



Sustainability Appraisal of the Main Modifications to the Herefordshire Minerals and Waste Local Plan

SA Addendum Report

Herefordshire Council

Final report

Prepared by LUC

June 2023

Version	Status	Prepared	Checked	Approved	Date
1	Draft Report	M. Mc Ginley	K. Nicholls	K. Nicholls	07.12.2022
2	Final Report (December 2022 Schedule of Main Modifications)	M. Mc Ginley	K. Nicholls	K. Nicholls	13.12.2022
3	Updated Final Report (May 2023 Schedule of Main Modifications)	M. Mc Ginley	K. Nicholls	K. Nicholls	16.05.2023
4	Final Report for consultation	M. Mc Ginley	K. Nicholls	K. Nicholls	14.06.2023



Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Contents

Chapter 1 **7** Introduction

Sustainability Appraisal and Strategic Environmental Assessment	8
SA of the Herefordshire Minerals and Waste Local Plan	9
Habitats Regulations Assessment	13
Structure of this SA Addendum	17

Chapter 2 **19** Methodology

Introduction	19
Sustainability Context for Development in Herefordshire	19
SA Framework	20
Reasonable Alternatives	20
Appraisal Symbology	21
SA Framework for the Herefordshire Minerals and Waste Local Plan	22
Secondary, Cumulative and Synergistic Effects	33
Mitigation	33
Monitoring	34

Chapter 3 **35** Sustainability Context for Development in Herefordshire

Policy Context	35
Baseline Information	43
Key Sustainability Issues	46

Sustainability Appraisal of the Main Modifications to the Herefordshire Minerals and Waste Local Plan	3
---	---

Contents

Chapter 4 **47** Appraisal of the Main Modifications to the Herefordshire Minerals and Waste Local Plan

Introduction	47
Summary of Changes to the Site Assessment SA Findings	48
Summary of Changes to the SA Findings for the Policies	50

Chapter 5 **57** Secondary, Cumulative and Synergistic Effects

Duration of Effects	57
Secondary, Cumulative and Synergistic Effects	59

Chapter 6 **64** Mitigation

SA Objective 3 – Protect and improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically	66
SA Objective 5 – Reduce road traffic, congestion and pollution, and promote sustainable modes of transport and efficient movement patterns in the county	69
SA Objective 6 – Value, protect and enhance the county’s historic environment and cultural heritage	72
SA Objective 7 – Value, protect and enhance the character and built quality of settlements and neighbourhoods	73
SA Objective 10 – Reduce Herefordshire’s vulnerability to the impacts of climate change as well as its contribution to the problem	74
SA Objective 12 – Value, maintain, restore and expand county biodiversity and geodiversity	77
SA Objective 13 – Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces	81

Contents

SA Objective 14 – Value, protect and enhance the quality of watercourses and maximise the efficient use of water	83
SA Objective 15 – Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	87
SA Objective 16 – Minimise noise, light, and air pollution	88
SA Objective 17 – Value, protect and enhance soil quality and resources	91

Chapter 7	94
Monitoring	

Chapter 8	95
Conclusion and Next Steps	

Conclusion	95
Next Steps	96

Appendix A	97
Representations on the Publications Draft Minerals and Waste Local Plan SA Report	

Appendix B	109
SA of the Schedule of the Main Modifications (May 2023)	

References	231
-------------------	------------

Contents

Table of Tables

Table 2.1: Key to symbols and colour coding used in the SA of the final Main Modifications 21

Table 4.1: Summary of changes to the site assessment SA findings 49

Table 4.2: Summary of changes to the SA findings for the MWLP policies 53

Chapter 1

Introduction

1.1 LUC was appointed by Herefordshire Council to carry out the Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the final Main Modifications to the Herefordshire Minerals and Waste Local Plan (MWLP) (hereafter referred to as ‘the MWLP’).

1.2 The Publication Draft Herefordshire MWLP [See reference 1] and its associated SA Report [See reference 2] were finalised in January 2021 and published for consultation for a six-week period from 12th 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 prepared a Schedule of Proposed Pre-Examination Modifications to the Herefordshire MWLP in September 2021 [See reference 3]. The proposed modifications related primarily to the representations received during the Regulation 19 consultation and to the revision to the National Planning Policy Framework (NPPF) in July 2021. The Schedule of Proposed Pre-Examination Main Modifications to the Herefordshire MWLP were subject to SA in December 2021. The SA Addendum Report (unpublished) along with the Schedule of Proposed Pre-Examination Main Modifications, the Herefordshire MWLP and the 2021 SA Report, were submitted to the Secretary of State for Examination on 22nd March 2022.

1.3 As part of the Examination, the Planning Inspectors considered the Proposed Pre-Examination Main Modifications and sought views during the Examination hearings which were held during November 2022.

1.4 Following the hearings, the Council prepared a final Schedule of Main Modifications in May 2023. The purpose of this SA Addendum, prepared in June 2023, is to consider whether the final Main Modifications are likely to have any new or different sustainability effects to those identified in the SA of the Publication Draft MWLP (January 2021) and, if so, to carry out SA of the

modifications. It should be noted that this is an addendum to the January 2021 SA Report and that these documents should therefore be read together. This SA Addendum (along with the accompanying Non-Technical Summary) updates and supersedes the SA Addendum that was prepared in December 2021 in relation to the Proposed Pre-Examination Main Modifications.

This SA Addendum focusses on the '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

1.5 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.

1.6 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required by the SEA Regulations **[See reference 4]**. 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.

1.7 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.

1.8 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 [See reference 5] 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'.

SA of the Herefordshire Minerals and Waste Local Plan

1.9 The stages of the Herefordshire MWLP preparation and the accompanying SA Reports that have been prepared and consulted on is summarised below. There have been six key stages in the SA of the Herefordshire MWLP to date.

1.10 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.

Herefordshire MWLP SA Stages and Consultation Documents

Scoping Stage

Local Plan Consultation Stage and Documents

- Call for sites, evidence gathering, etc.

SA Consultation Stage and Document

- Scoping Report (February 2017)
- Consultation: February – March 2017

Issues and Options Stage

Local Plan Consultation Stage and Documents

- Issues & Options Paper (August 2017)
- Consultation: 14th August – 6th October 2017

SA Consultation Stage and Document

- SA Report on the Issues & Options Paper
- Consultation: 14th August – 6th October 2017

Draft Stage

Local Plan Consultation Stage and Documents

- Draft Herefordshire Minerals and Waste Local Plan (January 2019)
- Consultation: 21st January – 4th March 2019

SA Consultation Stage and Document

- SA Report of the Draft Herefordshire Minerals and Waste Local Plan (December 2018)
- Consultation: 21st January – 4th March 2019

Publication Draft Stage

Local Plan Consultation Stage and Documents

- Publication Draft Herefordshire Minerals and Waste Local Plan (January 2021)
- Consultation: 12th April – 24th May 2021
- Proposed Pre-Examination Schedule of Main Modifications and Minor Changes (September 2021) (not published for consultation)

SA Consultation Stage and Document

- SA report on Draft Herefordshire Minerals and Waste Local Plan (January 2021)
- Consultation: 12th April – 24th May 2021
- SA Addendum Report of the Proposed Pre-Examination Schedule of Main Modifications and Minor Changes (not published for consultation)

Submission to the Secretary of State

- The Publication Draft Herefordshire MWLP and its associated SA Report (January 2021), and the Proposed Pre-Examination Schedule of Main Modifications and Minor Changes and its associated SA Addendum Report (December 2021) were submitted to Secretary of State on 22nd March 2022.

Examination

Local Plan Consultation Stage and Documents

- Hearing sessions: 8th, 9th and 10th November 2022
- Schedule of Final Main Modifications to the Herefordshire Minerals and Waste Local Plan (May 2023)
- Consultation: Commencing June / July 2023 for a six-week consultation period.

SA Consultation Stage and Document

- SA Addendum Report of the Final Main Modifications to the Herefordshire Minerals and Waste Local Plan (June 2023) (this report)
- Non-Technical Summary of the SA Addendum Report of the Final Main Modifications to the Herefordshire Minerals and Waste Local Plan (June 2023)
- Consultation: Commencing June / July 2023 for a six-week consultation period.

Adoption

Local Plan Consultation Stage and Documents

- Adoption of Herefordshire Minerals and Waste Local Plan (anticipated autumn/winter 2023)

SA Consultation Stage and Document

- SA/SEA Adoption Statement (to be prepared once the MWLP is adopted) (anticipated autumn/winter 2023)

Habitats Regulations Assessment

1.11 Under Article 6 (3) and (4) of the European Union Council Directive 92/43/EEC4 on the conservation of natural habitats and of wild fauna and flora (more commonly known as the Habitats Directive) land-use plans, including Minerals and Waste Local Plans, are subject to Habitats Regulations Assessment (HRA). The Conservation of Habitats and Species Regulations 2017 [See reference 6] transposes the Habitats Directive into national law. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a 'European site' [See reference 7] and to ascertain whether it would adversely affect the integrity of that site.

1.12 The HRA process has its own legislative drivers and requirements and, while the HRA findings may inform the SA, it is important that the HRA remains distinguishable from the wider SA process. The HRA has been undertaken in parallel with the SA and the detailed methodology and findings are reported separately.

1.13 A HRA Scoping Report was prepared by LUC on behalf of Herefordshire Council in August 2017 and related to the MWLP Issues and Options Report

(April 2017). A HRA Screening Report was prepared in parallel with the SA of the Draft MWLP in November 2018 and the findings were taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations proposed in the MWLP on biodiversity).

1.14 The HRA Report (December 2020) prepared to accompany the Publication Draft MWLP included a revised Screening Assessment in light of key changes and newly available information (e.g. issue of phosphates in the River Wye SAC) and detailed an Appropriate Assessment (AA). Following the Screening Assessment, the HRA Report (December 2020) identified the following potential Likely Significant Effects (LSEs) which required further consideration at the AA stage to determine whether they would result in Adverse Effects on Integrity (AEoI), either alone or in-combination with other plans and projects:

- River Wye SAC – Physical damage and loss of habitat; non-physical disturbance; water quality and quantity, air pollution and non-toxic contamination.
- Wye Valley and Forest of Dean Bat Sites SAC – Physical damage and loss of offsite functionally linked habitat, in relation to proposed minerals allocation M12 Callow Delve.
- Severn Estuary SAC, SPA and Ramsar site – Water quality and quantity.

1.15 The Screening Assessment identified a lack of certainty as to whether the following policies would result in LSE on European sites:

- M3: The winning and working of sand and gravel
- M5: The winning and working of building stone (sandstone)
- W3: Agricultural waste management for livestock units
- W4: Waste water management
- W5: Preferred locations for solid waste treatment facilities
- W6: Preferred locations for construction, demolition and excavation waste facilities

1.16 The Screening Assessment identified a lack of certainty as to whether the following proposed site allocations would result in LSE on European sites:

- M05 Wellington Quarry;
- M12 Callow Delve;
- W05 Leominster;
- W13 Former Lugg Bridge Quarry;
- M20 Westonhill Wood Delve;
- W63 Southern Avenue, Leominster;
- W66 Moreton Business Park, Moreton-on-Lugg;
- Preferred Area C (formerly referred to as Area of Search C); and
- W45 Wellington Quarry (waste use at site M05).

1.17 The Appropriate Assessment concluded that, providing the recommendations made in the HRA Report are implemented, and in light of the existing safeguards provided in the plan, the Publication Draft MWLP would not give rise to adverse effects on the integrity of the River Wye SAC, Wye Valley and Forest of Dean Bat Sites SAC or the Severn Estuary SPA, Ramsar and SAC, either alone or in-combination with the other plans or projects. The HRA Report (December 2020) was published for consultation from 12th April to 24th May 2021.

1.18 Following the Regulation 19 consultation period, the representations received on the Publication Draft Herefordshire MWLP and the HRA Report were reviewed by Herefordshire Council. As described earlier in this chapter, Herefordshire Council prepared a Schedule of Proposed Modifications (September 2021) to address the representations received during the Regulation 19 consultation and to reflect revisions to relevant national policy and legislation, as well as local plans and guidance documents published since January 2021.

1.19 Most notably for the HRA, the proposed Main Modifications provided the clarity requested by Natural England (NE), Environment Agency (EA) and Natural Resources Wales (NRW), particularly relating to the need for mineral and waste proposals to demonstrate at least nutrient neutrality on the River Wye SAC. A HRA Addendum Report was prepared by LUC in November 2021 to consider whether the Main Modifications that were proposed at that time were likely to have any new or different effects on European sites from those identified in the 2020 HRA of the Publication Draft MWLP and, if so, to carry out HRA of the proposed modifications. The November 2021 HRA Addendum concluded that the proposed Main Modifications would not affect the overall conclusions of the 2020 HRA Report.

1.20 The December 2020 HRA Report for the Publication Draft Herefordshire MWLP and the HRA Addendum Report (November 2021) were submitted for Examination to the Secretary of State on 22nd March 2022 alongside the MWLP and the Schedule of Proposed Modifications. On 9th May 2022, following an initial review of the Publication Draft Herefordshire MWLP, the Schedule of Proposed Modifications and the associated HRA reports, the Planning Inspectorate requested that the November 2021 HRA Addendum be reviewed and updated, stating:

“Natural England has recently updated the conservation status of the River Clun SAC and has provided updated advice together with a new generic methodology for assessing nutrient pollution. A review of the HRA is necessary to take into account this advice and update. In carrying out this review, you should obtain the views of Natural England as the appropriate nature conservation body and consider any available nutrient neutral mitigation proposals. This work is necessary to enable us to consider whether the Herefordshire Minerals and Waste Local Plan will result in a likely significant effect on the integrity of the European site”.

1.21 An updated HRA Addendum was prepared by LUC in June 2022 to take into account the latest advice from Natural England. The HRA Addendum (June

2022) also re-presented the information from the HRA Addendum (November 2021) about the implications of the Main Modifications that were proposed at that time for the HRA conclusions reported previously.

1.22 As the final set of Main Modifications have been prepared by the Council following Examination hearings, those modifications have been assessed in the updated HRA Addendum (June 2023), which will be published alongside the final Main Modifications for a formal consultation period. The HRA Addendum (June 2023) concluded that the final Main Modifications would not affect the overall conclusion of the 2020 HRA Report.

Structure of this SA Addendum

1.23 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 final Main Modifications and changes to SA findings since the January 2021 SA Report.
- Chapter 5 details the duration of effects and the secondary, synergistic and cumulative effects of the Herefordshire Minerals and Waste Local Plan as proposed to be modified.
- Chapter 6 describes mitigation measures that prevent, reduce and offset significant adverse effects from implementing the Herefordshire Minerals and Waste Local Plan as proposed to be modified.
- Chapter 7 presents an update to the Monitoring Framework.

- Chapter 8 summarises the key findings from the SA of the Schedule of Final Main Modifications and describes the next steps to be undertaken.

1.24 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 been addressed in this SA Addendum.
- Appendix B reproduces the Schedule of Final Main Modifications, with commentary on the SA implications of each modification.

Chapter 2

Methodology

2.1 This chapter describes the approach that has been taken to the SA of the final Main Modifications to the Herefordshire MWLP.

Introduction

2.2 The approach to assessing the SA implications of the Main Modifications firstly involved considering each modification as set out in the Schedule of Final Main Modifications. A column was added to the Schedule of Final Main Modifications to consider and record whether the modification would change the SA findings presented in the January 2021 SA Report for the relevant part of the Herefordshire MWLP that the modification relates to. The Schedule of Final Main Modifications with the additional 'SA implications' column is presented in Appendix B of this SA Addendum, and the findings are summarised in Chapter 4.

Sustainability Context for Development in Herefordshire

2.3 Chapter 3 of the January 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) 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 final Main Modifications.

SA Framework

2.4 This SA Addendum Report is prepared within the context of the previous SA work 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 January 2021 SA Report) remains valid.

2.5 The assessment reported in this document therefore continues to use this same 'SA Framework', with one minor amendment to address a representation made during the Regulation 19 consultation on the January 2021 SA Report (see the 'SA Framework for the Herefordshire Minerals and Waste Local Plan' section below). 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. This minor change to the wording of the SA objective does not in itself alter the earlier SA conclusions relating to that objective as the fundamental meaning of the SA objective is unchanged.

2.6 The 'SA Framework for the Herefordshire Minerals and Waste Local Plan' section below identifies which of the topics specified in the SEA Regulations is addressed by each objective. The final 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

2.7 The SEA Regulations require the consideration of reasonable alternatives to the Herefordshire MWLP. Most of the 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.

2.8 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. No reasonable alternatives to the final Main Modifications have been identified.

Appraisal Symbolology

2.9 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 final Main Modifications

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

Symbol and Colour Coding	Description
++/-	The policy/site allocation is likely to have a mixture of both significant positive and minor negative effects on the SA objective(s).
--/+	The policy/site allocation is likely to have a significant negative and minor positive effects on the SA objective(s).
++/--	The policy/site allocation is likely to have a mixture of both significant positive and negative effects on the SA objective(s).

SA Framework for the Herefordshire Minerals and Waste Local Plan

Employment

SA Objective 1: Support, maintain or enhance the provision of employment opportunities in the minerals and waste sectors

Appraisal Question

- 1.1: Support the development and growth of the minerals and waste economy in Herefordshire and generate employment opportunities for local people.

SEA Topics Covered by Objective

- Material assets **[See reference 8]**

- Population

SA Objective 2: Maintain or enhance conditions that enable a sustainable economy and continued investment

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Material assets
- Population

Healthy and Prosperous Communities

SA Objective 3: Protect and improve the health of the people of Herefordshire and reduce disparities in health geographically and demographically

Appraisal Question

- 3.1: Avoid or minimise adverse effects on human health and safety to acceptable levels from minerals 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.

SEA Topic Covered by Objective

- Population
- Human health

SA Objective 4: Reduce poverty and social inclusion by closing the gap between the most deprived areas in the county and the rest of the county

Appraisal Question

- 4.1: Provide opportunities for local people to access employment and skills in the minerals and waste sectors.

SEA Topic Covered by Objective

- Population
- Human health

Transport and Access

SA Objective 5: Reduce road traffic, congestion and pollution, and promote sustainable modes of transport and efficient movement patterns in the county

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Material assets

Built and Historic Environment

SA Objective 6: Value, protect and enhance the county's historic environment and cultural heritage

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Cultural heritage, including architectural and archaeological heritage

SA Objective 7: Value, protect and enhance the character and built quality of settlements and neighbourhoods

Appraisal Question

- 7.1: Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area.

SEA Topic Covered by Objective

- Material assets
- Soil

Resource Consumption and Climate Change

SA Objective 8: Move waste up the waste hierarchy

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Material assets

SA Objective 9: Promote sustainable use of mineral resources

Appraisal Question

- 9.1: Safeguard mineral resources from loss by permanent sterilisation.
- 9.2: Promote the most efficient use of mineral resources.

SEA Topic Covered by Objective

- Material assets

SA Objective 10: Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Climatic factors

SA Objective 11: Promote effective restoration and appropriate after use of sites

Appraisal Question

- Provide for the restoration of land to an appropriate after-use including the creation of accessible greenspace at former waste and mineral sites.

SEA Topic Covered by Objective

- Water
- Air
- Soil

Environmental

SA Objective 12: Value, maintain, restore and expand county biodiversity and geodiversity

Appraisal Question

- 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, extent or enhance Local Geological Sites.

SEA Topic Covered by Objective

- Biodiversity
- Fauna
- Flora

SA Objective 13: Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces

Appraisal Question

- 13.1: Value, enhance and protect natural environmental assets including AONBs, 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.

SEA Topic Covered by Objective

- Landscape
- Fauna

- Flora

SA Objective 14; Value, protect and enhance the quality of watercourses and maximise the efficient use of water

Appraisal Question

- 14.1: Protect and enhance the quality of watercourses.
- 14.2: Maximise the efficient use of water and protect the quality and quantity of ground and surface water from over abstraction.

SEA Topic Covered by Objective

- Water

SA Objective 15: Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Water

SA Objective 16: Minimise noise, light and air pollution

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Air

SA Objective 17: Value, protect and enhance soil quality and resources

Appraisal Question

- 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.

SEA Topic Covered by Objective

- Soil

Secondary, Cumulative and Synergistic Effects

2.10 The assessment described above considers each 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.

2.11 Chapter 6 of the January 2021 SA Report describes the secondary, cumulative, and synergistic effects and the duration of effects of the Publication Draft Herefordshire MWLP. Chapter 5 of this SA Addendum presents an update to that chapter of the SA and appraises the secondary, cumulative and synergistic effects of the Herefordshire Minerals and Waste Local Plan as proposed to be modified. Chapter 5 also includes a description of the likely duration of effects i.e. short-term, medium-term and long-term, and the nature of the effects i.e. permanent or temporary effects.

Mitigation

2.12 Schedule 2(7) of the SEA Regulations requires 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.

2.13 Chapter 7 of the January 2021 SA Report identifies the mitigation measures provided in the Publication Draft Herefordshire MWLP. Chapter 6 of

this SA Addendum presents an update to that chapter, taking into account mitigation provided by the Main Modifications.

Monitoring

2.14 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.

2.15 Chapter 8 of the January 2021 SA Report presents indicators for monitoring the potential significant effects of implementing the Herefordshire MWLP. Chapter 7 of this SA Addendum considers whether any additional monitoring indicators are required to monitor the sustainability effects identified through the SA of the final Main Modifications to the Herefordshire MWLP.

Chapter 3

Sustainability Context for Development in Herefordshire

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

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

Policy Context

3.3 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:

- UK economy narrowly avoiding recession – The UK economy narrowly avoided a recession after zero growth in the final quarter of 2022, thus avoiding two quarters of negative growth which mark a technical recession. However, the economy is still expected to shrink by 0.2% in 2023, according to the Office of Budget Responsibility (OBR) [See reference 9]. The OBR, which is the Government’s independent forecaster, expects housing incomes to drop by 6% this year and next once rising prices are taken into account – the largest two-year fall in living standards since the 1950s. Despite avoiding a recession, the UK is the only country in the G7 with an economy that is smaller than it was before the COVID-19 pandemic (-0.8% GDP growth October-December 2022) [See reference 10]. The potential implications for planning and development include Government spending cuts impacting on support available for services and facilities and new infrastructure.

- 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. However, emerging evidence suggests that there has been an increase in remote working; reduced commuting and related congestion and air pollution; and increased prioritisation of walking and cycling over private transport in towns and cities.
- Brexit – Following the United Kingdom’s (UK) departure from the European Union (EU) on 31st January 2020, it entered a transition period which ended on 31st December 2020. From 1st 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. Where EU law has been transposed into UK law and not repealed, the relevant UK legislation is still referred to in this report.
- The Levelling Up and Regeneration Bill [See reference 11], published on 11th May 2022, introduces a number of reforms to the planning system. It sets out the Government’s plans to drive local growth and empower local leaders to regenerate their areas. The Bill introduces a new Infrastructure Levy, new powers for councils to bring vacant properties back into use, a new approach to environmental assessments, and changes to neighbourhood planning including digitisation of the system.

National Planning Policy Framework

3.4 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.

3.5 Most notably is the publication of the revised National Planning Policy Framework [See reference 12] 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 [\[See reference 13\]](#)) however it does contain policies on the sustainable use of minerals.

3.6 Many of the changes to the 2021 NPPF relate to development other than for minerals and waste. However, of relevance to the Herefordshire MWLP, 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.

3.7 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

3.8 National Planning Practice Guidance (NPPG) [\[See reference 14\]](#) 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 was prepared:

- 25th August 2022 – 'Flood risk and coastal change'.
- 7th August 2022 – 'Healthy and safe communities'.

3.9 Both the Herefordshire MWLP and the SA are being prepared in accordance with the guidance outlined in the NPPG.

Other Relevant Plans and Programmes

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

Environmental Improvement Plan 2023

3.11 The Environmental Improvement Plan 2023 [See reference 15] is the first revision of the 25 Year Environment Plan. It details ten-goals identifying how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Of most relevance is Goal 5: Maximise our resources, minimise our waste:

- Eliminate avoidable waste by 2050 and double resource productivity;
- Eliminate avoidable plastic waste by 2042;
- Eliminate waste crime by 2042;
- Halve 'residual' waste (excluding major mineral waste) produces per person by 2042. For the purposes of the target, 'residual' waste is defined as waste that is sent to landfill, put through incineration or used in energy recovery in the UK, or that is sent overseas to be used in energy recovery.

3.12 The Herefordshire MWLP will help to deliver these new national targets.

Draft Agricultural Development Supplementary Planning Guidance

3.13 The Agricultural Development Supplementary Planning Guidance (SPG) (November 2022) seeks to provide clarity on the impact of farming on protected sites, most notably the River Wye and River Clun Special Areas of Conservation (SACs) which have significantly declined in quality over recent

years. The River Lugg sub-catchment of the River Wye SAC is also exceeding its limits of phosphates. The SPG requires all planning applications for agricultural development in the River Wye catchment to complete the Farmscoper tool to demonstrate the phosphorous loading of their development. The Draft SPG also requires applicants to detail the level of impact on biodiversity, geodiversity, the landscape, visual amenity, air quality, highway safety and access, public rights of way, flood risk, the historic environment, residential amenity, etc. The Draft SPG was published for consultation from 28th November 2022 to 23rd January 2023.

Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitat sites

3.14 On 16th March 2022, during the Examination process, Natural England issued advice to relevant planning authorities, including Herefordshire Council, relating to plans and projects which have the potential to affect water quality resulting in adverse nutrient impacts on designated habitat sites **[See reference 16]**. It also provided an update to advice previously issued to Herefordshire Council on how to address the impacts of development which have the potential to increase nutrient emissions and adversely affect the integrity of the River Wye SAC (River Lugg component), for which Natural England and Herefordshire Council had agreed that nutrient neutrality would be applied as a mitigation measure. Natural England recommended that Herefordshire Council applies the updated nutrient neutrality methodology and the updated catchment calculator when assessing the nutrient impacts of the Herefordshire MWLP on the integrity of the River Lugg as part of the River Wye SAC. Natural England also advised Herefordshire Council that the conservation status of the River Clun SAC is in unfavourable condition due to elevated nutrient levels (both phosphorus and nitrogen).

The River Lugg Catchment Position Statement

3.15 In April 2021 Herefordshire Council issued a Position Statement on the River Lugg Catchment [See reference 17] 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.

3.16 The River Lugg Catchment Position Statement (April 2021) (in the section titled '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).”

3.17 It is clear that the details around phosphate reduction and the protection of the River Wye SAC will change over the MWLP 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 final Main Modifications to the Herefordshire MWLP (May 2023) are in line with the advice from Natural England.

Heritage Impact Assessments

3.18 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 [See reference 18];
- Upper Lyde Quarry [See reference 19];
- Shobdon Quarry [See reference 20]; and
- Leinthall Quarry [See reference 21].

3.19 The HIAs describe the known heritage assets within the locality (both designated and undesignated), explore the impact and setting concerns of these sites in relation to the proposed extension and discuss 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

3.20 In July 2021, Herefordshire Council adopted a new Integrated Waste Management Strategy [See reference 22], 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.

3.21 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

3.22 The Wye Valley AONB Management Plan 2021-2026 [See reference 23] is intended to provide guidance and strategic objectives to support and steer positive landscape change. Aims include the 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 [See reference 24]

3.23 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

3.24 The National Model Design Code [See reference 25] 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.

Herefordshire County Archaeology and Minerals Resource Assessment

3.25 The Herefordshire County Archaeology and Minerals Resource Assessment [See reference 26] 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

3.26 Since the preparation of the SA Report for the Publication Draft Herefordshire MWLP in January 2021, the following baseline information of relevance to the SA of the Herefordshire MWLP has been updated/published:

- According to NRW's Compliance Assessment of Welsh River SACs against Phosphorous Targets [See reference 27], 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 COVID-19 pandemic, with construction sites closed for several months in 2020, reducing demand for minerals. According to the latest Index of Production bulletin released in January 2023 [See reference 28], mining and quarrying outputs were at -2.2% which is 19% below the recorded level in February 2020, the last month of "normal" trading conditions prior to COVID-19. In contrast, waste management (included in the same category as water supply and sewerage) grew by 0.6% in January 2023 which is 13.9% above its February 2020 level.
- In 2020/2021, Herefordshire Council collected 86,632 tonnes of local authority collected-waste (LACW), of which 72,949 tonnes was household waste [See reference 29]. Of the total amount of LACW, 32,825 tonnes were sent for recycling, composting or reuse with 48,807 tonnes not sent for recycling. There was a 3.9% decrease in household waste per person since 2019/2020 (from 391.9kg to 376.5kg). Of the total household waste collected, 28,202 tonnes were sent for recycling, composting or reuse (38.7%). There was a decrease in the percentage of household waste recycled from 41% in 2019/2020 to 38.7% in 2020/2021. Approximately 8,683 tonnes of non-household waste were collected of which 4,624 tonnes were sent for recycling, composting or reuse.
- The Office for National Statistics released the first results from the Census 2021 in June 2022. This showed that the population of Herefordshire in 2021 was 187,100 people – 3,600 more than in 2011 (up by 2.0%), which is a slower rate of growth than England and Wales (6.6%). With 86 people per square kilometre, Herefordshire had the fourth lowest population density out of all county level authorities in England in 2021 [See reference 30]. The latest population projections for Herefordshire predict that the population will increase to 219,891 by 2043, a percentage change

of 14.9% compared to the 2021 population of 187,100 people. There are approximately 13,200 people in Herefordshire with diverse needs (physical, cognitive) [See reference 31] who may encounter particular challenges when visiting a HWRC or understanding how to recycle properly.

- The latest labour market statistics [See reference 32] from October 2021 to September 2022 show that 94,100 people in Herefordshire were employed, accounting for 76.8% of the population, which is above the national average of 75.5%. The proportion of people who are unemployed is 3.1% which is lower than the regional average (4.9%) and the national average (3.7%). In February 2023, 2.4% of the population of Herefordshire claimed out-of-work benefits which is lower than both the West Midlands average (4.8%) and national average (3.7%).
- Commuting patterns result in a daily 3,062 population decrease in Herefordshire [See reference 33]. 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 (Census 2021 data is not available yet in relation to commuting patterns).

3.27 The baseline information presented in the January 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 south-east of Hereford and the Malvern Hills AONB incorporating an area east and north-east 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

3.28 Chapter 3 of the January 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.

Chapter 4

Appraisal of the Main Modifications to the Herefordshire Minerals and Waste Local Plan

4.1 This chapter summarises the findings of the SA of the final Main Modifications to the Herefordshire MWLP.

Introduction

4.2 Appendix B presents the Schedule of Main Modifications 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 January 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.

This exercise was previously undertaken in relation to the Proposed Pre-Examination Main Modifications, with the findings presented in the December 2021 SA Addendum. This current SA Addendum updates that work to reflect the final post-examination Main Modifications, and therefore supersedes the December 2021 SA Addendum.

Summary of Changes to the Site Assessment SA Findings

4.3 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 January 2021 SA Report.

4.4 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 January 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 and the effect is considered to be minor rather than significant.

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

SA Objective	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

4.5 This section outlines the changes in the likely effects identified for several policies (which include the site-specific Key Development Criteria (KDC)) as a result of the final Main Modifications to the Herefordshire MWLP.

4.6 The majority of the Main Modifications do not affect the SA findings presented in the January 2021 SA Report for 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.

4.7 Some policy updates do not change the overall SA effects recorded but reinforce or strengthen the effect previously recorded in the January 2021 SA Report. For example, the 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 already identified for SA objective 14: Water as the policy already sought to protect the quality of water and integrity of the River Wye SAC.

4.8 The Main Modifications principally relate to the following policies:

- Policy M2: Safeguarding of minerals resources and associated infrastructure from sterilisation or significant adverse effect
- Policy M3: Winning and working of sand and gravel
- Policy M4: Winning and working of crushed rock (limestone)
- Policy M5: Winning and working of sandstone
- Policy W3: Agricultural waste management for livestock units

Chapter 4 Appraisal of the Main Modifications to the Herefordshire Minerals and Waste Local Plan

- Policy W5: Preferred locations for solid waste treatment facilities
- Policy W6: Preferred locations for construction, demolition and excavation waste management facilities

4.9 The Main Modification to Policy M2 safeguards mineral resources and only permits non minerals development under certain circumstances, including where it occurs at depth and can be extracted in an economically viable alternative way and where it would not prejudice the operation of associated infrastructure. The previously identified minor positive effects for SA objectives 1: Employment and 2: Economy remain valid, however, the previously identified minor negative effect for SA objective 5: Sustainable Transport is revised to a minor positive effect as the policy will only support non-mineral development where it will not prejudice the operation of mineral infrastructure, principally the railheads used for the transportation of minerals.

4.10 The Main Modifications to the KDC for policies W5 and W6 relating to Former Lugg Bridge Quarry (W13), Rotherwas Industrial Estate (W58), Holmer Road (W61), Land between Little Marcle Road and Ross Road (W64), Leominster Enterprise Park (W62), Leominster HWS and HWRC (W05), Model Farm (W65), Moreton Business Park (W66), Shobdon Quarry (W44), Southern Avenue (W63), Three Elms Trading Estate (W60), Upper Lyde Quarry (W43), Wellington Quarry (W45) and Westfields Trading Estate (W59) require desk-based assessments and field evaluation of archaeological remains, and demonstration that proposed developments will appropriately minimise and mitigate impacts on heritage assets and their settings. Therefore, the previously identified minor negative effects for policies W5 and W6 in relation to SA objective 6: Historic Environment are now combined with minor positive effects to form mixed (minor positive / minor negative) effects, as the KDC support the conservation and protection of heritage assets.

4.11 The 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), Kingston Household Waste and Recycling Centre (W10), Leominster Enterprise Park (W62), Leominster HWS and HWRC (W05), Model Farm (W65), Moreton

Chapter 4 Appraisal of the Main Modifications to the Herefordshire Minerals and Waste Local Plan

Business Park (W66), Southern Avenue (W63), Three Elms Trading Estate (W60), and Westfields Trading Estate (W59) to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate 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 (minor positive / minor negative) effect.

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

SA Objective	Policy	Previous SA Effect	Revised SA Effect
SA Objective 5: Reduce road traffic, congestion and pollution, and promote sustainable modes of transport and efficient movement patterns in the county	Policy M2: Safeguarding of minerals resources and associated infrastructure from sterilisation or significant adverse effect	-?	+
SA Objective 6: Value, protect and enhance the county's historic environment and cultural heritage	Policy W5: Preferred locations for solid waste treatment facilities	-?	+?/-?
SA Objective 14: Value, protect and enhance the quality of watercourses and maximise the efficient use of water	Policy W6: Preferred locations for construction, demolition and excavation waste management facilities	-?	+?/-?
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	-?	+?/-?

4.12 Although the only changes to previously identified SA effects relate to policies W5 and W6, a brief summary of the other notable Main Modifications to policies M3, M4, M5, W5 and W6 and their KDC is provided in the following paragraphs.

4.13 The Main Modification outlined above also applies to policies M3, M4, M5 and W6 which requires 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This reinforces the positive effects that were already 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.

4.14 Similarly, the 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 previously as part of mixed overall effects for policies M3, M4 and M5 in relation to SA objective 14: Water; however the overall significance of the effects remains unchanged.

4.15 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 and Forest of Dean Bat Sites SAC will help mitigate any likely adverse effect of loss of habitat. The Main Modification to the KDC includes the recommendation from the HRA Addendum (unpublished, June 2022) for proposals to demonstrate how habitat severance for horseshoe bats

Chapter 4 Appraisal of the Main Modifications to the Herefordshire Minerals and Waste Local Plan

will be prevented (which may require the periphery woodland to be retained) and how noise and light impacts on this species will be avoided. 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. The Main Modification to the KDC reinforces the minor positive effect already identified as part of a mixed effect for Policy M5 for SA objective 12: Biodiversity and Geodiversity. The minor negative effect remains, as this policy relates not only to site M12, but also to several other sites allocated for sandstone extraction.

4.16 The Main Modification to Policy W3: Agricultural waste management for livestock units requires all proposals for livestock units, anaerobic digestion and other waste management proposals on agricultural holdings within the River Wye SAC or the River Clun SAC to demonstrate at least nutrient neutrality. This strengthens the previously identified positive effect for SA objective 14: Water as the policy already sought to protect the quality of water and integrity of the River Wye SAC, however, the modified policy now also protects the quality of water and integrity of the River Clun SAC from adverse effects from livestock units, anaerobic digestion and other waste management proposals on agricultural holdings.

4.17 Policies M3, M4, and M5, including the Main Modifications to the KDC for Leinthall Quarry (M07a and M07b), Perton Quarry (M10a and M10b), Shobdon Quarry (M04), Upper Lyde Quarry (M03), Wellington Quarry (M05) and Westonhill Wood Delves (M20), require desk-based assessments and field evaluation of archaeological remains, and demonstration that proposed developments will appropriately minimise and mitigate impacts on heritage assets and their settings. Overall, the previously identified mixed (uncertain minor positive/uncertain minor negative) effect of policies M3, M4 and M5 on SA objective 6: Historic Environment remain valid as there is still potential for minor 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.

4.18 The SA Addendum prepared in relation to the Proposed Pre-Examination Main Modifications (unpublished, December 2021) recommended that, in line with the advice received from Historic England in May 2021, the KDC for Holmer Road (W61) and Leinthall Quarry (M07a and M07b) should be updated to require proposed developments to appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s). These recommendations have been incorporated in the Schedule of Main Modifications. As a result, in relation to SA objective 6: Historic Environment, the previously identified mixed (minor positive / minor negative) effect for Policy M4 which includes Leinthall Quarry is reinforced (however, the significance remains unchanged) while the previously identified minor negative effect for Policy W5 which includes Holmer Road is now combined with a minor positive effect to form a mixed (minor positive / minor negative) effect, as the KDC support the conservation and protection of heritage assets.

Chapter 5

Secondary, Cumulative and Synergistic Effects

5.1 This chapter presents the likely secondary, cumulative and synergistic effects from the implementation of the Herefordshire MWLP as proposed to be modified.

Duration of Effects

5.2 The Herefordshire MWLP sets out how the future mineral and waste industries in Herefordshire should develop and operate over the period up to 2041. Effects may be experienced in the short-term (defined for this SA as over the next five years), medium-term (defined as over the next 10 years), or long-term effects (defined as over the whole plan period and beyond). Given the generic nature of the policies in the MWLP, it is difficult to be precise about when, where and in what form the effects will arise, and how one effect might relate to another. However, it is possible to draw some broad conclusions about the nature and interrelationship of the effects that the SA has identified:

- Most of the effects will be long-term, in that the Herefordshire MWLP aims to provide minerals and waste treatment facilities that will last over time. There will be some temporary and short or medium term effects during site preparation, construction or operation of facilities (see below).
- The effects which have been identified in the appraisal of the Herefordshire MWLP, both positive and negative, are likely to increase over time as the policies in the plan are implemented and more mineral and waste developments are delivered in Herefordshire, although some operations may be completed as new sites are developed so some effects may balance out.

Short-term Effects of the Herefordshire MWLP

5.3 The effects of the Herefordshire MWLP in the short-term are mostly related to the initial impacts of commencing minerals extraction and the development of waste facilities. These will include the removal of vegetation, soil, and provision of infrastructure required. Such works could have negative effects on biodiversity, health and wellbeing, amenity of local communities (possible disruption to rights of way, traffic flows, noise generation, vibration, dust etc.), soil quality, and the landscape. However, these impacts are temporary in nature and some may be minimised through good design and adherence to the policies in the Herefordshire MWLP or reversed through restoration measures in the medium to long-term.

Medium-term Effects of the Herefordshire MWLP

5.4 Medium-term positive effects relate to the employment and economic benefits of the waste and minerals sites. Negative effects in the medium-term include the implications of operational minerals extraction sites and waste management facilities on health and wellbeing, and the amenity of local communities (e.g. noise, dust, odour, increased traffic etc.), and on landscape quality. However, these effects should be avoided or mitigated through good practices by the minerals and waste operators, and adherence to the policies in the Herefordshire MWLP when planning proposals are assessed and determined by Herefordshire Council.

Long-term Effects of the Herefordshire MWLP

5.5 Long-term, permanent benefits that would result from the Herefordshire MWLP include the provision of sufficient mineral and waste developments to meet Herefordshire's needs, potential flood alleviation, habitat creation and

biodiversity enhancement, recreation enhancement opportunities through the restoration of former mineral sites, and the incorporation and preservation of important geological features within mineral sites. Long-term, permanent negative effects of the Herefordshire MWLP are potentially: loss of habitats, areas of Best and Most Versatile Agricultural Land; climate change implications of the energy required to operate facilities and vehicle movements to and from mineral and waste sites; and the disturbance and/or removal of archaeological remains. However, there may also be some long-term, permanent positive effects for biodiversity and landscape through the creation of new habitats and enhancement of landscape through well-designed and implemented restoration of former mineral sites; and long term, permanent positive effects on the historic environment as sites may benefit our understanding of the local archaeology which is found during minerals operations, and aggregates and building stone, for example, could also make a positive contribution towards local vernacular. Further long-term positive effects may include reduced consumption of resources and improvements in terms of air quality and greenhouse gases, through co-locating waste facilities and reduced volumes of landfilled waste through recovery and recycling of waste.

Secondary, Cumulative and Synergistic Effects

5.6 Secondary (or indirect) effects are effects that are not a direct result of a policy or site allocation but occur away from the original effect or as a result of a complex pathway. Cumulative effects occur where two or more insignificant effects combine to form a significant effect. Synergistic effects occur as the result of interactions between individual effects producing a total effect greater than the sum of each of the individual effects. Secondary, cumulative or synergistic effects may be either positive or negative.

5.7 The secondary, cumulative and synergistic effects of the policies and site allocations in the Herefordshire MWLP are summarised in the following paragraphs.

5.8 Encouraging investment in the minerals and waste industries has the potential to have a secondary effect on rates of deprivation through economic growth and job creation. Furthermore, the restoration of former mineral sites (Upper Lyde Quarry, Shobdon Quarry, Wellington Quarry, Leinthall Quarry, Perton Quarry, Callow Delve, Black Hill Delve, Llandraw Delve, Pennsylvani Delve, Sunnybank Delve and Westonhill Wood Delve) as required by NPPF (2021) would have secondary positive effects on investment in the county and consequently employment opportunities in Herefordshire.

5.9 There is potential for long-term adverse effects on the amenity of local communities where mineral workings, which tend to be clustered as adjacent permissions to be worked sequentially, are located (e.g. Upper Lyde Quarry, Wellington Quarry, Leinthall Quarry or Perton Quarry). Furthermore, sites which are within close proximity of a sensitive receptor and another mineral or waste site could also have a cumulative adverse effect on the amenity of the community – for example, site W07 is within 100m of residential areas and an existing waste water treatment works facility. Indirectly there may also be positive effects on human health, wellbeing and amenity resulting from the creation of high-quality habitats and landscapes that contribute to a high quality of life for present and future generations where after-use schemes are publicly accessible. There could be potential for cumulative negative effects on local air quality when waste management facilities are combined with other facilities within existing industrial estates or Strategic Employment Areas. There could also be potential negative cumulative effects from noise at mineral sites that are in close proximity, for example, the currently operational sites at Wellington Quarry (M05) and Upper Lyde Quarry (M03) are within 1.7km of each other. Effects may be experienced particularly at the settlement of Moreton on Lugg.

5.10 Minerals extraction and waste treatment requires the transport of minerals and materials which will commonly be road-based. Where waste road transport passes through urban areas it is likely to have a cumulative adverse effect on exacerbating congestion and air quality problems, particularly where new waste facilities may be located at Strategic Employment Areas W59, W60, W61, W62 and W63, as these are within close proximity to an Air Quality Management Area (AQMA). As the mineral sites are located in rural areas where traffic volumes are commonly low, the cumulative effects on the road network may be

disproportionately large where sites are in close proximity due to the low capacity of rural roads. Furthermore, depending on the type of restoration proposed for sites, there may be secondary effects from an increase in visitor numbers to an area which is likely to increase traffic volumes and transport emissions. Potential positive synergistic effects may be experienced from the co-locating of waste facilities due to reduced waste transport distances and from the clustering of mineral sites as adjacent permissions to be worked sequentially which presents an opportunity to use the same equipment for processing of aggregate. The processes associated with the extraction of minerals and the treatment of waste may also have cumulative adverse effects on air quality and greenhouse gas emissions.

5.11 Safeguarding minerals from inappropriate development through policies

M2: Safeguarding of minerals resources and associated infrastructure from sterilisation or significant adverse effect, M3: The winning and working of sand and gravel, M4: The winning and working of crushed rock and M5: The winning and working of sandstone would reduce the need to import minerals from outside the County, which would have positive secondary effects on achieving self-sufficiency as well as on congestion and greenhouse gas emissions.

Although there is little or no secondary aggregate production in Herefordshire, the use of recycled aggregates will also have positive secondary benefits as it reduces demand for the extraction of primary minerals. Similarly, the allocation of new waste management infrastructure and the promotion of the reuse, recovery and recycling of waste through policies W1: Waste strategy, W2: Solid waste management requirements, W5: Preferred locations for solid waste treatment facilities, W6: Preferred locations for construction, demolition and excavation waste management facilities and W7: Waste management operations will also have positive secondary effects on achieving self-reliance, reducing the need to identify sites for landfill (either within or outside of the County), and reducing greenhouse gas emissions from the transport of waste further afield for processing. Policies W1: Waste strategy, W3: Agricultural waste management and W7: Waste management operations support proposals for anaerobic digestion and incineration with energy recovery which results in landfill avoidance and enables the resultant heat and power to be used, thereby resulting in secondary positive effects on air quality through energy production that offsets/replaces consumption of fossil fuels but also potential secondary

negative effects on air quality from the release of emissions from incineration (although it should be noted that emissions from incineration are controlled under the Waste Incineration Directive and therefore secondary negative effects are unlikely).

5.12 Positive synergistic effects may be experienced in relation to the Strategic Employment Areas as there may be opportunities for symbiotic relationships between waste management, engineering, manufacturing and research industries which will contribute to the circular economy at a materials level. There are also opportunities for symbiotic relationships between agricultural practices and sewerage treatment, in relation to nutrient discharges to water and sludge management.

5.13 Secondary positive effects may be experienced in the built and historic environments as the Herefordshire MWLP provides a mechanism to ensure that there is a steady and adequate supply of natural stone for the conservation and restoration of buildings, including designated historic buildings, which will help to maintain heritage assets and a distinctive sense of place.

5.14 Positive secondary effects may be experienced at mineral sites as extraction may expose more geological features making them visible and available for learning opportunities. Positive secondary effects may also be experienced as the restoration of mineral sites offers the potential to deliver biodiversity gains in the long term; however many sites are restored to wetland and grassland habitats which can attract large numbers of species that may in certain circumstances pose a hazard to aircraft. There may be negative secondary effects from the development of mineral sites within an Aerodrome Safeguarding Zone (i.e. Shobdon Quarry and Preferred Areas A and D) as there is potential for adverse impacts on aircraft safety from bird-strike. The significance of the potential adverse effect is reduced as the Key Development Criteria for Shobdon Quarry (M04) require applicants to demonstrate the level of effect on the current and future operations of Shobdon Airfield. The positive and negative secondary effects will depend on the type of restoration proposed and eventually developed on the sites. There is also the potential for negative cumulative effects from quarries that are clustered at the same location as

these may have adverse effects on biodiversity through habitat fragmentation or species disturbance. Conversely, there may be potential for positive cumulative effects resulting from habitat restoration schemes at these sites which may collectively improve habitat connectivity. Finally, although policies SP2: Access to open space and recreation from minerals and waste development and SP4: Site reclamation seek to enhance and restore the landscape, they can also benefit biodiversity and the water and soil environments, even though this is not the primary purpose of these policies.

5.15 Cumulative adverse effects on the landscape, biodiversity and geodiversity, the water and soil environments, the historic environment, the road network, and the amenity of local communities may be experienced from mineral extraction at several sites in the same localities, for example at Upper Lyde Quarry, Leinthall Quarry and Perton Quarry. Phasing of sites is required in the Key Development Criteria to reduce cumulative adverse effects on these receptors. Works and restoration of existing sites should be completed prior to development starting on new sites to ensure no negative cumulative effects are experienced.

5.16 There may be potential negative cumulative effects on flood risk and water resources through changing surface water drainage patterns and the loss of permeable surfaces to minerals extraction and waste developments, particularly where sites are located in proximity to each other. Following restoration, particularly at mineral sites clustered at the same location, there is potential for positive cumulative effects in relation to flood alleviation through the provision of additional flood storage.

5.17 The loss of agricultural land at site W10 as the site has been developed and the potential temporary loss of Best and Most Agricultural Land at seven mineral sites, in addition to sites in three Preferred Areas, would cumulatively add to the loss of agricultural land in the UK. However, the loss is considered to be small in relation to the overall agricultural land lost in the UK per annum to development.

Chapter 6

Mitigation

6.1 It is a requirement of the SEA Regulations that consideration is given to “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”.

6.2 Proposals for minerals and waste development will be assessed not just in relation to the Herefordshire MWLP but also against all parts of the Development Plan. Under the Planning and Compulsory Purchase Act 2004, the Development Plan for proposals in Herefordshire comprises the Core Strategy (adopted October 2015); the Herefordshire MWLP; and other documents that comprise the Herefordshire Local Plan as relevant to the development proposed.

6.3 The following paragraphs identify the Herefordshire MWLP and Core Strategy policies that are expected to provide mitigation for the potential significant negative effects identified for the MWLP site allocations and policies (in Chapter 4 of this SA Addendum and Chapters 4, 5 and 6 of the 2021 SA Report). Note that mitigation is only considered in relation to those SA objectives for which potential significant negative effects were identified, therefore six of the SA objectives (SA objectives 1: Employment, 2: Sustainable Economy, 4: Poverty and Equality, 8: Waste Hierarchy, 9: Mineral Resources and 11: Restoration) are not included as they are unlikely to be significantly negatively affected by the policies or site allocations in the Herefordshire MWLP. It is also noteworthy that for some SA objectives, namely 6: Historic Environment and 13: Landscape, precautionary significant negative effects are recorded due to the constraints identified in the broad Preferred Areas. These effects are uncertain as the specific location of future minerals sites in these areas will not be known until planning applications come forward.

6.4 Furthermore, it should be noted that desk-based site assessments were appraised as 'policy-off', i.e. each site has been appraised firstly on its own merits without consideration to the potential mitigation and enhancement measures that might be available through policies in the MWLP.

6.5 Beyond the mitigation provided in the Herefordshire MWLP and Core Strategy, minerals and waste developments will be subject to The Town and County Planning (Environmental Impact Assessment) Regulations 2017 which will identify likely significant effects (both alone and cumulatively) on the environment at a site-level. Mineral working and waste management will also require an Environmental Permit, the applications for which will include consideration of potential impacts from the operations of such developments. Water discharge activities, groundwater discharge activities and emissions of greenhouse gases, are permitted through the Environmental Permitting Regime. Dust and noise are subject to control under several statutes, including the Environment Protection Act 1990 and the Environment Act 1995.

6.6 The mitigation measures provided by policies in the Core Strategy and Herefordshire MWLP will be implemented at the planning application stage when further detail regarding the location, type and scale of waste facility and mineral extraction will be known. Mitigation may include planning conditions requiring: noise and dust impact assessments; air quality assessments; ecological assessments; hydrological/hydrogeological assessments; flood risk assessments; landscape and visual impact assessments; separation distances/buffer zones between the development and sensitive receptors; phasing of sites to minimise adverse effects on the environment and local communities; routeing agreements and/or travel plans to control and alleviate the effects of traffic movements; archaeological evaluation and watching briefs; or the incorporation of green infrastructure and requirements for the high quality restoration of sites.

6.7 The Herefordshire MWLP policies and supporting text, including the Key Development Criteria for allocated sites in Appendix A, together with the Core Strategy policies generally provide sufficient mitigation to prevent, reduce and offset potential significant adverse effects.

6.8 Chapter 5: Strategic Policy and General Principles of the Herefordshire MWLP describes existing Core Strategy policies that are directly relevant to minerals and waste development, as well as setting out additional policies of a strategic nature applicable to minerals and waste development. Within this chapter the Herefordshire MWLP provides an explanation of how mineral and waste developments should seek to mitigate impacts on the natural, built and historic environments, as well as on the health and amenity of communities.

SA Objective 3 – Protect and improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically

6.9 Uncertain significant negative effects are identified for four mineral site allocations (M05, M07a, M07b and M10b), four Preferred Areas and two waste site allocations (W07 and W45) as these are either within 100m of sensitive receptors or, in the case of the Preferred Areas, contain sensitive receptors which could be adversely affected by noise, vibration, dust or light pollution. There is also potential for cumulative adverse effects from sites that are clustered at the same location (e.g. Wellington Quarry, Leinthall Quarry or Perton Quarry) or from sites that are near a sensitive receptor and another mineral or waste site (e.g. site W07). The following policies in the Core Strategy, policies and supporting text in the MWLP, and Key Development Criteria for the allocated sites provide mitigation for these effects on SA objective 3: Health.

6.10 Policy SD1: Sustainable design and energy efficiency in the Core Strategy applies to minerals and waste developments and requires planning proposals to safeguard residential amenity for existing and proposed residents; and to ensure that new development does not contribute to, or suffer from, adverse

impacts arising from noise, light or air contamination, land instability or cause ground water pollution. Core Strategy policy SS6: Environmental quality and local distinctiveness requires proposals to consider their impact on local amenity, including light pollution, air quality and tranquillity.

6.11 Policy SP2: Access to open space and recreation from minerals and waste development in the MWLP supports the provision of outdoor facilities, such as Public Rights of Way, and the incorporation of green infrastructure which will contribute to the amenity and health of local communities. Development that affects an area of open space will only be supported where it can be demonstrated that the effect is temporary over the smallest area possible and for the shortest duration; and any permanent impacts should occur only in exception circumstances.

6.12 For the description of Core Strategy policy SS6: Environmental quality and local distinctiveness, Chapter 5: Strategic Policy and General Principles of the MWLP provides an explanation of how mineral and waste developments should seek to mitigate impacts on local amenity, air quality and tranquillity. It states that all applications will be expected to incorporate robust measures to ensure that proposed developments do not cause unacceptable adverse impacts on either the environment or local communities, many of which can be overcome by implementing standard measures such as:

- Limiting working hours;
- Locating plant, machinery and haulage routes away from sensitive receptors;
- Advanced tree planting;
- Phasing so the development moves away from sensitive receptors;
- Acoustic screening measures;
- Enclosing plant and machinery;
- Plant being fitted with silencers and white noise alarms;
- Sheeting of lorries;

- Cleaning of lorry wheels before they exit the site;
- Good maintenance of bunds and stockpiles;
- Avoiding or minimising the use of blasting explosives; and
- Careful design of external lighting to confine its influence to the point of use.

6.13 It also states that the Council expects planning applications to include a proportionate consideration of cumulative impacts. Appropriate measures to optimise benefits and to avoid or mitigate harm should be made clear within the planning application.

6.14 The Key Development Criteria for the allocated sites in the MWLP require applications to:

- Demonstrate optimum phasing of the site, 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 (sites M03a, M03c, M04, M05, M07a, M07b, M10a, M10b).
- Deliver priorities of the Herefordshire Green Infrastructure Strategy during operation and reclamation phases (all mineral sites, W13).
- Demonstrate the level of effect on residential amenity at nearby properties (M03a, M03c, M04, M18, M20, W44, W43).
- Demonstrate the level of effect on the amenity, health and safety and environment of nearby sensitive properties (schools, housing, medical facility, hotel, picnic site) (M05, W59, W60, W61, W62, W63, W64, W45).
- Potentially require diversion of footpaths crossing sites or a non-working buffer such that the amenity value and connectivity of the footpaths are maintained (M05, W45).
- Demonstrate effect on air quality, particularly within the Hereford AQMA (W59, W61).

6.15 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites, there will be no residual significant negative effects in relation to SA objective 3: Health.

SA Objective 5 – Reduce road traffic, congestion and pollution, and promote sustainable modes of transport and efficient movement patterns in the county

6.16 Of the 14 minerals site allocations in the MWLP, six sites are expected to have significant negative effects in respect to SA objective 5: Sustainable Transport (M07a, M07b, M12, M13, M17 and M18) while the remaining eight mineral sites and the four Preferred Areas are expected to have significant negative effects as part of overall mixed effects, as these sites are either large (over 20ha) and are expected to generate high volumes of heavy goods vehicle traffic; are not within 250m of a main road thereby encouraging the use of local roads which may result in vehicles travelling slowly increasing the potential for traffic and pollutant deposition along those routes; or, are not within 800m of any sustainable transport links which will encourage private car use among employees. Significant negative effects (as part of mixed effects) are also identified for policies M3: The winning and working of sand and gravel, M4: The winning and working of crushed rock and M5: The winning and working of sandstone. The negative effects generally relate to minerals and waste being predominantly transported by heavy goods vehicles which will result in increases in traffic generation and transport-related emissions. There may also be cumulative adverse effects on exacerbating congestion problems where waste road transport passes through urban areas, particularly where new waste facilities may be located at Strategic Employment Areas W59, W60, W61, W62 and W63, as these are within close proximity of an AQMA. As the mineral sites are located in rural areas where traffic volumes are commonly low, the

cumulative effects may be disproportionately large where sites are in close proximity due to the low capacity of rural roads. Furthermore, depending on the type of restoration proposed for sites, there may be secondary effects from an increase in visitor numbers to an area which is likely to increase traffic volumes. The following policies in the Core Strategy, policies and supporting text in the MWLP and Key Development Criteria for the allocated sites provide mitigation for these effects on SA objective 5: Sustainable Transport.

6.17 Policy SP3: Transport within sites in the MWLP requires applications for minerals and waste development to demonstrate the arrangements for the transport of minerals, waste or other materials within the site which minimise the potential for adverse impacts, including greenhouse gas emissions and optimises the opportunities for green infrastructure, particularly through the use of conveyors, pipelines and/or electric powered vehicles.

6.18 Core Strategy policy SS4: Movement and transportation requires new developments to be designed and located to minimise the impacts on the transport network; ensuring that journey times and the efficient and safe operation of the network are not detrimentally impacted. Furthermore, where practicable, development proposals should be accessible by and facilitate a genuine choice of modes of travel, including walking, cycling and public transport.

6.19 Policy MT1: Traffic management, highway safety and promoting active travel of the Core Strategy requires development proposals to demonstrate that the strategic and local highway network can absorb the traffic impacts of the development without adversely affecting the safe and efficient flow of traffic on the network or that traffic impacts can be managed to acceptable levels to reduce and mitigate any adverse impacts from the development. It also encourages active travel; the protection of existing local and long-distance footways, cycleways and bridleways; and well-designed, safe layouts. Where traffic management measures are introduced, they should be designed to respect the character of the surrounding area including its landscape character.

6.20 Chapter 5: Strategic Policy and General Principles of the Herefordshire MWLP states that development proposals should consider the whole life of the site at the application stage which will enable a sustainable transport strategy to be put in place at the earliest opportunity. It supports the incorporation of green infrastructure into developments to offset carbon emissions caused by minerals and waste related traffic and the incorporation of cycle links or footpaths upon reclamation of the site. It also states that it may not always be possible to gain access directly to the strategic highway network from a site, but the proposed route should avoid local roads and settlements where feasible. Chapter 8: Delivery, Implementation and Monitoring states that, where necessary, routeing agreements and/or travel plans may be sought to control and alleviate the effects of traffic movements, for example in order to avoid environmentally sensitive places or local conditions of congestion on the highway network.

6.21 The Key Development Criteria for the allocated sites in the MWLP require applications to:

- Demonstrate the level of effect on the road network and that vehicles can access and leave sites safely (M03a, M03c, M05, M12, M17, M13, M16, M20, W61, W43, W45).
- Implement a non-working buffer to ensure railway safety is maintained (M05, W45).
- Demonstrate the potential to use rail network for the transport of materials and that the proposal does not prevent future use of the rail infrastructure (W66).

6.22 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites there will be no residual significant negative effects in relation to SA objective 5: Sustainable Transport.

SA Objective 6 – Value, protect and enhance the county’s historic environment and cultural heritage

6.23 Uncertain significant negative effects are identified for the Preferred Areas in relation to SA objective 6: Historic Environment 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. The following policies in the Core Strategy, supporting text in the MWLP, and Key Development Criteria for the allocated sites provide mitigation for these effects on SA objective 6: Historic Environment.

6.24 Planning applications for mineral extraction in the Preferred Areas will be assessed against Core Strategy policy LD4: Historic environment and heritage assets which requires development proposals to protect, conserve, and where possible enhance heritage assets and their settings; to record and advance the understanding of the significance of any heritage assets to be lost; and, where appropriate to improve the understanding of and public access to the heritage asset.

6.25 For the description of Core Strategy policy LD4: Historic environment and heritage assets, Chapter 5: Strategic Policy and General Principles of the MWLP provides an explanation of how mineral and waste developments should seek to protect and enhance the historic environment. The Herefordshire MWLP states that mineral and waste development proposals should include a clear strategy for enhancing the historic environment. Site reclamation and after-use may enable improved access to historic sites, enhance the setting of historic features (such as water meadows), reinstate historic features such as hedgerows, or provide on-site interpretation of the site and its history in association with publicly accessible areas. It also states that wet working of mineral sites may not be a viable option where there are potential

archaeological assets as this can significantly restrict the delivery of appropriate mitigation measures.

6.26 Policy SS6: Environmental quality and local distinctiveness of the Core Strategy also seeks to conserve and enhance historic environment and heritage assets, especially Scheduled Monuments and Listed Buildings.

6.27 The Key Development Criteria for the allocated sites in the Herefordshire MWLP require applications to:

- Demonstrate the potential for archaeological remains in sites, through desk-based assessment and/or field evaluation. Mitigation will include recording, protection or recovery of any assets (M04, M03a, M03c, M05, M10a, M10b, M13, M20, W58, W62, W63, W64, W65, W66, W13, W19, W44, W43, W45).
- Demonstrate that the proposed development will appropriately minimise impacts on heritage asset(s) and their setting(s) (M05, M07a, M07b, M10a, M10b, M20, W60, W61, W62, W63, W65, W66, W05, W45).

6.28 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites, there will be no residual significant negative effects in relation to SA objective 6: Historic Environment.

SA Objective 7 – Value, protect and enhance the character and built quality of settlements and neighbourhoods

6.29 Uncertain significant negative effects are identified with regard to SA objective 7: Built Environment for two mineral sites (M05 and M07a), four waste sites (W05, W07, W10 and W19) and all Preferred Areas (A, B, C, and D) as they are within close proximity (100m) of a settlement, and, as such, may have

an adverse effect on the character of an area. The following policy provides mitigation for these effects on SA objective 7: Built Environment.

6.30 Core Strategy policy SD1: Sustainable design and energy efficiency requires new developments to be designed to maintain local distinctiveness and to respect the scale, height, proportions and massing of surrounding development, whilst making a positive contribution to the character of an area.

6.31 Through the implementation of the above policy, there will be no residual significant negative effects in relation to SA objective 7: Built Environment.

SA Objective 10 – Reduce Herefordshire’s vulnerability to the impacts of climate change as well as its contribution to the problem

6.32 Of the 14 minerals site allocations in the Herefordshire MWLP, six sites are expected to have significant negative effects in respect to SA objective 10: Climate Change (M07a, M07b, M12, M13, M17 and M18) while the remaining eight mineral sites and the four Preferred Areas are expected to have significant negative effects as part of overall mixed effects as these sites are either large (over 20ha) and are expected to generate high volumes of heavy goods vehicle traffic resulting in the production of high levels of CO₂ or other greenhouse gas emissions; are not within 250m of a main road thereby encouraging the use of local roads which may result in vehicles travelling slowly increasing the potential for traffic and pollutant deposition along those routes; or, are not within 800m of any sustainable transport links which will encourage private car use among employees and increased transport emissions. Depending on the location of the development, indirect greenhouse gas emissions may also arise as a consequence of development on high carbon soils (e.g. in the Preferred Areas). Significant negative effects (as part of mixed effects) are identified for policies

M3: The winning and working of sand and gravel, M4: The winning and working of crushed rock and M5: The winning and working of sandstone. The negative effects generally relate to minerals and waste being predominantly transported by heavy goods vehicles which will result in increases in transport-related emissions. The following policies in the Core Strategy, and policies and supporting text in the MWLP provide mitigation for these effects on SA objective 10: Climate Change.

6.33 Policy SP1: Resource management in the MWLP directs minerals and waste resources to contribute positively to addressing climate change through promoting a circular economy and managing waste in accordance with the Waste Hierarchy will reduce energy use and greenhouse gas emissions associated with its transportation.

6.34 Policy SP3: Transport within sites in the MWLP requires applications for minerals and waste development to demonstrate the arrangements for the transport of minerals, waste or other materials within the site which minimise the potential for adverse impacts, including greenhouse gas emissions and optimises the opportunities for green infrastructure.

6.35 Policy SP4: Site reclamation in the MWLP requires mineral sites and greenfield sites for waste use to be reclaimed, at the earliest opportunities, to a beneficial after-use. It supports proposals that deliver landscape scale benefits and green infrastructure appropriate to its location. Site reclamation may focus on flood storage which would alleviate risks of flooding elsewhere.

6.36 Core Strategy policy SS7: Addressing climate change requires development proposals to include measures which will mitigate their impact on climate change. At a strategic level, this will include designing developments to reduce carbon emissions and use resources more efficiently; focusing development to the most sustainable locations; promoting the use of decentralised and renewable or low carbon energy, where appropriate; and, protecting the best agricultural land, where possible. For the description of policy SS7, the MWLP states that reduced energy and water usage can be achieved through different ways, including good site design to reduce transport

movements and circulating water within operations to reduce overall demand. Buildings and plant should be designed to reduce resource requirements and consequent carbon emissions, for example through the use of ultra-low emission vehicles (including non-fossil fuels and electric vehicles) and renewable energy supply (including solar panels, open-loop ground source or surface water source heating and cooling systems). Site reclamation also provides opportunities to address climate change by enabling the movement of wildlife and flood storage to alleviate risks elsewhere.

6.37 The Key Development Criteria for the allocated sites in the Publication Draft MWLP require applications to:

- Deliver priorities of the Herefordshire Green Infrastructure Strategy during operation and reclamation phases (all mineral sites, W13).
- Demonstrate effects on air quality, particularly within the Hereford AQMA (W59, W61).
- 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 (M04, W44, M05, W45, M12, M20, W59, W61, W62, W63, W64, W66, W13).
- Undertake a site-specific flood risk assessment to demonstrate compliance with a Local Development Order (W58).

6.38 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites, there will be no residual significant negative effects in relation to SA objective 10: Climate Change.

SA Objective 12 – Value, maintain, restore and expand county biodiversity and geodiversity

6.39 Sites M05, M20, W05 and W13 have all been identified as having uncertain significant negative effects with regard to SA objective 12: Biodiversity & Geodiversity as they are located within 250m of either the River Wye SAC and/or the River Lugg SSSI. The SA also identifies uncertain significant negative effects for site M13 as it is within 250m of the Black Mountains SSSI. An uncertain significant negative effect (as part of a mixed effect) is also identified for site W45 at Wellington Quarry as it is adjacent to the River Wye SAC and the River Lugg SSSI. Mixed effects (uncertain minor positive/uncertain significant negative) are identified for sites M10a and M10b as they either contain (as is the case for M10a) or are adjacent to (as is the case for M10b) the Perton Roadside Section Quarry SSSI.

6.40 The Screening Assessment in the HRA Report (December 2020) identified for sites M05, M12, W45 and Preferred Area C potential for significant effects on the River Wye SAC and potential for significant effects on the Wye Valley and Forest Dean Bat Sites SAC (for site M12 only) (LSEs on water quality are addressed in SA objective 14: Water). Furthermore, the Screening Assessment in the HRA Report identified a lack of certainty as to whether the following policies would result in LSEs on European sites (LSEs on water quality are addressed in SA objective 14: Water):

- Policy M3: The winning and working of sand and gravel (River Wye SAC – physical damage and loss of habitat, non-physical disturbance, and non-toxic contamination)
- Policy W6: Preferred locations for construction, demolition and excavation waste management facilities (River Wye SAC – physical loss of or damage to habitat, non-physical disturbance, nontoxic contamination)

6.41 There may also be negative secondary effects from the development of mineral sites within an Aerodrome Safeguarding Zone (i.e. Shobdon Quarry Area of Search B and Area of Search D) as there is potential for adverse effects on aircraft safety from bird-strike and potential negative cumulative effects from quarries that are clustered at the same location as these may have adverse effects on biodiversity through habitat fragmentation or species disturbance. The following Core Strategy policies, policies and supporting text in the MWLP, and Key Development Criteria for the allocated sites provide mitigation for these effects on SA objective 12: Biodiversity & Geodiversity.

6.42 Policy LD2: Biodiversity and geodiversity of the Core Strategy requires development proposals to conserve, restore and enhance biodiversity and geodiversity assets, through the:

- Retention and protection of nature conservation sites and habitats, and important species in accordance with their status as follows:
 - Development that is likely to harm sites and species of European Importance will not be permitted;
 - Development that would be liable to harm Sites of Special Scientific Interest or nationally protected species will only be permitted if the conservation status of their habitat or important physical features can be protected by conditions or other material considerations are sufficient to outweigh nature conservation considerations;
 - Development that would be liable to harm the nature conservation value of a site or species of local nature conservation interest will only be permitted if the importance of the development outweighs the local value of the site, habitat or physical feature that supports important species; and
 - Development that will potentially reduce the coherence and effectiveness of the ecological network of sites will only be permitted where adequate compensatory measures are brought forward.
- Restoration and enhancement of existing biodiversity and geodiversity features on site and connectivity to wider ecological networks; and

- Creation of new biodiversity features and wildlife habitats.

6.43 It also states that, where appropriate, the Council will work with developers to agree a management strategy to ensure the protection of, and prevention of adverse impacts on, biodiversity and geodiversity features.

6.44 For the description of Core Strategy policy LD2: Biodiversity and geodiversity, the MWLP states that the minerals and waste industries present significant opportunities to provide a net gain in biodiversity and to improve the coherence and resilience of habitats and ecological networks, enabling wildlife to respond to a range of environmental pressures. Site reclamation will be expected to contribute at a landscape scale towards achieving nationally identified habitats of principal importance, taking account of the attributes of the site and of nearby areas, to support coherent and resilient networks of habitats that link the site with relevant ecological features in the wider landscape. Management strategies associated with a minerals or waste development may include a buffer within the development site to protect vulnerable features. Minerals and waste development proposals will also be expected to avoid unacceptable impacts on geodiversity value. Planning applications should demonstrate how the proposed development will deliver objectives of UK and Herefordshire Geodiversity Action Plans, such that geodiversity features are successfully incorporated with green infrastructure into reclamation and after-use, through measures such as:

- Providing safe public access to geological features, whilst avoiding damage to them;
- Involving geologists, geodiversity groups and museums in advising on, recording and sampling geodiversity;
- Incorporating geodiversity considerations into site management plans to protect and maintain exposures;
- Providing information to support understanding, interpretation and enjoyment of the features; and
- Creating links beyond the site boundary into the wider landscape.

6.45 Policy SP4: Site reclamation in the MWLP requires mineral sites and greenfield sites for waste use to be reclaimed, at the earliest opportunities, to a beneficial after-use. The supporting text states that reclamations schemes should take account of the proximity and purpose of airfields and be designed accordingly. Chapter 5 of the MWLP provides further explanation of Core Strategy policy SD1: Sustainable design and energy efficiency stating that proposals for site working, restoration and after-use will be required to consider aviation safety in demonstrating the appropriateness of water management and site reclamation schemes.

6.46 The HRA Addendum (June 2023) concludes that adverse effects on the integrity of the River Wye SAC and Wye Valley and Forest Dean Bat Sites SAC will be avoided, due to avoidance and mitigation measures already included within the Core Strategy and the policies in the MWLP which have been modified to include the recommended mitigation measures detailed in the HRA Report (December 2020) and HRA Addendum (June 2022).

6.47 The Key Development Criteria for the allocated sites in the Herefordshire MWLP require applications to:

- Demonstrate the level of effect on geodiversity and incorporate mitigation measures as appropriate. Mitigation will include recording, protection or recovery of any assets (M04, M03, M05, M07, M10, M13, M20, W44, W43, W45).
- Design site to deliver a net gain in biodiversity and providing enhancement for priority bird species (M04, M03, M05, M07, M10, M12, M17, M18, M13, M16, M20, W58, W59, W60, W61, W62, W63, W64, W65, W66, W19, W10, W07, W05, W19, W44, W43, W45).
- An Appropriate Assessment is required to demonstrate no likely significant effects on the River Wye SAC. Development will be required to demonstrate at least nutrient neutrality (M03, M04, W44, W43, M05, W45, M10, M12, M20, W58, W59, W60, W61, W62, W63, W65, W66, W19, W10, W05, W19).
- Demonstrate through an Appropriate Assessment no likely significant effects on the Wye Valley Woodlands SAC and Wye Valley and Forest of

Dean Bat Sites SAC. Need to demonstrate how habitat severance for horseshoe bats will be prevented (which may require the periphery woodland to be retained) and how noise and light impacts on this species will be avoided (M12).

- Demonstrate the level of effect on the River Lugg SSSI (M03, M05, M10, W62, W63, W05, W19, W43, W45) / River Teme SSSI and River Lugg (M07) / Caeiron Meadow SSSI and Pikes Farm Meadows SSSI (M17, M18) / Black Mountains SSSI (M13) River Wye SSSI (W58, M20).

6.48 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites, there will be no residual significant negative effects in relation to SA objective 12: Biodiversity and Geodiversity.

SA Objective 13 – Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces

6.49 Uncertain significant negative effects are identified for Preferred Areas C and D in relation to SA objective 13: Landscape as they either contain part of the Wye Valley AONB, areas of open space, or areas identified as being of high sensitivity according to The Urban Fringe Sensitivity Analysis. There are also potential cumulative adverse effects on landscape character and quality where several sites are proposed in the same locality. The following Core Strategy policies, policies and supporting text in the MWLP, and the Key Development Criteria for the allocated sites provide mitigation for these effects on SA objective 13: Landscape.

6.50 Planning applications for mineral extraction in the Preferred Areas will be assessed against Core Strategy policy LD1: Landscape and townscape which

requires development proposals to conserve and enhance the natural, historic and scenic beauty of important landscapes and features, including Areas of Outstanding Natural Beauty, nationally and locally designated parks and gardens, and conservation areas. The policy also requires proposals to demonstrate that character of the landscape has positively influenced the design and scale of the development. Proposals should also incorporate new landscape schemes to ensure development integrates appropriately into its surroundings. For the description of policy LD1, the MWLP outlines a number of mitigation measures that could minimise impacts on the landscape from mineral and waste developments including:

- Protecting, enhancing or creating views;
- Interpretation boards at publicly accessible areas to enable greater understanding of the landscape, historic landscape character and influence of the underlying geology;
- Designing waterbodies to be of a type, shape and scale that fits with the local landscape character and optimises biodiversity gains;
- Protecting or re-instating historic landscape features such as hedgerows or woodland; and
- Ensuring any planting is appropriate to the landscape character, using locally present species to optimise biodiversity gains.

6.51 For the description of Core Strategy policy SD1: Sustainable design and energy efficiency, Chapter 5: Strategic Policy and General Principles of the MWLP states that the Council will expect proposals to incorporate best practice measures to minimise the effects of visual intrusion and care should be taken to ensure that screening measures are appropriate and are not, in themselves, a source of visual intrusion.

6.52 Other policies which planning applications will be assessed against include:

- Policy LD3: Green infrastructure of the Core Strategy which requires development proposals to protect, manage and plan for the preservation of existing and delivery of new green infrastructure.

- Policy SP4: Site reclamation of the MWLP which supports site reclamation schemes that deliver landscape scale benefits and/or integrated green infrastructure appropriate to its location.
- Policy SP2: Access to open space and recreation from minerals and waste development of the MWLP which supports the protection and enhancement of green infrastructure and open space as part of mineral and waste developments.

6.53 The Key Development Criteria for the allocated sites in the Herefordshire MWLP require applications to:

- Deliver priorities of the Herefordshire Green Infrastructure Strategy during operation and reclamation phases. Design sites to incorporate key features of the landscape character (all mineral sites, W13).
- Design sites to incorporate key features of the landscape character (all waste sites).
- Demonstrate the level of effect on the surrounding landscape (W62, W63, W64, W65, W66, W19, W10).

6.54 Through the implementation of the above policies, the supporting text in the MWLP, the Key Development Criteria for the allocated sites, there will be no residual significant negative effects in relation to SA objective 13: Landscape.

SA Objective 14 – Value, protect and enhance the quality of watercourses and maximise the efficient use of water

6.55 The SA identified uncertain significant negative effects for sites M04, M05, M13, M16, M20, W05, W07, W13, W44, W45 and all four Preferred Areas. The Screening Assessment in the HRA Report (December 2020) identified that, due to hydrological connectivity, likely significant effects (LSEs) from sites

M05/W45, M20, M12, W05, W63, W66 and Preferred Area C on water quality and quantity at the River Wye SAC and Severn Estuary SAC, SPA and Ramsar, cannot be ruled out in the absence of appropriate safeguards and mitigation measures. The Screening Assessment in the HRA Report also identified a lack of certainty as to whether the following policies would result in LSEs on water quality and quantity in the River Wye SAC and Severn Estuary SPA, SAC and Ramsar site:

- Policy M3: The winning and working of sand and gravel
- Policy M5: The winning and working of building stone (sandstone)
- Policy W3: Agricultural waste management for livestock units
- Policy W4: Wastewater management
- Policy W5: Preferred locations for solid waste treatment facilities
- Policy W6: Preferred locations for construction, demolition and excavation waste management facilities

6.56 There may also be potential negative cumulative effects on water resources through changing surface water drainage patterns, particularly where sites are located in proximity to each other. The following Core Strategy policies, policies and supporting text in the MWLP, and Key Development Criteria for the allocated sites, provide mitigation for these effects on SA objective 14: Water.

6.57 Policy SD3: Sustainable water management and water resources of the Core Strategy requires development proposals to reduce flood risk; to avoid an adverse impact on water quality; to protect and enhance groundwater resources; and, to provide opportunities to enhance biodiversity, health and recreation.

6.58 For the description of Core Strategy policy SD3: Sustainable water management and water resources, the MWLP states that proposals for minerals extraction and waste management should ensure protection of water resources, particularly when river abstraction and/or groundwater sources may be affected.

The potential for impact on water quantity, quality and flow should be assessed through hydrological and hydrogeological assessments to establish the base line position and ensure operations are appropriately designed, monitored and managed. The Council will seek to avoid:

- Significant change to groundwater or surface water levels, for example, the process of ‘dewatering’ (when water is pumped out of a pit to allow dry working below the water table) must be carefully monitored, to ensure no adverse impacts on surrounding water availability; and
- Pollution of ground and surface water by chemicals and other contaminants, for example a considerable amount of water can be used when processing wastes or aggregates; drainage during site operations and any discharge to local watercourses, must be controlled to comply with standards set by the Environment Agency.

6.59 Policy W4: Wastewater management promotes wastewater management, enabling the treatment and reuse of water, outline that works undertaken should contribute to achieving nutrient neutrality within the River Wye SAC, and that wherever practical, phosphorus should be recovered for beneficial uses which would improve the chemical and ecological status of the watercourses in the catchment. Policy W3: Agricultural waste management for livestock units also seeks to protect the quality of water and integrity of the River Wye SAC and River Clun SAC by requiring all proposals for livestock units, anaerobic digestion and other waste management proposals on agricultural holdings within the SCs to demonstrate at least nutrient neutrality.

6.60 The 2020 HRA Report and current June 2023 HRA Addendum (relating to the Main Modifications) conclude that adverse effects on the integrity of the River Wye SAC, River Clun SAC and Severn Estuary SPA, SAC and Ramsar site will be avoided, due to avoidance and mitigation measures already included within the Core Strategy, the MWLP and Key Development Criteria for each allocated site which includes specific reference to achieving nutrient neutrality within the River Wye SAC and achieving reductions in phosphate releases from agricultural sources.

6.61 The Key Development Criteria for the allocated sites in the MWLP require applications to:

- Demonstrate any contamination on site will be identified and remediated, particularly with reference to protection of drinking water (W58, W19).
- Demonstrate how any pathways for contamination of the Source Protection Zones will be identified and avoided (W62, W63, W65).
- Demonstrate potential risks to the water environment as glaciofluvial sand and gravel deposits represent a secondary aquifer in hydraulic continuity with watercourses (M04, M03, M05, W44, W43, W45).
- Demonstrate potential risks to the water environment, including abstractions (public and private supply) wells and springs, for sites located within the hard rock of the Silurian Aymestry Limestone Formation / St. Maughans sandstone bedrock formation, classified as a secondary aquifer (M07, M10, M13, M16).
- Demonstrate potential risks to the water environment, including abstractions (public and private supply) wells and springs as site is located within Brownstones formation, classified as a secondary aquifer and adjacent to a groundwater spring Source Protection Zone for public drinking water supply (M12).
- Demonstrate potential risks to the water environment, including abstractions (public and private supply) wells and springs as site located within secondary aquifer of the Devonian (M20).
- Demonstrate the level of effect on water quality and hydrology in Pinsley Brook (M04, W44) / River Monnow (M13, M16) / Widemarsh Brook and Yazor Brook (W59, W60) / River Leadon (W64, W05) / Wellington Brook and Moreton Brook (W66, M05, W45) / Little Lugg River (W13) / River Lugg SSSI (M03, M05, M10, W62, W63, W05, W19, W43, W45) / River Teme SSSI and River Lugg (M07) / River Wye SSSI (W58, M20).
- Undertake an Appropriate Assessment to demonstrate no likely significant effects on the River Wye SAC. Development will be required to demonstrate at least nutrient neutrality (M03, M04, W44, W43, M05, W45,

M10, M12, M20, W58, W59, W60, W61, W62, W63, W65, W66, W19, W10, W05, W19).

6.62 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites, and the above recommendation, there will be no residual significant negative effects in relation to SA objective 14: Water.

SA Objective 15 – Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment

6.63 Mineral site M05, eight waste sites (W13, W45, W58, W60, W61, W62, W63, W64 and W66), and Preferred Areas A-C are expected to have uncertain significant negative effects in relation to SA objective 15: Flooding as they are within Flood Zones 2, 3a or 3b or are likely to increase flood risk elsewhere. The Strategic Flood Risk Assessment (SFRA) states that all sites assessed in the SFRA pass the Sequential Test and are appropriate for proposed development as set out in the MWLP, noting that a sequential approach may still need to be applied within sites to steer development to areas at lowest flood risk (sites M12, M17, M18 and the Preferred Areas were not assessed in the SFRA). Where flood risk areas have been identified and the Exception Test is required, it is likely that this can be best managed through the appropriate location of more vulnerable development in areas at lower flood risk and, where required, there are feasible mitigation measures that can be implemented to manage these risks without increasing flood risk elsewhere. The SFRA recommends mitigation measures including site-specific FRAs; detailed hydraulic modelling of nearby watercourses; and shallow infiltration and attenuated discharge to nearby watercourses. The following Core Strategy and MWLP policies provide mitigation for these effects on SA objective 15: Flooding.

6.64 Policy SP4: Site reclamation supports site reclamation schemes which have the potential to create wetland habitats, thereby providing flood storage.

6.65 Policy SD3: Sustainable water management and water resources requires development proposals to reduce flood risk; to avoid an adverse impact on water quality; to protect and enhance groundwater resources; and, to provide opportunities to enhance biodiversity, health and recreation. It also states that developments will be located in accordance with the Sequential Test and Exception Test (where appropriate).

6.66 The Key Development Criteria for the allocated sites in the Herefordshire MWLP require applications 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 (M04, W44, M05, W45, M12, M20, W59, W61, W62, W63, W64, W66, W13).
- Undertake a site-specific flood risk assessment to demonstrate compliance with a Local Development Order (W58).

6.67 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites, there will be no residual significant negative effects in relation to SA objective 15: Flooding.

SA Objective 16 – Minimise noise, light, and air pollution

6.68 Uncertain significant negative effects are expected for M05, W05, W07, W10 and W45 in relation to SA objective 16: Pollution as, whilst they are not within an AQMA, they are within 100m of settlements which could result in adverse effects on sensitive receptors. All four Preferred Areas are considered

to have potential to result in significant negative effects given that there are sensitive receptors including schools, settlements and churches within these areas. There could be potential for cumulative negative effects on local air quality where waste management facilities are combined with other facilities within existing industrial estates or Strategic Employment Areas or potential negative cumulative effects from noise at mineral sites that are in close proximity. The following Core Strategy policies, supporting text in the MWLP, and Key Development Criteria for the allocated sites provide mitigation for these effects on SA objective 16: Pollution.

6.69 Policy SD1: Sustainable design and energy efficiency of the Core Strategy applies to minerals and waste developments and requires planning proposals to ensure that new development does not contribute to, or suffer from, adverse impacts arising from noise, light or air contamination. Core Strategy policy SS6: Environmental quality and local distinctiveness requires proposals to consider their impact on residential and local amenity, including light pollution and air quality.

6.70 For the description of Core Strategy policy SS6: Environmental quality and local distinctiveness, Chapter 5: Strategic Policy and General Principles of the Herefordshire MWLP provides an explanation of how mineral and waste developments should seek to mitigate impacts on local amenity, air quality and tranquillity. It states that all applications will be expected to incorporate robust measures to ensure that proposed developments do not cause unacceptable adverse impacts on either the environment or local communities, many of which can be overcome by implementing standard measures such as:

- Limiting working hours;
- Locating plant, machinery and haulage routes away from sensitive receptors;
- Advanced tree planting;
- Phasing so the development moves away from sensitive receptors;
- Acoustic screening measures;
- Enclosing plant and machinery;

- Plant being fitted with silencers and white noise alarms;
- Sheeting of lorries;
- Cleaning of lorry wheels before they exit the site;
- Good maintenance of bunds and stockpiles;
- Avoiding or minimising the use of blasting explosives; and
- Careful design of external lighting to confine its influence to the point of use.

6.71 It also states that the Council expects planning applications to include a proportionate consideration of cumulative impacts. Appropriate measures to optimise benefits and to avoid or mitigate harm should be made clear within the planning application.

6.72 The Key Development Criteria for the allocated sites in the Herefordshire MWLP require applications to:

- Demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site (M07, M10, M12, M17, M18, M13, M16, M20).
- Demonstrate the level of effect on residential amenity at nearby properties (M03, M04, M18, M20, W44, W43).
- Demonstrate the level of effect on the amenity, health and safety and environment of nearby sensitive properties (schools, housing, medical facility, hotel, picnic site) (M05, M07a, M07b, M10a, M10b, W59, W60, W61, W62, W63, W64, W45).
- Demonstrate effect on air quality, particularly within the Hereford AQMA (W59, W61).

6.73 Through the implementation of the above policies, the supporting text in the MWLP, and the Key Development Criteria for the allocated sites, there will be no residual significant negative effects in relation to SA objective 16: Pollution.

SA Objective 17 – Value, protect and enhance soil quality and resources

6.74 Four mineral sites proposed in the Herefordshire MWLP have been found to have uncertain significant negative effects in relation to SA objective 17: Soil as development on mainly (>50%) high quality Best and Most Versatile Agricultural Land (Grade 1, 2 and 3a) or on large areas of greenfield land (>20ha) will result in that land being lost to other uses (M03a, M03c, M04 and M0). Uncertain significant negative effects are identified for Preferred Areas A, B and C as these areas comprise Grade 2 and Grade 3 Best and Most Versatile Agricultural Land. A significant negative effect is identified for site W10 as the Grade 2 agricultural land has already been lost as this is an operational sites. There may also be potential negative cumulative effects on the soil environment from the loss of Best and Most Versatile Agricultural Land to minerals extraction and waste developments. The following Core Strategy policies, and policies and supporting text in the MWLP provide mitigation for these effects on SA objective 17: Soil.

6.75 Policy SP4: Site reclamation in the Herefordshire MWLP supports site reclamation schemes which have the potential to return sites to agricultural use, thereby safeguarding the long-term potential of Best and Most Versatile Agricultural Land and conserving soil resources.

6.76 Policy SS7: Addressing climate change of the Core Strategy supports the protection of best agricultural land, where possible. The supporting text states that “areas of lower quality agricultural land will be utilised in preference to the best and most versatile agricultural land, in accordance with the National Planning Policy Framework (Para 112), where possible” (p.44).

6.77 For the description of Core Strategy policy LD2: Biodiversity and geodiversity, Chapter 5: Strategic Policy and General Principles of the Herefordshire MWLP provides an explanation of how mineral and waste developments should protect and conserve soil resources. According to the

Herefordshire MWLP, planning applications should consider the following in demonstrating that mineral development on the Best and Most Versatile Agricultural Land is necessary:

- Whether there is an available alternative;
- Whether the need for development outweighs the adverse impact upon agricultural land quality;
- Whether proposals will affect the long term agricultural potential of the land or soils; and
- Whether alternative land of lower agricultural value has considerations which outweigh the adverse impact upon agricultural land quality.

6.78 It also states that the protection of the original soils removed prior to mineral extraction should always be a priority. Furthermore, the stripping and storage of soils for reuse and restoration can lead to degradation, although best practice in soil management can minimise the impacts of this damage. Planning applications should demonstrate how best practice measures for soil handling and storage will be achieved on site, throughout the life of the development. Reclamation schemes should incorporate remediation activities and after-use proposals that optimise the storage and use of best and most versatile soils.

6.79 The supporting text in the MWLP for Core Strategy policy SD1: Sustainable design and energy efficiency states that proposals should demonstrate the measures to be used to ensure that quarry sides and slopes are stable and will not result in landslip, either within the site or on adjoining land, both during and after the lifetime of the development. Waste stockpiles and mineral waste tips should be constructed and accessed so that they are unlikely to give rise to danger through instability, using suitable vegetation which can assist with stability and bring environmental benefit. Where there is any likelihood of instability, a stability report should be provided setting out measures appropriate to ensure the continued stability and integrity of infrastructure adjoining or close to the development site.

6.80 Through the implementation of the above policies and the supporting text in the MWLP, there will be no residual significant negative effects in relation to SA objective 17: Soil.

Chapter 7

Monitoring

7.1 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”.

7.2 Chapter 8 of the January 2021 SA Report sets out a number of indicators for monitoring the potential significant sustainability effects of implementing the Herefordshire MWLP. In light of the updated SA findings taking into account the Main Modifications to the Herefordshire MWLP, a review of the indicators presented in the Monitoring Framework has been undertaken. It was concluded that the Monitoring Framework presented in Chapter 8 of the 2021 SA Report remains valid.

Chapter 8

Conclusion and Next Steps

8.1 This chapter presents the overall conclusions of the SA of the Final Main Modifications and describes the next steps to enable adoption of the Herefordshire MWLP.

Conclusion

8.2 This SA Addendum Report presents an assessment of the final Schedule of Main Modifications to the Herefordshire MWLP (May 2023), superseding the SA Addendum that was prepared in December 2021 in relation to the Proposed Pre-Examination Main Modifications. The majority of the modifications in the Schedule of Main Modifications do not affect the SA findings presented in the January 2021 SA Report for 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.

8.3 These final 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 within the River Wye SAC and to demonstrate that proposed developments will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s).

8.4 Where the Main Modifications would result in changes to the SA effects identified in the January 2021 SA Report, these are detailed in Chapter 4 of this SA Addendum. The Main Modifications resulted in the revision of SA effects for three policies (policies M2, W5 and W6), all of which resulted in more positive effects. An updated assessment of the secondary, synergistic and cumulative effects has also been undertaken; however these effects remain broadly the

same as those identified in the January 2021 SA Report due to the small number of changes made to the SA conclusions as a result of the Main Modifications.

Next Steps

8.5 This SA Addendum will be published for consultation alongside the final Main Modifications to the Herefordshire MWLP in June / July 2023 for a six-week consultation period.

8.6 Following the formal Main Modifications consultation, the Inspector will consider the representations made and recommend any final changes necessary to make the MWLP meet the test of soundness. If the Herefordshire MWLP is found to be 'sound', it can be formally adopted by the 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.

LUC

June 2023

Appendix A

Representations on the Publications Draft Minerals and Waste Local Plan SA Report

Historic England

- Representation date: 24th May 2021

Representation

A.1 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.

SA Response

A.2 Noted with thanks.

Representation

A.3 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.

SA Response

A.4 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 “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”.

A.5 Action: Chapter 3 of this SA Addendum updates the review of plans and baseline information and refers to “The Herefordshire County Archaeology and Minerals Resource Assessment”.

Representation

A.6 Historic England welcomes the inclusion of SA Objective 6, focussed on the historic environment and cultural heritage and a separate objective, SA

Appendix A Representations on the Publications Draft Minerals and Waste Local Plan SA Report

Objective 7, focussed on valuing, protecting and enhancing the built quality of settlements and neighbourhoods.

SA Response

A.7 Noted with thanks.

Representation

A.8 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 assets and in the absence of further assessment work, as detailed in our detailed response attached at Annex A.

SA Response

A.9 Noted with thanks.

A.10 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 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

Appendix A Representations on the Publications Draft Minerals and Waste Local Plan SA Report

assets. Therefore, the uncertain minor negative effects previously identified for sites M05 and, M07a and M07b remain unchanged.

Representation

A.11 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.

SA Response

A.12 Noted with thanks.

A.13 However, the assessment of SA objective 6: Historic Environment 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.

Representation

A.14 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.

SA Response

A.15 Noted with thanks.

A.16 Effects are expected to be significant for the four Preferred Areas 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 Preferred Areas as it would be dependent on the exact location of minerals development within the Preferred Areas, which would not be known until the planning application stage.

Representation

A.17 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.

SA Response

A.18 Action: Chapter 5 of this SA Addendum presents an update to the cumulative effects section to recognise the potential cumulative adverse effects on the historic environment from Upper Lyde, Leinthall and Perton quarries.

Representation

A.19 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 conclusively stated that there will be “no residual significant effect in relation to SA Objective 6: Historic Environment” (para. 7.28).

SA Response

A.20 Action: Since the Reg 19 consultation, Historic England and Herefordshire Council have reached a Statement of Common Ground. As a result, the relevant KDC for sites (M05, M07a, M07b, M10a, M10b, M20, W60, W61, W62, W63, W65, W66, W05, W45) have been amended to require applicants to demonstrate that proposed developments will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s). Through the implementation of the Core Strategy policies and the policies in the MWLP, including the Key Development Criteria for the allocated sites, the SA concludes that there will be no residual significant negative effects in relation to SA objective 6: Historic Environment.

Representation

A.21 Appendix A: 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.

A.22 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).

SA Response

A.23 Noted with thanks.

A.24 Heritage Impact Assessments were undertaken in August 2021 for Shobdon Quarry, Upper Lyde Quarry, Wellington Quarry, Leinthall Quarry by Herefordshire Archaeology.

A.25 Since the Reg 19 consultation, Historic England and Herefordshire Council have reached a Statement of Common Ground. As a result, the relevant KDC for sites (M05, M07a, M07b, M10a, M10b, M20, W60, W61, W62, W63, W65, W66, W05, W45) have been amended to require applicants to demonstrate that proposed developments will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s).

Environment Agency

- Representation received: 24th May 2021

Representation

A.26 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.

SA Response

A.27 Action: SA objective 8 is reworded in Chapter 2 of this SA Addendum to ‘Move waste up the waste hierarchy’.

Representation

A.28 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.

SA Response

A.29 Noted with thanks, however, this point relates more to the content of the Plan rather than the SA Report.

Representation

A.30 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.

SA Response

A.31 Action: Chapter 3 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.

Representation

A.32 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?

SA Response

A.33 Action: Para 5.11 has been updated to outline that there are opportunities for symbiotic relationships between agricultural practices and sewerage treatment, in relation to nutrient discharges to water and sludge management.

Representation

A.34 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.

SA Response

A.35 Noted with thanks, however, this point relates more to the content of the Plan rather than the SA Report.

Representation

A.36 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.

SA Response

A.37 Significant positive effects were identified in the 2021 SA Report for all mineral sites in relation to SA objective 11: Restoration, which could include developing former mineral sites into reservoirs. We acknowledge in the 2021

Appendix A Representations on the Publications Draft Minerals and Waste Local Plan SA Report

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.

Natural Resources Wales

- Representation dated: 24th May 2021 (email)

Representation

A.38 Phosphate Sensitive Catchment – River Wye Special Area of Conservation (SAC): 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 21st January 2021 we issued a planning position statement [See reference 34] 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.

A.39 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 [See reference 35] is taken into consideration in the sustainability appraisal and accompanying Habitats Regulations Assessment and be updated accordingly.

SA Response

A.40 Action: Chapter 3 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'.

Representation

A.41 Landscape: 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.

A.42 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.

A.43 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.

SA Response

A.44 Action: Chapter 3 of this SA Addendum updates the baseline information relating to the landscape. The assessment of site M13 (Black Hill Delve) has been updated in Chapter 4 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.

Appendix B

SA of the Schedule of the Main Modifications (May 2023)

Section 2: Introduction and Background

MM1, paragraph 2.4.2

Modification

B.1 The following strikethrough text was removed and the underlined text was added:

- British Geological Survey was commissioned to prepare comprehensive mapping of the geology and mineral ~~reserves~~ resource across Herefordshire. This information became available in early 2017 and has been used in the sites analysis.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: This Main Modification relates to the evidence base sources that were used to prepare the MWLP which were not previously appraised in the SA and therefore do not need to be appraised as part of this SA process.

Section 3: Context

MM2, paragraph 3.2.2 to 3.2.4

Modification

B.2 The following strikethrough text was removed:

- ~~3.2.2—A detailed review and republication of the Waste Strategy was completed in 2011. This set a suite of principles, policies and targets for the management of municipal waste across both counties. As part of this work, and in line with Government guidance, the authorities committed to review the Strategy at least every 5 years.~~
- ~~3.2.3—An Addendum to the Waste Strategy was prepared in September 2017, to provide a summary of the 2016 review of the Waste Strategy. The Addendum confirms that the authorities continue to invest in the existing processing and collection capabilities, with the example of EnviroSort, the material reclamation facility having been refurbished to include the provision of a glass breaker and improved fire protection system. However, the Addendum also makes clear the challenges that lie ahead in delivering the Strategy, recognising financial constraints and budget cuts.~~
- ~~3.2.4—In 2020/21 the Waste Strategy was reviewed again, to incorporate current national municipal waste management targets. It is to be expected that the Waste Strategy will continue to be updated throughout the lifetime of the MWLP.~~

B.3 The following underlined text was added:

- 3.2.2 In July 2021, Herefordshire Council adopted a new Integrated Waste Management Strategy, which identified 6 targets:

1. Net zero carbon by 2030;

Appendix B SA of the Schedule of the Main Modifications (May 2023)

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

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: This Main Modification relates to Herefordshire Council working together with other local authorities to manage waste. The review of relevant plans and the baseline information detailed in Chapter 3 of this SA Addendum have been revised to refer to the Integrated Waste Management Strategy. As Chapter 3 of the MWLP is simply outlining the context for minerals and waste development in Herefordshire and does not contain any objectives, policies or site allocations, it was not previously appraised in the SA and so it does not need to be appraised as part of this SA process.

MM3, paragraph 3.3.8

Modification

B.4 The following strikethrough text was removed and the underlined text was added:

- The MWLP can enable a steady, adequate and sustainable supply of construction minerals to be delivered through a positive policy approach, identifying specific sites for quarry working and preferred areas of search for mineral working.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: This Main Modification details the relevant policy context for the MWLP which was not previously appraised in the SA and therefore do not need to be appraised as part of this SA process.

MM4, paragraph 3.3.38 (new) (this edit also introduced a new footnote, number 27)

Modification

B.5 The following underlined text was added:

- In April 2021, the council issued ‘Position Statement – Development in the River Lugg Catchment Area, April 2021 An Update²⁷ (River Lugg Catchment Position Statement (April 2021)) that confirmed the River Wye SAC NMP is under review with the intention to provide an increased level of certainty around phosphate reduction and timescales. The River Lugg

Catchment Position Statement (April 2021) 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM4-MM6 relate to phosphate levels in the River Lugg; Natural England's River Lugg Catchment Position Statement; and the requirement for new development with a connection to the River Wye SAC to demonstrate at least nutrient neutrality in order to gain planning permission. The review of relevant plans and the baseline information detailed in Chapter 3 of this SA Addendum have been revised to refer to the Position Statement. As Chapter 3 of the MWLP is simply outlining the context for minerals and waste development in Herefordshire and does not contain any objectives, policies or site allocations, it was not previously appraised in the SA and so it does not need to be appraised as part of this SA process.

MM5, paragraph 3.3.39 (new)

Modification

B.6 The following underlined text was added:

- 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).'

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM3.c-MM3.e relate to phosphate levels in the River Lugg; Natural England's River Lugg Catchment Position Statement; and the requirement for new development with a connection to the River Wye SAC to demonstrate at least nutrient neutrality in order to gain planning permission. The review of relevant plans and the baseline information detailed in Chapter 3 of this SA Addendum have been revised to refer to the Position Statement. As Chapter 3 of the MWLP is simply outlining the context for minerals and waste development in Herefordshire and does not contain any objectives, policies or site allocations, it was not previously appraised in the SA and so it does not need to be appraised as part of this SA process.

MM6, paragraph 3.3.40 (new)

Modification

B.7 The following underlined text was added:

- 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM3.c-MM3.e relate to phosphate levels in the River Lugg; Natural England's River Lugg Catchment Position Statement; and the requirement for new development with a connection to the River

Wye SAC to demonstrate at least nutrient neutrality in order to gain planning permission. The review of relevant plans and the baseline information detailed in Chapter 3 of this SA Addendum have been revised to refer to the Position Statement. As Chapter 3 of the MWLP is simply outlining the context for minerals and waste development in Herefordshire and does not contain any objectives, policies or site allocations, it was not previously appraised in the SA and so it does not need to be appraised as part of this SA process.

Section 4: Vision, Objectives and Spatial Strategy

MM7, Vision

Modification

B.8 The following underlined text was added:

- 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, protecting, conserving and enhancing environmental, heritage and cultural assets and strengthening the local economy.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: This Main Modification will not alter the minor positive effects previously identified for SA objectives 12: Biodiversity & Geodiversity, 13: Landscape, 14: Water, 15: Flooding, and 17: Soil.

MM8, Objective 2

Modification

B.9 The following strikethrough text was removed and the underlined text was added:

- To prioritise the long-term conservation of primary minerals through enabling provision of sustainable alternatives, effective use of mineral ~~reserves~~ resources, and promoting efficient use of minerals in new development.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM9, Objective 3 (new)

Modification

B.10 The following underlined text was added:

- SA Objective 3: To safeguard appropriate mineral and waste resources, and associated transport infrastructure, within Herefordshire.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: Strategic Objective 3: Safeguarding was omitted in error from the Publication Draft MWLP however, it was assessed in the 2021 SA Report.

MM10, Objective 6

Modification

B.11 The following underlined text was added:

- To plan for the steady, adequate and sustainable supply of minerals present within Herefordshire, to contribute to the county's economic growth, development and local distinctiveness and to make a reasonable contribution to the MASS.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM11, Objective 11

Modification

B.12 The following underlined text was added:

- 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 decarbonise, to mitigate and adapt to climate change and to leave a positive legacy.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: This Main Modification reinforces the significant positive effects previously identified for SA objectives 10: Climate Change and 16: Pollution.

MM12, paragraph 4.3.3

Modification

B.13 The following strikethrough text was removed and the underlined text was added:

- Sand and gravel working is to be focussed within the large expanse of ~~reserve~~ resource that wraps around the northern and eastern sides of Hereford and at Shobdon, to the north-west of Hereford. These ~~reserves~~ resources are well located to supply aggregate for the growth proposed in Hereford and having two areas brings resilience to supply.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM12-MM14 replace the word 'reserve' with 'resource'. The minor wording changes do not alter the previously identified findings of the SA.

MM13, paragraph 4.3.4

Modification

B.14 The following strikethrough text was removed and the underlined text was added:

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

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM12-MM14 replace the word ‘reserve’ with ‘resource’. The minor wording changes do not alter the previously identified findings of the SA.

MM14, paragraph 4.3.5

Modification

B.15 The following strikethrough text was removed and the underlined text was added:

- Limestone working will be preferred within the ~~reserves~~ resources located to the north of the county and to the east of Hereford. The two areas provide resilience to supply and provide more local supply potential to the main settlements of Herefordshire.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM12-MM14 replace the word 'reserve' with 'resource'. The minor wording changes do not alter the previously identified findings of the SA.

MM15, paragraph 4.3.6

Modification

B.16 The following strikethrough text was removed:

- No preferred areas ~~of search~~ are identified for sandstone, clay, coal or gas. Sandstone is worked as low-key development in small delves; the potential for harm is limited. There is little evidence to suggest that clay, coal or gas will be exploited over the plan period.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

Section 5: Strategic Policy and General Principles

MM16, paragraph 5.1.8 (new)

Modification

B.17 The following underlined text was added:

- 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, they are referenced within and form a part of each policy within which they are referenced.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM16 clarifies the policy status of the key development criteria which have been assessed individually in the 'SA of the Key Development Criteria: Schedule of Main Modifications (December 2022)' section in Appendix B.

MM17, paragraph 5.3.1 (new sentence)

Modification

B.18 The following underlined text was added:

- 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- 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.

MM18, paragraph 5.4.23

Modification

B.19 The following strikethrough text was removed:

- As recognised in the Core Strategy, green infrastructure is a practical way to consider sustainable development. The preferred areas ~~of search~~ for minerals development and the spatial strategy for waste development reflect the priority areas of the green infrastructure concept map (Green Infrastructure Strategy, Figure 4-3 [See reference 36]). This overlap means that minerals and waste development have a good reference and potential to deliver integrated benefits on site and at a landscape scale.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM19, paragraph 5.5.14

Modification

B.20 The following strikethrough text was removed and the underlined text was added:

- New development requires significant volumes of construction materials; ~~and the facilities provided on site can affect how it performs~~ how it is designed will affect waste generation and management options through its operational lifetime. The planning system has a role to play encouraging the use of secondary or recycled construction materials, ~~and preventing~~ reducing waste generated in construction and redevelopment projects ~~and~~ in ensuring appropriate waste management solutions are provided.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM19-MM23 relate to Policy SP1: Resource Management and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP1, particularly the significant positive effects identified for SA objectives 8: Waste, 9: Mineral Resources, and 10: Climate Change.

MM20, paragraph 5.5.15 (new)

Modification

B.21 The following underlined text was added:

- Herefordshire Council will encourage waste prevention by:

- a. promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest value for as long as possible;
- b. maintaining engagement with businesses, community groups, and the general public to raise levels of awareness and understanding of waste issues;
- c. working in partnership with other public bodies to ensure that waste prevention and the circular economy is addressed in all contracts for works and services; and
- d. leading by example in its activities.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM19-MM23 relate to Policy SP1: Resource Management and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP1, particularly the significant positive effects identified for SA objectives 8: Waste, 9: Mineral Resources, and 10: Climate Change.

MM21, paragraph 5.5.15

Modification

B.22 The following underlined text was added:

- Any application for major development, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as may be amended) that includes built development, will be required to be accompanied by a comprehensive Resource Audit addressing all the matters set out in policy SP1. A proportionate approach will be applied to all other development proposals that include built

development, which should at least provide commentary on waste prevention and management measures to be implemented. All submitted applications should make reference to the national and local zero-carbon plans in place at the time in order to inform best practice measures that can be incorporated into the proposed development.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM19-MM23 relate to Policy SP1: Resource Management and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP1, particularly the significant positive effects identified for SA objectives 8: Waste, 9: Mineral Resources, and 10: Climate Change.

MM22, paragraph 5.5.17

Modification

B.23 The following strikethrough text was removed:

- Such documents are expected to have an increasing role demonstrating how new development is delivered and managed in a sustainable manner, explicitly setting out: how the use of raw materials will be minimised; how waste created can be reused, with priority given to the reuse of materials on site; how the development will contribute to achieving local and national carbon reduction targets; and how the long term management of the development will contribute to delivering the circular economy. ~~Smaller applications, accompanied by Design and Access Statements, should include commentary on waste prevention and management measures. All submitted applications should make reference to the national and local zero-carbon plans in place at the time in order to inform best practice measures that can be incorporated into the proposed development.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM19-MM23 relate to Policy SP1: Resource Management and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP1, particularly the significant positive effects identified for SA objectives 8: Waste, 9: Mineral Resources, and 10: Climate Change.

MM23, Policy SP1

Modification

B.24 The following strikethrough text was removed and the underlined text was added:

- 1. Development proposals will be supported that contribute positively to addressing climate change and delivering the circular economy where they adopt through adopting sustainable design principles, construction methods and procurement policies. This includes using the minimal amount minimum quantity 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. The level of contribution made will be demonstrated through submission of a
- ~~The use of minerals and waste resources will be directed to contribute positively to addressing climate change through:~~
- ~~Herefordshire Council encouraging waste prevention by:~~
- ~~promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest value for as long as possible;~~

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- ~~maintaining engagement with businesses, community groups, and the general public to raise levels of awareness and understanding of waste issues;~~
- ~~working in partnership with other public bodies to ensure that waste prevention and the circular economy is addressed in all contracts for works and services; and leading by example in its activities.~~
- ~~2. requiring submission of 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; and
 - ~~The Resource Audit will set out~~ how waste will be minimised and how it will be managed, both during the construction phase and once it is in use, in order to meet the strategic objective of driving waste management up the waste hierarchy.
- ~~Information appropriate to the planning application shall be provided on the following matters:~~
- 2. The Resource Audit, to be submitted with the planning application, should address the following matters using an approach proportionate to the development proposed:
 - a. the amount and type of construction aggregates required and their likely source;
 - b. the steps to be taken to minimise the use of raw materials (including hazardous materials) in the construction phase, through sustainable design and the use of recycled or reprocessed materials;
 - c. the steps to be taken to reduce, re-use and recycle waste (including hazardous wastes) that is produced through the construction phase;
 - d. the type and volume of waste that the development will generate (both through the construction and operational phases);
 - e. on-site waste recycling facilities to be provided (both through the construction and operational phases);

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- f. the steps to be taken to ensure the maximum diversion of waste from landfill (through recycling, composting and recovery) once the development is operational;
- g. end of life considerations for the materials used in the development; and
- h. embodied carbon and lifecycle carbon costs for the materials used in the development.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM19-MM23 relate to Policy SP1: Resource Management and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP1, particularly the significant positive effects identified for SA objectives 8: Waste, 9: Mineral Resources, and 10: Climate Change.

MM24, paragraph 5.6.7 and 5.6.8

Modification

B.25 The following strikethrough text was removed and the underlined text was added:

- 5.6.7 Footpaths are rooted in their local context ~~an historical and landscape context~~. A permanent diversion may sever important cultural links, but also brings the opportunity to improve a route that has been adversely affected, for example by flooding or a changed view. Permanent diversions should be well designed, reflecting the local cultural, historic and landscape context, to result in an enhancement to the rights of way network within Herefordshire. Enhancement can be achieved through improvements to the view from, surface of and/or route of the right of way, including making provision for disabled people. Improving access to open

spaces includes the enhancement to existing facilities and provision of new routes and open spaces.

- 5.6.8 Any ~~closure of~~ permanent impact on the right of way network, or existing open space, should be avoided. Where it is necessary, the council will expect compensatory provision to be made proportionate to the ~~scale of the closure~~ level of impact. This can include the provision of new or improved access or recreation facilities located off site. The council is clear that development should have the smallest impact as practicable and enhancement will be sought at every reasonable opportunity.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM24 and MM25 relate to Policy SP2: Access to open space and recreation from minerals and waste development and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP2, particularly the positive effects identified for SA objectives 3: Health and 5: Sustainable Transport.

MM25, Policy SP2

Modification

B.26 The following strikethrough text was removed and the underlined text was added:

- 1. Planning permission will be ~~granted~~ supported for mineral and waste development proposals that optimise opportunities to improve public access to open spaces, ~~integrating historic context~~ taking account of the local context and integrating green infrastructure as appropriate.
- 2. Development that affects a right of way ~~or existing open space~~ will only be supported where it is demonstrated that:

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- a. any temporary diversion is designed to be for as short a distance and duration as practicable; and
- b. any permanent diversion is designed to achieve an enhanced route over that which was previously available.; ~~and~~
- ~~c. any closure occurs only in exceptional circumstances and compensatory provision is made.~~
- 3. Development that affects an area of open space will only be supported where it is demonstrated that:
 - a. any temporary impact is over the smallest area and for the shortest duration as practicable; and
 - b. any permanent impact occurs only in exceptional circumstances and compensatory provision is made.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM24 and MM25 relate to Policy SP2: Access to open space and recreation from minerals and waste development and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP2, particularly the positive effects identified for SA objectives 3: Health and 5: Sustainable Transport.

MM26, paragraph 5.7.13

Modification

B.27 The following strikethrough text was removed and the underlined text was added:

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Coal has historically been worked in Herefordshire, in the far south of the county with the ~~reserve~~ resource largely contained within the Forest of Dean.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM27, paragraph 5.10.6

Modification

B.28 The following strikethrough text was removed and the underlined text was added:

- Each site will have different spatial influences on transport design, requirements for the material to be moved, and receptors. An assessment should be undertaken to demonstrate that all relevant factors have been considered, with the level of detail within that assessment proportionate to the scale of development proposed. Development proposals should consider which transport mode (i.e. vehicular, conveyor, or pipeline) and route is most appropriate, minimising adverse impacts and finding the balance between practicability, energy and carbon efficiency, ~~reduced impacts~~, integrated design and safety.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM27 and MM28 relate to Policy SP3: Transport within sites and its supporting text. The Main Modifications

reinforce the positive effects identified for Policy SP2, particularly the significant positive effect identified for SA objective 5: Sustainable Transport and the minor positive effects for SA objectives 12: Biodiversity and Geodiversity, 13: Landscape, 14: Water, and 16: Pollution.

MM28, Policy SP3

Modification

B.29 The following strikethrough text was removed and the underlined text was added:

- Planning permission will be ~~granted~~ supported for minerals or waste development where it is demonstrated that the arrangements for the transport of mineral, waste or other materials within the site minimises the potential for adverse impacts, including greenhouse gas emissions, and optimises the opportunities for green infrastructure, for example the use of conveyors, and/or pipelines and/or ~~is required where they would be appropriate to the circumstances of the site and the nature of the material to be moved. Electric powered vehicles. would be considered an appropriate alternative to fossil fuel powered vehicles.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM27 and MM28 relate to Policy SP3: Transport within sites and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP2, particularly the significant positive effect identified for SA objective 5: Sustainable Transport and the minor positive effects for SA objectives 12: Biodiversity and Geodiversity, 13: Landscape, 14: Water, and 16: Pollution.

MM29, paragraph 5.11.5

Modification

B.30 The following underlined text was added:

- All new mineral workings are only likely to receive planning permission where they provide for the restoration and aftercare of the site to a beneficial use, in a phased manner. The Town and Country Planning Act (as amended) gives the council, as the mineral planning authority, the ability to apply a restoration condition requiring such steps to be taken as may be necessary to bring the land to the required standard for use for agriculture, forestry or amenity. However, reclamation provides the opportunity for delivering a range of benefits to the environment and/or amenity and the council will welcome well-considered schemes that will deliver green infrastructure priorities on a landscape scale. The term 'landscape scale benefits' in policy SP4 is not focussed on the size of the benefits to be derived from the proposed reclamation scheme, but to the extent of the impact to be gained; i.e. that the proposals will incorporate the local cultural, historic and landscape features, re-integrating the site into the wider landscape to deliver benefits beyond the site area. A number of examples have been provided throughout the MWLP.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM29-MM31 relate to Policy SP4: Site Reclamation and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP4, particularly the significant positive effect identified for SA objective 11: Restoration and the minor positive effects for SA objectives 6: Historic Environment, 7: Built Environment, and 13: Landscape.

MM30, paragraph 5.11.10

Modification

B.31 The following strikethrough text was removed and the underlined text was added:

- In all cases a high standard of reclamation will be expected, that ~~integrates historic context~~ reflects the local cultural, historic and landscape context and integrates green infrastructure, ~~and leaves~~ leaving a positive legacy. Defra's Guidance for Successful Reclamation of Mineral and Waste Sites is a useful reference document for designing reclamation schemes. Long-term management beyond the statutory five-year aftercare period will be required where appropriate, for example to establish a new habitat or to bring community benefit. Commitment for such provision will be gained through a planning obligation, as set out in Core Strategy policy ID1.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM29-MM31 relate to Policy SP4: Site Reclamation and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP4, particularly the significant positive effect identified for SA objective 11: Restoration and the minor positive effects for SA objectives 6: Historic Environment, 7: Built Environment, and 13: Landscape.

MM31, Policy SP4a&b

Modification

B.32 The following underlined text was added:

- a. proposals that take account of the geography of the site, its surroundings, and any significant permitted or proposed development and development plan policies relevant to the area;
- b. proposals that deliver landscape scale benefits ~~and/or integrated historic context~~ taking account of the local context and integrating green infrastructure appropriate to its location;

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM29-MM31 relate to Policy SP4: Site Reclamation and its supporting text. The Main Modifications reinforce the positive effects identified for Policy SP4, particularly the significant positive effect identified for SA objective 11: Restoration and the minor positive effects for SA objectives 6: Historic Environment, 7: Built Environment, and 13: Landscape.

Section 6: Minerals

MM32, paragraph 6.1.8

Modification

B.33 The following strikethrough text was removed and the underlined text was added:

- Because mineral resources may be substantial, it is possible for more than one quarry to operate within a single ~~reserve~~ area of resource, either through extensions or new quarries opening up in the vicinity of an existing site.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM33, paragraph 6.1.9

Modification

B.34 The following strikethrough text was removed and the underlined text was added:

- Figure 7 ~~sets out~~ (at Annex A, with key policy details included in the interactive mapping available on the Herefordshire Council website) presents the mineral ~~reserve~~ resource and key elements of infrastructure

safeguarded by ~~policy~~ policies M1 and M2. ~~Policy M2 provides further detail.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- This Main Modification relates to Figure 7 which was not previously appraised in the SA and so it does not need to be appraised as part of this SA process (however, the mineral resource and key elements of infrastructure safeguarded by policies M1 and M2 as illustrated in Figure 7 have been appraised elsewhere in the SA).

MM34, Policy M1c and d

Modification

B.35 The following strikethrough text was removed and the underlined text was added:

- c. ~~allocating preferred areas and sites~~ allocation of the Specific Sites and Preferred Areas that are considered appropriate in principle for construction minerals development;
- d. restricting the extraction of hydrocarbons to within either the Surface Coal Resource areas or PEDL block SO51a (as appropriate to the mineral) and requiring compelling reasons to demonstrate that the use of any hydrocarbon is necessary, acceptable and provides national, local or community benefits which clearly outweigh the likely impacts, including to protected areas and local communities ~~and the greenhouse gas emissions associated with both the extraction and use of hydrocarbons;~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modifications do not alter the previously identified mixed effect (minor positive / minor negative) for SA objective 10: Climate Change.

MM35, paragraph 6.1.12 (this edit also introduced a new footnote, number 45)

Modification

B.36 The following strikethrough text was removed and the underlined text was added:

- Figure 7 presents the Minerals Safeguarding Areas for Herefordshire, incorporating: areas of ~~reserve~~ resource indicated by the British Geological Survey data; surface coal resource areas from the Coal Authority; currently ~~consented~~ permitted quarries and their associated infrastructure; the operating ~~rail head~~ railhead at Moreton-on-Lugg; and the disused railhead at Moreton Business Park. ~~Figure 7 is available in its original A3 format at Annex A, with key policy details included in the interactive mapping available on the Herefordshire Council website.~~ Limited sandstone resource is shown on Figure 7, although this is not where any of the delves are located. The Minerals Safeguarding Areas include 250m buffers, to provide effective safeguarding for the resource and associated infrastructure. Policy M2 applies across the totality of the Minerals Safeguarding Areas as shown. Detailed information about the geology in Herefordshire can be gained from Geology Viewer, hosted by the British Geological Survey⁴⁵.
- New footnote, number 45: <https://geologyviewer.bgs.ac.uk/>

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM35-MM36 relate to Figure 7 which was not previously appraised in the SA and so it does not need to be appraised as part of this SA process (however, the mineral resource and key elements of infrastructure safeguarded by policies M1 and M2 as illustrated in Figure 7 have been appraised elsewhere in the SA).

MM36, Figure 7

Modification

B.37 The following strikethrough text was removed and the underlined text was added:

- Mineral Reserves Resources

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM35-MM36 relate to Figure 7 which was not previously appraised in the SA and so it does not need to be appraised as part of this SA process (however, the mineral resource and key elements of infrastructure safeguarded by policies M1 and M2 as illustrated in Figure 7 have been appraised elsewhere in the SA).

MM37, paragraph 6.1.14 to 6.1.16 (new)

Modification

B.38 The following underlined text was added:

- 6.1.14 The National Planning Policy Framework makes clear that local policy should also safeguard sites for infrastructure associated with mineral working. Within Herefordshire, these facilities are substantially located within operational mineral workings, and this is an approach that is expected to continue at appropriate sites. The two railheads are identified and safeguarded by policy M2 as they provide existing and potential alternatives to road movements.
- 6.1.15 Strategic development (policy M2(1,d)) is that which is either allocated in the local development plan or would constitute major development as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as may be amended). Exempt developments (policy M2(1,e) are:
 - a. applications for householder development;
 - b. applications for alterations and extensions to existing buildings and for change of use of existing development, unless intensifying activity on site;
 - c. applications for advertisement consent, for works to trees and for prior notifications (telecoms, forestry, agriculture, demolition);
 - d. any other development specified in the local development plan as exempt from the need for consideration on safeguarding grounds.
- 6.1.16 During the period 2020-2022 around half of all planning applications received in Herefordshire would have fallen within the Mineral Safeguarding Area. When applying the above criteria, around a quarter of all applications would have had to demonstrate how they would have protected the mineral resource and complied with Policy M2.

B.39 Paragraphs 6.1.14 to 6.1.16 would be renumbered accordingly.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- Change to SA findings: MM37-MM38 relate to Policy M2: Safeguarding of mineral resources and associated infrastructure from sterilisation or significant adverse effects, and its supporting text. The Main Modifications 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 and where it would not prejudice the operation of associated infrastructure, principally the railheads. The previously identified minor positive effects for SA objectives 1: Employment and 2: Economy remain valid. However, the previously identified minor negative effect for SA objective 5: Sustainable Transport, is revised to a minor positive effect as the policy will only support non-mineral development where it will not prejudice the operation of mineral infrastructure, principally the railheads used for the transportation of minerals. The clarifications provided in paragraphs 6.1.15 and 6.1.16 do not alter the previously identified SA effects.

MM38, Policy M2

Modification

B.40 The following underlined text was added:

- 1. Within the minerals safeguarding areas, non-minerals development will only be supported in the following circumstances:
 - a. 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

Appendix B SA of the Schedule of the Main Modifications (May 2023)

extracted in an economically viable alternative way; does not exist; or has been sufficiently depleted by previous extraction; or

- b. the mineral can be extracted satisfactorily prior to non-minerals development without materially affecting the timing and viability of the non-minerals development; or
 - c. the non-minerals development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction or operation of the associated infrastructure within the timescale that the mineral is likely to be needed; or
 - d. the need for the non-mineral development is strategic and can be demonstrated to outweigh the need for the mineral resource and associated infrastructure; or
 - e. it constitutes exempt development (see paragraph 6.1.15); and
 - f. the development would not prejudice the operation of associated infrastructure, principally the identified railheads.
- Where the operation of an existing mineral working, including associated infrastructure, 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- Change to SA findings: MM37-MM38 relate to Policy M2: Safeguarding of mineral resources and associated infrastructure from sterilisation or significant adverse effects, and its support text. The Main Modifications 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 and where it would not prejudice the operation of associated infrastructure, principally the railheads. The previously identified minor positive effects for SA objectives 1: Employment and 2: Economy remain valid. However, the previously

identified minor negative effect for SA objective 5: Sustainable Transport, is revised to a minor positive effect as the policy will only support non-mineral development where it will not prejudice the operation of mineral infrastructure, principally the railheads used for the transportation of minerals.

MM39, paragraph 6.2.2 to 6.2.6

Modification

B.41 The following strikethrough text was removed and the underlined text was added:

- 6.2.2 The MNA ~~2019~~ 2021 forecasts a range of future sand and gravel demand, indicating that the landbank at 2041 could be less than 7 years, particularly if a level of self-sufficiency is to be achieved. ~~Data released by the British Geological Survey for year 2014, indicates that Herefordshire was 40% to 50% self-sufficient in sand and gravel provision. This data is not verified, but provides the most comprehensive indication of mineral movements currently available. In addition, at the time of preparing the MWLP, the two operational quarries Wellington and Upper Lyde are subject to planning conditions requiring that the winning and working of minerals must cease by 31 December 2026 and 30 September 2029 respectively.~~
- 6.2.3 ~~It would be advantageous for Herefordshire to increase its level of self-sufficiency (not least to reduce the environmental burdens from transport) and to make a reasonable contribution to the Managed Aggregate Supply System. Data released by the British Geological Survey for year 2014, indicates that Herefordshire was 40% to 50% self-sufficient in sand and gravel provision. This data is not verified, but provides the most comprehensive indication of mineral movements currently available. It would be advantageous for Herefordshire to increase its level of self-sufficiency (not least to reduce the environmental burdens from transport)~~

and to make a reasonable contribution to the Managed Aggregate Supply System ('MASS').

- 6.2.4 ~~In addition, at the time of preparing the MWLP, the two operational quarries Wellington and Upper Lyde are subject to planning conditions requiring that the winning and working of minerals must cease by 31 December 2026 and 30 September 2029 respectively. Therefore, regardless of which forecast most closely represents the real outcome for sand and gravel over the lifetime of the Draft MWLP, there will be a need for additional reserves of sand and gravel to be consented to meet demand from 2027 onwards. The MNA 2021 considered a range of forecasts, addressing economic, population and housing growth and infrastructure demands, which resulted in a very wide range of future demand of 4 to 13 million tonnes when assuming 100% self-sufficiency. These forecasts were further tested through the MNA Sensitivity Paper, which resulted in very much less future demand. The provision of 5 million tonnes, as sought through policy M3, is considered to reflect a higher level of forecast that will increase self-sufficiency and enable Herefordshire to make a reasonable contribution to the MASS.~~
- 6.2.5 ~~To ensure that an adequate supply (i.e. to maintain a landbank of at least 7 years) is available at the end of 2041 additional resource may be needed, depending on the actual scale of demand that arises.~~ Recognising the level of uncertainty in forecasts, it can be reasonably expected that the demand forecast for sand and gravel may change over the plan period. Therefore, it is not considered appropriate to specify the precise level of further provision that may be needed in order to maintain a minimum 7-year landbank at 31 December 2041. This is a matter that is effectively and appropriately addressed by monitoring the MWLP, through annual reviews of the Local Aggregates Assessment and the five-year MWLP reviews, at which time the level of additional provision can be considered, with additional site allocations brought forward if necessary.
- 6.2.6 Recognising the advantages of working an area efficiently, specific sites for future sand and gravel extraction are allocated adjacent or near to existing sites with planning permission to be worked. Sand and gravel reserves at Upper Lyde (c.700,000 tonnes), Shobdon and Wellington (2.25 million tonnes) are allocated in the MWLP. ~~The MWLP~~

~~evidence base indicates that these allocations would provide a minimum of nearly 3 million tonnes of sand and gravel resource.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification details the updated evidence base for the future demand for sand and gravel as presented in the most recent Mineral Needs Assessment which does not alter the previously identified SA findings.

MM40, paragraph 6.2.7 and 6.2.8

Modification

B.42 The following strikethrough text was removed and the underlined text was added:

- 6.2.7 In addition, policy M3 identifies preferred areas for sand and gravel working; new operations in these areas ~~of search~~ would add to the robustness of sand and gravel supply within Herefordshire. Sand and gravel working is to be focussed within the large expanse of ~~reserve~~ resource that wraps around the northern and eastern sides of Hereford and at Shobdon, to the north-west of Hereford.
- 6.2.8 Only where the preferred locations Specific Sites or Preferred Areas cannot be demonstrated to fulfil a reasonable level of demand, will proposals for sand and gravel extraction outside of these areas be permitted. Policy ~~M3/2~~ M3(2c) is deliberately worded to refer only to extraction. Mineral working outside Specific Sites and Preferred Areas is intended to be limited in its operation and consequently, in order to reduce the potential for adverse impacts, it is intended that mineral will be expected to be transported off-site for processing.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording changes detailed in this Main Modification do not alter the previously identified findings of the SA.
- Uncertain significant negative effects are expected for all Preferred Areas for SA objective 3: Health as, depending on the location of the sites, there is potential for adverse effects on health and residential amenity from the extraction of minerals. The clarification that mineral workings in these areas will be limited in their operations and mineral processing will be undertaken off-site, will help mitigate adverse effects, however, the significance of the adverse effect remains unchanged.

MM41, paragraph 6.2.9

Modification

B.43 The following strikethrough text was removed and the underlined text was added:

- ~~In addition to~~ 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. There is no key development criteria for the preferred areas of search; they are too extensive. However, this does not mean that development proposals within these areas will not be subject to the same level of scrutiny.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording changes detailed in this Main Modification do not alter the previously identified findings of the SA.

MM42, paragraph 6.2.10 (new)

Modification

B.44 The following underlined text was added:

- Whilst minerals development is not recognised as a key contributor of additional nutrient load, policy requires nutrient neutrality to be demonstrated for development proposals located within the River Wye SAC or River Clun SAC catchments. This may be demonstrated through the absence of a pathway or through the use of mitigation techniques such as: best practice soil stripping and storage; sediment storage; the use of riparian buffer habitats; and/or coppice plantations.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: Uncertain mixed effects (minor negative / minor positive) are expected for SA objective 12: Biodiversity and Geodiversity from the continued operation of existing quarries and the future extraction at either the specific sites or within the Preferred Areas. The requirement for mineral developments within the River Wye SAC or River Clun SAC catchments to demonstrate at least nutrient neutrality reinforces the positive effect previously identified as part of the overall mixed effect for SA objective 12: Biodiversity and Geodiversity for Policy M3.

MM43, paragraph 6.2.10

Modification

B.45 The following strikethrough text was removed and the underlined text was added:

- The order of preference set out at policy ~~M3/2~~ M3(2a&b) is for the Specific Sites to be ~~preferred over~~ worked prior to the Preferred Areas; there is no order of preference within the locations identified under each of those categories. Planning permission will not be supported for proposals that do not respect the order of preference.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The clarification regarding the order of preference for the working of sites does not alter the previously identified SA findings.

MM44, Policy M3,2 and M3,3

Modification

B.46 The following strikethrough text was removed and the underlined text was added:

- 2. In order of preference, sand and gravel extraction shall be supported at the following locations:
 - a. Specific Sites (presented in alphabetical order) subject to the key development criteria set out at section 9:

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Shobdon Quarry;
- Upper Lyde Quarry (c.700,000 tonnes);
- Wellington Quarry (2.25 million tonnes).
- b. Preferred Areas of Search:
- Area B of the Key Diagram;
- Area C of the Key Diagram.
- c. ~~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 ~~will~~ be supported in any other area of ~~reserve~~ resource.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording changes do not alter the previously identified findings of the SA.

MM45, paragraph 6.2.11 to 6.2.15

Modification

B.47 The following strikethrough text was removed and the underlined text was added:

- 6.2.11 The MNA ~~2019~~ 2021 makes two forecasts of future crushed rock demand, indicating that the landbank at 2041 could be less than 10 years, particularly if a level of self-sufficiency is to be achieved. ~~Data released by the British Geological Survey for year 2014, indicates that Herefordshire was 20% to 30% self-sufficient in crushed rock provision. This data is not~~

~~verified, but provides the most comprehensive indication of mineral movements currently available.~~ In addition, at the time of preparing the MWLP, there are two active operational crushed rock quarries in Herefordshire, with the planning conditions for Leinthall Quarry requiring that the winning and working of minerals at that site must cease by 31 August 2027.

- 6.2.12 Data released by the British Geological Survey for year 2014, indicates that Herefordshire was 20% to 30% self-sufficient in crushed rock provision. This data is not verified, but provides the most comprehensive indication of mineral movements currently available. It would be advantageous for Herefordshire to increase its level of self-sufficiency (not least to reduce the environmental burdens from transport) and to make a reasonable contribution to the ~~Managed Aggregate Supply System~~ MASS.
- 6.2.13 ~~In addition, at the time of preparing the MWLP, there were two active crushed rock quarries in Herefordshire, with the planning conditions for Leinthall Quarry requiring that the winning and working of minerals at that site must cease by 31 August 2027. There may remain a need for additional reserves of crushed rock to be consented to meet demand from 2027 onwards.~~ The MNA 2021 considered two forecasts, addressing population and housing growth, which resulted in a very wide range of future demand of 9.5 to 19 million tonnes when assuming 100% self-sufficiency. These forecasts were further tested through the MNA Sensitivity Paper, which resulted in very much less future demand. The provision of 9 million tonnes, as sought through policy M4, is considered to reflect a higher level of forecast that will increase self-sufficiency and enable Herefordshire to make a reasonable contribution to the MASS.
- 6.2.14 ~~To ensure that an adequate supply (i.e. to maintain a landbank of at least 7 years) is available at the end of 2041 additional resource may be needed, depending on the actual scale of demand that arises.~~ Recognising the level of uncertainty in forecasts, it can be reasonably expected that the demand forecast for crushed rock may change over the plan period. Therefore, it is not considered appropriate to specify the precise level of further provision that may be needed in order to maintain a minimum 10 year landbank at 31 December 2041. This is a matter that is

effectively and appropriately addressed by monitoring the MWLP, through annual reviews of the Local Aggregates Assessment and the five-year MWLP reviews, at which time the level of additional provision can be considered, with additional site allocations brought forward if necessary.

- 6.2.15 Recognising the advantages of working an area efficiently, specific sites for future crushed rock extraction are allocated adjacent or near to existing sites with planning permission to be worked. Crushed rock reserves at Leinthall Quarry (7 million tonnes) and Perton Quarry are allocated in the MWLP. ~~The MWLP evidence base indicates that these allocations would provide around 9 million tonnes of crushed rock.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification details the updated evidence base for the future demand for crushed rock as presented in the most recent Mineral Needs Assessment which does not alter the previously identified SA findings.

MM46, paragraph 6.2.16 and 6.2.17

Modification

B.48 The following strikethrough text was removed and the underlined text was added:

- 6.2.16 In addition, policy M4 identifies preferred areas for limestone working, new operations in these areas ~~of search~~ would add to the robustness of crushed rock supply within Herefordshire. Limestone working will be preferred within the ~~reserve~~ resource located to the north of the county and to the east of Hereford. Mineral working should not take place within the Wye Valley Area of Outstanding Natural Beauty.

- 6.2.17 Only where the ~~preferred locations~~ Specific Sites or Preferred Areas cannot be demonstrated to fulfil a reasonable level of demand, will proposals for limestone extraction outside of these areas be permitted. Policy ~~M4/2~~ M4(2c) is deliberately worded to refer only to extraction. Mineral working outside Specific Sites and Preferred Areas is intended to be limited in its operation and consequently, in order to reduce the potential for adverse impacts, it is intended that mineral would ~~would~~ will be expected to be transported off-site for processing.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording changes detailed in this Main Modification do not alter the previously identified findings of the SA.
- Uncertain significant negative effects are expected for all Preferred Areas for SA objective 3: Health as, depending on the location of the sites, there is potential for adverse effects on health and residential amenity from the extraction of minerals. The clarification that mineral workings in these areas will be limited in their operations and mineral processing will be undertaken off-site, will help mitigate adverse effects, however, the significance of the adverse effect remains unchanged.

MM47, paragraph 6.2.20 (new)

Modification

B.49 The following underlined text was added:

- Whilst minerals development is not recognised as a key contributor of additional nutrient load, policy requires nutrient neutrality to be demonstrated for development proposals located within the River Wye SAC or River Clun SAC catchments. This may be demonstrated through the absence of a pathway or through the use of mitigation techniques such

as: best practice soil stripping and storage; sediment storage; the use of riparian buffer habitats; and/or coppice plantations.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: Uncertain mixed effects (minor negative / minor positive) are expected for SA objective 12: Biodiversity and Geodiversity from the continued operation of existing quarries and the future extraction at either the specific sites or within the Preferred Areas. The requirement for mineral developments within the River Wye SAC or River Clun SAC catchments to demonstrate at least nutrient neutrality reinforces the positive effect previously identified as part of the overall mixed effect for SA objective 12: Biodiversity and Geodiversity for Policy M4.

MM48, paragraph 6.2.19

Modification

B.50 The following strikethrough text was removed and the underlined text was added:

- The order of preference set out at policy M4(2a&b) is for the Specific Sites to be ~~preferred over~~ worked prior to the Preferred Areas; there is no order of preference within the locations identified under each of those categories. Planning permission will not be supported for proposals that do not respect the order of preference.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The clarification regarding the order of preference for the working of sites does not alter the previously identified SA findings.

MM49, Policy M4,2 and M4,3

Modification

B.51 The following strikethrough text was removed and the underlined text was added:

- 2. In order of preference, crushed rock extraction shall be supported at the following locations:
 - a. Specific Sites (presented in alphabetical order) subject to the key development criteria set out at section 9:
 - Leinthall Quarry (7 million tonnes);
 - Perton Quarry;
 - b. Preferred Areas ~~of Search~~:
 - Area A of the Key Diagram;
 - Area D of the Key Diagram.
 - c. ~~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 limestone extraction ~~will~~ be supported in any other area of ~~reserve~~ resource.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording changes do not alter the previously identified findings of the SA.

MM50, paragraph 6.3.5

Modification

B.52 The following strikethrough text was removed and the underlined text was added:

- New sites ~~might~~ may be appropriate where ~~the building stone is important to ensure the preservation of local distinctiveness,~~ the proposed workings ~~are small-scale~~ (reflecting the historic pattern of sandstone extraction in Herefordshire) and the proposal is limited to the production of non-aggregate materials (principally building stone, dimension stone and roof tiles). Any overburden (the soil and rock layers overlying the sandstone) and spoil (the offcuts and residues remaining from working the building stone) shall be retained on site and used for its reclamation.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM51, paragraph 6.3.6 (new)

Modification

B.53 The following underlined text was added:

- Whilst minerals development is not recognised as a key contributor of additional nutrient load, policy requires nutrient neutrality to be demonstrated for development proposals located within the River Wye SAC or River Clun SAC catchments. This may be demonstrated through the absence of a pathway or through the use of mitigation techniques such as: best practice soil stripping and storage; sediment storage; the use of riparian buffer habitats; and/or coppice plantations.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: Uncertain mixed effects (minor negative / minor positive) are expected for SA objective 12: Biodiversity and Geodiversity from the continued operation of existing delves, the development of new delves as extensions, the deepening at specific sites, or at other appropriate locations, including micro-scale extractions. The requirement for mineral developments within the River Wye SAC or River Clun SAC catchments to demonstrate at least nutrient neutrality reinforces the positive effect previously identified as part of the overall mixed effect for SA objective 12: Biodiversity and Geodiversity for Policy M5.

MM52, paragraph 6.3.7

Modification

B.54 The following strikethrough text was removed and the underlined text was added:

- ~~In addition to~~ 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM53, Policy M5(1,a&b)

Modification

B.55 The following strikethrough text was removed and the underlined text was added:

- a. the extension of time for completion of extraction at ~~consented~~ the following permitted sandstone extraction sites, subject to the key development criteria set out at section 9:
 - Black Hill Delve;
 - Callow Delve;

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Llandraw Delve;
 - Pennsylvania Delves;
 - Sunnybank Delve; and
 - Westonhill Wood Delves.
- b. the lateral extension and/or deepening of workings at the following ~~consented~~ permitted sandstone extraction sites, subject to the key development criteria set out at section 9:

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM53 – MM54 relate to Policy M5. The minor wording changes and the reference to the KDC do not alter the previously identified findings of the SA.

MM54, Policy M5,2

Modification

B.56 The following strikethrough text was removed and the underlined text was added:

- 2. The working of sandstone at the above locations will be supported where:
 - a. the need for the material for the preservation of local distinctiveness, particularly features of local historic or architectural interest, listed and vernacular buildings or archaeological sites, outweighs any material harm extraction might cause to matters of acknowledged importance; and
 - ~~b. the proposed workings are small scale; and~~

- ~~b.~~ the proposal is limited to the production of non-aggregate materials, with any overburden and spoils retained on-site and used for its reclamation.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM53 – MM54 relate to Policy M5. The minor wording changes and the reference to the KDC do not alter the previously identified findings of the SA.

Section 7: Waste

MM55, paragraph 7.2.3

Modification

B.57 The following strikethrough text was removed and the underlined text was added:

- A flexible approach to the provision of waste management infrastructure is set out within the MWLP. This is deliberate, recognising both the lack of certainty that exists around forecasting future wastes and infrastructure demand, and that the provision of waste management infrastructure is market led and unlikely to result in the provision of too much capacity. Table 2 presents the maximum forecast capacity demand for each waste stream (as calculated in the WNA 2021). If food waste collection is provided across Herefordshire, this is considered likely to require additional capacity of some 10,000 tonnes. There does appear to be available capacity at recycling facilities particularly for LACW, consequently an additional 50,000 tonnes of capacity (as a minimum) is sought through policy W2, focussing on moving C&I wastes up the

hierarchy. The largest need for new capacity is in the recovery of residual wastes (c.110,000 tonnes) and CD&E wastes (c.250,000 tonnes). This number is referenced in policy W4 (generally rounded up) to provide Policy W4 presents a framework for delivery over the plan period; for all management routes except disposal,; this is a one-off requirement. A waste treatment facility providing 25,000tpa of capacity will be able to do this year on year, under standard operating procedures. However, a landfill void will be filled up every time a deposit is made, consequently an annual, or cumulative, tonnage is required.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification provides context for the data presented in Table 2 which does not alter the previously identified findings of the SA.

MM56, paragraph 7.2.6

Modification

B.58 The following underlined text was added:

- For CD&E wastes it has been assumed that a recovery rate of 90% will be achieved, which exceeds current policy expectations and would deliver management that aligns to the best practice currently found across England. Whilst higher rates of recovery are to be welcomed, it is also important to make provision for a reasonable level of disposal capacity, recognising that some wastes may not be recoverable and former mineral workings can be beneficially reclaimed. Recovery of CD&E wastes is used to refer collectively to re-use, recycling and other recovery operations.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification clarifies that the term CD&E collectively refers to re-use, recycling and other recovery operations which does not alter the previously identified findings of the SA.

MM57, Policy W2

Modification

B.59 The following strikethrough text was removed and the underlined text was added:

- Development for the following waste management priorities will be supported:
- 3. biological treatment of household waste of at least 10,000 tonnes per annum;
- 4. recycling capacity of municipal, commercial and industrial and non-natural agricultural wastes of at least 50,000 tonnes per annum;
- 5. recovery of materials and energy from municipal, commercial and industrial, non-natural agricultural and hazardous wastes of at least 110,000 tonnes per annum;
- 6. recovery of materials from construction and demolition waste of at least 250,000 tonnes per annum; and
- 7. ~~disposal of inert wastes providing a cumulative void~~ inert waste disposal capacity in the order of 30,000 tonnes per ~~year~~ annum.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The clarification that the tonnage presented in Policy W2 relates to each year does not alter the previously identified findings of the SA.

MM58, paragraph 7.2.16

Modification

B.60 The following strikethrough text was removed:

- ~~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:~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The deleted text does not alter the previously identified findings of the SA.

MM59, paragraph 7.2.17

Modification

B.61 The following strikethrough text was removed:

- ~~‘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.’~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The deleted text does not alter the previously identified findings of the SA.

MM60, paragraph 7.2.26 (new) (this edit also introduced a new footnote, number 50) and paragraph 7.2.27 (new) (this edit also introduced a new footnote, number 51)

Modification

B.62 The following underlined text was added:

- 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.
- New footnote, number 50: <https://ahdb.org.uk/>

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- 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.
- New footnote, number 51: <https://ahdb.org.uk/RB209>

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The new text clarifies the purpose of the AHDB which does not alter the previously identified findings of the SA.

MM61, paragraph 7.2.28 (new) (this edit also introduced a new footnote, number 52)

Modification

B.63 The following underlined text was added:

- 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 a designated site. This advice (as may be amended over time) should be referenced in any development proposal.
- New footnote, number 52: 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM61-MM62 require 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 SA objective 14: Water as the policy seeks to protect the quality of water and integrity of the River Wye SAC.

MM62, paragraph 7.2.29 (new)

Modification

B.64 The following underlined text was added:

- 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM61-MM62 require 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 SA objective 14: Water as the policy seeks to protect the quality of water and integrity of the River Wye SAC.

MM63, paragraph 7.2.32 (new)

Modification

B.65 The following underlined text was added:

- The forthcoming Agricultural Development Supplementary Planning Document (SPD) will provide additional guidance of the planning policy issues that can be associated with proposals for agricultural development, setting out in more detail the requirements such proposals will be expected to address.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification references the forthcoming Agricultural Development SPD which does not alter the previously identified findings of the SA.

MM64, Policy W3

Modification

B.66 The following strikethrough text was removed and the underlined text was added:

- 1. Waste management method statements will be required for proposals ~~Planning permission~~ for livestock unit(s) on agricultural holdings ~~will supported where it is demonstrated through a waste management method statement~~ that:

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- a. for non-EIA development, demonstrates that both natural and non-natural wastes generated by the proposed development will be appropriately managed both on and off-site; or
- b. for EIA development, demonstrates that both natural and non-natural wastes generated by the whole agricultural unit will be appropriately managed both on and off-site.
- 2. Anaerobic digestion will be supported where its use is to manage only natural wastes generated primarily on the agricultural unit within which it is located.
- 3. All development proposals for livestock unit(s) and anaerobic digestion and other waste management proposals on agricultural holdings within the River Wye SAC or the River Clun SAC will be required to demonstrate ~~delivery of a net reduction in nutrient discharges contributing to~~ at least nutrient neutrality, ~~or betterment, within the River Wye SAC.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification requires all proposals for livestock units, anaerobic digestion and other waste management proposals on agricultural holdings within the River Wye SAC or the River Clun SAC to demonstrate at least nutrient neutrality. This reinforces the 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 and River Clun SAC.

MM65, paragraph 7.2.32

Modification

B.67 The following underlined text was added:

- Dwr Cymru/Welsh Water and Severn Trent Water provide wastewater treatment services within Herefordshire, with both companies operating wastewater treatment works. These facilities and the associated pipelines need to be upgraded and extended periodically in order to meet improved standards, cope with increased flows from new developments in their catchment area and to replace out of date equipment. The requirement within policy W4, to achieve at least nutrient neutrality, is applicable to the proposed development.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM65-MM66 provide 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 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.

MM66, Policy W4

Modification

B.68 The following strikethrough text was removed and the underlined text was added:

- Planning permission will be ~~granted to~~ supported for 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.
- Works undertaken ~~should contribute to achieving~~ will be required to demonstrate at least nutrient neutrality, ~~or betterment,~~ within the River Wye SAC.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: MM65-MM66 provide 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 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.

MM67, paragraph 7.3.2

Modification

B.69 The following underlined text was added:

- Herefordshire has a number of well-established industrial estates and extensive strategic employment areas (see policy E1 of the Core Strategy) distributed within the market towns that lie within the spatial strategy.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The new text refers to Policy E1: Employment Provision of the Core Strategy which states that large employment proposals will be directed to the strategic employment sites of Hereford, the market towns and rural industrial estates, where appropriate. The addition of the reference to Policy E1 does not alter the previously identified findings of the SA.

MM68, paragraph 7.3.4

Modification

B.70 The following underlined text was added:

- Whilst it would not be appropriate to set an absolute threshold, as the development of land is site specific, the following guidelines are intended to apply:
 - Small-scale facility is one of around or less than 50,000 tonnes per annum throughput and would be focussed on delivering a more local service, for example a household waste recycling centre, open windrow composting, or construction and demolition waste recycling facility.
 - Large-scale facility is one providing more than 50,000 tonnes per annum throughput and would be focussed on providing a more strategic service, for example a materials recycling facility or energy recovery facility (either biological or incineration) accepting waste from across Herefordshire and potentially beyond.
- An industrial estate is a site with local plan allocation or planning permission for use under planning use classes, B2 general industrial and B8 storage and distribution.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification clarifies that an industrial estate should fall under the planning use classes of either 'general industrial' or 'storage and distribution' which does not alter the previously identified findings of the SA.

MM69, paragraph 7.3.6

Modification

B.71 The following underlined text was added:

- There is an identified need for new waste management (recovery and disposal) capacity for CD&E wastes. Recovery of CD&E wastes is used to refer collectively to re-use, recycling and other recovery operations.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The Main Modification clarifies that the term CD&E collectively refers to re-use, recycling and other recovery operations which does not alter the previously identified findings of the SA.

MM70, paragraph 7.3.7

Modification

B.72 The following underlined text was added:

- The CD&E waste recovery facility operating at Former Lugg Bridge Quarry has the potential for a substantial increase in capacity; this is the preferred location for additional CD&E waste recovery capacity. CD&E waste recovery facilities are often appropriately located on industrial estates and strategic employment areas (see policy E1 of the Core Strategy), where they may be close to substantial demolition and refurbishment projects. In addition, they can be located at minerals workings, where the same processing equipment can be shared.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The new text refers to Policy E1: Employment Provision of the Core Strategy which states that large employment proposals will be directed to the strategic employment sites of Hereford, the market towns and rural industrial estates, where appropriate. The addition of the reference to Policy E1 does not alter the previously identified findings of the SA.

MM71, Policy W6,1

Modification

B.73 The following strikethrough text was removed and the underlined text was added:

- 1. ~~In order of preference, sustainable~~ Sustainable recovery of construction, demolition and excavation wastes will be delivered at the following locations:
 - a. Former Lugg Bridge Quarry, subject to the key development criteria set out at section 9;
 - b. strategic employment areas and industrial estates, subject to the key development criteria set out at section 9;
 - c. active mineral workings, recognising that the lifetime of the waste treatment facility may be limited to the lifetime of the quarry;

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change does not alter the previously identified findings of the SA.

MM72, paragraph 7.4.4

Modification

B.74 The following underlined text was added:

- In order to assist both the developer and the council to determine that a proposed facility is for energy recovery and not for waste disposal, policy W7 seeks information on the level of energy recovery expected to be achieved and the market(s) for that energy (e.g. identifying an electricity connection or heat/power recipient). The application should demonstrate that the proposed development has secured/will secure an appropriate recovery classification in the Environmental Permit.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The addition of text clarifying that a proposed development must demonstrate it has secured an appropriate recovery classification in an Environmental Permit does not alter the previously identified findings of the SA.

MM73, Policy W7

Modification

B.75 The following strikethrough text was removed and the underlined text was added:

- 1. Facilities for the reuse, recycling or recovery of materials ~~shall~~ will 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.
- 2. Facilities for the recovery of energy ~~shall~~ will only be supported where it is demonstrated:
 - a. that the proposed development will enable delivery of the waste hierarchy and/or make a positive contribution to achieving the circular economy in Herefordshire; and
 - b. that phosphorus in the fly ash will be separately recovered and put to beneficial use; and
 - c. that both the resultant heat and power will be utilised where viable.
- 3. Proposals for new landfill or landraising facilities or extensions to existing facilities ~~shall~~ will be supported where it is demonstrated that:
 - a. the proposed development will enable delivery of the waste hierarchy; and
 - b. the ~~proposal~~ proposed development incorporates measures for safe working and satisfactory reclamation, particularly in accordance with policy SP4.
- 4. Planning permission may be ~~granted~~ supported 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings: The minor wording change for consistency purposes does not alter the previously identified findings of the SA.

Section 9: Key Development Criteria

MM74, paragraph 9.1.1

Modification

B.76 The following strikethrough text was removed and the underlined text was added:

- Each allocated site is subject to a number of key development criteria, which form part of the policy. These criteria ~~simply~~ identify the key matters that will be required to be carefully and comprehensively considered in preparing any development project at an allocated site.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings for MM74-MM76: The minor wording changes to clarify the purpose of the KDC do not alter the previously identified findings of the SA.

MM75, paragraph 9.1.2

Modification

B.77 The following underlined text was added:

- The key development criteria do not replace development management policy; they are a part of the policy within which they are referenced and are additive to the requirements of all other policies within the development plan relevant to the project being proposed.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings for MM74-MM76: The minor wording changes to clarify the purpose of the KDC do not alter the previously identified findings of the SA.

MM76, Table 9: Key Development Criteria

Modification

B.78 These changes are shown in Table 2.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- No change to SA findings for MM74-MM76: The minor wording changes to clarify the purpose of the KDC do not alter the previously identified findings of the SA.

Section 10: Glossary

MM77, Appropriate assessment

Modification

B.79 The following strikethrough text was removed and the underlined text was added:

- Process for assessing impacts on ~~European sites~~ National Network Sites, habitats or species. It is a decision making tool.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM78, Area of Search

Modification

B.80 The following strikethrough text was removed:

- ~~Area of Search~~
- ~~An area identified as having minerals resources potentially suitable for extraction and where working may be acceptable subject to more detailed assessment at project stage.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM79, Conservation of Habitats and Species Regulations 2017 (as amended)

Modification

B.81 The following underlined text was added:

- The abbreviated term used for the 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM80, Green Infrastructure

Modification

B.82 The following strikethrough text was removed and the underlined text was added:

- ~~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.~~
- 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM81, Habitats Regulation Assessment

Modification

B.83 The following strikethrough text was removed and the underlined text was added:

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- A Habitats Regulations Assessment is the assessment of the impacts of implementing a plan or policy on a ~~Natura 2000~~ National Network Site.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM82, National Network Site(s)

Modification

B.84 The following underlined text was added:

- The group terminology given to SAC, SPA and Ramsar Sites under the Conservation of Habitats and Species Regulations 2017 (as amended).

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM83, Nutrient

Modification

B.85 The following underlined text was added:

- 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM84, Nutrient neutrality

Modification

B.86 The following underlined text was added:

- 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).
- 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.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM85, Preferred Area

Modification

B.87 The following strikethrough text was removed and the underlined text was added:

- Preferred ~~area of search~~ Area
- An area identified as having policy support for development, but where it is not practicable to define a specific development boundary.

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM86, SAC

Modification

B.88 The following strikethrough text was removed and the underlined text was added:

- 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.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

MM87, SPA

Modification

B.89 The following strikethrough text was removed and the underlined text was added:

- 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 safeguard the habitats of migratory birds and certain particularly threatened birds.~~

Does the Main Modification affect the SA findings previously reported in the Publication Draft SA Report?

- MM77-MM87 relate to parts of the plan which were not previously appraised in the SA and so do not need to be appraised as part of this SA process.

SA of the Key Development Criteria: Schedule of Main Modifications (May 2023)

MM88, Black Hill Delve, Policy M5(1,a&b)

Key Development Criteria

B.90 The following strikethrough text was removed and the underlined text was added:

- Archaeology and geodiversity: Need to demonstrate the potential for archaeological remains or geological features to be present on the site,

Appendix B SA of the Schedule of the Main Modifications (May 2023)

through desk-based assessment and/or field evaluation as appropriate. Mitigation will include recording, protection or recovery of any assets.

- Ancient Woodland: Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.
- Black Mountains SSSI: Need to demonstrate the level of effect on the key features of this designation.
- Dark Skies: Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.
- Green infrastructure: 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.
- Ground water: 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.
- MOD Low Fly Zone: Need to demonstrate the level of effect on the current and likely future operations within the MOD Low Fly Zone.
- River Monnow: Need to demonstrate the level of effect on water quality and hydrology of the River Monnow.
- Site Access: Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.91 Changes to SA findings:

- 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 SA objective 14: Water 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 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 SA objective 14: Water remains unchanged as this policy relates, not only to site M13, but also to several other sites allocated for sandstone extraction.

- 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 Brecon Beacons National Park (identified through NRW's representation – see Chapter 4 and Appendix A). 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.

MM89, Callow Delve, Policy M5(1,a)

Key Development Criteria

B.92 The following strikethrough text was removed and the underlined text was added:

- Ancient Woodland: Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Dark Skies: Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.
- Flood Risk: 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.
- Green infrastructure: 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.
- Ground water: 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 ~~the~~ potential risks to the water environment, including ~~private drinking water supply abstractions~~ (public and private supply) wells and springs.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.
- Site Access: Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.
- Woodland at Welsh Newton & Callow Hill LWS: Need to demonstrate the likely effect on the key features of the designated site.
- Wye Valley Woodlands SAC and Wye Valley & Forest of Dean Bat Sites SAC: 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) and how noise and light impacts on this species will be avoided.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.93 No change to SA findings:

- 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 SA objectives 12: Biodiversity & Geodiversity and 14: Water.
- The Main Modification provides clarification regarding the need for development proposals at Callow Delve to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will 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 SA objective 14: Water. 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 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.
- The clarification in terms of the AA needing to demonstrate no likely significant effects on the Wye Valley Woodlands SAC and Wye Valley & Forest of Dean Bat Sites SAC will help mitigate 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 includes the recommendation from the HRA Addendum for proposals to demonstrate how noise and light impacts on horseshoe bats will be avoided. 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 SA objectives 12: Biodiversity & Geodiversity and 14: Water remain unchanged, as this policy relates, not only to site M12, but also to several other sites allocated for sandstone extraction.

MM90, Former City Spares Site, Policy W5(3)

Key Development Criteria

B.94 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Contaminated land: 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.
- Landscape: 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.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.
- Veteran tree: Need to demonstrate level of effect on ancient black poplar located to the north of the site.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.95 Changes to SA findings:

- The site assessment of W19 (Former City Spares Site) identified an uncertain minor negative effect for SA objective 14: Water as the site is within 1km of the River Wye. The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). The minor negative effect remains as the policy relates, not only to site W19 but also to several other sites allocated for solid waste treatment facilities.

MM91, Former Lugg Bridge Quarry, Policy W6(1,a)

Key Development Criteria

B.96 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Flood Risk: 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.
- Green infrastructure: 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.
- Little Lugg River: Need to demonstrate the level of effect on water quality and hydrology of the Little Lugg River.
- River Lugg SSSI: Need to demonstrate the level of effect on the key features of this designation.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.
- Site reclamation: 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).
- Utilities: Utility infrastructure (gas) that cross the site may require diversion or a non-working buffer to enable the site to be worked.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.97 Changes to SA findings:

- The site assessment of W13 (Former Lugg Bridge Quarry) identified an uncertain significant negative effect for SA objective 14: Water as the site

contains a small section of the River Lugg (which is a tributary of the River Wye) which has a moderate ecological status and is failing in terms of chemical status. The Main Modification provides clarification regarding the need for development proposals at Former Lugg Bridge Quarry to demonstrate no likely significant effects on the River Wye SAC.

Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality reinforcing the positive effect identified as part of a mixed effect for Policy W6 for SA objective 14: Water. 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 which has informed the SA findings. Overall, the mixed effect (minor positive / minor negative) identified for Policy W6 for SA objective 14: Water remains unchanged as this policy relates, not only to site W13, but also to several other sites allocated for CD&E waste facilities.

- Policy W6, including the KDC for site W13, provides mitigation for adverse effects on the historic environment by requiring desk-based assessments and field evaluation of archaeological remains. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of the historic environment. Therefore, the minor negative effect previously identified for Policy W6 in relation to SA objective 6: Historic Environment is revised to a mixed effect (minor positive / minor negative). The minor negative effect remains as there is still potential for some adverse effects on the historic environment.

MM92, Hereford Enterprise Zone (Rotherwas Industrial Estate), Policy W5(2)

Key Development Criteria

B.98 The following strikethrough text was removed and the underlined text was added:

- Ancient Woodland: Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.
- Archaeology: 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.
- Contaminated land: 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.
- Flood Risk: 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).
- Hampton Grange medical facility: Need to demonstrate the level of effect on the amenity, health & safety and environment of this medical facility.
- Heritage assets: Need to demonstrate ~~the level of effect~~ that the proposed development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s), particularly listed buildings and the scheduled monuments Rotherwas House and Rotherwas Chapel.
- Landscaping: 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.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Pool at Rotherwas LWS: Need to demonstrate the level of effect on the key features of this designation.
- River Wye: Need to demonstrate the level of effect on water quality and hydrology of the River Wye.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.
- River Wye SSSI: Need to demonstrate the level of effect on the key features of this designation.
- Veteran tree: Need to demonstrate level of effect on ancient black poplars located within the site, with a priority given to avoidance.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.99 Change to SA findings:

- 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 Main Modification to the KDC provides additional mitigation by requiring proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings and the scheduled monuments Rotherwas House and Rotherwas Chapel. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.
- The 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 no

likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). The minor negative effect remains as the policy relates, not only to site W58 but also to several other sites allocated for solid waste treatment facilities.

MM93, Holmer Road, Policy W5(2)

Key Development Criteria

B.100 The following strikethrough text was removed and the underlined text was added:

- Flood Risk: 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.
- Hereford AQMA: Need to demonstrate the level of effect on air quality, particularly within the Hereford AQMA.
- Heritage assets: Need to demonstrate that the proposed development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.
- Landscaping: Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Road network: Need to demonstrate the level of effect on the local road network in the vicinity of the site.
- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (housing and schools).

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.101 Changes to SA findings:

- The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). 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.
- The Main Modification to the KDC requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings in the vicinity of the site. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM94, Kington Household Waste and Recycling Centre, Policy W5(3)

Key Development Criteria

B.102 The following strikethrough text was removed and the underlined text was added:

- Landscape: 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.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.103 Changes to SA findings:

- The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). 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.

MM95, Land between Little Marcle Road and Ross Road, Policy W5(2)

Key Development Criteria

B.104 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Flood Risk: 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.
- Heritage assets: Need to demonstrate ~~the level of effect that the proposed~~ development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.
- Landscape: 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 biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.
- River Leadon: Need to demonstrate the level of effect on water quality and hydrology of the River Leadon.

- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (housing, hotel and picnic site).

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.105 Changes to SA findings:

- Policy W5, including the Main Modification to the KDC for site W64 (Land between Little Marcle Road and Ross Road), requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings in the vicinity of the site. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM96, Leinthall Quarry, Policy M4(2,a)

Key Development Criteria

B.106 The following strikethrough text was removed and the underlined text was added:

- Dark Skies: Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.
- Downton Gorge SAC: An Appropriate Assessment is required to demonstrate the likely significant effect(s) on the SAC.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Geodiversity: 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.
- Green infrastructure: 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.
- Ground water: 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.
- Heritage assets: Need to demonstrate ~~the level of effect~~ that the proposed development will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly of Croft Ambrey Hill Fort and Croft Castle Park.
- Phased working: 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. A consolidated application should be made, providing the opportunity to review working practices and reclamation across the whole site.
- River Teme SSSI and River Lugg SSSI: Need to demonstrate the level of effect on the key features of these designations.
- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (housing)
- Veteran tree: Need to demonstrate level of effect on ancient yew tree located to the south of the site.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.107 No change to SA findings:

- The 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 SA objective 14: Water remains unchanged as this policy relates, not only to site M07a and M07b, but also to other sites allocated for crushed rock extraction, including sites that may come forward within the Preferred Areas (A and D).
- The assessment of SA objective 6: Historic Environment 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, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly Croft Ambrey Hill Fort and Croft Castle Park. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. 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. Overall, the previously identified mixed effect (uncertain minor positive / uncertain minor negative) for Policy M4 for 6: Historic Environment remains valid as there is still potential for minor adverse effects on the historic environment from the sites proposed to be allocated by Policy M4, including from sites that may come forward within the Preferred Areas (A and D).

MM97, Leominster Enterprise Park, Policy W5(2)

Key Development Criteria

B.108 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Flood Risk: 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.
- Heritage assets: Need to demonstrate ~~the level of effect that the proposed development will appropriately minimise and mitigate impacts~~ on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.
- Landscape: 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.
- River Lugg: Need to demonstrate the level of effect on water quality and hydrology of the River Lugg.
- River Lugg SSSI: Need to demonstrate the level of effect on the key features of this designation.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development should will be required to demonstrate at least nutrient neutrality ~~or betterment.~~

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (schools, cemetery and associated place of worship).
- Source Protection Zone 3: Need to demonstrate how any pathways for contamination will be identified and avoided.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.109 Changes to SA findings:

- The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). 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.
- Policy W5, including the Main Modification to the KDC for site W62, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings in the vicinity of the site. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM98, Leominster Household Waste Site and Household Waste Recovery Centre, Policy W5(3)

Key Development Criteria

B.110 The following strikethrough text was removed and the underlined text was added:

- Heritage assets: Need to demonstrate ~~the level of effect~~ that the proposed development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s).
- Landscaping: Site design should deliver a net gain in biodiversity, providing enhancement for priority bird species, and incorporate key features of the landscape character.
- River Lugg: Need to demonstrate the level of effect on water quality and hydrology of the River Lugg.
- River Lugg SSSI: Need to demonstrate the level of effect on the key features of this designation.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.111 Changes to SA findings:

- The site assessment of W05 (Leominster HWS and HWRC) identified an uncertain significant negative effect for SA objective 14: Water as the site

is within 250m of the River Lugg. The 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 to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate 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 SA objective 14: Water 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.

- Policy W5, including the Main Modification to the KDC for site W05, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM99, Llandraw Delve, Policy M5(1,a&b)

Key Development Criteria

B.112 The following strikethrough text was removed and the underlined text was added:

- Dark Skies: Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Green infrastructure: Operation and reclamation phases should deliver 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.
- Ground water: 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.
- MOD Danger Area and Low Fly Zone: Need to demonstrate the level of effect on the current and likely future operations within the MOD Danger Area and Low Fly Zone.
- River Monnow: Need to demonstrate the level of effect on water quality and hydrology of the River Monnow.
- Site Access: Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.113 No change to SA findings:

- 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 SA objective 14: Water 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 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 SA objective 14: Water remains unchanged, as this policy relates, not only to site M16, but also to several other sites proposed for sandstone extraction.

MM100, Model Farm, Policy W5(2)

Key Development Criteria

B.114 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Heritage assets: Need to demonstrate ~~the level of effect that the proposed development will appropriately minimise and mitigate impacts~~ on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.
- Landscape: 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.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no likely significant effect(s) on the SAC. Development should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment.~~
- Wye Valley AONB: Need to demonstrate the level of effect on the AONB.
- Source Protection Zone 2: Need to demonstrate how any pathways for contamination will be identified and avoided.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.115 Changes to SA findings:

- The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). The minor negative effect remains as the policy relates, not only to site W65 but also to several other sites proposed for solid waste treatment facilities.
- Policy W5, including the Main Modification to the KDC for site W65, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings in the vicinity of the site. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM101, Moreton Business Park, Policy W5(2)

Key Development Criteria

B.116 The following strikethrough text was removed and the underlined text was added:

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Archaeology: 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.
- Ancient Woodland: Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.
- Flood Risk: 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.
- Heritage assets: Need to demonstrate ~~the level of effect that the proposed~~ development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s), particularly ~~listed buildings and~~ Sutton Walls Hillfort, St Mary's Church and the historic core of Malden and other listed buildings.
- Landscape: 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.
- Rail: 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.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.
- Wellington Brook and Moreton Brook: Need to demonstrate the level of effect on water quality and hydrology of these watercourses.
- Wellington Marsh LWS: Need to demonstrate the level of effect on the key features of this designation.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.117 Changes to SA findings:

- The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate 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 SA objective 14: Water 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.
- Policy W5, including the KDC for site W66, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly Sutton Walls Hillfort, St Mary's Church, the historic core of Malden and other listed buildings. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM102, Perton Quarry, Policy M4(2,a)

Key Development Criteria

B.118 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Dark Skies: Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.
- Geodiversity, Perton Roadside Section and Quarry SSSI: 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.
- Green infrastructure: 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.
- Ground water: 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, including abstractions (public and private supply) wells and springs.~~ the potential risks to the water environment, including abstractions (public and private supply) wells and springs.
- Heritage assets: Need to demonstrate that the proposed development will appropriately minimise and mitigate impacts on Registered Park and Garden Stoke Edith
- Peregrine Falcons: This is a species protected under Schedule 1 of the Wildlife and Countryside Act 1981.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Phased working: 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. A consolidated application should be made, providing the opportunity to review working practices and reclamation across the whole site.
- River Lugg SSSI: Need to demonstrate the level of effect on the key features of this designation.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the~~ no likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment.~~
- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (housing).

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.119 No change to SA findings:

- The Main Modification provides clarification regarding the need for development proposals at sites M10a and M10b (Perton Quarry) to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality reinforcing the positive effect identified as part of a mixed effect for Policy M4 for SA objective 14: Water. The 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 SA objective 14: Water remains unchanged as this policy

relates, not only to sites M10a and M10b, but also to several other sites proposed for crushed rock extraction.

- Policy M4, including the KDC for sites M10a and M10b, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly the Registered Park and Garden Stoke Edith This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. The mixed effect (minor positive / minor negative) identified for Policy M4 in relation to SA objective 6: Historic Environment remains unchanged as there is still potential for minor or moderate adverse effects on the historic environment.
- The Main Modification requiring a consolidated application to be made, providing the opportunity to review working practices and reclamation across the whole site reinforces the significant positive effect previously identified for SA objective 11: Restoration.

MM103, Shobdon Quarry, Policy M3(2,a) and Policy W6(2)

Key Development Criteria

B.120 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Flood Risk: 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.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Geodiversity: 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.
- Green infrastructure and reclamation: 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.
- Ground water: Glaciofluvial sand and gravel deposits represent a secondary aquifer in hydraulic continuity with watercourses. Need to demonstrate ~~the~~ potential risks to the water environment, including abstractions (public and private supply) wells and springs.
- Housing: Need to demonstrate the level of effect on residential amenity at nearby properties.
- Pinsley Brook: Need to demonstrate the level of effect on water quality and hydrology in Pinsley Brook.
- Phased working: 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. A consolidated application should be made, providing the opportunity to review working practices and reclamation across the whole site.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the~~ no likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment.~~
- Shobdon Airfield: Need to demonstrate the level of effect on the current and likely future operations of Shobdon Airfield.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.121 Changes to SA findings:

- 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 SA objective 14: Water as the site is within 250m of Pinsley Brook which has a 'poor' ecological status and is failing in terms of chemical status. The Main Modification provides clarification regarding the need for development proposals at Shobdon Quarry to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate 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 SA objective 14: Water. The 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 SA objective 14: Water remain unchanged as these policies relate, not only to Shobdon Quarry, but also to several other sites allocated for sand and gravel extraction / CD&E waste facilities.
- The site assessment of Shobdon Quarry (M04/W44) identified an uncertain minor negative effect for SA objective 6: Historic Environment, while the Preferred Areas (B and C) 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 (minor positive / minor

negative) identified for Policy M3 remains unchanged while the minor negative effect previously identified for Policy W6 in relation to SA objective 6: Historic Environment is revised to a mixed effect (minor positive / minor negative). The minor negative effect remains as there is still potential for some 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 (B and C).

MM104, Southern Avenue, Policy W5(2)

Key Development Criteria

B.122 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Flood Risk: 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.
- Heritage assets: Need to demonstrate ~~the level of effect~~ that the proposed development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.
- Landscape: 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.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- River Lugg: Need to demonstrate the level of effect on water quality and hydrology of the River Lugg.
- River Lugg SSSI: Need to demonstrate the level of effect on the key features of this designation.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the~~ no likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality or betterment.
- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (schools, cemetery and associated place of worship).
- Source Protection Zones 1 and 2: Need to demonstrate how any pathways for contamination will be identified and avoided.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.123 Changes to SA findings:

- The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate 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 SA objective 14: Water 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.

- Policy W5, including the KDC for site W63, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings in the vicinity of the site. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM105, Three Elms Trading Estate, Policy W5(2)

Key Development Criteria

B.124 The following strikethrough text was removed and the underlined text was added:

- Heritage assets: Need to demonstrate ~~the level of effect that the proposed development will appropriately minimise and mitigate impacts~~ on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.
- Landscaping: Site design should deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development should will be required to demonstrate at least nutrient neutrality ~~or betterment.~~
- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (housing and schools).

- Yazor Brook: Need to demonstrate the level of effect on water quality and hydrology of the Yazor Brook.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.125 Changes to SA findings:

- The 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 no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). The minor negative effect remains as the policy relates, not only to site W60 but also to several other sites allocated for solid waste treatment facilities.
- Policy W5, including the Main Modification to the KDC for site W60, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings in the vicinity of the site. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM106, Upper Lyde Quarry, Policy M3(2,a) and Policy W6(2)

Key Development Criteria

B.126 The following strikethrough text was removed and the underlined text was added:

- Archaeology: 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.
- Geodiversity: 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.
- Green infrastructure and reclamation: 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.
- Ground water: Glaciofluvial sand and gravel deposits represent a secondary aquifer in hydraulic continuity with watercourses. Need to demonstrate ~~the~~ potential risks to the water environment, including abstractions (public and private supply) wells and springs.
- Housing: Need to demonstrate the level of effect on residential amenity at nearby properties.
- Phased working: 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

Appendix B SA of the Schedule of the Main Modifications (May 2023)

opportunity. A proliferation of ancillary infrastructure will not be permitted. A consolidated application should be made, providing the opportunity to review working practices and reclamation across the whole site.

- River Lugg: Need to demonstrate the level of effect on water quality and hydrology of these watercourses.
- River Lugg SSSI: Need to demonstrate the level of effect on the key features of this designation.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the~~ no likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.
- Road network: 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.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.127 Changes to SA findings:

- The Main Modification provides clarification regarding the need for development proposals at Upper Lyde Quarry (M03a and M03c/W43) to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate 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 SA objective 14: Water. The 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 SA objective 14: Water remain unchanged as these policies relate, not only to Upper Lyde Quarry but also to several

other sites proposed for sand and gravel extraction / CD&E waste facilities.

- The site assessment of Upper Lyde Quarry (M03a and M03c/W43) identified an uncertain minor negative effect for SA objective 6: Historic Environment, while the Preferred Areas (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 (minor positive / minor negative) identified for Policy M3 remains unchanged while the minor negative effect previously identified for Policy W6 in relation to SA objective 6: Historic Environment is revised to a mixed effect (minor positive / minor negative). The minor negative effect remains as there is still potential for some 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 (B and C).
- The Main Modification requiring a consolidated application to be made, providing the opportunity to review working practices and reclamation across the whole site reinforces the significant positive effect previously identified for SA objective 11: Restoration.

MM107, Wellington Quarry, Policy M3(2,a) and Policy W6(2)

Key Development Criteria

B.128 The following strikethrough text was removed and the underlined text was added:

- Archaeology and geodiversity: 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.
- Flood Risk: 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.
- Footpath: 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.
- Green infrastructure: 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.
- Ground water: Glaciofluvial sand and gravel deposits represent a secondary aquifer in hydraulic continuity with watercourses. Need to demonstrate ~~the~~ potential risks to the water environment, including abstractions (public and private supply) wells and springs.
- Heritage assets: Need to demonstrate ~~the level of effect~~ that the proposed development will appropriately minimise and mitigate impacts on heritage

Appendix B SA of the Schedule of the Main Modifications (May 2023)

asset(s) and their setting(s) particularly Sutton Walls Hillfort, St Mary's Church and the historic core of Malden and other listed buildings ~~and Sutton Walls Fort.~~

- Marches Line: A non-working buffer may be required such that railway safety is maintained.
- Otter: Detail protected species survey required to determine any site-specific mitigation and protection measures.
- Phased working: 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. A consolidated application should be made, providing the opportunity to review working practices and reclamation across the whole site.
- River Lugg and Wellington Brook: Need to demonstrate the level of effect on water quality and hydrology of these watercourses.
- River Lugg LWS and SSSI: Need to demonstrate the level of effect on the key features of this designation.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment.~~
- Road network: 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.
- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (school and housing).
- Utilities: 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.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.129 Changes to SA findings:

- The assessment of SA objective 6: Historic Environment 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 Main Modification to the KDC requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly Sutton Walls Hillfort, St Mary's Church, the historic core of Malden and other listed buildings. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. 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 (minor positive / minor negative) identified for Policy M3 remains unchanged while the minor negative effect previously identified for Policy W6 in relation to SA objective 6: Historic Environment is revised to a mixed effect (minor positive / minor negative). The minor negative effect remains as there is still potential for some 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 (B and C).
- The Main Modification provides clarification regarding the need for development proposals at Wellington Quarry to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate 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 SA objective 14: Water.

The 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 SA objective 14: Water remain unchanged as these policies relate, not only to Wellington Quarry, but also to several other sites allocated for sand and gravel extraction / CD&E waste facilities.

- The Main Modification requiring a consolidated application to be made, providing the opportunity to review working practices and reclamation across the whole site reinforces the significant positive effect previously identified for SA objective 11: Restoration.

MM108, Westfields Trading Estate, Policy W5(2)

Key Development Criteria

B.130 The following strikethrough text was removed and the underlined text was added:

- Flood Risk: 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.
- Hereford AQMA: Need to demonstrate the level of effect on air quality, particularly within the Hereford AQMA.
- Heritage assets: Need to demonstrate ~~the level of effect~~ that the proposed development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s), particularly listed buildings in the vicinity of the site.

Appendix B SA of the Schedule of the Main Modifications (May 2023)

- Landscaping: Site design should deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.
- Plough Lane LWS, Widemarsh Brook LWS and Yazor Brook LWS: Need to demonstrate the level of effect on the key features of these designations.
- Sensitive properties: Need to demonstrate the level of effect on the amenity, health & safety and environment of nearby sensitive properties (schools).
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the no~~ likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment~~.
- Widemarsh Brook and Yazor Brook: Need to demonstrate the level of effect on water quality and hydrology of the Yazor Brook.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.131 Changes to SA findings:

- The 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 Quarry to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality. 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). 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.

- Policy W5, including the Main Modification to the KDC for site W59, requires proposed developments to demonstrate they will appropriately minimise and mitigate impacts on heritage assets and their settings, particularly listed buildings in the vicinity of the site. This will directly support SA objective 6: Historic Environment which requires the conservation and protection of heritage assets. Therefore, a mixed effect (minor positive / minor negative) is identified for Policy W5 in relation to SA objective 6: Historic Environment. The minor negative effect remains as there is still potential for minor adverse effects on the historic environment.

MM109, Westonhill Wood Delves, Policy M5(1,a&b)

Key Development Criteria

B.132 The following strikethrough text was removed and the underlined text was added:

- Airfield: Need to demonstrate the level of effect on the current and likely future operations of the nearby airfield.
- Ancient Woodland: Need to demonstrate the level of effect on the ancient woodland, leaving a buffer adequate to protect the designation.
- Archaeology and geodiversity: 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.
- Dark Skies: Need to demonstrate that lighting will be kept to the minimum required to ensure safe working conditions on site.
- Green infrastructure: 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

Appendix B SA of the Schedule of the Main Modifications (May 2023)

deliver a net gain in biodiversity, providing enhancement for priority habitats, and incorporate key features of the landscape character.

- Ground water: Located on secondary aquifer of the Devonian. Need to demonstrate ~~the~~ potential risks to the water environment, including abstractions (public and private supply) wells and springs including drinking water.
- Housing: Need to demonstrate the level of effect on residential amenity at nearby properties.
- Heritage assets: Need to demonstrate ~~the level of effect~~ that the proposed development will appropriately minimise and mitigate impacts on heritage asset(s) and their setting(s).
- Merbach Hill LWS, Benfield Park LWS and Westonhill Wood LWS: Need to demonstrate the level of effect on the key features of these designations.
- River Wye SAC: An Appropriate Assessment is required to demonstrate ~~the~~ no likely significant effect(s) on the SAC. Development ~~should~~ will be required to demonstrate at least nutrient neutrality ~~or betterment.~~
- River Wye SSSI: Need to demonstrate the level of effect on the key features of this designation.
- Site Access: Need to demonstrate that vehicles can continue to access and leave the site, to and from the public highway, safely.

Does the Main Modifications affect the SA findings previously reported in the Publication Draft SA Report?

B.133 No change to SA findings:

- 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 SA objective 6: Historic Environment. Policy M5, including the Main Modification to the KDC for site M20, provides mitigation for adverse effects on the historic environment by

Appendix B SA of the Schedule of the Main Modifications (May 2023)

requiring applicants to demonstrate that the proposed development will appropriately minimise and mitigate impacts on heritage assets and their settings. Overall, the mixed effect (minor positive / minor negative) identified for Policy M5 for SA objective 6: Historic Environment remains unchanged as this policy relates, not only to site M20, but also to several other sites proposed for sandstone extraction.

- 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 SA objective 14: Water as the site is within 100m of the River Wye. The Main Modification provides clarification regarding the need for development proposals at Westonhill Wood Delves to demonstrate no likely significant effects on the River Wye SAC. Development proposals must also demonstrate at least nutrient neutrality to avoid any adverse effects on the River Wye SAC. This will help mitigate likely adverse effects arising from changes in water quality reinforcing the positive effect identified as part of a mixed effect for Policy M5 for SA objective 14: Water. 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 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 SA objective 14: Water remains unchanged as this policy relates, not only to site M20, but also to several other sites proposed for sandstone extraction.

References

- 1 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->
- 2 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>
- 3 Hendeca (2021) Herefordshire Minerals and Waste Local Plan – Schedule of Main Modifications and Minor Changes Proposed Pre-Examination
- 4 Statutory Instrument 2004, No 1633, as amended by Statutory Instrument 2018 No 1232 and by Statutory Instrument 2020 No 1531.
- 5 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>
- 6 The Conservation of Habitats and Species Regulations 2017
- 7 Special Areas of Conservation and Special Protection Areas
- 8 ‘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.
- 9 Office for Budget Responsibility (2023) Economic and fiscal outlook – March 2023 [online]. Available at: <https://obr.uk/economic-and-fiscal-outlooks/>

References

- 10 UK Parliament – House of Commons Library (2023) GDP – International Comparisons: Key Economic Indicators [online]. Available at:
<https://commonslibrary.parliament.uk/research-briefings/sn02784/>
- 11 Department for Levelling Up, Housing and Communities (2022) The Levelling Up and Regeneration Bill [online]. Available at:
<https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>
- 12 Department for Levelling Up, Housing and Communities (2012) National Planning Policy Framework [online]. Available at:
<https://www.gov.uk/guidance/national-planning-policy-framework>
- 13 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>
- 14 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>
- 15 Department for Environment, Food and Rural Affairs (2023) Environmental Improvement Plan 2023 [online]. Available at:
<https://www.gov.uk/government/publications/environmental-improvement-plan>
- 16 The advice relates to:
 - Special Protection Areas (SPA) designated under the Habitat Regulations 2017.
 - Special Areas of Conservation (SAC) designated under the Habitat Regulations 2017.
 - Sites designated under the Ramsar Convention, which as a matter of national policy are afforded the same protection as if they were designated under the Habitat Regulations 2017.

References

- Sites identified or required as compensatory measures for adverse effects on SPAs, SACs and Ramsar sites.
- 17** 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>
- 18** Herefordshire Archaeology (2021) A Heritage Impact Assessment for Wellington Quarry Extension, Wellington, Herefordshire
- 19** Herefordshire Archaeology (2021) A Heritage Impact Assessment for Upper Lyde Quarry Extension, Pipe and Lyde, Herefordshire
- 20** Herefordshire Archaeology (2021) A Heritage Impact Assessment for Shobdon Quarry Extension, Herefordshire
- 21** Herefordshire Archaeology (2021) A Heritage Impact Assessment for Leinthall Earls Quarry Extension, Aymestrey, Herefordshire
- 22** Herefordshire Council (2021) Draft Integrated Waste Management Strategy [pdf]. Available at: <https://councillors.herefordshire.gov.uk/documents/s50092270/Appendix%20A%20-%20Waste%20Strategy.pdf>
- 23** Wye Valley AONB Office (2021) Wye Valley Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026 [pdf]. Available at: https://www.wyevalleyaonb.org.uk/wp-content/uploads/dlm_uploads/Wye-Valley-AONB-Management-Plan-2021-26-finalised.pdf
- 24** 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=13255713217000000>
- 25** 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>
- 26** Herefordshire Council (2014) Herefordshire County Archaeology and Minerals Resource Assessment [pdf]. Available at:

References

- https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-1459-1/dissemination/pdf/hereford2-273877_1.pdf
- 27** 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>
- 28** Office for National Statistics (2023) Index of Production, UK: January 2023 [online]. Available at: <https://www.ons.gov.uk/economy/economicoutputandproductivity/output/bulletins/indexofproduction/january2023>
- 29** DEFRA (2022) Local authority collected waste: annual results tables [online]. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>
- 30** Understanding Herefordshire (2022) 2021 Census population and household estimates for Herefordshire [online]. Available at: <https://understanding.herefordshire.gov.uk/latest-news/2022/june/2021-census-population-and-household-estimates-for-herefordshire/>
- 31** Herefordshire Council (2007) Needs Analysis: Adults with Physical Disabilities [pdf]. Available at: <https://councillors.herefordshire.gov.uk/documents/s14249/Append%20%20Needs%20Analysis%20-%20Adults%20with%20Physical%20Disabilities%20V4%203-final-appendix.pdf>
- 32** Nomis (2023) Labour Market Profile – Herefordshire, County of [online]. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157169/report.aspx>
- 33** Nomis (undated) Location of usual residence and place of work by sex [online]. Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>
- 34** Natural Resources Wales (2021) Planning Position Statement [pdf]. Available at: <https://cdn.cyfoethnaturiol.cymru/media/693023/planning->

References

- [position-statement-river-sac-compliance.pdf?mode=pad&rnd=13255713217000000](#)
- 35** 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>
- 36** Herefordshire Council (2010) Green Infrastructure Strategy Herefordshire: Local Development Framework [pdf]. Available at: https://www.herefordshire.gov.uk/download/downloads/id/2063/herefordshire_green_infrastructure_strategy.pdf

Report produced by LUC

Report produced by LUC

Bristol

12th Floor, Colston Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Cardiff

16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 032 9006
cardiff@landuse.co.uk

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow

37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London

250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester

6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment
Development Planning / Urban Design & Masterplanning
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation