

**Herefordshire Council**

# **Sustainability Appraisal of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan SA Addendum Report**

**Final report**

Prepared by LUC

December 2021



## Herefordshire Council

### Sustainability Appraisal of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan SA Addendum Report

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# Chapter 1

## Introduction

**LUC was appointed by Herefordshire Council to carry out the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the proposed pre-examination Main Modifications to the Herefordshire Minerals and Waste Local Plan (MWLP) (hereafter referred to as 'the Plan').**

**1.1** The Publication Draft Herefordshire MWLP<sup>1</sup> and its associated SA Report<sup>2</sup> were finalised in January 2021 and published for consultation for a six-week period from 12<sup>th</sup> April 2021. Following the Regulation 19 consultation period, the representations received on the Publication Draft Herefordshire MWLP and SA Report were reviewed by Herefordshire Council. Herefordshire Council has prepared a schedule of proposed pre-examination modifications to the Herefordshire MWLP (September 2021)<sup>3</sup>. The proposed modifications relate primarily to the representations received during the Regulation 19 consultation and to the revision to the National Planning Policy Framework in July 2021. The Schedule of Proposed Pre-Examination Main Modifications and Minor Changes to the Herefordshire MWLP are proposed to be considered through the Examination process. The schedule proposes nearly 80 Main Modifications across the Herefordshire MWLP.

**1.2** The purpose of this SA Addendum is to consider whether the proposed pre-examination Main Modifications are likely to have any new or different sustainability effects to those identified in the SA of the Publication Draft MWLP and,

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<sup>1</sup> Herefordshire Council (2021) Herefordshire Minerals and Waste Local Plan Publication Draft [pdf]. Available at: [https://www.herefordshire.gov.uk/downloads/file/22074/1-publication-draft-herefordshire-minerals-and-waste-local-plan-jan-2021-](https://www.herefordshire.gov.uk/downloads/file/22074/1-publication-draft-herefordshire-minerals-and-waste-local-plan-jan-2021)

<sup>2</sup> LUC (2021) Sustainability Appraisal of the Publication Draft Herefordshire Minerals and Waste Local Plan [pdf]. Available at:

<https://www.herefordshire.gov.uk/downloads/file/22090/25-sustainability-appraisal-2021-publication-draft-stage>

<sup>3</sup> Hendeca (2021) Herefordshire Minerals and Waste Local Plan - Schedule of Main Modifications and Minor Changes proposed pre-Examination

if so, to carry out SA of the proposed modifications. It should be noted that this is an addendum to the 2021 SA Report and that the two documents should therefore be read together.

This SA Addendum focusses on the proposed pre-examination 'Main Modifications' to the Herefordshire MWLP only. Additional 'Minor Changes' have also been proposed by Herefordshire Council to address non-substantive matters such as typographical, factual and grammatical errors. These Minor Changes are not subject to SA as they do not have the potential to lead to significant sustainability effects.

### Sustainability Appraisal and Strategic Environmental Assessment

**1.3** Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

**1.4** Strategic Environmental Assessment (SEA) is also a statutory assessment process, required by the SEA Regulations<sup>4</sup>. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

**1.5** The UK left the EU in January 2020, with the transition period ending at the end of 2020. Following the end of the transition period, most EU law continues to apply as set out in

the European Union (Withdrawal) Act 2018 (EUWA) and the 'EU Exit' amendments to English legislation.

**1.6** SEA and SA are separate processes but have similar aims and objectives. SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, such as social and economic impacts. The Government's Planning Practice Guidance<sup>5</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Herefordshire MWLP is being undertaken using this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

This SA Addendum does not constitute a 'full' Environmental Report and therefore does not contain all the information required by Schedule 2 of the SEA Regulations (see Table 1.4 of the 2021 SA Report).

### SA of the Herefordshire Minerals and Waste Local Plan

**1.7** **Table 1.1** summarises the stages of the Herefordshire MWLP preparation and the accompanying SA Reports that have been prepared and consulted on. There have been four key stages in the SA of the Herefordshire MWLP to date (see **Table 1.1**). As previously explained, this SA Addendum should be read in conjunction with the 2021 SA Report.

**1.8** Following each stage of consultation, all representations relating to the SA process were reviewed. Appendix K of the 2021 SA Report contains a summary of the representations received during the consultations on the Scoping Report and the Draft MWLP SA Report. **Appendix A** of this SA Addendum contains a schedule of SA-related representations that were received during the consultation on the Publication Draft Herefordshire MWLP.

**Table 1.1: Herefordshire MWLP SA stages and consultation documents**

Local Plan Consultation Stage and Document	SA Consultation Stage and Document
Scoping Stage	
Call for sites, evidence gathering, etc.	Scoping Report (February 2017)

<sup>4</sup> Statutory Instrument 2004, No 1633, as amended by Statutory Instrument 2018 No 1232 and by Statutory Instrument 2020 No 1531.

<sup>5</sup> HM Government (2016, updated 2021) Planning practice guidance: The National Planning Policy Framework and relevant planning

practice guidance [online]. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

Local Plan Consultation Stage and Document	SA Consultation Stage and Document
	Consultation: February – March 2017
Issues and Options Stage	
<u>Issues &amp; Options Paper</u> (August 2017) Consultation: 14 <sup>th</sup> August – 6 <sup>th</sup> October 2017	<u>SA Report on the Issues &amp; Options Paper</u> Consultation: 14 <sup>th</sup> August – 6 <sup>th</sup> October 2017
Draft Stage	
<u>Draft Herefordshire Minerals and Waste Local Plan</u> (January 2019) Consultation: 21 <sup>st</sup> January – 4 <sup>th</sup> March 2019	<u>SA Report of the Draft Herefordshire Minerals and Waste Local Plan</u> (December 2018) Consultation: 21 <sup>st</sup> January – 4 <sup>th</sup> March 2019
Publication Draft Stage	
<u>Publication Draft Herefordshire Minerals and Waste Local Plan</u> (January 2021) Consultation: 12 <sup>th</sup> April – 24 <sup>th</sup> May 2021 Proposed Pre-Examination Schedule of Main Modifications and Minor Changes (September 2021) (not published for consultation)	<u>SA Report on Draft Herefordshire Minerals and Waste Local Plan</u> (January 2021) Consultation: 12 <sup>th</sup> April – 24 <sup>th</sup> May 2021 SA Addendum Report of the Proposed Pre-Examination Schedule of Main Modifications and Minor Changes (this report) (not published for consultation)
Submission to the Secretary of State	
The Publication Draft Herefordshire MWLP and its associated SA Report, and the Proposed Pre-Examination Schedule of Main Modifications and Minor Changes and its associated SA Addendum Report will be submitted to Secretary of State in early 2022.	
Section 2 Examination	
Anticipated spring/summer 2022.	
Adoption	
Anticipated winter 2022/2023.	

## Structure of this SA Addendum

**1.9** This chapter has described the plan-making and SA processes undertaken to date in preparing the Herefordshire MWLP. The rest of this SA Addendum is structured as follows:

- **Chapter 2** sets out the methodology used for the assessments in this SA Addendum.
- **Chapter 3** presents an update to the review of relevant plans and baseline information.
- **Chapter 4** summarises the appraisal findings for the proposed pre-examination Main Modifications and changes to SA findings as a result of representations received during the Regulation 19 consultation on the 2021 SA Report.

- **Chapter 5** summarises the key findings from the SA of the Schedule of Proposed Pre-Examination Main Modifications and describes the next steps to be undertaken.

**1.10** This SA Addendum is supported by the following appendices:

- **Appendix A** presents the consultation responses received in relation to the Publication Draft 2021 SA Report and explains how each one has either been addressed in this SA Addendum or will be addressed in the next iteration of the SA Report.
- **Appendix B** reproduces the Schedule of Proposed Pre-Examination Main Modifications, with commentary on the SA implications of each proposed modification.

## Chapter 2

### Methodology

This chapter describes the approach that has been taken to the SA of the proposed pre-examination Main Modifications to the Herefordshire MWLP.

#### Introduction

**2.1** The approach to assessing the SA implications of the proposed pre-examination Main Modifications firstly involved considering each proposed modification as set out in the Schedule of Proposed Pre-Examination Main Modifications. A column was added to the Schedule of Proposed Pre-Examination Main Modifications to consider and record whether the proposed modification would change the SA findings presented in the 2021 SA Report for the relevant part of the Herefordshire MWLP that the modification relates to. The Proposed Pre-Examination Schedule of Main Modifications with the additional 'SA implications' column is presented in **Appendix D** of this SA Addendum, and the findings are summarised in **Chapter 4**.

#### Sustainability Context for Development in Herefordshire

**2.2** Chapter 3 of the 2021 SA Report sets out the sustainability context for the Herefordshire MWLP. It provides a review of relevant plans and programmes; a description of the current state (at that time, January 2021) of the environment; key sustainability issues facing the County; and their likely future evolution in the absence of the Herefordshire MWLP. **Chapter 3** of this SA Addendum presents an update to those sections to reflect the most recent situation and up-to-date sources of data, in order to inform the assessment of the proposed pre-examination Main Modifications.

#### SA Framework

**2.3** This SA Addendum Report is prepared within the context of the previous SA that was undertaken for the Herefordshire MWLP in January 2021. Having updated the policy review, baseline information and key sustainability issues facing Herefordshire, it was concluded that the framework of sustainability objectives used to guide the previous stages of

SA work (as set out in Chapter 2 of the 2021 SA Report) remains valid.

**2.4** The assessment reported in this document therefore continues to use this same 'SA framework', with one minor amendment to address a representation raised during the Regulation 19 consultation of the 2021 SA Report (see **Table 2.2** overleaf). **SA objective 8: Waste** is reworded from 'Move treatment of waste up the waste hierarchy' to 'Move waste up the waste hierarchy', to reflect that all waste should move up the waste hierarchy and not just waste treatment.

**2.5** The final column of the table identifies which of the topics specified in the SEA Regulations is addressed by each objective. The proposed pre-examination Main Modifications were appraised in relation to their likely effects in relation to the sustainability objectives set out in this SA framework, compared to the present baseline situation and likely evolution of key issues in the absence of the Plan.

### Reasonable Alternatives

**2.6** The SEA Regulations require the consideration of reasonable alternatives to the Herefordshire MWLP. Most of the proposed pre-examination Main Modifications to the MWLP address minor details in the Plan, for example text clarifications and corrections. Such changes are not considered to have reasonable alternatives.

**2.7** The 2021 SA Report which accompanied the Publication Draft Herefordshire MWLP sets out how reasonable alternatives were considered and selected as part of the SA and plan-making processes up until Submission, as required by the SEA Regulations. Reasonable alternatives to the formal Main Modifications will be identified (if appropriate) and appraised in the next iteration of the SA.

### Appraisal Symbology

**2.8** The SA uses colour-coded symbols attributed to each policy and site allocation to indicate its likely sustainability effects and performance against the 17 SA objectives in the SA framework (see **Table 2.1**).

**Table 2.1: Key to symbols and colour coding used in the SA of the Proposed Pre-Examination Main Modifications**

Symbol and Colour Coding	Description
++	The policy/site allocation is likely to have a significant positive impact on the SA objective(s).
+	The policy/site allocation is likely to have a minor positive impact on the SA objective(s).
0	The policy/site allocation is likely to have a negligible or no impact on the SA objective(s).
+/ or ++/	The policy/site allocation is likely to have a mixture of both positive and negative impacts on the SA objective(s).
	The policy/site allocation is likely to have a minor negative impact on the SA objective(s).
	The policy/site allocation is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect the policy/site allocation will have on the SA objective(s).
++/	The policy/site allocation is likely to have a mixture of both significant positive and minor negative impacts on the SA objective(s).
/+	The policy/site allocation is likely to have a mixture of both significant negative and minor positive impacts on the SA objective(s).



**Table 2.2: SA framework for the Herefordshire Minerals and Waste Local Plan**

SA Objective	Appraisal Question	SEA Topic Covered by Objective
<b>Employment</b>		
1. Support, maintain or enhance the provision of employment opportunities in the minerals and waste sectors.	1.1. Support the development and growth of the minerals and waste economy in Herefordshire and generate employment opportunities for local people.	Material assets <sup>6</sup> Population
2. Maintain or enhance conditions that enable a sustainable economy and continued investment.	2.1. Encourage long-term investment in Herefordshire's minerals and waste sectors. 2.2. Ensure a steady and adequate supply of minerals to meet the needs of society in accordance with national policy.	Material assets Population
<b>Healthy and Prosperous Communities</b>		
3. Protect and improve the health of the people of Herefordshire and reduce disparities in health geographically and demographically.	3.1. Avoid or minimise adverse effects on human health and safety to acceptable levels from mineral and waste operations. 3.2. Provide opportunities to improve health and amenity through delivery of green infrastructure, enhanced public rights of way and improved access to recreation as part of the development and restoration of sites. 3.3. Avoid or minimise adverse effects on the quality and extent of existing recreational assets.	Population Human health
4. Reduce poverty and social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.	4.1. Provide opportunities for local people to access employment and skills in the minerals and waste sectors.	Population Human health
<b>Transport and Access</b>		
5. Reduce road traffic, congestion and pollution, and promote sustainable modes of transport and efficient movement patterns in the county.	5.1. Reduce the vehicle kilometres travelled for the transportation of minerals and waste. 5.2. Promote the use of sustainable modes of transport. 5.3. Encourage the use of low emission vehicles for the transportation of waste and minerals.	Material assets
<b>Built and Historic Environment</b>		
6. Value, protect and enhance the county's historic environment and cultural heritage.	6.1. Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including the Hereford Area of Archaeological Importance, Conservation Areas, Scheduled Monuments, Registered Historic Parks and Gardens Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g., locally listed buildings.	Cultural heritage, including architectural and archaeological heritage

<sup>6</sup> 'Material assets' is listed as one of the topics to be considered in the SEA, but there is no clear definition of what this topic should cover in the SEA Directive or Regulations, and it has been variously defined in different SEA reports as relating to natural resources, e.g., minerals, or built infrastructure, e.g., transport infrastructure. For the purposes of this SEA, the material assets topic is assumed to include resources such as water, minerals and waste, as well as built infrastructure, including transport and waste infrastructure, but also economic and employment infrastructure and interests.

SA Objective	Appraisal Question	SEA Topic Covered by Objective
7. Value, protect and enhance the character and built quality of settlements and neighbourhoods.	7.1. Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area.	Material assets Soil
<b>Resource Consumption and Climate Change</b>		
8. Move waste up the waste hierarchy.	8.1. Minimise disposal of waste to landfill from households, businesses etc. including hazardous waste. 8.2. Promote re-use, recovery and recycling of waste. 8.3. Deal with waste locally and/or through the best Practical Environmental Option. 8.4. Promote sustainable waste management principles.	Material assets
9. Promote sustainable use of mineral resources.	9.1. Safeguard mineral resources from loss by permanent sterilisation. 9.2. Promote the most efficient use of mineral resources.	Material assets
10. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	10.1. Reduce the county's contribution to climate change by reducing greenhouse gas emissions from waste and mineral transportation and management activities. 10.2. Promote energy efficiency by encouraging the use of energy efficient buildings and plant, and the use of appropriate renewable or lower carbon energy sources on site.	Climatic factors
11. Promote effective restoration and appropriate after use of sites.	11.1. Provide for the restoration of land to an appropriate after-use including the creation of accessible greenspace at former waste and mineral sites.	Water Air Soil
<b>Environmental</b>		
12. Value, maintain, restore and expand county biodiversity and geodiversity.	12.1. Protect and enhance habitats of international, national, regional or local importance. 12.2. Protect international, national, regional or locally important terrestrial or aquatic species. 12.3. Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces. 12.4. Provide opportunities for enhancing biodiversity and achieve net gains in biodiversity, where possible as part of the development and restoration of a site. 12.5. Maintain and improve geodiversity, avoid irreversible losses, and create, extend or enhance Local Geological Sites.	Biodiversity Fauna Flora
13. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	13.1. Value, enhance and protect natural environmental assets including AONB's, open spaces, parks and gardens and their settings. 13.2. Minimise the landscape and visual intrusion of waste and mineral facilities on sensitive and/or distinct landscapes.	Landscape Fauna Flora
14. Value, protect and enhance the quality of	14.1. Protect and enhance the quality of watercourses.	Water

SA Objective	Appraisal Question	SEA Topic Covered by Objective
watercourses and maximise the efficient use of water.	14.2. Maximise the efficient use of water and protect the quality and quantity of ground and surface water from over abstraction.	
15. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	15.1. Ensure minerals and waste development are not at risk of flooding both presently and taking into account climate change and do not increase the risk of flooding elsewhere.  15.2. Ensure flood risk reduction / improvements to the flood regime.	Water
16. Minimise noise, light, and air pollution.	16.1. Minimise air, noise and light pollution from activities associated with mineral and waste developments and the potential for such pollution.  16.2. Help achieve the objectives of Air Quality Management Plans.	Air
17. Value, protect and enhance soil quality and resources.	17.1. Provide opportunities to improve soil quality and minimise contamination of soils.  17.2. Avoid the loss of the best and most versatile agricultural land by prioritising the location of waste and mineral developments to previously developed sites in preference to greenfield locations.	Soil

## Secondary, Cumulative and Synergistic Effects

**2.9** The assessment described above considers each proposed Main Modification to the Herefordshire MWLP in isolation. However, the SEA Regulations require consideration of secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary effects.

**2.10** Chapter 6 of the 2021 SA Report describes the secondary, cumulative, and synergistic effects and the duration of effects of the Herefordshire MWLP. The next iteration of the SA will relate to the formal Main Modifications, which will be published for consultation following the Examination hearings. It will present an update to this chapter and will consider whether the Main Modifications have any implications for the secondary, cumulative and synergistic effects of the Herefordshire MWLP that were reported previously.

## Mitigation

**2.11** Schedule 2(7) of the SEA Regulations require the measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme to be described in the Environmental Report (i.e., the SA Report). These are usually termed 'mitigation' measures.

**2.12** Chapter 7 of the 2021 SA Report identifies the mitigation measures provided in the Publication Draft Herefordshire MWLP. The next iteration of the SA will relate to the formal

Main Modifications and will present an update to this chapter taking into account mitigation provided by the Main Modifications.

## Monitoring

**2.13** The SEA Regulations require that *"the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"* and that the environmental report should provide information on *"a description of the measures envisaged concerning monitoring"*. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

**2.14** Chapter 8 of the 2021 SA Report presents indicators for monitoring the potential significant effects of implementing the Herefordshire MWLP. The next iteration of the SA, which will relate to the formal Main Modifications, will consider whether any additional monitoring indicators are required to monitor the sustainability effects identified through the SA of the finalised Main Modifications to the Herefordshire MWLP.

## Chapter 3

# Sustainability Context for Development in Herefordshire

This chapter presents an update to the review of plans and programmes and baseline information presented in Chapter 3 of the 2021 SA Report, in order to inform the assessment of the proposed pre-examination Main Modifications.

**3.1** The following paragraphs present a synopsis of the key changes to the policy context since the January 2021 SA Report was prepared.

### Policy Context

**3.2** It should be noted that the policy context within which the Herefordshire MWLP and its SA are being prepared is inherently uncertain given the following key factors:

- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors, notably the success of the ongoing vaccination programme to combat the virus. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development; changes to permitted development rights; increased remote working and reduced commuting and related congestion and air pollution; increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.
- **Brexit** – Following the United Kingdom's (UK) departure from the European Union (EU) on 31<sup>st</sup> January 2020, it entered a transition period which ended on 31<sup>st</sup> December 2020. From 1<sup>st</sup> January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed

into UK law. For completeness relevant EU legislation has still been referred to in this report where UK legislation is yet to be amended.

### National Planning Policy Framework

**3.3** Since the preparation of the Publication Draft Herefordshire MWLP, a number of international, national and local plans, policies and programmes have been updated/published that are relevant to the Herefordshire MWLP.

**3.4** Most notably is the publication of the revised **National Planning Policy Framework**<sup>7</sup> in July 2021 and replaces the previously published NPPF published in March 2012, revised in July 2018, and updated in February 2019. The Publication Draft SA Report was published in January 2021 and therefore referred to the 2019 version of the NPPF that was extant at that time. The NPPF does not contain specific waste policies (contained in **National Planning Policy for Waste**<sup>8</sup>) however it does contain policies on the sustainable use of minerals.

**3.5** The 2021 revisions to the NPPF reflect the Government's commitment to making beauty and place making a strategic theme in national planning policy. The changes make clear that development that is not well designed should be refused and that 'good design and beautiful places' should be at the centre of plan making and decision making.

**3.6** Both the Herefordshire MWLP and SA are being prepared in line with the NPPF. The SA framework contains sustainability objectives relating to good design (SA objective 7), the conservation and enhancement of the natural and built environment (SA objectives 6, 12, 13, 14, 15, 16 and 17), and the restoration of sites to create accessible greenspace (SA objective 11).

### National Planning Practice Guidance

**3.7 National Planning Practice Guidance (NPPG)**<sup>9</sup> provides guidance on the interpretation and implementation of the NPPF. The NPPG is an online resource that is continuously being updated and the following updates have been made since the January 2021 SA Report:

- 20<sup>th</sup> August 2021 – updated guidance on 'Flood risk and coastal change'.

**3.8** Both the Herefordshire MWLP and the SA are being prepared in line with the guidance outlined in the NPPG.

### Other Relevant Plans and Programmes

**3.9** Other relevant plans and programmes that have been published/updated of relevance to the Herefordshire MWLP and SA include:

#### The River Lugg Catchment Position Statement

**3.10** In April 2021, Herefordshire Council issued a Position Statement on the River Lugg Catchment<sup>10</sup> which confirmed that the River Wye SAC Nutrient Management Plan (NMP) is under review with the intention to provide an increased level of certainty around phosphate reduction and timescales. The Position Statement reports on the Interim Phosphate Delivery Plan that is being developed in consultation with Natural England and provides a revised position in relation to discharges to drainage fields.

**3.11** The River Lugg Catchment Position Statement (April 2021) (under title 'In the Interim') reiterates previous advice that:

*"On Natural England's advice, there remains potential for a positive appropriate assessment, where it can be demonstrated that development is nutrient neutral or would lead to betterment to enable development to proceed. Proposals will need to provide appropriate evidence of avoidance/mitigation measures. (Refer to Stage 2 of the Interim Plan for guidance)."*

**3.12** It is clear that the details around phosphate reduction and the protection of the River Wye SAC will change over the Plan period; however, the fundamental aim remains to be that any new development with a connection to the River Wye SAC will need to demonstrate at least nutrient neutrality in order to gain planning permission. The proposed pre-examination Main Modifications to the Herefordshire MWLP are in line with the advice from Natural England.

<sup>7</sup> Department for Levelling Up, Housing and Communities (2012) National Planning Policy Framework [online]. Available at: <https://www.gov.uk/guidance/national-planning-policy-framework>  
<sup>8</sup> Ministry of Housing, Communities and Local Government (2014) National planning policy for waste [online]. Available at: <https://www.gov.uk/government/publications/national-planning-policy-for-waste>

<sup>9</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, updated

2021) Planning practice guidance: The National Planning Policy Framework and relevant planning practice guidance [online]. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>10</sup> Herefordshire Council (2021) Position Statement – Development in the River Lugg Catchment: Area April 2021: An Update [pdf]. Available at: <https://www.herefordshire.gov.uk/downloads/file/22149/position-statement-update-april-2021>



### Heritage Impact Assessments

**3.13** In line with advice received from Historic England, Herefordshire Archaeology, commissioned by Herefordshire Council, undertook Heritage Impact Assessments (HIAs) in August 2021 for the following sites:

- Wellington Quarry<sup>11</sup>;
- Upper Lyde Quarry<sup>12</sup>;
- Shobdon Quarry<sup>13</sup>; and
- Leinthall Quarry<sup>14</sup>.

**3.14** The HIAs describe the known heritage assets within the locality (both designated and undesignated), explores the impact and setting concerns of these sites in relation to the proposed extension and discusses the potential for survival of archaeological features and artefacts within the proposed extension area. They conclude that the proposals for further extraction at these sites (through extensions of the existing sites) will not directly affect any known archaeological heritage assets or other heritage assets.

### Herefordshire Integrated Waste Management Strategy

**3.15** In July 2021, Herefordshire Council adopted a new Integrated Waste Management Strategy<sup>15</sup>, which identifies six targets:

1. Net zero carbon by 2030.
2. Reduce residual household waste arisings to less than 330kg/household/year by 2035.
3. Achieve national municipal reuse and recycling rate targets of 55% by 2025, 60% by 2030 and 65% by 2035.
4. To meet the requirements of the Environment Bill.
5. No more than 1% of municipal waste to be sent to landfill from 2025 and zero waste to landfill by 2035.
6. Improve reuse and recycling at all HWRC sites to achieve a reuse and recycling target of 85% by 2035.

**3.16** The new Waste Strategy and the MWLP are aligned and policy of the MWLP will help to deliver these new strategic targets.

### Wye Valley AONB Management Plan 2021-2026

**3.17** The Wye Valley AONB Management Plan 2021-2026<sup>16</sup> is intended to provide guidance and strategic objectives to support and steer positive landscape change. Aims include conservation and enhancement of landscape, biodiversity and heritage assets, as well as guiding sustainable land management and development.

### Natural Resources Wales' (NRW's) Planning Position Statement<sup>17</sup>

**3.18** In January 2021, NRW published a Planning Position Statement regarding the phosphate levels from development in the riverine SAC catchments in Wales. It identifies that the River Wye SAC fails in terms of achieving the phosphate standards and presents evidence of 'widespread or severe' phosphate levels (67%). In waterbodies which already fail to satisfy the phosphate standards set for a SAC, there is no headroom within these waterbodies to accommodate increased levels of phosphate and further increases in phosphate will further worsen the condition of the SAC. Therefore, any proposed development within the catchment or waterbody that might increase the amount of phosphate within the catchment or waterbody could lead to additional damaging effects to the SAC therefore such proposals should be screened through a HRA to determine whether they are likely to have a significant effect on the site's qualifying features.

### National Design Guide

**3.19** The National Model Design Code<sup>18</sup> presents a framework for creating healthy, greener, environmentally responsive, sustainable and distinctive places, with a consistent and high-quality standard of design. It is primarily focussed on built forms of development, but the underlying principles can be applied to minerals and waste projects.

<sup>11</sup> Herefordshire Archaeology (2021) A Heritage Impact Assessment for Wellington Quarry Extension, Wellington, Herefordshire

<sup>12</sup> Herefordshire Archaeology (2021) A Heritage Impact Assessment for Upper Lyde Quarry Extension, Pipe and Lyde, Herefordshire

<sup>13</sup> Herefordshire Archaeology (2021) A Heritage Impact Assessment for Shobdon Quarry Extension, Herefordshire

<sup>14</sup> Herefordshire Archaeology (2021) A Heritage Impact Assessment for Leinthall Ears Quarry Extension, Aymestrey, Herefordshire

<sup>15</sup> Herefordshire Council (2021) Draft Integrated Waste Management Strategy [pdf]. Available at:

<https://councillors.herefordshire.gov.uk/documents/s50092270/Appendix%20A%20-%20Waste%20Strategy.pdf>

<sup>16</sup> Wye Valley AONB Office (2021) Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026 [pdf]. Available at: [https://www.wyvalleyaonb.org.uk/wp-content/uploads/dlm\\_uploads/Wye-Valley-AONB-Management-Plan-2021-26-finalised.pdf](https://www.wyvalleyaonb.org.uk/wp-content/uploads/dlm_uploads/Wye-Valley-AONB-Management-Plan-2021-26-finalised.pdf)

<sup>17</sup> Natural Resources Wales (2021) Planning Position Statement [pdf]. Available at: <https://cdn.cyfoethnaturiol.cymru/media/693023/planning-position-statement-river-sac-compliance.pdf?mode=pad&rnd=132557132170000000>

<sup>18</sup> Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2019, updated 2021) National design guide [online]. Available at: <https://www.gov.uk/government/publications/national-design-guide>

## Herefordshire County Archaeology and Minerals Resource Assessment

**3.20** The Herefordshire County Archaeology and Minerals Resource Assessment<sup>19</sup> was omitted in error from the review of relevant plans in the January 2021 SA Report. It sets out an archaeological and minerals resource assessment for the county of Herefordshire. The data outputs from the Assessment have informed the assessment of proposed sites to be allocated in the MWLP.

## Baseline Information

**3.21** Since the preparation of the SA Report for the Publication Draft Herefordshire MWLP, the following baseline information has been updated/published that are relevant to the SA of the Herefordshire MWLP.

- According to NRW's Compliance Assessment of Welsh River SACs against Phosphorous Targets<sup>20</sup>, the comparison of phosphorus concentrations in the River Wye SAC against NRW's phosphate targets indicates widespread failures, some of them large in magnitude. Fourteen waterbodies in the Wye SAC passed their targets however, 28 failed and three were unknown. Both consistent and episodic failures were identified.
- The mining and quarrying sector was significantly impacted by the Coronavirus pandemic, with construction sites closed for several months in 2020, reducing demand for minerals. According to the latest Index of Production bulletin released in August 2021<sup>21</sup>, there was a 16% increase in mining and quarrying activities since July 2021, however this is still 5.8% below the recorded level in February 2020, the last month of "normal" trading conditions prior to COVID-19. The rise in 'production output'<sup>22</sup> in the UK is almost entirely because of the recent strong growth in mining and quarrying. Waste management (included in the same category as water supply and sewerage) is 5.3% above its February 2020 level.
- In 2019/2020, Herefordshire Council collected 86,811 tonnes of LACW, of which 75,649 tonnes was household waste. Of the total household waste collected 31,590 tonnes was sent for recycling<sup>23</sup>, composting or reuse (41%). Approximately 11,162 tonnes of non-household waste was collected of which 6,021 tonnes was sent for recycling, composting or reuse. Of the total amount of LACW 37,611 tonnes was sent for recycling, composting or reuse with 49,199 tonnes not sent for recycling. This shows a decreasing trend in the level of LACW arisings in Herefordshire from 2018/19.
- The latest population projections for Herefordshire predict that the population will increase to 107,345 by 2043, a percentage change of 12% compared to 2018 (95,055). There are approximately 13,200 people in Herefordshire with diverse needs (physical, cognitive)<sup>24</sup> who may encounter particular challenges when visiting a HWRC or understanding how to recycle properly.
- The latest labour market statistics<sup>25</sup> from July 2020 to June 2021 show that 96,800 people in Herefordshire were employed, accounting for 81.5% of the population, which is above the national average of 78.4%. The proportion of people who are unemployed is 3.4% which is a marked difference since the March 2020 figure of 2.5% of the population, however, this is still lower than the regional average (5.4%) and the national average (5.0%). In March 2020, 1.9% of the population of Herefordshire claimed out-of-work benefits which has increased to 3.1% in September 2021. This increase in claimants reflects the economic implications of COVID-19 pandemic.
- The Index of Production bulletin released in July 2021<sup>26</sup>, identified that the waste and mining sectors, along with several other industries, are experiencing difficulties in recruitment. Employment agencies report that there is a lack of candidates to fill positions, partly because of EU nationals returning to their home nations and because of

<sup>19</sup> Herefordshire Council (2014) Herefordshire County Archaeology and Minerals Resource Assessment [pdf]. Available at: [https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-1459-1/dissemination/pdf/hereford2-273877\\_1.pdf](https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-1459-1/dissemination/pdf/hereford2-273877_1.pdf)

<sup>20</sup> Natural Resources Wales (2021) Compliance Assessment of Welsh River SACs against Phosphorous Targets [pdf]. Available at: <https://cdn.cyfoethnaturiol.cymru/media/693025/compliance-assessment-of-welsh-sacs-against-phosphorus-targets-final-v10.pdf?mode=pad&rnd=132557227300000000>

<sup>21</sup> Office for National Statistics (2021) Index of Production, UK: August 2021 [online]. Available at: <https://www.ons.gov.uk/economy/economicoutputandproductivity/output/bulletins/indexofproduction/august2021>

<sup>22</sup> Production output includes outputs from manufacturing, mining and quarrying, energy supply, and water and waste management.

<sup>23</sup> DEFRA (2017) ENV18 – Local authority collected waste: annual results tables

<sup>24</sup> Herefordshire Council (2007) Needs Analysis: Adults with Physical Disabilities [pdf]. Available at: <https://councillors.herefordshire.gov.uk/documents/s14249/Append%207%20Needs%20Analysis%20-%20Adults%20with%20Physical%20Disabilities%20V4%203-final-appendix.pdf>

<sup>25</sup> Nomis (2021) Labour Market Profile – Herefordshire, County of [online]. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157169/report.aspx>

<sup>26</sup> Office for National Statistics (2021) Coronavirus and the impact on output in the UK economy: July 2021 [online]. Available at: <https://www.ons.gov.uk/economy/grossdomesticproductgdp/articles/coronavirusandtheimpactonoutputintheukeconomy/july2021>

a perceived risk from the workforce in starting a new job if the economy slows down.

- Commuting patterns result in a daily 3,062 population decrease in Herefordshire<sup>27</sup>. Around 13,876 people commute out of Herefordshire to other areas each day, most notably to Malvern Hills, Shropshire and Forest of Dean. However, these commuting patterns are expected to have significantly changed due to the increase in working from home as a response to the COVID-19 pandemic.

**3.22** The baseline information presented in the 2021 SA Report relating to the 'Landscape' omitted reference to the Brecon Beacons National Park. Therefore, the following section is updated:

- The Wye Valley Area of Outstanding Natural Beauty (AONB) and the Malvern Hills AONB lie partially within Herefordshire. The Wye Valley AONB broadly follows the River Wye, ending just southeast of Hereford and the Malvern Hills AONB incorporating an area east and northeast of Ledbury. The Shropshire Hills AONB lies almost adjacent to the north-western part of Herefordshire, near Leintwardine. There are no national parks or Green Belt designations in the county, however, the Brecon Beacons National Park borders the western boundary of Herefordshire.

## Key Sustainability Issues

**3.23** Chapter 3 of 2021 SA Report describes the key sustainability issues facing the county. Following the review of relevant plans and updates to the baseline, the following additional key sustainability issue is identified:

- **COVID-19 impacts** – The COVID-19 pandemic has had a dramatic effect on the mineral sector, with production levels still below pre-pandemic levels. Industrial and commercial waste production significantly reduced due to the closure of businesses and industries during the lockdowns. During the COVID-19 restrictions, many household recycling centres and civic amenity sites were closed, while at the same time people took advantage of getting rid of old furniture, clothes, electronics, leading to an increase in illegal dumping in the UK.

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<sup>27</sup> Nomis (undated) Location of usual residence and place of work by sex [online]. Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>

## Chapter 4

# Appraisal of the Proposed Pre-Examination Main Modifications

This chapter summarises the findings of the SA of the proposed pre-examination Main Modifications to the Herefordshire MWLP.

### Introduction

**4.1 Appendix B** presents the Schedule of Proposed Pre-Examination Main Modifications and the Council's reasons for proposing each change, with a final column added to record the implications of each Main Modification for the SA conclusions reported previously.

The SA implications have been considered, based on whether each Main Modification changes the conclusion of the 2021 SA Report of the Publication Draft Herefordshire MWLP. Therefore, this chapter should be read in conjunction with chapters 4-6 of the 2021 SA Report.

### Summary of Changes to the Site Assessment SA Findings

**4.2** This section outlines the changes in the assessment for one site as a result of NRW's representation received during the Regulation 19 consultation of the 2021 SA Report, updating Table 4.2 and Table 4.4 presented in Chapter 4 of the 2021 SA Report.

**4.3** As outlined in **Chapter 3** of this SA Addendum, a representation received during the Regulation 19 consultation highlighted that the baseline information erroneously omitted reference to the Brecon Beacons National Park. The site assessment for **SA objective 13: Landscape** for site M13 (Black Hill Delve) is updated to acknowledge that it is within 500m of the National Park. This results in the previously identified negligible effect being revised to an uncertain minor negative effect, to recognise the potential for adverse effects on the character and special qualities of the National Park (see Assumptions in Appendix F of the 2021 SA Report). However, as the site comprises a small delve and due its

topography in relation to the National Park, the likelihood for adverse effects on the National Park are limited.

Table 4.1: Summary of changes to the site assessment SA findings

Site	Previous SA Effect	Revised SA Effect
SA Objective 13. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.		
M13: Black Hill Delve	0	?

### Summary of Changes to the SA Findings for the Policies

**4.4** This section outlines the changes in the assessment scoring for several policies (which include the site-specific Key Development Criteria (KDC)) as a result of the proposed pre-examination Main Modifications to the Herefordshire MWLP.

**4.5** The majority of the proposed pre-examination Main Modifications do not affect the SA findings presented in the 2021 SA Report of the Publication Draft Herefordshire MWLP, as noted in **Appendix B**, generally because they are updates or clarifications to text within the MWLP and not fundamental changes to the policies or site allocations.

**4.6** Some policy updates do not change the overall SA effects recorded but reinforce or strengthen the effect previously recorded in the 2021 SA Report. For example, the proposed Main Modification to Policy W4 (Wastewater management) provides clarification regarding the need for statutory water and sewerage infrastructure works to demonstrate at least nutrient neutrality within the River Wye SAC. This reinforces the significant positive effect previously identified for **SA objective 14: Water** as the policy seeks to protect the quality of water and integrity of the River Wye SAC.

**4.7** The most significant proposed pre-examination Main Modifications relate to the site-specific KDC for the following policies:

- M3 (Winning and working of sand and gravel);
- M4 (Winning and working of crushed rock (limestone));
- M5 (Winning and working of sandstone);
- W5 (Preferred locations for solid waste treatment facilities); and
- W6 (Preferred locations for construction, demolition and excavation waste management facilities).

**4.8** The proposed Main Modification to the KDC for Policy W5 provides clarification regarding the need for development proposals at the Former City Spares Site (W19), Rotherwas Industrial Estate (W58), Holmer Road (W61), Kington Household Waste and Recycling Centre (W10), Leominster Enterprise Park (W62), Leominster HWS and HWRC (W05), Model Farm (W65), Moreton Business Park (W66), Southern Avenue (W63), Three Elms Trading Estate (W60), and Westfields Trading Estate (W59) to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. It also supports the HRA Addendum Report conclusion of no adverse effect on the integrity on the River Wye SAC from sites W05, W63, and W66 or Policy W5 which has informed the SA findings. Therefore, the previously identified minor negative effect for Policy W5 in relation to **SA objective 14: Water** is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative).

Table 4.2: Summary of changes to the SA findings for the policies

Site	Previous SA Effect	Revised SA Effect
SA Objective 14: Value, protect and enhance the quality of watercourses and maximise the efficient use of water.		
Policy W5 (Preferred locations for solid waste treatment facilities)	?	+?/ ?

**4.9** Although the only change to previously identified SA effects relates to Policy W5, a brief summary of the other notable proposed pre-examination Main Modifications to

policies M3, M4, M5, W5 and W6 and their KDC is provided in the subsequent paragraphs.



## Chapter 4

### Appraisal of the Proposed Pre-Examination Main Modifications

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**4.10** The proposed Main Modification outlined above also applies to policies M3, M4, M5 and W6 requiring development proposals at Callow Delve (M12), Former Lugg Bridge Quarry (W13), Perton Quarry (10a and 10b), Shobdon Quarry (M04/W44), Upper Lyde Quarry (M03a and M03c/W43), Wellington Quarry (M05/W45), and Westonhill Wood Delves (M20) to demonstrate at least nutrient neutrality within the River Wye SAC. This reinforces the positive effects identified as part of mixed effects for policies M3, M4, M5, and W6 for **SA objective 14: Water**, however, the overall significance of the effects remains unchanged.

**4.11** Similarly, the proposed Main Modification to policies M3, M4 and M5, including the KDC for Black Hill Delve (M13), Callow Delve (M12), Leinthall Quarry (M07a and M07b), Llandraw Delve (M16), Perton Quarry (M10a and M10b), Shobdon Quarry (M04), Upper Lyde Quarry (M03a and M03c), Wellington Quarry (M05) and Westonhill Wood Delve (M20) to require applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs helps to mitigate against adverse effects on the water environment, in particular groundwater. This reinforces the positive effects identified as part of mixed effects for policies M3, M4 and M5 for **SA objective 14: Water**, however, the overall significance of the effects remains unchanged.

**4.12** The clarification in terms of the appropriate assessment for Callow Delve (M12) to demonstrate no likely significant effects on the Wye Valley Woodlands SAC and Wye Valley & Forest of Dean Bat Sites SAC will help contribute to mitigating any likely adverse effect of loss of habitat reinforcing the minor positive effect identified as part of a mixed effect for Policy M5 for **SA objective 12: Biodiversity & Geodiversity**. It also supports the HRA Addendum Report conclusion of no adverse effects on the integrity of these two SACs from site M12 or Policy M5 which has informed the SA findings.

**4.13** Policies M3, M4, M5, W5 and W6, including the proposed pre-examination Main Modifications to the KDC for the Rotherwas Industrial Estate (W58), Land between Little Marcle Road and Ross Road (W64), Leinthall Quarry (M07a and M07b), Leominster Enterprise Park (W62), Leominster HWS and HWRC (W05), Model Farm (W65), Moreton Business Park (W66), Perton Quarry (M10a and M10b), Southern Avenue (W63), Three Elms Trading Estate (W60), Wellington Quarry (M05/W45), Westfields Trading Estate (W59), and Westonhill Wood Delves (M20) provide mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. The uncertain minor negative effects identified for policies W5 and W6 and the uncertain minor negative effects identified as part of mixed effects for policies M3, M4, M5 in relation to **SA objective 6: Historic Environment** remain unchanged as there is still potential for

minor or moderate adverse effects on the historic environment.

**4.14** It is recommended that, in line with the advice received from Historic England in May 2021, **the KDC for Holmer Road (W61) is updated to require a Heritage Statement to accompany any planning application for this site. Alternatively, the KDC could be updated to require proposals to demonstrate less than substantial harm to heritage asset(s) and their setting(s)**, which would be consistent with the KDC for other sites proposed to be allocated in the Herefordshire MWLP.

**4.15** For consistency, **it is recommended that the KDC for Leinthall Quarry (M07a and M07b) is updated to require applicants to demonstrate less than substantial harm on heritage asset(s) and their setting(s), particularly Croft Ambrey Hill Fort and Croft Castle Park**. Currently it requires demonstration of the level of effect on heritage assets.

**4.16** Both of these changes could be done in the final Schedule of Main Modifications prepared in agreement with the Inspector following the Examination hearings.

## Chapter 5

### Conclusions and Next Steps

This chapter presents the overall conclusions of the SA of the proposed pre-examination Main Modifications and describes the next steps to enable adoption of the Herefordshire MWLP.

#### Conclusion

**5.1** This SA Addendum Report has presented an assessment of the proposed pre-examination Main Modifications to the Herefordshire MWLP. The majority of the proposed modifications in the Schedule of Proposed Pre-Examination Main Modifications do not generally affect the SA findings presented in the 2021 SA Report of the Publication Draft MWLP, either because they are updates or clarifications to text within the MWLP or are not fundamental changes to the policies or site allocations.

**5.2** The proposed pre-examination Main Modifications have provided the clarity requested by Natural England, Historic England, the Environment Agency, and Natural Resources Wales, particularly relating to the need for mineral and waste proposals to demonstrate at least nutrient neutrality on the River Wye SAC and to demonstrate less than substantial harm to heritage assets and their settings.

**5.3** The previously identified SA effect for **SA objective 14: Water** for Policy W5 is revised from a minor negative effect to a mixed effect (minor positive / minor negative). This recognises the KDC for the Former City Spares Site (W19), Rotherwas Industrial Estate (W58), Holmer Road (W61), Kington Household Waste and Recycling Centre (W10), Leominster Enterprise Park (W62), Leominster HWS and HWRC (W05), Model Farm (W65), Moreton Business Park (W66), Southern Avenue (W63), Three Elms Trading Estate (W60), and Westfields Trading Estate (W59) to demonstrate at least nutrient neutrality within the River Wye SAC which is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. It also supports the HRA Addendum Report conclusion of no adverse effect on

the integrity on the River Wye SAC from sites W05, W63, and W66 or Policy W5 which has informed the SA findings.

**5.4** While the SA effects for **SA objective 6: Historic Environment** for the MWLP policies, including the KDC, remain unchanged, the following recommendations are made in the final Schedule of Main Modifications prepared in agreement with the Inspector following the Examination hearings:

- It is recommended that, in line with the advice received from Historic England in May 2021, the KDC for Holmer Road (W61) is updated to require a Heritage Statement to accompany any planning application for this site. Alternatively, the KDC could be updated to require proposals to demonstrate less than substantial harm to heritage asset(s) and their setting(s), which would be consistent with the KDC for other sites proposed to be allocated in the Herefordshire MWLP.
- For consistency, it is recommended that the KDC for Leinthall Quarry (M07a and M07b) is updated to require applicants to demonstrate less than substantial harm on heritage asset(s) and their setting(s), particularly Croft Ambrey Hill Fort and Croft Castle Park. Currently it requires demonstration of the level of effect on heritage assets.

## Next Steps

**5.5** This SA Addendum will be submitted to the Secretary of State for Examination alongside the Herefordshire MWLP, the 2021 SA Report, and the Schedule of Proposed Pre-Examination Main Modifications in early 2022.

**5.6** As part of the Examination, the Inspector will consider the proposed pre-examination Main Modifications and seek views during the Examination hearings. Following the hearings, the Council will prepare a final Schedule of Main Modifications, which will be published for a formal consultation stage. Depending on the timing of that consultation and the extent of the final Main Modifications, either a further SA Addendum will be prepared, or the full SA Report will be updated to reflect the final Schedule of Main Modifications and to determine whether the MWLP as proposed to be modified will have any significant sustainability effects that were not previously identified in either the January 2021 SA Report or this SA Addendum.

**5.7** Following the Main Modifications consultation, the Inspector will consider the representations raised in respect of the Main Modifications and will recommend any final changes necessary in his or her report to make the MWLP meet the tests of soundness.

**5.8** If the Herefordshire MWLP is found to be 'sound', it can be formally adopted by Herefordshire Council. Once the

Herefordshire MWLP has been adopted, a SA Adoption Statement will be published to report the full plan-making and SA process and the framework for monitoring future effects.

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**Appendix A**

**Representations on the  
Publication Draft Local Plan SA  
Report**

Table A.1: Representations relating to the Publication Draft Herefordshire MWLP SA Report

Respondent	Representation	SA Response
<b>Historic England</b> Representation date 24 <sup>th</sup> May 2021	With regard to the SA which accompanies the Regulation 19 Minerals and Waste Plan, Historic England welcomes that heritage assets are included under reference to the historic environment of the County, in para. 3.47, under “Environmental Characteristics” comprising the baseline for the SA. We also welcome that the ‘Historic Environment’ is included as a key sustainability issue, and consideration is given in the SA of the likely evolution of the issue without the MWLP.	Noted with thanks.
	Historic England notes that in Chapter 3 under the “Review of relevant plans, programmes and environmental protection objectives” there is still no reference to Historic Landscape Characterisation information, or any evidence that the Historic Environment Record has been consulted and considered in the Local PPP part of the SA. We are aware from the Plan itself (para. 5.4.28) that evidence relating to heritage has been considered, and therefore documents such as “The Herefordshire County Archaeology and Minerals Resource Assessment” (2014) and this should be referenced within the baseline documents for the SA.	The review of plans was previously updated to refer to Herefordshire's Historic Environment Record (including the Historic Landscape Characterisation map). The baseline includes the following information relating to the HER:  <i>“In addition, there are also over 27,500 archaeological and historic sites in Herefordshire, identified within the Herefordshire Historic Environment Record (HER). Not all of these are listed, but they contribute to the character of the area. The HER also holds data on the historic landscape characterisation map of Herefordshire, which maps the age of the present-day cultural landscape, primarily using field shapes. The HER is maintained by Herefordshire Council.”</i>  <b>Action: Chapter 3</b> of this SA Addendum update the review of plans and baseline information and refers to "The Herefordshire County Archaeology and Minerals Resource Assessment".
	Historic England welcomes the inclusion of SA Objective 6, focussed on the historic environment and cultural heritage and a separate objective, SA Objective 7, focussed on valuing, protecting and enhancing the built quality of settlements and neighbourhoods.	Noted with thanks.
	For SA Objective 7, in relation to the SA findings for the mineral site allocations & areas of search, it is noted that uncertain significant negative effects (--?) are expected for two site allocations; the proposed extensions to Wellington (M05) and Leinthall Quarries (M07a) (paras. 4.18 – 4.21 inclusive p.107). Whilst Historic England would agree with this assessment, we consider that similar scorings should be given in relation to SA Objective 6 for both of these allocations, given their potential for impact on the setting of heritage	Noted with thanks.  Heritage Impact Assessments for Wellington Quarry and Leinthall Quarry were undertaken in August 2021. The HIAs describe the known heritage assets within the locality (both designated and undesignated), explores the impact and setting concerns of these sites in relation to the proposed extension and discusses the potential for survival of archaeological features and artefacts within the proposed extension



Appendix A  
Representation on the Publication Draft Local Plan SA Report

SA of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan  
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Respondent	Representation	SA Response
	assets and in the absence of further assessment work, as detailed in our detailed response attached at Annex A.	area. They conclude that the proposals for further extraction at these sites (through extensions of the existing sites) will not directly affect any known archaeological heritage assets or other heritage assets. Therefore, the uncertain minor negative effects previously identified for sites M05 and, M07a and M07b remain unchanged.
	With regard to SA Objective 7, in relation to the SA findings for the waste site allocations, it is noted that uncertain significant negative effects (--?) are expected for several proposed sites: Leominster HWS & HWRC (W05), Ledbury WRC (W07), Kington WRC (W10) and City Spares MRS (W19) due to their close proximity (100m) of a settlement. However, in relation to SA Objective 6, we note that uncertain negligible effects (0?) have been determined for most sites and we consider that with regard to the proposal for Rotherwas Industrial Estate (W58), given the extent of designated heritage assets in the vicinity and the potential for important non-designated archaeological remains to be affected, the scoring should be reviewed and possibly amended to uncertain minor effects (-?) at this stage.	Noted with thanks.  However, the assessment of <b>SA objective 6: Historic Environment</b> for site W58 remains unchanged as the modified KDC provide sufficient mitigation to avoid adverse effects on the historic environment. Furthermore, W58 is within a large Strategic Employment Area. The potential impacts on the historic environment from this Strategic Employment Area were considered prior to its allocation in the Core Strategy, which was adopted in 2015.
	Historic England also notes that uncertain significant negative effects are identified for Mineral Areas of Search (p.201-202) in relation to SA Objective 6, and also in relation to buried archaeology for sandstone and sand and gravel, and agrees that further assessment work is required for certain sites to inform this further. Please see our attached Annex A for details.	Noted with thanks.  Effects are expected to be significant for the four Areas of Search as these areas contain designated heritage assets that could be adversely affected by mineral extraction if development were to take place at sites either containing or adjacent to these assets or at sites that contribute to the setting of heritage assets. Therefore, effects are uncertain for the Areas of Search as it would be dependent on the exact location of minerals development within the Areas of Search, which would not be known until the planning application stage.
	In relation to cumulative effects (p.234) Historic England considers that there is the potential for cumulative adverse effects on the historic environment with particular regard to Upper Lyde, Leinhthall and Perton quarries and that this should be recognised within the SA report.	<b>Action:</b> The <u>next</u> iteration of the SA will update the cumulative effects section to recognise the potential cumulative adverse effects on the historic environment from Upper Lyde, Leinhthall and Perton quarries.
	Historic England welcomes the recommendation for SA Objective 6 (p.245), but considers that in the absence of a more complete evidence base comprising further assessment work prior to certain sites being allocated (please see our Appendix A for details), it cannot be	<b>Action:</b> The overall findings section in the <u>next</u> iteration of the SA will be caveated to say that it is likely there will be no residual significant effects in relation to <b>SA objective 6: Historic Environment</b> , pending further assessment work.

Appendix A  
Representation on the Publication Draft Local Plan SA Report

SA of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan  
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Respondent	Representation	SA Response
	<p>conclusively stated that there will be “no residual significant effect in relation to SA Objective 6: Historic Environment” (para. 7.28).</p> <p><b>Appendix A:</b></p> <p>HE advises that Heritage Impact Assessments are undertaken for Shobdon Quarry (M04/W44), Upper Lyde Quarry (M03a and M03c/W43), Wellington Quarry (M05/W45), and Leinthall Quarry (M07a and M07b) prior to the allocation in the Herefordshire MWLP.</p> <p>HE advises that Heritage Statements should accompany any planning application and that this should be a requirement of the Key Development Criteria for Perton Quarry (M10a and M10b), Hereford Enterprise Zone (Rotherwas Industrial Estate) (W58), Holmer Road (W61), Westfield Trading Estate (W59) and Moreton Business Park (W66).</p>	<p>Noted with thanks.</p> <p>Heritage Impact Assessments were undertaken in August 2021 for Shobdon Quarry, Upper Lyde Quarry, Wellington Quarry, Leinthall Quarry by Herefordshire Archaeology.</p> <p>The relevant KDC have been amended to reflect the NPPF requirement to demonstrate less than substantial harm to heritage assets, which is considered by the Council to address the need for applicants to complete Heritage Statements to accompany planning applications for Perton Quarry, Hereford Enterprise Zone (Rotherwas Industrial Estate), Westfield Trading Estate and Moreton Business Park. However, in line with the advice from Historic England, it is recommended that the KDC for Holmer Road (W61) is also updated to require a Heritage Statement to accompany any planning application for this site. Alternatively, the KDC could be updated to require proposals to demonstrate less than substantial harm to heritage asset(s) and their setting(s), which would be consistent with the KDC for other sites proposed to be allocated in the Herefordshire MWLP.</p>
<p><b>Environment Agency</b></p> <p>Representation received 24<sup>th</sup> May 2021</p>	<p>SA Objective 8 says “Move treatment of waste up the hierarchy” – Why only “treatment”? As mentioned in the Plan, waste treatment may or may not involve a preparatory process (such as removing water,). Possibly the term “treatment” is superfluous, in referring to its’ overall handling, -rather than as a specific “Waste Treatment activity”? As in the Appraisal question, wastes destined to landfill or incineration should also be moved up the Waste Hierarchy as far as possible. This may simply be an issue with the wording.</p> <p>Section 1.1.05 refers to Herefordshire as a Tourist destination. With reference to earlier comments on educating people, visitors may be unaware of local arrangements for waste, and even feel that “recycling” is “optional” or not necessary when they are on Holiday, – as seen with some littering behaviours at beauty spots during Covid-19. Is it possible to improve engagement with visitors regarding waste and recycling? Education could also help tackle issues such as fly-tipping.</p>	<p><b>Action:</b> SA objective 8 is reworded in <b>Chapter 2</b> of this SA Addendum to 'Move waste up the waste hierarchy'.</p> <p>Noted with thanks, however, this point relates more to the content of the Plan rather than the SA Report.</p>

Appendix A  
Representation on the Publication Draft Local Plan SA Report

SA of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan  
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Respondent	Representation	SA Response
	<p>Regarding the population profile, there seems to be no specific mention to people with physical or cognitive restrictions, however they also produce waste and may encounter particular challenges, such as when visiting a HWRC, or understanding how to recycle properly. How can particular accessibility needs be addressed? Facilities such as charity shops and donation points can aim to support these groups as well as animals and wildlife.</p>	<p><b>Action: Chapter 3</b> of this SA Addendum updates the population profile to include the number of people with a range of diverse needs (physical, cognitive). However, specifying which facilities support accessibility groups is too detailed for the content of the MWLP and SA.</p>
	<p>The Statement “Encourage symbiotic relationships between waste management, engineering, manufacturing and research industries which will help to reduce the transport distances of waste;” does start to capture the need for an integrated Circular Economy, where traditional waste management is not seen as somehow detached from other activities, -perhaps this should include Agriculture, and Sewage treatment (regarding Nutrient discharges to water and sludge management,) as well?</p>	<p><b>Action:</b> Update paragraphs 6.18 and 6.39 in the <u>next</u> iteration of the SA to refer to agricultural waste and sewerage treatment.</p>
	<p>In addition to energy generation, there is an increasing need for energy storage to help manage demand in a de-fossilised energy sector. Technologies such as gasification and AD could support this, alongside things like water storage for hydropower, and possibly compressed/liquefied air storage. Energy from waste facilities could power these, and possibly end-of life mineral workings could provide either capacity for water, or heat that could be recovered by water-source heat pumps? Presumably energy supply in Herefordshire is also being considered as part of the Climate Emergency response. Additionally we may need to maximize the recovery of elements used to make batteries, such as lithium.</p>	<p>Noted with thanks, however, this point relates more to the content of the Plan rather than the SA Report.</p>
	<p>Water resources is also under focus, especially regarding the River Wye, and in a changing climate, prolonged hot dry weather could be a challenge for both domestic consumers and agriculture as well as various commercial sectors. Large end-of-life mineral workings could be adapted to become reservoirs, -if the location and geology is suitable.</p>	<p>Significant positive effects were identified in the 2021 SA Report for all mineral sites in relation to <b>SA objective 11: Restoration</b>, which could include developing former mineral sites into reservoirs. We acknowledge in the 2021 SA Report that these effects are uncertain and will be dependent on the type of restoration proposed and eventually developed on sites, which will not be known until the planning application stage.</p>
<p><b>Natural Resources Wales</b></p>	<p><b>Phosphate Sensitive Catchment – River Wye Special Area of Conservation (SAC):</b> We were last consulted on this plan on 21/01/2019 where the plan was in its draft form. Since the previous consultation, the evidence and data available to inform the production of Local Plan documents has changed. On the 21<sup>st</sup> January 2021 we issued a planning</p>	<p><b>Action: Chapter 3</b> of this SA Addendum updates the review of plans to include NRW's Planning Position Statement. The baseline information is also updated in this chapter to refer to the evidence in the 'Compliance Report Data and Evidence'.</p>

Respondent	Representation	SA Response
Representation dated 24 <sup>th</sup> May 2021 (email)	<p>position statement<sup>28</sup> regarding the phosphate levels from development in the riverine SAC catchments in Wales. We consider that this evidence needs to be a key consideration in the production of the LDP policies and allocated sites.</p> <p>Having reviewed the list of key local plans, programmes and environmental protection objectives outlined in the 'Publication Draft Herefordshire Minerals and Waste Local Plan Sustainability Appraisal', we note that this evidence has not been referenced. Notwithstanding advice provided by Natural England or the Environment Agency, we recommend that the compliance report data and evidence<sup>29</sup> is taken into consideration in the sustainability appraisal and accompanying Habitats Regulations Assessment and be updated accordingly.</p> <p><b>Landscape:</b></p> <p>We note that that the environmental baseline information is set out in Appendix C1 of the Sustainability Appraisal of the Publication Draft Herefordshire Minerals and Waste Local Plan appendices documents dated December 2020.</p> <p>Paragraph C.112 sets outline the environmental baseline information in respect of Landscape. Whilst reference is made to national character area 99: Black Mountains and Golden Valley, no reference is made to the Brecon Beacons National Park which borders the Western boundary of Herefordshire.</p> <p>The National Park should be considered in the baseline assessment for the MWLP. Sites need to consider whether they are likely to have any impact upon the Special Qualities of the National Park and any impact upon its visual setting. Given the scale, distance and intervening features between the National Park and the allocations, it is unlikely that any significant impacts would be identified, however consideration of the impacts must be given at this stage in order to inform the sustainability appraisal for the MWLP.</p>	<p><b>Action: Chapter 3</b> of this SA Addendum updates the baseline information relating to the landscape. The assessment of site M13 (Black Hill Delve) has been updated in <b>Chapter 4</b> of this SA Addendum to acknowledge that it is within 500m of the National Park and could have the potential to adversely impact on the character and special qualities of the National Park.</p>

<sup>28</sup> Natural Resources Wales (2021) Planning Position Statement [pdf]. Available at: <https://cdn.cyfoethnaturiol.cymru/media/693023/planning-position-statement-river-sac-compliance.pdf?mode=pad&rnd=132557132170000000>

<sup>29</sup> Natural Resources Wales (undated) Compliance Assessment of Welsh River SACs Against Phosphorus Targets [online]. Available at: <https://naturalresources.wales/evidence-and-data/research-and-reports/water-reports/compliance-assessment-of-welsh-river-sacs-against-phosphorus-targets/?lang=en>

## **Appendix B**

### **Schedule of Proposed Pre- Examination Main Modifications**

Table B.1: Schedule of Proposed Pre-Examination Main Modifications

Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
Section 4: Vision, Objectives and Spatial Strategy				
MM4.a	Vision	Over the period to 2041, Herefordshire will deliver sustainable provision of minerals supply and waste management, balancing development needs whilst supporting the county's communities, <del>protecting</del> conserving and enhancing environmental, heritage and cultural assets and strengthening the local economy.	To bring text up to date and provide a more forward looking approach.	<b>No change to SA findings:</b> This proposed Main Modification will not alter the minor positive effects previously identified for <b>SA objectives 12: Biodiversity &amp; Geodiversity, 13: Landscape, 14: Water, 15: Flooding, and 17: Soil.</b>
Table 1 MWLP Objectives				
MM4.b	Objective 2	To prioritise the long-term conservation of primary minerals through enabling provision of sustainable alternatives, effective use of mineral <del>reserves</del> <u>resources</u> , and promoting efficient use of minerals in new development.	To replace text with the correct terminology and to ensure the principle is applied more widely than just permitted reserves.	<b>No change to SA findings:</b> The minor wording change does not alter the previously identified findings of the SA.
MM4.c	Objective 3 (new)	To safeguard appropriate mineral and waste resources, and associated transport infrastructure, within Herefordshire.	To replace the missing objective.	<b>No change to SA findings:</b> Strategic Objective 3: Safeguarding was omitted in error from the Publication Draft MWLP however, it was assessed in the 2021 SA Report.
MM4.d	Objective 11	To address the causes and impacts of climate change relating to minerals and waste development activity, including using opportunities arising from minerals and waste operations and reclamation activity to <u>decarbonise</u> , to mitigate and adapt to climate change and to leave a positive legacy.	To incorporate a request made in representation and to explicitly recognise the objective to achieve decarbonisation.	<b>No change to SA findings:</b> This proposed Main Modification reinforces the significant positive effects previously identified for <b>SA objectives 10: Climate Change and 16: Pollution.</b>
Section 5: Strategic Policy and General Principles				
MM5.a	5.1.8 (new)	<u>Each of the site allocations made in policy of the MWLP is accompanied by key development criteria. To avoid repetition and for clarity in the MWLP, these criteria are provided in the Site Allocation appendix and set out at section 9 of the MWLP; however,</u>	To address comment raised in representation and to	<b>No change to SA findings:</b> MM5.a clarifies the policy status of the key development criteria which have been assessed individually in <b>Table B.2.</b>



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 Schedule of Proposed Pre-Examination Main Modifications

SA of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan  
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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<u>they are referenced within and form a part of each policy within which they are referenced.</u>	clarify the policy status of the key development criteria.	
MM5.b	5.3.1 (new sentence)	<u>In addition, the railheads at Moreton-on-Lugg (operational) and at Moreton Business Park (not-operational) provide the opportunity to increase non-road based transport.</u>	To address comment raised in representation that railheads in Herefordshire were not appropriately recognised.	The Main Modification provides clarification only and relates to Core Strategy policies SS4 and MT1 which are adopted policies and therefore were not subject to SA in the 2021 SA Report.
MM5.c	Policy SP1 (new text at start of policy)	<u>Development proposals will be supported where they adopt sustainable design principles, construction methods and procurement policies. This includes using the minimal amount of primary materials, reusing or facilitating the recycling of wastes and materials generated on site and using alternative construction materials sourced from secondary and recycled aggregates.</u>	To ensure the policy is explicit about the intended outcome.	<b>No change to SA findings:</b> The Main Modification reinforces the positive effects identified for Policy SP1, particularly the significant positive effects identified for <b>SA objectives 8: Waste, 9: Mineral Resources, and 10: Climate Change.</b>
MM5.d	Policy SP1/2	requiring <u>all applicants to submit</u> <del>submission of</del> a Resource Audit that identifies the quantum required and approach to sourcing construction materials, the amount and type of waste that is expected to be produced by the development and end of life considerations for the development materials.	To ensure the policy is explicit about who is expected to submit the Resource Audit.	<b>No change to SA findings:</b> This proposed Main Modification provides clarification only and will not alter the previously identified findings of the SA.
MM5.e	5.5.14	New development requires significant volumes of construction materials, and the facilities provided on site can affect <del>how it performs</del> <u>the sustainability of that development</u> through its operational lifetime.	To improve clarity in the text.	<b>No change to SA findings:</b> This proposed Main Modification provides clarification only and will not alter the previously identified findings of the SA.
MM5.f	Policy SP2/1	Planning permission will be <del>granted</del> <u>supported</u> for mineral development proposals that optimise opportunities to improve public access to open spaces, integrating historic context and green infrastructure as appropriate.	To make the policy text consistent throughout the MWLP.	<b>No change to SA findings:</b> The minor wording change does not alter the previously identified findings of the SA.

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MM5.g	Policy SP3	Planning permission will be <del>granted</del> <u>supported</u> for minerals or waste development where it is demonstrated that the arrangements for the transport of mineral, waste or other materials...	To make the policy text consistent throughout the MWLP.	<b>No change to SA findings:</b> The minor wording change does not alter the previously identified findings of the SA.
MM5.h	5.11.9	As a starting point, developers should refer to the particular issues identified in the key development criteria ( <del>section 9</del> ) established for <del>the</del> <u>each</u> allocated sites and the Green Infrastructure Strategy already in place.	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy SP4 which will not alter the previously identified findings of the SA.
Section 6: Minerals				
MM6.a	Policy M2/1a	the development would not sterilise or prejudice the future extraction of the mineral resource because it can be demonstrated that the resource: is not of economic value; occurs at depth and can be extracted in an <u>economically viable</u> alternative way; does not exist; or has been sufficiently depleted by previous extraction; or	To reflect request made in representation and to explicitly recognise that mineral extraction needs to be economically viable, and to correct the grammar.	<b>No change to SA findings:</b> The proposed Main Modification safeguards mineral resources and only permits minerals development under certain circumstances, including where it occurs at depth and can be extracted in an economically viable alternative way. Therefore, the previously identified minor positive effect for <b>SA objectives 1: Employment</b> and <b>2: Economy</b> remain valid.
MM6.b	Policy M2/2	Where the operation of an existing mineral working, <u>including associated infrastructure</u> , could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant shall be required to provide suitable mitigation before the new development is completed.	To ensure the policy is explicit that the agent of change principle applies to infrastructure as well as working.	<b>No change to SA findings:</b> The clarification that the agent of change principle applies to infrastructure as well as mineral working does not alter the previously identified findings of the SA.
MM6.c	6.2.3	<u>To this end, policy M3 has been drafted on the assumption that reserve in Herefordshire supplies 100% of the forecast sand and gravel demand.</u>	To clarify this position.	<b>No change to SA findings:</b> The proposed Main Modification clarifies that reserves in Herefordshire supply 100% of the forecast sand and gravel demand. This ensures a steady and adequate supply of minerals to meet the needs of society and encourages long-term investment in Herefordshire's mineral sector, reinforcing the previously identified significant positive effect for <b>SA objective 2: Economy</b> .

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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM6.d	6.2.9	<del>In addition to</del> As part of this policy framework, the allocated sites are accompanied by key development criteria that present particular issues to be comprehensively addressed in association with any development proposal.	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy M3 which will not alter the previously identified findings of the SA.
MM6.e	Policy M3/2a	Specific Sites (presented in alphabetical order) subject to the key development criteria <del>set out at section 9:</del>	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy M3 which will not alter the previously identified findings of the SA.
MM6.f	Policy M3/3	Only where it is demonstrated to be necessary to maintain an adequate landbank or there is a shortfall in production capacity available at the Specific Sites or Preferred Areas of Search, will sand and gravel extraction <del>will</del> be supported in any other area of <del>reserve resource</del> .	To replace text with the correct terminology.	<b>No change to SA findings:</b> The minor wording change does not alter the previously identified findings of the SA.
MM6.g	6.2.12	<u>To this end, policy M4 has been drafted on the assumption that reserve in Herefordshire supplies 100% of the forecast crushed rock demand.</u>	To clarify this position.	<b>No change to SA findings:</b> The proposed Main Modification clarifies that reserves in Herefordshire supply 100% of the forecast crushed rock demand. This ensures a steady and adequate supply of minerals to meet the needs of society and encourages long-term investment in Herefordshire's mineral sector, reinforcing the previously identified significant positive effect for <b>SA objective 2: Economy</b> .
MM6.h	6.2.18	<del>In addition to</del> As part of this policy framework, the allocated sites are accompanied by key development criteria that present particular issues to be comprehensively addressed in association with any development proposal.	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy M4 which will not alter the previously identified findings of the SA.
MM6.j	Policy M4/2a	Specific Sites (presented in alphabetical order) subject to the key development criteria <del>set out at section 9:</del>	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy M4 which will not alter the previously identified findings of the SA.

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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM6.k	Policy M4/3	Only where it is demonstrated to be necessary in order to maintain an adequate landbank or there is a shortfall in production capacity available at the Specific Sites or Preferred Areas of Search, will limestone extraction be supported in any other area of <del>reserve</del> <u>resource</u> .	To replace text with the correct terminology.	<b>No change to SA findings:</b> The minor wording change does not alter the previously identified findings of the SA.
MM6.m	6.3.6	<del>In addition to</del> <u>As part of</u> this policy framework, the allocated sites are accompanied by key development criteria that present particular issues to be comprehensively addressed in association with any development proposal.	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy M5 which will not alter the previously identified findings of the SA.
MM6.n	Policy M5/1b	the lateral extension and/or deepening of workings at the following consented sandstone extraction sites, subject to the key development criteria <del>set out at section 9:</del>	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy M5 which will not alter the previously identified findings of the SA.
Section 7: Waste				
MM7.a	7.2.15	<del>In November 2018, judgement was handed down from the Court of Justice of the European Union in the case of Cooperatie Mobilisatie (Joined Cases C-293/17 and C-294/17, the 'Dutch Case'). The Dutch Case concluded that where a site is failing in its water quality objectives, and is therefore classed as being in an unfavourable condition, there is limited scope for the approval of additional damaging effects and that the future benefit of mitigation measures cannot be relied upon at Appropriate Assessment, where those benefits are uncertain at the time of the assessment.</del>	To delete text that repeats the content of paragraph 3.3.36.	<b>No change to SA findings:</b> The deletion of the repeated text does not alter the previously identified findings of the SA.
MM7.b	7.2.16	<del>Herefordshire Council subsequently prepared a Position Statement titled 'Current Development in the River Lugg catchment Area' dated 15 October 2019 (the 'Herefordshire Council Position Statement'). The Herefordshire Council Position Statement advises (on page 2) that:</del>	To update the text recognising that this was no longer the most recent document on the matter.	<b>No change to SA findings:</b> The deleted text does not alter the previously identified findings of the SA.

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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM7.c	7.2.17	<del>There remains potential for a positive Appropriate Assessment to enable development to proceed, on Natural England's advice, where it can be demonstrated that any impacts would be neutral (where avoidance / mitigation measures included in the plan or project, counterbalance any nutrient (phosphate) increase from the plan or project), or would lead to 'betterment.'</del>	To update the text.	<b>No change to SA findings:</b> The deleted text does not alter the previously identified findings of the SA.
MM7.d	7.2.25 As modified: 7.2.22	The waste management practices available to the agricultural sector are wide-ranging and varied, and can be expected to change over the plan period, <del>for example Defra is due to publish the Farm Emissions Reduction Plan in 2020, which will also provide a framework of actions.</del>	To update the text.	<b>No change to SA findings:</b> The deleted text does not alter the previously identified findings of the SA.
MM7.e	7.2.26 (new)  FN50 (new)	<u>The Agriculture and Horticulture Development Board (AHDB) purpose is 'to inspire our farmers, growers and industry to succeed in a rapidly changing world. We equip the industry with easy to use, practical know-how, which they can apply straight away to make better decisions and improve their performance'. It is operated as a statutory levy board and is funded by farmers, growers and others in the supply chain.</u>  <a href="https://ahdb.org.uk/">https://ahdb.org.uk/</a>	To incorporate guidance as advised by Herefordshire Ecology & Arboriculture Officer (Planning).	<b>No change to SA findings:</b> The new text clarifies the purpose of the AHDB which does not alter the previously identified findings of the SA.
MM7.f	7.2.27 (new)  FN51 (new)	<u>The AHDB provides a wide range of advice to farmers and has prepared a Nutrient Management Guide (RB209) to explain the value of nutrients, soil and why good nutrient management is about more than just fertiliser application. Updates are also available on the website. This advice (as may be amended over time) should be referenced in any development proposal.</u>  <a href="https://ahdb.org.uk/RB209">https://ahdb.org.uk/RB209</a>	To incorporate guidance as advised by Herefordshire Ecology & Arboriculture Officer (Planning).	<b>No change to SA findings:</b> The new text updates reference to a guidance document which does not alter the previously identified findings of the SA.
MM7.g	7.2.28 (new)	<u>The River Wye SAC NMP River Lugg Catchment Position Statement (April 2021) provides advice on new thresholds relevant to discharges made within the surface or groundwater catchment of</u>	To update the text.	<b>No change to SA findings:</b> The proposed Main Modification clarifies that the advice regarding nutrient neutrality is likely to change over the plan period

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	FN52 (new)	<u>a designated site. This advice (as may be amended over time) should be referenced in any development proposal.</u>  <u>Advice regarding nutrient neutrality is likely to change throughout the plan period. Up to date guidance available on Herefordshire Council's website should be consulted in understanding the current approach to nutrient neutrality.</u>		which does not alter the previously identified findings of the SA.
MM7.h	7.2.29 (new)	<u>Any development proposal located within the catchment of the River Wye SAC can bring a risk of increased phosphate entering the designated site. It is likely that an appropriate assessment will be required to consider the likely significant effect of that project, along with any measures that may be implemented to address the risk.</u>	To reflect the latest advice from NE.	<b>No change to SA findings:</b> The proposed Main Modification requires development proposals within the catchment of the River Wye SAC to undertake an appropriate assessment to demonstrate at least nutrient neutrality. This reinforces the significant positive effect previously identified for Policy W3 for <b>SA objective 14: Water</b> as the policy seeks to protect the quality of water and integrity of the River Wye SAC.
MM7.j	Policy W3,3	All development proposals will be required to demonstrate <del>delivery of a net reduction in nutrient discharges contributing to</del> at least nutrient neutrality, <del>or betterment</del> , within the River Wye SAC.	To address comment raised in representation and to clarify the policy.	<b>No change to SA findings:</b> The proposed Main Modification requires development proposals to demonstrate at least nutrient neutrality within the River Wye SAC. This reinforces the significant positive effect previously identified for <b>SA objective 14: Water</b> as the policy seeks to protect the quality of water and integrity of the River Wye SAC.
MM7.k	Policy W4	Planning permission will be <del>granted to</del> <u>supported for</u> the statutory water and sewerage undertaker to extend, upgrade, or make provision for new infrastructure necessary to ensure the statutory undertaker can continue to undertake its duty to supply potable water and treat foul flows.  <del>Works undertaken should contribute to achieving</del> <u>will be required to demonstrate at least</u> nutrient neutrality, <del>or betterment</del> , within the River Wye SAC.	To make the policy text consistent throughout the MWLP.  To address comment raised in representation and to clarify the policy.	<b>No change to SA findings:</b> The proposed Main Modification provides clarification regarding the need for statutory water and sewerage infrastructure works undertaken to demonstrate at least nutrient neutrality within the River Wye SAC. This reinforces the significant positive effect previously identified for <b>SA objective 14: Water</b> as the policy seeks to protect the quality of water and integrity of the River Wye SAC.



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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM7.m	Policy W5/3	at the following locations (presented in alphabetical order) subject to the key development criteria <del>set out at section 9</del> :	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy W5 which will not alter the previously identified findings of the SA.
MM7.n	Policy W6/2a	Former Lugg Bridge Quarry, subject to the key development criteria <del>set out at section 9</del> ;	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy W6 which will not alter the previously identified findings of the SA.
MM7.p	Policy W6/2b	strategic employment areas and industrial estates, subject to the key development criteria <del>set out at section 9</del> ;	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy W6 which will not alter the previously identified findings of the SA.
MM7.q	Policy W6/3	The sustainable disposal of inert wastes will be delivered at the following locations (presented in alphabetical order) subject to the key development criteria <del>set out at section 9</del> :	To ensure that the KDC are recognised as an element of policy under which each site is allocated.	<b>No change to SA findings:</b> This proposed Main Modification clarifies that the KDC are part of Policy W6 which will not alter the previously identified findings of the SA.
MM7.r	Policy W7/1	Facilities for the reuse, recycling or recovery of materials <del>shall</del> <u>will</u> be supported where it is demonstrated that the proposed development will enable delivery of the waste hierarchy and/or make a positive contribution to achieving the circular economy in Herefordshire.	To make the policy text consistent throughout the MWLP.	<b>No change to SA findings:</b> The minor wording change for consistency purposes does not alter the previously identified findings of the SA.
MM7.s	Policy W7/2	Facilities for the recovery of energy <del>shall</del> <u>will</u> only be supported where it is demonstrated:	To make the policy text consistent throughout the MWLP.	<b>No change to SA findings:</b> The minor wording change does not alter the previously identified findings of the SA.
MM7.t	Policy W7/3	Proposals for new landfill or landraising facilities or extensions to existing facilities <del>shall</del> <u>will</u> be supported where it is demonstrated that:	To make the policy text consistent throughout the MWLP.	<b>No change to SA findings:</b> The minor wording changes do not alter the previously identified findings of the SA.

Appendix B  
Schedule of Proposed Pre-Examination Main Modifications

SA of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan  
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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<u>a.</u> the proposed development will enable delivery of the waste hierarchy; <u>and</u> <u>b.</u> the proposed development incorporates measures for safe working and satisfactory reclamation, particularly in accordance with policy SP4.	Amended formatting and tidying up the terminology to clarify the text of the policy.	
MM7.u	Policy W7/4	4. Planning permission may be <del>granted</del> <u>supported</u> if these expectations are demonstrated to be unachievable but that a material level of benefit is otherwise gained and no unacceptable adverse impact results from the proposed development.	Amended formatting to clarify the text of the policy.	<b>No change to SA findings:</b> The minor wording change does not alter the previously identified findings of the SA.
<b>Section 9: Key Development Criteria</b>				
MM9.a	9.1.1	Each allocated site is subject to a number of key development criteria, <u>which form part of the policy</u> . These criteria <del>simply</del> identify <del>the</del> key matters that will be required to be carefully and comprehensively considered in preparing any development project at an allocated site.	To clarify the purpose of the KDC.	<b>No change to SA findings for MM9.a-MM9.d:</b> The minor wording change to clarify the purpose of the KDC do not alter the previously identified findings of the SA.
MM9.b	9.1.2	The key development criteria do not replace development management policy; they are <u>a part of the policy within which they are referenced</u> and are additive to the requirements of all other policies within the development plan relevant to the project being proposed.	To clarify the purpose of the KDC.	
MM9.c	9.1.4	<del>In addition, t</del> The key development criteria are <u>also</u> presented, along with site mapping, in the Allocated Sites Appendix. The Allocated Sites Appendix is unlikely to be suitable for users of assisted technology, <u>whilst Table 9 has been prepared to be easier to read</u> .	To clarify the purpose of the KDC.	
MM9.d	Table 9 Key Development Criteria	These changes are shown in Table 2.		

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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
Section 10: Glossary				
MM10.a	Appropriate Assessment	Process for assessing impacts on <del>European sites</del> <u>National Network Sites</u> , habitats or species. It is a decision making tool.	To update the terminology.	MM10.a-MM10.j relate to part of the plan which was not previously appraised in the SA and so it does not need to be appraised as part of this SA process.
MM10.b	<u>Conservation of Habitats and Species Regulations 2017 (as amended)</u>	The abbreviated term used for the <u>Conservation of Habitats and Species Regulations (England and Wales) 2017; as amended by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018; and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.</u>	To update the terminology and reflect recent legislative changes.	
MM10.c	Green Infrastructure	<del>A planned and delivered network of green spaces and other environmental features designed and managed as a multifunctional resource providing a range of environmental and quality of life benefits for local communities. Green infrastructure includes parks, open spaces, playing fields, woodlands, allotments and private gardens.</del>	To update the Plan reflecting the new NPPF.	
		<u>A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.</u>		
MM10.d	Habitats Regulation Assessment	A Habitats Regulations Assessment is the assessment of the impacts of implementing a plan or policy on a <del>Natura 2000</del> <u>National Network Site</u> .	To update the terminology.	
MM10.e	<u>National Network Site(s)</u>	The group terminology given to SAC, SPA and Ramsar Sites under <u>the Conservation of Habitats and Species Regulations 2017 (as amended).</u>	To update the terminology.	

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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM10.f	<u>Nutrient</u>	<u>The ecology of the River Wye SAC including the River Lugg and its catchment are sensitive to nitrate and phosphate concentration. Nitrate and phosphate are nutrients that promote algal growth, affecting the conservation objectives of the SAC.</u>	To address comment raised in representation and to clarify the text of the MWLP.	
MM10.g	<u>Nutrient Neutrality</u>	<u>The means of ensuring that development does not add to existing nutrient burdens and provides certainty that the whole of the scheme is deliverable in line with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended).</u>  <u>Advice regarding nutrient neutrality is likely to change throughout the plan period. Up to date guidance available on Herefordshire Council's website should be consulted in understanding the current approach to nutrient neutrality.</u>	To address comment raised in representation and to clarify the text of the MWLP.	
MM10.h	SAC	<u>A Special Area of Conservation (SAC) is one given greater protection under Conservation of Habitats and Species Regulations 2017 (as amended). They have been designated because of a possible threat to the special habitats or species which they contain and to provide increased protection to a variety of animals, plants and habitats of importance to biodiversity both on a national and international scale. is defined in the European Union's Habitat Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora.</u>	To update the terminology and reflect recent legislative changes.	
MM10.j	SPA	<u>A Special Protection Area (SPA) is designated under Conservation of Habitats and Species Regulations 2017 (as amended). Post transition the UK is still required to identify internationally important areas for breeding, over-wintering and migrating birds and designate them as SPA. is a designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to</u>	To update the terminology and reflect recent legislative changes.	

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Mod. Ref.	Paragraph/Policy/ Figure Reference	Proposed Modification	Reason for Change	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<del>safeguard the habitats of migratory birds and certain particularly threatened birds.</del>		
On line Interactive Mapping				
Webpage mapping		To include Minerals Safeguarded Areas including railheads.	To correct an omission found in the on-line resource.	This proposed Main Modification relates to the webpage mapping which was not previously appraised in the SA and so it does not need to be appraised as part of this SA process (although the specific locations and boundaries of all minerals and waste site allocations and safeguarded areas were assessed as part of the SA process).

Table B.2: Key development criteria: Schedule of Proposed Pre-Examination Main Modifications

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM9.d.1	Black Hill Delve Policy M5(1,a&b)	<p><b>Archaeology and geodiversity:</b> Need to demonstrate the potential for archaeological remains or geological features to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Ancient Woodland:</b> Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.</p> <p><b>Black Mountains SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>Dark Skies:</b> Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 8. Site design should deliver a net gain in biodiversity, linking priority habitats, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Located in the St. Maughans sandstone bedrock formation, classified a secondary aquifer. Need to demonstrate the potential risks for to the water environment, including abstractions (public and private supply) wells and springs.</p> <p><b>MOD Low Fly Zone:</b> Need to demonstrate the level of effect on the current and likely future operations within the MOD Low Fly Zone.</p> <p><b>River Monnow:</b> Need to demonstrate the level of effect on water quality and hydrology of the River Monnow.</p> <p><b>Site Access:</b> Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.</p>	<p><b>Changes to SA findings:</b></p> <p>The assessment of site M13 (Black Hill Delve) (using the assumptions outlined in Appendix F of the 2021 SA Report) identified an uncertain significant negative effect on <b>SA objective 14: Water</b> as it is within 250m from the River Monnow which has a moderate ecological status and is failing in terms of its chemical status. Policy M5, including the KDC for site M13, provides mitigation for adverse effects on the water environment by requiring applicants to demonstrate the level of effect on water quality and hydrology of the River Monnow. The proposed Main Modification will also help to mitigate against adverse effects by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effect (minor positive / minor negative) identified for Policy M5 for <b>SA objective 14: Water</b> remains unchanged as this policy relates, not only to site M13, but also to several other sites proposed for sandstone extraction.</p> <p>The site assessment for <b>SA objective 13: Landscape</b> for site M13 (Black Hill Delve) is updated to acknowledge that it is within 500m of the Brecon Beacons National Park (identified through NRW's representation – see <b>Chapter 4</b> and <b>Appendix A</b>). This results in the previously identified negligible effect being revised to an uncertain minor negative effect, to recognise the potential for adverse effects on the character and special qualities of the National Park (see Assumptions in Appendix F of the 2021 SA Report). However, as the site comprises a small delve and due to the topography of the site in relation to the National Park, the likelihood for adverse effects on the National Park is limited.</p>



Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM9.d.2	Callow Delve Policy M5(1,a)	<p><b>Ancient Woodland:</b> Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.</p> <p><b>Dark Skies:</b> Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased. Flood alleviation should be considered in designing site reclamation.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Located within the Brownstones formation, classified a secondary aquifer and adjacent to a groundwater spring source protection zone for public drinking water supply. Need to demonstrate <del>the</del> potential risks to the water environment, including <del>private drinking water supply</del> <u>abstractions (public and private supply) wells and springs.</u></p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment.</del></p> <p><b>Site Access:</b> Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.</p> <p><b>Woodland at Welsh Newton &amp; Callow Hill LWS:</b> Need to demonstrate the likely effect on the key features of the designated site.</p> <p><b>Wye Valley Woodlands SAC and Wye Valley &amp; Forest of Dean Bat Sites SAC:</b> An Appropriate Assessment is required to demonstrate the no likely significant effect(s) on the SAC. Need to demonstrate how habitat severance for horseshoe bats will be prevented, which may require the periphery woodland to be retained.</p>	<p><b>No change to SA findings:</b></p> <p>The assessment of site M12 (Callow Delve) (using the assumptions outlined in Appendix F of the 2021 SA Report) identified uncertain minor negative effects for <b>SA objectives 12: Biodiversity &amp; Geodiversity</b> and <b>14: Water</b>.</p> <p>The proposed Main Modification provides clarification regarding the need for development proposals at Callow Delve to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality reinforcing the positive effect identified as part of a mixed effect for Policy M5 for <b>SA objective 14: Water</b>. It also supports the HRA Addendum Report conclusion of no adverse effect on the integrity on the River Wye SAC from site M12 or Policy M5 which has informed the SA findings. The proposed Main Modification to the KDC for site M12 will also help to mitigate against adverse effects on the water environment by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs.</p> <p>The clarification in terms of the AA needing to demonstrate no likely significant effects on the Wye Valley Woodlands SAC and Wye Valley &amp; Forest of Dean Bat Sites SAC will help contribute to mitigating any likely adverse effect of loss of habitat reinforcing the minor positive effect identified as part of a mixed effect for Policy M5 for <b>SA objective 12: Biodiversity &amp; Geodiversity</b>. It also supports the HRA Addendum Report conclusion of no adverse effects on the integrity of these two SACs from site M12 or Policy M5 which has informed the SA findings. Overall, the mixed effects (minor positive / minor negative) identified for Policy M5 for <b>SA objectives 12: Biodiversity &amp; Geodiversity</b> and <b>14: Water</b> remain unchanged, as this policy relates, not only to site M12, but also to several other sites proposed for sandstone extraction.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM9.d.3	Former City Spares Site Policy W5(3)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Contaminated land:</b> Recognising the site as a former car breakers' yard, there is a high potential for contaminated land. The site is located within a drinking water protected area. Need to demonstrate how any contamination on site will be identified and remediated, particularly with reference to protection of drinking water.</p> <p><b>Landscape:</b> The site is set at a lower level than surrounding land but occupies a position on the southern boundary of Hereford. Need to demonstrate the level of effect on the surrounding landscape. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <u>no the</u> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Veteran tree:</b> Need to demonstrate level of effect on ancient black poplar located to the north of the site.</p>	<p><b>Changes to SA findings:</b></p> <p>The site assessment of W19 (Former City Spares Site) identified an uncertain minor negative effect for <b>SA objective 14: Water</b> as the site is within 1km of the River Wye. The proposed Main Modification to the KDC for site W19 (as part of Policy W5) provides clarification regarding the need for development proposals at the Former City Spares Site to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W19 but also to several other sites proposed for solid waste treatment facilities.</p>
MM9.d.4	Former Lugg Bridge Quarry Policy W6(1,a)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased. Flood alleviation should be considered in designing site reclamation.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 2, District Enhancement Zone 2 and Hereford Fringe Zone 1. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>Little Lugg River:</b> Need to demonstrate the level of effect on water quality and hydrology of the Little Lugg River.</p>	<p><b>No change to SA findings:</b></p> <p>The site assessment of W13 (Former Lugg Bridge Quarry) identified an uncertain significant negative effect for <b>SA objective 14: Water</b> as the site contains a small section of the River Lugg which has a moderate ecological status and is failing in terms of chemical status. The proposed Main Modification provides clarification regarding the need for development proposals at Former Lugg Bridge Quarry to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality reinforcing the positive effect identified as part of a mixed effect for Policy W6 for <b>SA objective 14: Water</b>. It also supports the HRA Addendum Report conclusion of no adverse effect on the integrity on the River Wye SAC from site W13 or Policy W6</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>River Lugg SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <u>no</u> the likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Site reclamation:</b> Due to the site having a mineral working history and rural location it is required to be reclaimed at the earliest opportunity should current operations cease (as consented under references: 131870/N, dated 22.07.2013; 151184, dated 10.11.2015; and 162032, dated 02.12.2016).</p> <p><b>Utilities:</b> Utility infrastructure (gas) that cross the site may require diversion or a non-working buffer to enable the site to be worked.</p>	<p>which has informed the SA findings. Overall, the mixed effect (minor positive / minor negative) identified for Policy W6 for <b>SA objective 14: Water</b> remains unchanged as this policy relates, not only to site W13, but also to several other sites proposed for CD&amp;E waste facilities.</p>
MM9.d.5	<p>Hereford Enterprise Zone (Rotherwas Industrial Estate)          Policy W5(2)</p>	<p><b>Ancient Woodland:</b> Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.</p> <p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Contaminated land:</b> Recognising the site as a former munitions factory, there is a high potential for contaminated land. The site is located within a drinking water protected area. Need to demonstrate how any contamination on site will be identified and remediated, particularly with reference to protection of drinking water.</p> <p><b>Flood Risk:</b> Site-specific flood risk assessment required to demonstrate compliance with Local Development Order. Reference should be made to the Drainage and Flood Management Strategy (2009 and as amended).</p> <p><b>Hampton Grange medical facility:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of this medical facility.</p> <p><b>Heritage assets:</b> Need to demonstrate <u>the level of effect less than substantial harm</u> on heritage asset(s) and their setting(s), particularly listed buildings and the scheduled monuments Rotherwas House and Rotherwas Chapel.</p>	<p><b>Change to SA findings:</b></p> <p>Policy W5, including the KDC for site W58, provides mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. The proposed Main Modification to the KDC provides additional mitigation by requiring demonstration of less than substantial harm on heritage assets and their settings. However, the uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p> <p>The proposed Main Modification to the KDC for site W58 (Rotherwas Industrial Estate) (as part of Policy W5) provides clarification regarding the need for development proposals at Rotherwas Industrial Estate to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Landscaping:</b> Site design should deliver a net gain in biodiversity, linking priority habitat, and providing enhancement for priority habitats, and incorporate key features of the landscape character.</p> <p><b>Pool at Rotherwas LWS:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye:</b> Need to demonstrate the level of effect on water quality and hydrology of the River Wye.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to</u> demonstrate <u>at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>River Wye SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>Veteran tree:</b> Need to demonstrate level of effect on ancient black poplars located within the site, with a priority given to avoidance.</p>	<p>negative effect remains as the policy relates, not only to site W58 but also to several other sites proposed for solid waste treatment facilities.</p>
MM9.d.6	Holmer Road Policy W5(2)	<p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased.</p> <p><b>Hereford AQMA:</b> Need to demonstrate the level of effect on air quality, particularly within the Hereford AQMA.</p> <p><b>Landscaping:</b> Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to</u> demonstrate <u>at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Road network:</b> Need to demonstrate the level of effect on the local road network in the vicinity of the site.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (housing and schools).</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W61 (Holmer Road) (as part of Policy W5) provides clarification regarding the need for development proposals at Holmer Road to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W61 but also to several other sites proposed for solid waste treatment facilities.</p> <p>The uncertain minor negative effect identified for Policy W5, including site allocation W61, for <b>SA objective 6: Historic Environment</b> remains unchanged as there is potential for impacts on the adjacent Widemarsh Common Conservation</p>

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Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
			<p>Area. <b>In line with the advice received from Historic England, it is recommended that the KDC is updated to require a Heritage Statement to accompany any planning application for this site. Alternatively, the KDC could be updated to require proposals to demonstrate less than substantial harm to heritage asset(s) and their setting(s)</b>, which would be consistent with the KDC for other sites proposed to be allocated in the Herefordshire MWLP.</p>
MM9.d.7	<p>Kington Household Waste and Recycling Centre            Policy W5(3)</p>	<p><b>Landscape:</b> The site is set at a lower level than surrounding land but occupies a position on the southern boundary of Kington. Need to demonstrate the level of effect on the surrounding landscape. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <u>no the</u> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W10 (as part of Policy W5) provides clarification regarding the need for development proposals at the Kington HWRC to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W10 but also to several other sites proposed for solid waste treatment facilities.</p>
MM9.d.8	<p>Land between Little Marcle Road and Ross Road            Policy W5(2)</p>	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased.</p> <p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect</del> <u>less than substantial harm</u> on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.</p> <p><b>Landscape:</b> The site is set at a lower level than surrounding land but occupies a position on the south western boundary of Ledbury. Need to demonstrate the level of effect on the surrounding landscape. Site design should deliver a net gain in</p>	<p><b>No change to SA findings:</b></p> <p>Policy W5, including the proposed Main Modification to the KDC for site W64 (Land between Little Marcle Road and Ross Road), provides mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. The uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p>biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>River Leadon:</b> Need to demonstrate the level of effect on water quality and hydrology of the River Leadon.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (housing, hotel and picnic site).</p>	
MM9.d.9	Leinthall Quarry Policy M4(2,a)	<p><b>Dark Skies:</b> Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.</p> <p><b>Downton Gorge SAC:</b> An Appropriate Assessment is required to demonstrate the likely significant effect(s) on the SAC.</p> <p><b>Geodiversity:</b> Need to demonstrate the level of effect on geodiversity and incorporate mitigation measures as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 9. Site design should deliver a net gain in biodiversity, linking priority habitats, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Located within the hard rock of the Silurian Aymestry Limestone Formation, classified as a secondary aquifer. Need to demonstrate the potential risks to the water environment, including abstractions (public and private supply) wells and springs.</p> <p><b>Heritage assets:</b> Need to demonstrate the level of effect on heritage assets and their settings, particularly of Croft Ambrey Hill Fort and Croft Castle Park.</p> <p><b>Phased working:</b> Need to demonstrate optimum phasing of the allocated area, including how existing infrastructure will be used (to include at least site access and processing equipment) and reclamation at the earliest opportunity. A proliferation of ancillary infrastructure will not be permitted.</p>	<p><b>No change to SA findings:</b></p> <p>The proposed Main Modification helps to mitigate against adverse effects on the water environment by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effect (minor positive / minor negative) identified for Policy M4 for <b>SA objective 14: Water</b> remains unchanged as this policy relates, not only to site M07a and M07b, but also to other sites proposed for crushed rock extraction, including sites that may come forward within the Preferred Areas of search (A and D).</p> <p>The assessment of <b>SA objective 6: Historic Environment</b> for site M07a (Leinthall Quarry) identified an uncertain minor negative effect using the assumptions outlined in Appendix F of the 2021 SA Report. Policy M4, including the KDC for sites M07a and M07b, provides mitigation for adverse effects on the historic environment by requiring the demonstration of the level of effect on heritage assets and their settings. Furthermore, in line with advice received from Historic England, a Heritage Impact Assessment of the site was undertaken in August 2021 which concluded that the allocation is acceptable in terms of its potential impact on heritage assets and their settings. Although the assessment of sites M07a and M07b is revised, the mixed effect (uncertain minor positive / uncertain minor negative) for Policy M4 for <b>6: Historic Environment</b> remains valid as there is still potential for minor or moderate adverse effects on the</p>



Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>River Teme SSSI and River Lugg SSSI:</b> Need to demonstrate the level of effect on the key features of these designations.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (housing)</p> <p><b>Veteran tree:</b> Need to demonstrate level of effect on ancient yew tree located to the south of the site.</p>	<p>historic environment from the sites proposed to be allocated by Policy M4, including from sites that may come forward within the Preferred Areas of Search (A and D). <b>For consistency, it is recommended that the KDC for site M07a (Leinthall Quarry) is updated to require applicants to demonstrate less than substantial harm on heritage asset(s) and their setting(s), particularly Croft Ambrey Hill Fort and Croft Castle Park.</b> Currently it requires demonstration of the level of effect on heritage assets.</p>
MM9.d.10	Leominster Enterprise Park Policy W5(2)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased.</p> <p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect</del> <u>less than substantial harm</u> on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.</p> <p><b>Landscape:</b> The site is set at a lower level than surrounding land but occupies a position on the southern boundary of Leominster. Need to demonstrate the level of effect on the surrounding landscape. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>River Lugg:</b> Need to demonstrate the level of effect on water quality and hydrology of the River Lugg.</p> <p><b>River Lugg SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> <u>likely significant effect(s) on the SAC. Development should will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W62 (as part of Policy W5) provides clarification regarding the need for development proposals at the Leominster Enterprise Park to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W62 but also to several other sites proposed for solid waste treatment facilities.</p> <p>Policy W5, including the proposed Main Modification to the KDC for site W62, provides mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. The uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (schools, cemetery and associated place of worship).</p> <p><b>Source Protection Zone 3:</b> Need to demonstrate how any pathways for contamination will be identified and avoided.</p>	
MM9.d.24	<p>Leominster Household Waste Site and Household Waste Recovery Centre</p> <p>Policy W5(3)</p>	<p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect</del> <u>less than substantial harm</u> on heritage asset(s) and their setting(s).</p> <p><b>Landscaping:</b> Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>River Lugg:</b> Need to demonstrate the level of effect on water quality and hydrology of the River Lugg.</p> <p><b>River Lugg SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to</u> demonstrate <u>at least</u> nutrient neutrality <del>or betterment</del>.</p>	<p><b>Changes to SA findings:</b></p> <p>The site assessment of W05 (Leominster HWS and HWRC) identified an uncertain significant negative effect for <b>SA objective 14: Water</b> as the site is within 250m of the River Lugg. The proposed Main Modification to the KDC for site W05 (as part of Policy W5) provides clarification regarding the need for development proposals at the Leominster HWS and HWRC to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. It also supports the HRA Addendum Report conclusion of no adverse effect on the integrity on the River Wye SAC from site W05 or Policy W5 which has informed the SA findings. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W05 but also to several other sites proposed for solid waste treatment facilities.</p> <p>Policy W5, including the proposed Main Modification to the KDC for site W05, provides mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. The uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM9.d.11	Llandraw Delve Policy M5(1,a&b)	<p><b>Dark Skies:</b> Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 8. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Located in the St. Maughans sandstone bedrock formation, classified a secondary aquifer and proximate to the side of the Black Mountains where many springs and watercourses issue off the slopes. Need to demonstrate the potential risks for to the water environment, including abstractions (public and private supply) wells and springs.</p> <p><b>MOD Danger Area and Low Fly Zone:</b> Need to demonstrate the level of effect on the current and likely future operations within the MOD Danger Area and Low Fly Zone.</p> <p><b>River Monnow:</b> Need to demonstrate the level of effect on water quality and hydrology of the River Monnow.</p> <p><b>Site Access:</b> Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.</p>	<p><b>No change to SA findings:</b></p> <p>The assessment of site M16 (Llandraw) (using the assumptions outlined in Appendix F of the 2021 SA Report) identified an uncertain significant negative effect on <b>SA objective 14: Water</b> as it is within 250m from the River Monnow which has a moderate ecological status and is failing in terms of its chemical status. Policy M5, including the KDC for site M16, provides mitigation for adverse effects on the water environment by requiring applicants to demonstrate the level of effect on water quality and hydrology of the River Monnow. The proposed Main Modification will also help to mitigate against adverse effects by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effect (minor positive / minor negative) identified for Policy M5 for <b>SA objective 14: Water</b> remains unchanged, as this policy relates, not only to site M16, but also to several other sites proposed for sandstone extraction.</p>
MM9.d.12	Model Farm Policy W5(2)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Heritage assets:</b> Need to demonstrate the level of effect less than substantial harm on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.</p> <p><b>Landscape:</b> The site is set at a lower level than surrounding land but occupies a position on the eastern side of Ross-on-Wye. Need to demonstrate the level of effect on the surrounding landscape. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W65 (Model Farm) (as part of Policy W5) provides clarification regarding the need for development proposals at Model Farm to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Wye Valley AONB:</b> Need to demonstrate the level of effect on the AONB.</p> <p><b>Source Protection Zone 2:</b> Need to demonstrate how any pathways for contamination will be identified and avoided.</p>	<p>remains as the policy relates, not only to site W65 but also to several other sites proposed for solid waste treatment facilities.</p> <p>Policy W5, including the proposed Main Modification to the KDC for site W65, provides mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. The uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>
MM9.d.13	Moreton Business Park Policy W5(2)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Ancient Woodland:</b> Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased.</p> <p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect</del> <u>less than substantial harm</u> on heritage asset(s) and their setting(s), particularly <del>listed buildings and</del> Sutton Walls Hillfort, <u>St Mary's Church and the historic core of Malden and other listed buildings</u>.</p> <p><b>Landscape:</b> The site is set at a lower level than surrounding land but occupies a rural position. Need to demonstrate the level of effect on the surrounding landscape. Site design should deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.</p> <p><b>Rail:</b> Need to demonstrate the potential to use the rail network for the transport of materials or that the proposal does not prevent future use of the rail infrastructure available within the site.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W66 (Moreton Business Park) (as part of Policy W5) provides clarification regarding the need for development proposals at Moreton Business Park to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. It also supports the HRA Addendum Report conclusion of no adverse effect on the integrity on the River Wye SAC from site W66 or Policy W5 which has informed the SA findings. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W66 but also to several other sites proposed for solid waste treatment facilities.</p> <p>Policy W5, including the KDC for site W66, provides mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. The proposed Main Modification to the KDC provides additional mitigation by requiring demonstration of less than substantial harm on heritage assets and their settings.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Wellington Brook and Moreton Brook:</b> Need to demonstrate the level of effect on water quality and hydrology of these watercourses.</p> <p><b>Wellington Marsh LWS:</b> Need to demonstrate the level of effect on the key features of this designation.</p>	<p>However, the uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>
MM9.d.15	Perton Quarry Policy M4(2,a)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Dark Skies:</b> Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.</p> <p><b>Geodiversity, Perton Roadside Section and Quarry SSSI:</b> Need to demonstrate the level of effect on geodiversity and incorporate mitigation measures as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 3. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Located within the Silurian Limestones and shales of the Woolhope Dome structure, classified as a secondary aquifer. Need to demonstrate the potential risks to the water environment, <u>including abstractions (public and private supply) wells and springs.</u></p> <p><b>Heritage assets:</b> Need to demonstrate less than substantial harm on Registered Park and Garden Stoke Edith.</p> <p><b>Peregrine Falcons:</b> This is a species protected under Schedule 1 of the Wildlife and Countryside Act 1981.</p> <p><b>Phased working:</b> Need to demonstrate optimum phasing of the allocated area, including how existing infrastructure will be used (to include at least site access and processing equipment) and reclamation at the earliest opportunity. A proliferation of ancillary infrastructure will not be permitted.</p>	<p><b>No change to SA findings:</b></p> <p>The proposed Main Modification provides clarification regarding the need for development proposals at sites M10a and M10b (Perton Quarry) to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality reinforcing the positive effect identified as part of a mixed effect for Policy M4 for <b>SA objective 14: Water</b>. The proposed Main Modification to the KDC for sites M10a and M10b will also help to mitigate against adverse effects on the water environment by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effect (minor positive / minor negative) identified for Policy M4 for <b>SA objective 14: Water</b> remains unchanged as this policy relates, not only to sites M10a and M10b, but also to several other sites proposed for crushed rock extraction.</p> <p>Policy M4, including the KDC for sites M10a and M10b, provides mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. The proposed Main Modification to the KDC provides additional mitigation by requiring demonstration of less than substantial harm on Registered Park and Garden Stoke Edith. The mixed effect (minor positive / minor negative) identified for Policy M4 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>River Lugg SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <u>no</u> the likely significant effect(s) on the SAC. Development <del>should</del> <u>will</u> be required to demonstrate <u>at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (housing).</p>	
MM9.d.16	Shobdon Quarry Policy M3(2,a) Policy W6(2)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased. Flood alleviation should be considered in designing site reclamation.</p> <p><b>Geodiversity:</b> Need to demonstrate the level of effect on geodiversity and incorporate mitigation measures as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Green infrastructure and reclamation:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Enhancement Zone 2. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Glaciofluvial sand and gravel deposits represent a secondary aquifer in hydraulic continuity with watercourses. Need to demonstrate <del>the</del> potential risks to the water environment, <u>including abstractions (public and private supply) wells and springs</u>.</p> <p><b>Housing:</b> Need to demonstrate the level of effect on residential amenity at nearby properties.</p> <p><b>Pinsley Brook:</b> Need to demonstrate the level of effect on water quality and hydrology in Pinsley Brook.</p>	<p><b>No change to SA findings:</b></p> <p>The site assessment of Shobdon Quarry (M04/W44) (using the assumptions outlined in Appendix F of the 2021 SA Report) identified an uncertain significant negative effect for <b>SA objective 14: Water</b> as the site is within 250m of Pinsley Brook which has a 'poor' ecological status and is failing in terms of chemical status. The proposed Main Modification provides clarification regarding the need for development proposals at Shobdon Quarry to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality reinforcing the positive effects identified as part of mixed effects for policies M3 and W6 for <b>SA objective 14: Water</b>. The proposed Main Modification to the KDC for site M04/W44 will also help to mitigate against adverse effects on the water environment by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effects (minor positive / minor negative) identified for policies M3 and W6 for <b>SA objective 14: Water</b> remain unchanged as these policies relate, not only to Shobdon Quarry, but also to several other sites proposed for sand and gravel extraction / CD&amp;E waste facilities.</p> <p>The site assessment of Shobdon Quarry (M04/W44) identified an uncertain minor negative effect for <b>SA objective 6: Historic Environment</b>, while the Preferred Areas of Search (B and C)</p>



Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Phased working:</b> Need to demonstrate optimum phasing of the allocated area, including how existing infrastructure will be used (to include at least site access and processing equipment) and reclamation at the earliest opportunity. A proliferation of ancillary infrastructure will not be permitted.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Shobdon Airfield:</b> Need to demonstrate the level of effect on the current and likely future operations of Shobdon Airfield.</p>	<p>are expected to have uncertain significant negative effects on this objective. Policies M3 and W6, including the KDC for site M04/W44, provide mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. Furthermore, in line with advice received from Historic England, a Heritage Impact Assessment of site M04/W44 was undertaken in August 2021 which concluded that the allocation is acceptable in terms of its potential impact on heritage assets and their settings. Overall, the mixed effect (uncertain minor positive / uncertain minor negative) for Policy M3 and the uncertain minor negative effect for Policy W6 for <b>SA objective 6: Historic Environment</b> remain valid as there is still potential for minor or moderate adverse effects on the historic environment from the sites proposed to be allocated by these policies, including from sites that may come forward within the Preferred Areas of Search (B and C).</p>
MM9.d.17	Southern Avenue Policy W5(2)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased.</p> <p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect</del> <u>less than substantial harm</u> on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.</p> <p><b>Landscape:</b> The site is set at a lower level than surrounding land but occupies a position on the southern boundary of Leominster. Need to demonstrate the level of effect on the surrounding landscape. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>River Lugg:</b> Need to demonstrate the level of effect on water quality and hydrology of the River Lugg.</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W63 (Southern Avenue) (as part of Policy W5) provides clarification regarding the need for development proposals at Southern Avenue to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. It also supports the HRA Addendum Report conclusion of no adverse effect on the integrity on the River Wye SAC from site W63 or Policy W5 which has informed the SA findings. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W63 but also to several other sites proposed for solid waste treatment facilities.</p>



Appendix B  
 Schedule of Proposed Pre-Examination Main Modifications

SA of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan  
 December 2021

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>River Lugg SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <u>no</u> the likely significant effect(s) on the SAC. Development <del>should</del> <u>will</u> be required to demonstrate <u>at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (schools, cemetery and associated place of worship).</p> <p><b>Source Protection Zones 1 and 2:</b> Need to demonstrate how any pathways for contamination will be identified and avoided.</p>	<p>Policy W5, including the KDC for site W63, provides mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. The proposed Main Modification to the KDC provides additional mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. The uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>
MM9.d.18	Sunnybank Delve Policy M5(1,a)	<p><b>Dark Skies:</b> Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 8. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>Housing:</b> Need to demonstrate the level of effect on residential amenity at nearby properties.</p> <p><b>MOD Danger Area and Low Fly Zone:</b> Need to demonstrate the level of effect on the current and likely future operations within the MOD Danger Area and Low Fly Zone.</p> <p><b>Pikes Farm Meadows SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p>	<p>Included in error – no proposed Main Modifications to Policy M5 or the KDC for Sunnybank Delve.</p>
MM9.d.19	Three Elms Trading Estate Policy W5(2)	<p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect</del> <u>less than substantial harm</u> on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W60 (Three Elms Trading Estate) (as part of Policy W5) provides clarification regarding the need for development proposals at the Three Elms Trading Estate to demonstrate at least nutrient</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Landscaping:</b> Site design should deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no</del> the likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to</u> demonstrate <u>at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (housing and schools).</p> <p><b>Yazor Brook:</b> Need to demonstrate the level of effect on water quality and hydrology of the Yazor Brook.</p>	<p>neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W60 but also to several other sites proposed for solid waste treatment facilities.</p> <p>Policy W5, including the proposed Main Modification to the KDC for site W60, provides mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. The uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>
MM9.d.20	Upper Lyde Quarry Policy M3(2,a) Policy W6(2)	<p><b>Archaeology:</b> Need to demonstrate the potential for archaeological remains to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Geodiversity:</b> Need to demonstrate the level of effect on geodiversity and incorporate avoidance, mitigation and monitoring measures as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Green infrastructure and reclamation:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 2 and Hereford Fringe Zone 4. Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Glaciofluvial sand and gravel deposits represent a secondary aquifer in hydraulic continuity with watercourses. Need to demonstrate <del>the</del> potential risks to the water environment, <u>including abstractions (public and private supply) wells and springs</u>.</p>	<p><b>No change to SA findings:</b></p> <p>The proposed Main Modification provides clarification regarding the need for development proposals at Upper Lyde Quarry (M03a and M03c/W43) to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality reinforcing the positive effects identified as part of mixed effects for policies M3 and W6 for <b>SA objective 14: Water</b>. The proposed Main Modification to the KDC for Upper Lyde Quarry will also help to mitigate against adverse effects on the water environment by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effects (minor positive / minor negative) identified for policies M3 and W6 for <b>SA objective 14: Water</b> remain unchanged as these policies relate, not only to Upper</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Housing:</b> Need to demonstrate the level of effect on residential amenity at nearby properties.</p> <p><b>Phased working:</b> Need to demonstrate optimum phasing of the allocated area, including how existing infrastructure will be used (to include at least site access and processing equipment) and reclamation at the earliest opportunity. A proliferation of ancillary infrastructure will not be permitted.</p> <p><b>River Lugg:</b> Need to demonstrate the level of effect on water quality and hydrology of these watercourses.</p> <p><b>River Lugg SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <u>no the</u> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment</del>.</p> <p><b>Road network:</b> Highways England identifies the site as located near to the strategic road network. Need to demonstrate the level of effect on the local road network in the vicinity of the site.</p>	<p>Lyde Quarry but also to several other sites proposed for sand and gravel extraction / CD&amp;E waste facilities.</p> <p>The site assessment of Upper Lyde Quarry (M03a and M03c/W43) identified an uncertain minor negative effect for <b>SA objective 6: Historic Environment</b>, while the Preferred Areas of Search (B and C) are expected to have uncertain significant negative effects on this objective. Policies M3 and W6, including the KDC for Upper Lyde Quarry, provide mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. Furthermore, in line with advice received from Historic England, a Heritage Impact Assessment of site M03a and M03c/W43 was undertaken in August 2021 which concluded that the allocation is acceptable in terms of its potential impact on heritage assets and their settings. Overall, the mixed effect (uncertain minor positive / uncertain minor negative) for Policy M3 and the uncertain minor negative effect for Policy W6 for <b>SA objective 6: Historic Environment</b> remain valid as there is still potential for minor or moderate adverse effects on the historic environment from the sites proposed to be allocated by these policies, including from sites that may come forward within the Preferred Areas of Search (B and C).</p>
MM9.d.21	Wellington Quarry Policy M3(2,a) Policy W6(2)	<p><b>Archaeology and geodiversity:</b> Need to demonstrate the potential for archaeological remains or geological features to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere (including Leystone Bridge); and where possible, flood risk is decreased. Flood alleviation should be considered in designing site reclamation.</p> <p><b>Footpath:</b> Wellington footpaths 23, 23A and 34 cross the site and may require diversion or a non-working buffer such that the amenity value and connectivity of the footpaths are maintained.</p>	<p><b>No change to SA findings:</b></p> <p>The assessment of <b>SA objective 6: Historic Environment</b> for Wellington Quarry (M05/W45) identified an uncertain minor negative effect using the assumptions outlined in Appendix F of the 2021 SA Report. Policies M3 and W6, including the KDC for Wellington Quarry, provide mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. The proposed Main Modification to the KDC provides additional mitigation by requiring demonstration of less than substantial harm on designated heritage assets and their settings. Furthermore, in line with advice received from Historic England, a Heritage</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 1 and District Enhancement Zone 3. Site design should deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Glaciofluvial sand and gravel deposits represent a secondary aquifer in hydraulic continuity with watercourses. Need to demonstrate <del>the</del> potential risks to the water environment, <u>including abstractions (public and private supply) wells and springs.</u></p> <p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect less than substantial harm</del> on heritage asset(s) and their setting(s) particularly <u>Sutton Walls Hillfort, St Mary's Church and the historic core of Malden and other listed buildings and Sutton Walls Fort.</u></p> <p><b>Marches Line:</b> A non-working buffer may be required such that railway safety is maintained.</p> <p><b>Otter:</b> Detail protected species survey required to determine any site-specific mitigation and protection measures.</p> <p><b>Phased working:</b> Need to demonstrate optimum phasing of the allocated area, including how existing infrastructure will be used (to include at least site access and processing equipment) and reclamation at the earliest opportunity. A proliferation of ancillary infrastructure will not be permitted.</p> <p><b>River Lugg and Wellington Brook:</b> Need to demonstrate the level of effect on water quality and hydrology of these watercourses.</p> <p><b>River Lugg LWS and SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no</del> <u>the</u> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment.</del></p>	<p>Impact Assessment of site M03a and M03c/W43 was undertaken in August 2021 which concluded that the allocation is acceptable in terms of its potential impact on heritage assets and their settings. Overall, the mixed effect (minor positive / minor negative) identified for Policy M3 and the minor negative effect identified for Policy W6 in relation to <b>SA objective 6: Historic Environment</b> remain unchanged as there is still potential for minor or moderate adverse effects on the historic environment from the sites proposed to be allocated by these policies, including from sites that may come forward within the Preferred Areas of Search (B and C).</p> <p>The proposed Main Modification provides clarification regarding the need for development proposals at Wellington Quarry to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality reinforcing the positive effects identified as part of mixed effects for policies M3 and W6 for <b>SA objective 14: Water</b>. The proposed Main Modification to the KDC for site M05/W45 will also help to mitigate against adverse effects on the water environment by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effects (minor positive / minor negative) identified for policies M3 and W6 for <b>SA objective 14: Water</b> remain unchanged as these policies relate, not only to Wellington Quarry, but also to several other sites proposed for sand and gravel extraction / CD&amp;E waste facilities.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<p><b>Road network:</b> Highways England identifies this site as located near to the strategic road network. Need to demonstrate the level of effect on the A49 and that vehicles can access and leave the site, to and from the public highway, safely.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (school and housing).</p> <p><b>Utilities:</b> Utility infrastructure (high pressure gas, water mains and foul sewer) that cross the site may require diversion or a non-working buffer to enable the site to be worked.</p>	
MM9.d.22	Westfields Trading Estate  Policy W5(2)	<p><b>Flood Risk:</b> Need to demonstrate that: the site will be safe in the event of a flood; risk is not increased on site or elsewhere; and where possible, flood risk is decreased.</p> <p><b>Hereford AQMA:</b> Need to demonstrate the level of effect on air quality, particularly within the Hereford AQMA.</p> <p><b>Heritage assets:</b> Need to demonstrate the level of effect <del>less than substantial harm</del> on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.</p> <p><b>Landscaping:</b> Site design should deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.</p> <p><b>Plough Lane LWS, Widemarsh Brook LWS and Yazor Brook LWS:</b> Need to demonstrate the level of effect on the key features of these designations.</p> <p><b>Sensitive properties:</b> Need to demonstrate the level of effect on the amenity, health &amp; safety and environment of nearby sensitive properties (schools).</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no the</del> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to</u> demonstrate <del>at least</del> nutrient neutrality <del>or betterment</del>.</p> <p><b>Widemarsh Brook and Yazor Brook:</b> Need to demonstrate the level of effect on water quality and hydrology of the Yazor Brook.</p>	<p><b>Changes to SA findings:</b></p> <p>The proposed Main Modification to the KDC for site W59 (Westfields Trading Estate) (as part of Policy W5) provides clarification regarding the need for development proposals at the Westfields Trading Estate to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality. Therefore, the previously identified minor negative effect for Policy W5 in relation to <b>SA objective 14: Water</b> is now combined with a minor positive effect to form a mixed effect (minor positive / minor negative). The minor negative effect remains as the policy relates, not only to site W59 but also to several other sites proposed for solid waste treatment facilities.</p> <p>Policy W5, including the proposed Main Modification to the KDC for site W59, provides mitigation for adverse effects on the historic environment by requiring demonstration of less than substantial harm on heritage assets and their settings. However, the uncertain minor negative effect identified for Policy W5 in relation to <b>SA objective 6: Historic Environment</b> remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.</p>

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
MM9.d.23	Westonhill Wood Delves  Policy M5(1,a&b)	<p><b>Airfield:</b> Need to demonstrate the level of effect on the current and likely future operations of the nearby airfield.</p> <p><b>Ancient Woodland:</b> Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.</p> <p><b>Archaeology and geodiversity:</b> Need to demonstrate the potential for archaeological remains or geological features to be present on the site, through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.</p> <p><b>Dark Skies:</b> Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.</p> <p><b>Green infrastructure:</b> Operation and reclamation phases should deliver priorities of the Herefordshire Green Infrastructure Strategy, in particular those associated with District Strategy Corridor 7. Site design should deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.</p> <p><b>Ground water:</b> Located on secondary aquifer of the Devonian. Need to demonstrate <del>the</del> potential risks to the water environment, <u>including abstractions (public and private supply) wells and springs including drinking water.</u></p> <p><b>Housing:</b> Need to demonstrate the level of effect on residential amenity at nearby properties.</p> <p><b>Heritage assets:</b> Need to demonstrate <del>the level of effect</del> <u>less than substantial harm</u> on heritage asset(s) and their setting(s).</p> <p><b>Merbach Hill LWS, Benfield Park LWS and Westonhill Wood LWS:</b> Need to demonstrate the level of effect on the key features of these designations.</p> <p><b>River Wye SAC:</b> An Appropriate Assessment is required to demonstrate <del>no</del> <u>the</u> likely significant effect(s) on the SAC. Development <del>should</del> <u>will be required to demonstrate at least</u> nutrient neutrality <del>or betterment.</del></p> <p><b>River Wye SSSI:</b> Need to demonstrate the level of effect on the key features of this designation.</p>	<p><b>No change to SA findings:</b></p> <p>The assessment of site M20 (Westonhill Wood Delves) (using the assumptions outlined in Appendix F of the 2021 SA Report) identified an uncertain minor negative effect for <b>SA objective 6: Historic Environment</b>. Policy M5, including the proposed Main Modification to the KDC for site M20, provides mitigation for adverse effects on the historic environment by requiring applicants to demonstrate less than substantial harm on heritage assets and their settings. Overall, the mixed effect (minor positive / minor negative) identified for Policy M5 for <b>SA objective 6: Historic Environment</b> remains unchanged as this policy relates, not only to site M20, but also to several other sites proposed for sandstone extraction.</p> <p>The assessment of site M20 (Westonhill Wood Delves) (using the assumptions outlined in Appendix F of the 2021 SA Report) identified an uncertain significant negative effect for <b>SA objective 14: Water</b> as the site is within 100m of the River Wye. The proposed Main Modification provides clarification regarding the need for development proposals at Westonhill Wood Delves to demonstrate at least nutrient neutrality within the River Wye SAC. This is likely to help contribute to the mitigation of likely adverse effects arising from changes in water quality reinforcing the positive effect identified as part of a mixed effect for Policy M5 for <b>SA objective 14: Water</b>. It also supports the HRA Addendum Report conclusion of no adverse effect on the integrity on the River Wye SAC from site M20 or Policy M5 which has informed the SA findings. The proposed Main Modification to the KDC for site M20 will also help to mitigate against adverse effects on the water environment by requiring applicants to demonstrate the potential risks to the water environment, including from abstractions, wells and springs. Overall, the mixed effect (minor positive / minor negative) identified for Policy M5 for <b>SA objective 14: Water</b> remains unchanged as this policy relates, not only to site M20,</p>

Appendix B  
Schedule of Proposed Pre-Examination Main Modifications

SA of the Proposed Pre-Examination Main Modifications to the Herefordshire Minerals and Waste Local Plan  
December 2021

Mod. Ref.	Site Name and Policy	Key Development Criteria	Does the Proposed Main Modification Affect the SA Findings Previously Reported in the Publication Draft SA Report?
		<b>Site Access:</b> Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.	but also to several other sites proposed for sandstone extraction.