

# Herefordshire Minerals & Waste Local Plan

## Summary of Internal Comments to Draft Minerals And Waste Local Plan and Responses

2020

Name and department	Comments	Response to comments
<p>James Bisset - Ecology &amp; Arboriculture Officer, Herefordshire Council</p>	<p>In general any sites that have water quality as a potential issue and are within the River Wye Catchment should be subject to HRA I think although likely to be mitigated we can't take that in to account at initial screening. Suggest the draft plan and HRA screening are submitted to Natural England for a more detailed comment.</p> <p>Former Lugg Bridge – this is not identified as being part of the Wye SAC (which includes the Lugg up to Hampton Court Bridge) – only indicated as SSSI which is incorrect. Will need full HRA appropriate assessment</p> <p>Leinthall Quarry – has River Teme SSSI been considered alongside Downton Gorge SAC?</p> <p>Leominster Household Waste Site – Lugg is directly part of wider SAC lower down and so is fully part of the Wye SAC catchment – may need consideration as such (i.e. full HRA process on any application)</p> <p>Upper Lyde (all sites) needs to include Lugg as SAC and SSSI in considerations.</p> <p>Wellington Quarry (strangely this has picked up as SAC but Lyde only a mile upstream wasn't? Why are the Wellington sites all different in relation to SSSI/SAC etc. – surely as all together all are the same consideration?</p>	<p>This is essentially the approach that has been followed. NE has been consulted.</p> <p>Entry corrected and Appropriate Assessment required in KDC.</p> <p>Yes, and included in KDC.</p> <p>Appropriate Assessment required in KDC.</p> <p>Appropriate Assessment required for River Wye SAC, which includes River Lugg.</p> <p>Separate assessment of discrete land parcels made. Combined together in final KDC. Requirement for HRA of River Wye SAC included.</p>

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	<p>Three Elms – need to ensure that all references to SINCs and Special Wildlife Sites are changed to and called Local Wildlife Sites in line with core strategy terminology (they are all the same level of local designation and the CS brought them all together under the better known current term of Local Wildlife Site.</p> <p>Leominster Southern Ave – SAC?</p> <p>Land between Little Marcle Road and Ross Rd, Ledbury – have current housing sites just to N of little Marcle road and south and east of ‘bypass’ been considered?</p> <p>I haven’t checked loss of priority habitats (Habitats of Principle Importance) for these sites – I note ancient woodland has been picked up in some sites but have all the other designated priority habitats?</p> <p>As in line with NPPF important trees should now also be mentioned and considered – e.g. the Ancient Tree Inventory listing.</p> <p>I may have missed it but is Lighting and Dark Skies covered anywhere? Another specified NPPF consideration now.</p> <p>Otherwise really everything ecology comes down to site specific local assessment and prioritisation of maintaining/improving habitats and habitat connectivity as they come forwards.</p>	<p>Noted. LWS referenced in KDC as appropriate.</p> <p>Yes, and included in KDC.</p> <p>Housing proximate to site has been recognised hence, sensitive properties included in KDC.</p> <p>Assessment has included all relevant features and any features requested in consultation as appropriate.</p> <p>Ancient Tree Inventory listing has been considered.</p> <p>Dark Skies assessment is presented in Supplementary Site Report and included as appropriate in KDC.</p> <p>Noted.</p>

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	<p>Further comments received 12/3/20</p> <p>I am assuming all relevant Strategic Environmental Assessment, Environmental Impact Assessment and overall HRA process will be completed for MWLP as a whole.</p> <p>Likewise within above assessment of environmental impacts of emissions due to increased vehicle movements</p> <p>Allocated Site Comments: General: Effects of air emissions from additional vehicle movements on any designated site or priority habitat will need consideration and as relevant assessment and modelling./mitigation (eg changes of routing to avoid adjacent habitats/sites). I believe Natural England have done work on this:</p> <p>Dark Skies and intrinsically dark landscapes should apply across the board.</p> <p>Protected Species and biodiversity should apply across the board</p> <p>Specific Sites: Upper Lyde: Lugg SAC is a consideration so as Wye SAC need HRA process.</p> <p>Shobdon: Lugg SAC catchment</p>	<p>Work completed.</p> <p>Assessment of impacts remains to be driven by policy within the development plan.</p> <p>This will be a feature for the Appropriate Assessments as relevant to each project.</p> <p>Dark Skies assessment is presented in Supplementary Site Report and included as appropriate in KDC.</p> <p>Assessment of impacts remains to be driven by policy within the development plan, and relevant legislation.</p> <p>Appropriate Assessment required in KDC.</p> <p>Appropriate Assessment required in KDC.</p>

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	<p>Leinthall Quarry: Lugg SAC catchment in addition to SSSI. Adjacent to habitats of Principal Importance. European Protected Species recorded on/adjacent</p> <p>Perton Quarry: Lugg SAC catchment,</p> <p>Black Hill Delve: May require consultation with NRW and Brecon Beacons National Park</p> <p>Leominster household site: Lugg SAC</p> <p>Kington: Lugg SAC</p> <p>Lugg Bridge Quarry: also impacts Lugg &amp; Hampton Meadows SSSI, Lugg SAC</p> <p>Wellington: Lugg SAC</p> <p>Leominster Enterprise Park/Southern Avenue: Lugg SAC</p> <p>Little Marcle Road – impact on views to and from Malvern Hills AONB</p> <p>Moreton Business park – Lugg SAC, possibly impacting Lugg and Hampton Meadows SSSI</p>	<p>Site is just outside Lugg SAC catchment. KDC includes reference to other key habitats.</p> <p>Appropriate Assessment required in KDC.</p> <p>Noted.</p> <p>Appropriate Assessment required in KDC.</p> <p>Appropriate Assessment required in KDC.</p> <p>SSSI and Appropriate Assessment across SAC included in KDC.</p> <p>Appropriate Assessment required in KDC.</p> <p>Appropriate Assessment required in KDC.</p> <p>Landscape impacts included in KDC.</p> <p>SSSI and Appropriate Assessment across SAC included in KDC.</p>
<p>Julian Cotton – Archaeological Advisor, Herefordshire Council</p>	<p><b>Comment A</b></p> <p>MINERALS</p> <p>1. There are no great surprises here in terms of the sites and any proposed extensions etc.</p>	<p>Noted.</p>

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	<p>2. There are no allocations that would attract an outright objection from me on current evidence. In general, any archaeological matters would be dealt with and straightforwardly as per Core Strategy LD4 and Para 189 of the NPPF. It is my understanding that Historic England are just about to bring out a new 'HEAN' (historic environment advice note) in relation to minerals. This should of course be followed.</p> <p>3. As regards the 'hard rock' quarries such as Leinthall and Perton, the additional areas are not that extensive, and although there may be some direct impact on heritage assets of moderate interest locally, it is not anticipated that there would be issues of substance here. The delves, I don't believe to be a problem, and may in fact be beneficial.</p> <p>4. As regards the aggregate extraction zones (in particular but not limited to Wellington) it is noted that some extensive new areas are proposed. Given the sensitivity of the locations, and the hecтарage involved, it is almost inevitable that some below-ground remains of at least regional importance will be disturbed by aggregates extraction here. However, there are sound and established procedures in place to deal with such findings, and these will be followed. Indeed, I am of the view that the archaeological approach followed by minerals companies in the county has generally been exemplary to date, so I have no wish to change things.</p>	<p>Noted.</p> <p>Not available at time of preparing MWLP.</p> <p>Noted.</p> <p>Noted. Archaeology included in KDC.</p>

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	<p>WASTE / EMPLOYMENT LAND</p> <p>I have no particular comments to make here: In most cases I have already had an input via the usual pre-apps applications etc.</p>	<p>Noted.</p>
<p>Liz Duberley – Principal Natural Environment Advisor, Herefordshire Council</p>	<ul style="list-style-type: none"> <li>• 5.4.6 landscape character – should it say local landscape character and also reference to the LCA SPG.</li> <li>• 5.4.9 Significant development of agricultural land – is the word significant necessary – what is meant by this?</li> <li>• 5.4.14 Hfds Biodiversity Action Plans whilst these are updated they don't have a great deal of significance for HC would it be better to refer to nationally identified habitats of principal importance - in an ideal world we would update the HC Biodiversity Guidance!</li> <li>• 5.4.16 LD3 Green Infrastructure should a link be made with the HC GI Strategy?</li> <li>• 5.4.18 Should say biodiversity net gain</li> </ul>	<p>Text refers to landscape scale change that incorporates character. Reference to SPG has been included.</p> <p>'Significant' would be meant as something with a material effect. Text has been amended.</p> <p>Text updated.</p> <p>Yes, this has been done</p> <p>No, this refers to more than biodiversity.</p>
<p>Matthew Knight – Principal Building Conservation Officer, Herefordshire Council</p>	<p>i. For the Historic England guidance, what would the status of this be with regards the plan and would GPA3 be relevant in terms of the setting of assets?</p> <p>ii. Is there consideration of the impact on noise on setting of heritage assets please?</p>	<p>i. Herefordshire Council met with Historic England (25 June 2019) to discuss their comments and to agree the additional work that has now been completed. This sought to understand historic (and other assets) in more detail, to audit more clearly the site assessment, and to inform a review of the key development criteria. This work has</p>

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	<p>iii. Very positive that small scale 'delves' for stone extraction are permitted.</p> <hr/> <p>Thank you for consulting the Building Conservation Team about the proposed site to the immediate south of Arrow Mill Farm.</p> <p>From a desktop study, Arrow Mill House is listed at Grade 2. Arrow Mill is listed at Grade 2* and is an exceptional example of a well preserved C16 and C17 water mill with well-preserved machinery. The mill leat and tranquil rural setting are key aspects of the setting of the building which contribute strongly to its significance. From the proximity of the proposals it is felt that the site should be ruled out on heritage grounds please.</p>	<p>been undertaken, mindful of Historic England's guidance for plan preparation and allocating sites. It has led to some changes as set out in the Supplementary Sites Report and Preparing the Publication draft Plan report.</p> <p>ii. All impacts on the setting of heritage assets are considered at both plan making and development application stages</p> <p>iii. Noted</p> <hr/> <p>Comments noted and incorporated into draft document.</p>
<p>Rebecca Pickup – Specialist Registrar in Public Health</p>	<p>In general we have no comment. However on consultation with our Environmental health colleagues would it be possible to include noise within section 5.7? Comment below:</p> <p>Could noise be included either with vibration or as a topic in its own right, as specialist noise consultancy advice would likely to be required to ensure minimum impact is assured from the proposed activity?</p>	<p>Text amended.</p>