

Statement on behalf of the **Mineral Products Association (MPA)**.

Independent Examination of the Herefordshire Minerals & Waste Local Plan.

Main Matter 3 - Strategic Policies

Issue: Whether the general Strategic Policies adequately address the Plan's Spatial Strategy, and whether they are sound.

Policy SP1: Resource Management

- 27 *The supporting text in paragraph 5.5.15 states that a Resource Audit would be required for applications for major development. Should this be stated in the policy? Does the requirement to undertake a Resource Audit for major development have any impacts for the whole plan viability assessment, which is encompassed at present in the Core Strategy Economic Viability Assessment 2014?*

Yes, the requirement for a resource audit should be in the policy to ensure clarity and effectiveness. However, our interpretation of Policy SPI is that this requires all developments that use construction materials to submit a resource audit. Therefore, it is believed that major development as per paragraph 5.5.15 would be captured in this policy. We support the use of resource audits to bring clarity to future demand for materials.

Policy SP3: Transport within sites

- 33 *Should the requirement for use of conveyors and/or pipelines be subject to a requirement that there is no unacceptable adverse environmental impact? Alternatively, should the policy encourage, rather than require these methods of transport?*

Yes, the policy should encourage the use of conveyors/pipelines *if appropriate* and viable, and the policy should reflect this. The use of pipeline would not be practical for aggregates due to high quantities of water required and the abrasive nature of the material on the pipelines. The use of conveyors would depend on the site shape and size and would require electricity.

34 *What would electric powered vehicles be an alternative to?*

This is not clear, but one assumes it is referring to loading shovels, dump trucks and support vehicles etc. These types of plant and vehicles are not available yet. Suggest that the policy includes the additional words of *...if practical and available* to the end of the last sentence of the policy.

Policy SP4: Site Reclamation

35 *Is criterion (a) sufficiently clear in terms of what is meant by the words “any development”*

No, it is not.

36 *Would the requirements of paragraph (b) be practical in all cases?*

Clearly not. You would need a site of sufficient size to have a *landscape scale* benefit potential. As suggested previously the words *when and where practical* need inserting into the policy.

M E North
Mineral Products Association
26 September 2022.