry** is an operational site, recovering construction, demolition and excavation wastes. In the call for sites it is proposed for significant intensification. Site W13 is located just beyond the settlement boundary of Hereford and benefits from good road access into the city. Its location consequently fits with the spirit of the spatial strategy even if it falls slightly outside the defined area. The evidence base does suggest that a significant increase of recovery capacity for this waste stream is required; as an operating facility and part of a wider waste management business that has aspirations to grow, it is demonstrated to be a viable site. The Environment Agency raises no objections to the site and it is concluded to be appropriate to be allocated in the MWLP.

Safeguarding

3.3.24 Safeguarding for minerals reserves and associated infrastructure has been discussed, at section 2.2, but safeguarding of waste facilities is yet to be concluded.

3.3.25 It would be inappropriate to safeguard all the existing waste management sites: some are not operating in preferred locations; some of those that reported waste inputs in 2016 had been cleared at the time of the site visit; and most of the sites operating in Herefordshire are located on industrial estates or similar. Waste management facilities might be expected to change over time, identifying a set list of facilities could quickly become out of date.

3.3.26 It is necessary to safeguard minerals because they can only be worked where they lie; they are severely limited in terms of where else they can be worked. Waste facilities are not so constrained and, as is seen within Herefordshire already, the waste industry makes good use of industrial estate locations.

3.3.27 However, it is recognised that caution should be given to the loss of operating waste management infrastructure, particularly when that would occur through subsequent encroachment from a non-waste development. The intention is to safeguard those facilities that align with the spatial strategy for waste. This avoids both safeguarding existing facilities that are inappropriately located and preparing a list of facilities that becomes out of date within the plan period, but provides some protection for this essential infrastructure.

3.3.28 This position is simplified by Herefordshire being a unitary authority, with planning applications being considered within a single team and the opportunity available to consider the impact of a new development on an existing facility.

4. Conclusions for the MWLP

4.1 Introduction

4.1.1 This section of the report presents the key conclusions drawn from considering the spatial context for the MWLP and assessing the potential role for sites around the county.

4.2 Principles

4.2.1 The plan area for the MWLP will comprise the administrative boundary of the county of Herefordshire.

4.2.2 The Core Strategy provides an appropriate spatial strategy to use in considering waste management; it is not so readily applied to minerals development but does identify key areas of constraint and growth that are appropriate to consider.

4.2.3 The Core Strategy also generally provides an appropriate level of development management policy for minerals and waste development, although some additional provision will need to be made, for example in relation to mineral site reclamation.

4.2.4 The BGS data identifies reasonably extensive resources of sand and gravel and limestone, such that preferred areas of search are identified (Figure 2.4) having applied relevant criteria. Preferred areas of search are not prepared for building stone, clay or coal; these areas are very much more limited, and the demand for these resources is more limited throughout the plan period.

4.2.5 All mineral reserves are intended to be safeguarded save those that lie within, or within 50m of a settlement. This safeguarding is intended to include minerals ancillary infrastructure that lies within a quarry. The safeguarded reserves are shown on Figure 2.5. In addition, the Moreton-on-Lugg railhead and rail tracks lying within the Moreton Business Park are also proposed to be safeguarded.

4.2.6 Those waste facilities that align with the spatial strategy are proposed to be safeguarded, but not those mineral processing plants that do not lie within a quarry. The evidence does not indicate that this is necessary, particularly having regard to the fact that Herefordshire is a unitary authority.

4.2.7 A mineral consultation area is not proposed. As a unitary authority, Herefordshire has just one planning department and does not require a formalised consultation area.

4.3 Site Allocations

Minerals

4.3.1 Sand and gravel reserves at: Upper Lyde (Sites M03); Shobdon (Site M04); and Wellington (Sites M05) are all proposed to be allocated in the MWLP. Using information provided in the Call for Sites submissions these allocations would provide a minimum of nearly 3 million tonnes of sand and gravel resource. In addition, there are further preferred areas of search and new operations in these areas of search would add to the robustness of sand and gravel supply within Herefordshire.

4.3.2 Crushed rock reserves at Leinthall (Sites M07) and Perton (Sites M10) quarries are both proposed to be allocated in the MWLP. Within the submissions made in response to the Call for Sites 2016, the reserve across Site M07b is around 7 million tonnes. Information has not been provided to date on the reserve at Site M10b. In addition, preferred areas of search have been identified for working limestone reserves within Herefordshire.

4.3.3 All the active sandstone delves appeared suitable in principle to be able to gain an extension of time for mineral working. This applies to sites: M12 Callow Delve; M13 Black Hill Delve; M16 Llandraw Delve; M17 Pennsylvani Delves; M18 Sunnybank Delve; and M20 Westonhill Wood Delves.

4.3.4 In addition, sites: M13 Black Hill Delve; M16 Llandraw Delve; and M20 Westonhill Wood Delves seem also to be appropriate for an extension in size of the working area.

4.3.5 No site is proposed to be allocated for the extraction of clay, coal or unconventional hydrocarbons.

Waste

4.3.6 There are many waste management sites operating in Herefordshire that are located on an industrial estate or strategic employment site. These are the preferred locations for new waste management facilities and will be promoted in policy.

4.3.7 Many of the sites not operating in these locations are also situated beyond the areas covered by the spatial strategy; these are not preferred sites for waste management development and consequently are not intended to be promoted in policy.

4.3.8 Five discrete sites that are not within an industrial estate or strategic employment site, do lie within the spatial strategy and are considered appropriate for future waste management development. These sites are considered appropriate in principle to accommodate a range of waste treatment and recovery operations. Each of these sites are proposed to be allocated in the MWLP:

- Site W05 Leominster HWS and HWRC;
- Site W07 Ledbury HWRC;
- Site W10 Kington HWRC;
- Site W13 Former Lugg Bridge Quarry; and
- Site W19 City Spares MRS.

4.3.9 In addition, there are three sand and gravel sites that are considered appropriate for the deposit of inert wastes disposal to achieve the recovery of land following mineral extraction. These are: Sites W43 Upper Lyde; Site W44 Shobdon; and Sites W45 Wellington.

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