

HERTFORDSHIRE COUNTY COUNCIL

**ENVIRONMENT, PLANNING & TRANSPORT
CABINET PANEL
THURSDAY, 7 SEPTEMBER 2017 AT 10:00AM**

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| <u>Agenda Item</u> <u>No</u> 7 |
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SITES TO BE IDENTIFIED IN THE DRAFT MINERALS LOCAL PLAN

Report of the Chief Executive and Director of Environment

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1. Purpose of report

- 1.1. To outline the process undertaken for the site selection work and seek Cabinet approval for the potential site options for inclusion in the draft Minerals Local Plan.

2. Summary

- 2.1. The Minerals Planning Authority (MPA) has a statutory responsibility to prepare a Minerals Local Plan (MLP) in line with national policy and regulations. National policy requires the MPA to identify/allocate sites for future mineral extraction to ensure there is a steady and adequate supply of minerals for Hertfordshire.
- 2.2. In order to achieve this requirement, the County Council produced and consulted on a site selection methodology to assess and identify sites for inclusion in the plan.

3. Recommendation

- 3.1. That the Panel considers the site options presented and the recommended Option 4 as set out in Section 13. The Panel is also asked to recommend that Cabinet approves these sites for inclusion in the Draft Minerals Local Plan.

4. Background: The Site Selection Methodology

- 4.1. The site selection methodology was developed with independent consultants (Land Use Consultants (LUC)) and subject to public consultation. The methodology was presented to the Environment, Planning and Transport Planning in February 2016.

- 4.2. The purpose of the methodology was to assess the sites and/or areas identified for their economic viability. Each site/area was assessed against a set of local planning and environment constraints.
- 4.3. The site selection methodology and subsequent sites identified have also been subject to Sustainability Appraisal (SA) (including Strategic Environmental Assessment – SEA).
- 4.4. The site selection methodology for sand and gravel consisted of three stages which are referred to as ‘sieves.’ It is important to note at this stage that the detailed site assessments undertaken for the MLP are not replacements for the assessments required as part of a planning application for a minerals site. The sieves were:

Sieve 1 – Major Constraints

- Urban areas
- Sites with extant planning permission for other development (for the identification of preferred areas or areas of search , these will be limited to those sites whose area is greater than 5ha due to difficulties associated with collection of data for smaller planning permissions such as house extensions etc.).
- Previously worked sites

- 4.5. Areas identified within the sieve 1 criteria outlined above were removed from the process either in part or in full.

Sieve 2 – Resource and Economic Viability

- 4.6. This sieve verified evidence relating to commercial viability and deliverability. Sieve 2 is not an exclusionary sieving stage. For sites put forward during the call for sites process a certain level of information was expected to be provided by the site promoter to demonstrate that their proposed site was economically viable.

Sieve 3 – Detailed Site Assessments

Criteria for:

- Airport Safeguarding Zones
- Ancient Woodland
- Aquifers
- BAP priority species or habitats
- Best and Most Versatile Agricultural Land
- Cumulative effects
- Ecological status of water bodies
- Flood Risk
- Geodiversity
- Green Belt
- Groundwater vulnerability
- Heritage designations

- International and national ecological designations
- Land ownership
- Landscape designations
- Local Nature Reserves and Local Wildlife Sites
- Proximity of allocated residential or built development
- Recreation
- Restoration
- Sensitive land uses
- Sustainable transport
- Sustainable transport and pollution to the environment (dust, air and water)

4.7. Sieve 3 assessed the sites and/or areas against more detailed environmental and planning constraints and issues to identify those most appropriate for inclusion in the emerging MLP. Each criterion was considered in turn to inform a detailed comparative evaluation of the sites.

5. Call for Sites Process

5.1. Once the Site Selection Methodology was established, the next stage in the process was to undertake a call for sites. A call for sites is a request for sites within Hertfordshire that contain mineral resources (primarily sand and gravel) that may be suitable for extraction. This took place between February and April 2016.

5.2. Hertfordshire County Council received 20 submissions during the call for sites process. Out of the 20 sites put forward, 18 were for sand and gravel and two were for brick clay extraction. Maps of each of the sites can be found in **Appendix 1**.

| Site ID | Site Name | Mineral to Extract |
|----------|---|--------------------|
| MLPCS001 | Land at Cromer Hyde Farm | Sand and Gravel |
| MLPCS002 | Land at Salisbury Hall | Sand and Gravel |
| MLPCS003 | Land at Ware Park | Sand and Gravel |
| MLPCS004 | Land at Pynesfield | Sand and Gravel |
| MLPCS005 | Land at Nashe's and Fairfold's Farm | Sand and Gravel |
| MLPCS006 | Hatfield Aerodrome | Sand and Gravel |
| MLPCS007 | Barwick | Sand and Gravel |
| MLPCS008 | Hatfield – Furze Field | Sand and Gravel |
| MLPCS009 | Hatfield Quarry – Land Adjoining Coopers Green Lane | Sand and Gravel |

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| MLPCS010 | The Briggens Estate | Sand and Gravel |
| MLPCS011 | Water Hall Quarry – Farm Fields Area | Sand and Gravel |
| MLPCS012 | Water Hall Quarry – Broad Green Area | Sand and Gravel |
| MLPCS013 | Harry’s Field | Brick Clay |
| MLPCS014 | Water Hall Quarry – Bunkers Hill South Areas | Sand and Gravel |
| MLPCS015 | Plashes Farm | Sand and Gravel |
| MLPCS016 | Water Hall Quarry – Howe Green Area | Sand and Gravel |
| MLPCS017 | Robins Nest Hill | Sand and Gravel |
| MLPCS018 | Southfield Wood East | Sand and Gravel |
| MLPCS019 | Pipers End | Sand and Gravel |
| MLPCS020 | Roundhill Wood | Brick Clay |

5.3. In addition to the sites put forward the three existing Preferred Areas within the adopted Minerals Local Plan were taken forward for assessment. Maps of each of the Preferred Areas can be found in **Appendix 2**.

| Site ID | Site Name | Mineral to Extract |
|---------|---|--------------------|
| 1 | Land close to the existing Hatfield Quarry (remaining northern Land at BAe) | Sand and Gravel |
| 2 | Land to the north of the existing Rickneys Quarry | Sand and Gravel |
| 3 | Land to the south-east of the existing Tyttenhanger Quarry | Sand and Gravel |

6. Site Assessment: Land Use Consultants (LUC) Report (Appendix 3)

- 6.1. The consultants have provided an independent assessment of the sites put forward by industry and the Preferred Areas. Each site/area has been assessed against the set of 22 criteria within the site selection methodology.
- 6.2. Each criterion was given a score based on a traffic light ranking system of impact ranging from Positive (Dark Green), Low (Green), Medium (Amber), High (Red) and Very High (Dark Red). In addition Highways and Landscape and Visual Impact Assessment scores were also recorded. The sites/areas have also been subject to the Sustainability Appraisal (incorporating Strategic Environmental Assessment).

- 6.3. The final report (March 2017) ranks the sites and preferred areas in terms of the potential impacts on the site and surrounding environment. The report summarises the most appropriate site options for allocation in the Minerals Local Plan based on the number of 'red' assessment scores.
- 6.4. The sand and gravel site options and existing preferred areas that score between two and four 'red' scores (i.e. least number of reds) are:
- MLPCS004 Pynesfield
 - MLPCS012 Broad Green
 - MLPCS017 Robins Nest Hill
 - MLPCS008 Hatfield – Furze Field
 - MLPCS006 Hatfield Aerodrome
 - MLPCS009 Land Adjoining Coopers Green Lane
 - MLPCS018 Southfield Wood
- 6.5. These are likely to have the greatest potential to mitigate the adverse impacts associated with their excavation and operation and are therefore considered to be the most appropriate site options for allocation in the Minerals Local Plan based on the report conclusions. As Preferred Areas 1 and 2 also score between one and four 'red' scores, these areas could also be considered as continuing preferred areas.
- 6.6. Preferred Area 3 comprises land to the south-east of the existing Tyttenhanger Quarry, almost all of which has now been worked and therefore will not be considered as a preferred area in the emerging Minerals Local Plan.
- 6.7. From this list of sites, there is some uncertainty regarding the suitability of the site options MLPCS017 Robins Nest Hill and MLPCS018 Southfield Wood. These sites score 'red' in the Sieve 2 assessment due to a lack of information to conclusively determine their economic viability and deliverability. This uncertainty would need to be resolved before either of these sites could be re-assessed for allocation within the Minerals Local Plan.

7. Consultation

- 7.1. The information used to assess sites and areas against the criteria was provided from a range of sources. In addition, informal consultation was undertaken with internal officers and external statutory bodies (Environment Agency, Historic England, and Natural England) on the sites.
- 7.2. Specific comments were received from Historic England in regards to sites/areas and impacts upon listed buildings, conservation areas, scheduled monuments, historic parks and gardens etc. or their settings, based upon a brief desk based assessment. These topics were covered by the Sieve 3 criterion.

- 7.3. Comments were also received from Natural England in regards to the conservation, enhancement of the natural environment in terms of landscape, biodiversity, ancient woodland, geological conservation, best and most versatile land and public rights of way and access. These topics were also covered by the Sieve 3 criterion.
- 7.4. Comments on the sites have been received from the Environment Agency which outlined that:
- Land at Ware Park, Land at Pynesfield, Barwick and Water Hall, Howe Green fall within Source Protection Zone 1.
 - Water Hall, Farm Fields is heavily constrained by the River Lee and its associated flood plains.
 - There are ten proposed sites which fall within the bromate plume (namely Hatfield Aerodrome, Hatfield Furze Field, Land adjoining Coopers Green Lane, Water Hall, Broad Green, Water Hall, Bunkers Hill south, Robins Nest Hill and Pipers End) which will need to be assessed and demonstrate that the bromate plume will not be spread either vertically or laterally as a result of mineral extraction.
 - Land at Cromer Hyde Farm, Nashe's and Fairfold's Farm, Briggens Estate, Harrys Field, Plashes Farm and Roundhill Wood fall within Source protection zones 2 and 3 and as such, groundwater would have to be protected.
 - Southfield Wood East and Salisbury Hall are adjacent to historic landfills and therefore it would need to ensure that there was not an increased risk to controlled waters from mobilised contamination.
- 7.5. Water quality has been reviewed as part of the Sieve 3 criteria in the Site Selection Study for aquifers, ecological status of water bodies and groundwater vulnerability. All sites scored medium in regards to aquifers. Eight sites scored high in regards to Ecological status of water bodies, these were: Hatfield Aerodrome, Land Adjoining Coopers Green Lane, Salisbury Hall, Farm Fields, Pipers End, Briggens Estate, Howe Green and Barwick.
- 7.6. Barwick, Land at Ware Park and Pynesfield scored High for Groundwater Vulnerability.

8. Site Options Summary Explanation Identification of Specific Sites, Preferred Areas and/or Areas of Search

- 8.1. Following the application of the site selection methodology, consideration was given as to whether sites should be identified as a Specific Site, a Preferred Area and/or an Area of Search as appropriate. This depended on the level of information and known degree of deliverability of the areas/sites in question.
- 8.2. National Policy sets out the definitions for each:

Specific Sites – are designated where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;

Preferred Areas – are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or

Areas of Search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply.

Plan Requirement and Permitted Reserves

- 8.3. The Draft Minerals Local Plan is to be a 15 year plan period running from 2016-2031.
- 8.4. National policy requires the MPA to identify/allocate sites/areas for future mineral extraction to ensure there is a steady and adequate supply ensuring an adequate landbank¹ of at least seven years can be maintained throughout the 15 year plan period (for sand and gravel this would be 15 years plus seven years at the end of the plan period, totalling 22 years).
- 8.5. In order to calculate this requirement, Hertfordshire is continuing to plan in line with the ‘revised sub-regional apportionment’ figure for the East of England Aggregate Working Party (AWP).
- 8.6. The apportionment figure for Hertfordshire is 1.39 million tonnes per annum. As such, the total plan requirement is 30.58² million tonnes.
- 8.7. Permitted reserves are mineral deposits which have planning permission for extraction and therefore make up the landbank. The current permitted reserves are set out in the Local Aggregates Assessment, available on the county council website.
- 8.8. Taking this into account, the following table provides a summary of the plan requirement:

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| Total Plan Requirement (15year plus 7 years) based on East of England Apportionment Figure: | 30,580,000 tonnes |
| Permitted Reserves (as at 31/12/2015) | 13,215,716 tonnes |
| Permitted Reserves (including Pynesfield) | 13,565,716 tonnes |
| Plan requirement shortfall minus permitted reserves | 17,364,284 tonnes |
| Plan requirement minus permitted reserves (including Pynesfield) | 17,014,284 tonnes |

- 8.9. The County Council is seeking to address the identified shortfall by allocating sufficient sites/areas in the Minerals Local Plan and as such a series of site

¹ A stock of planning permissions for the winning and working of minerals (Paragraph 145, NPPF).

² 22 years (15 year plan period plus 7 years) x 1.39mt = 30.58mt

option combinations have been assembled for further assessment to establish which combination is most appropriate to meet the plan requirement.

- 8.10. The options have been developed using the conclusions from the Site Selection Report, as a basis, together with a review of their deliverability and potential tonnage yield from each site. The options and the process undertaken to compile them are set out below.

Site Options

Option 1: based solely on LUC recommendations from the Site Selection Report (March 2017)

| Option 1 |
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| 004 Pynesfield |
| 012 Broad Green |
| 017 Robins Nest Hill |
| 008 Furze Field |
| PA1 Land at BAe/Land Close to the existing Hatfield Quarry |
| 006 Hatfield Aerodrome |
| 009 Land Adjoining Coopers Green Lane |
| 018 Southfield Wood |
| PA2 Land at Rickneys |
| Option 1 Total Tonnage: 21,750,000 tonnes |

- 8.11. An assumption was made that sites MLP017 and 018 are economically viable for inclusion in this option. Economic viability issues would need to be confirmed if these sites were to be identified in the Draft Plan.
- 8.12. Pynesfield was granted permission on appeal 18 January 2017 and therefore in further options has been included as Permitted Reserves.
- 8.13. There is an outstanding query on the potential quantity of mineral for MLPCS009. A revised figure has not been clarified and therefore remains at 6.6mt.
- 8.14. Estimated figures have been included for the remainder of the Preferred Areas in the adopted Minerals Local Plan (Land at BAe/Land close to existing Hatfield Quarry (remaining northern section) and Land at Rickneys (existing northern part of preferred area 2)).

Option 2: Summary from Option 1 to Option 2: Removed sites 004, 017 and 018

| Option 2 |
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012 Broad Green
008 Furze Field
PA1 Land at BAe/Land Close to the existing Hatfield Quarry
006 Hatfield Aerodrome
009 Land Adjoining Coopers Green Lane
PA2 Land at Rickneys

Option 2 Total Tonnage: 19,900,000 tonnes

- 8.15. Pynesfield was granted permission on appeal 18 January 2017 and therefore is included as Permitted Reserves. It therefore does not feature as a site option.
- 8.16. Sites MLP017 (Robins Nest Hill) and 018 (Southfield Wood) have been removed in this and further options due to issues with economic viability and landownership constraints, scoring 'red' in Sieve 2.
- 8.17. This and further options do not include sites which have scored 'red' at Sieve 2 due to the lack of information to conclusively determine their economic viability and deliverability.
- 8.18. This option includes the remaining parts of Preferred Areas 1 and 2 of the adopted MLP as land which has not been subject to planning applications or put forward by industry in the call for sites.
- 8.19. There is an outstanding query on the quantity of minerals for MLPCS009, however a revised figure has not been clarified, and therefore the figure remains at 6.6mt.

Option 3: Summary from Option 2 to Option 3: Removed site 012, Preferred Area 1 (northern), added in Land at Ware Park, 003

Option 3

008 Furze Field
006 Hatfield Aerodrome
009 Land Adjoining Coopers Green Lane
PA2 Land at Rickneys
003 Land at Ware Park

Option 3 Total Tonnage: 21,050,000 tonnes

- 8.20. Pynesfield was granted permission on appeal 18 January 2017 and therefore included as Permitted Reserves. It therefore does not feature as a site option.
- 8.21. MLP012 Broad Green has been removed from this option due uncertainty with a current enforcement case on Bunkers Hill Quarry and therefore uncertainty with deliverability for this site. Bunkers Hill is due to be restored by December 2017. This may restrict the use of an internal haul road leading to the processing plant which was suggested by the site promoter as the method for transporting minerals for processing. In addition, the existing plant is due to be removed by December 2019. A previous planning application on this site was refused by the county council and subject to appeal. The appeal was dismissed on grounds which include cumulative impact, noise and impacts of dust on sensitive land uses.
- 8.22. There is an outstanding query on the quantity of minerals for MLPCS009, however a revised figure has not been clarified, and therefore the figure remains at 6.6mt.
- 8.23. The remaining part (northern) adopted Preferred Area 1 Land at BAe (Land close to the existing Hatfield Quarry) has been removed from this option due to uncertainty on deliverability due to the bromate plume. This uncertainty has been confirmed by correspondence with the Environment Agency. In addition the borehole data shows a considerable level of overburden. Both of these were taken into consideration by the operator (Brett Aggregates) on promotion of the application at Hatfield Aerodrome, which was recently approved by the County Council.
- 8.24. This option does not include sites which have scored 'red' at Sieve 2 due to the lack of information to conclusively determine their economic viability and deliverability.
- 8.25. In the LUC ranking list, Salisbury Hall features as the next site to score 'Green' at Sieve 2 in the ranking. However highways comments for this site state that 'significant concerns have been identified for this site which are likely to attract highway objections', therefore this site has not been included in the option. As a result, Land at Ware Park is the next site in the ranking table (excluding sites which score 'Red' in Sieve 2) and has been included in this option.

Option 4: Summary from Option 3 to Option 4: Removed Preferred Area 2 (northern) and 003, added 010, Briggens Estate as a preferred area

| Option 4 |
|---------------------------------------|
| 008 Furze Field |
| 006 Hatfield Aerodrome |
| 009 Land Adjoining Coopers Green Lane |
| 010 (Preferred Area) Briggens Estate |

Option 4 Total Tonnage: 25,750,000 tonnes

- 8.26. This option is based on Option 3; however, MLP003 Land at Ware Park has been removed due to the recent planning application being refused for a number of reasons including impact on the Green Belt (plant, machinery and stock piles), impact on landscape and highways concerns.
- 8.27. The remaining part of the Preferred Area 2 Rickneys has also been removed from this option to provide an alternative scenario from the preferred areas in the adopted Minerals Local Plan. Under the adopted Minerals Local Plan, it states that the working of the site would be considered as an extension to existing Rickneys Quarry. Circumstances have changed over time and the existing site at Rickneys Quarry has been mothballed with no plant and machinery remaining on site. This area was not put forward by the landowner(s) or industry in the most recent call for sites and therefore this may question its deliverability.
- 8.28. This option does not include sites which have scored 'red' at Sieve 2 due to the lack of information to conclusively determine their economic viability and deliverability.
- 8.29. The Briggens Estate is included in this option as a new Preferred Area to make up the plan provision shortfall from specific sites. This area would be identified as a preferred area rather than a specific site in line with the definition in the NPPG and based upon some high scorings for Sieve 3 and current highways assessment. It could be considered that as this is a large area, opportunities exist for smaller areas to come forward which may overcome some of these issues raised.
- 8.30. There is an outstanding query on the quantity of minerals for MLPCS009, however a revised figure has not been clarified, and therefore the figure remains at 6.6mt.

Reasoning for the remaining sites excluded from these options

- 8.31. Not all sites promoted were considered appropriate for inclusion in the site options. A summary of the reasoning for this is set out below:

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| <p>MLPCS001 Land at Cromer Hyde Farm</p> | <p>This site has scored 'red' at Sieve 2 and therefore has not been included in the site options due to the lack of information to conclusively determine economic viability and deliverability.</p> <p>It is considered that development of the site could have a very high impact on heritage designations as the site is partly located within Brocket Hall Registered Park and Garden.</p> <p>In addition, the site could have a high impact on ancient</p> |
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| | <p>woodland as the site is adjacent to two areas of ancient woodland; recreation as the site contains a Public Right of Way (PRoW) and is adjacent to a number of additional PRoWs and the Brocket Park Golf Course; sensitive land uses as the site is immediately adjacent to a number of residential properties; and sustainable transport as the site is not located within close proximity to the rail network or a navigable waterway.</p> <p>The site is considered to have an overall moderate-high landscape and visual sensitivity to mineral extraction.</p> <p>The site is considered to raise significant concerns which are likely to attract highway objections.</p> |
| MLPCS002 Land at Salisbury Hall | <p>It is considered that this site could have a high impact on the ecological status of water bodies as the site contains a water body; recreation as the site contains a PRoW and is immediately adjacent to a number of additional PRoWs and the Watford Football Club Training Ground; sensitive land uses as a number of residential properties are located adjacent to the site; and sustainable transport as the site is not located within close proximity to the rail network or a navigable waterway.</p> <p>Hertfordshire County Council Highways has raised significant concerns which are likely to attract a highway objection which is the main reason this site has not been taken forward in the site options.</p> |
| MLPCS005 Nashe's and Fairfold's Farm | <p>This site was withdrawn and therefore has not been recommended as a potential site for inclusion in the plan.</p> <p>This site has scored 'red' at Sieve 2.</p> <p>It is considered that this site could have a high impact on the ancient woodland as the site is adjacent to one area of ancient woodland; recreation as the site contains a PRoW and is adjacent to a number of additional PRoWs; sustainable transport as the site is not located within close proximity to the rail network or a navigable waterway; and sustainable transport and pollution to the environment as the site is not within close proximity to the strategic road network.</p> <p>The site is considered to have an overall moderate-high landscape and visual sensitivity to mineral extraction.</p> <p>The site is considered to raise significant concerns which are likely to attract highway objections.</p> |
| MLPCS007 Barwick | <p>This site has scored 'red' at Sieve 2 and therefore has not been included in the site options due to the lack of information</p> |

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| | <p>to conclusively determine economic viability and deliverability.</p> <p>It is considered that this site could have a high impact on ancient woodland as the site is adjacent to an area of ancient woodland; the ecological status of water bodies as the site contains a watercourse; groundwater as part of the site is within Source Protection Zone 1; recreation as the site contains a PRow and is adjacent to a number of additional PRows; sensitive land uses as the site is adjacent to a number of residential properties; and sustainable transport as the site is not located within close proximity to the rail network or a navigable waterway.</p> <p>The site was also considered to have an overall moderate-high landscape and visual sensitivity to mineral extraction.</p> <p>The site has not been assessed by the County Council's Highways as no information has been provided on the proposed access points or HGV routing.</p> |
| MLPCS011 Water Hall Quarry - Farm Fields Area | <p>This site has scored 'red' at Sieve 2 and therefore has not been included in the site options due to the lack of information to conclusively determine economic viability and deliverability.</p> <p>It is considered that this site could have a high impact on the ecological status of water bodies as the site contains one watercourse and is adjacent to another watercourse; recreation as the site is adjacent to a PRow and within close proximity of three additional PRow; sustainable transport as the site is not located within close proximity of the rail network or a navigable waterway; and sustainable transport and pollution to the environment as the site is not located within close proximity of the strategic road network.</p> |
| MLPCS014 Water Hall Quarry – Bunkers Hill South Area | <p>This site has scored 'red' at Sieve 2 and therefore has not been included in the site options due to the lack of information to conclusively determine economic viability and deliverability.</p> <p>It is considered that this site could have a high impact on ancient woodland as the site is adjacent to one area of ancient woodland; recreation as the site is adjacent to one PRow; sensitive land uses as the site is adjacent to a number of residential properties; sustainable transport as the site is not located within close proximity of the rail network or a navigable waterway; and sustainable transport and pollution to the environment as the site is not located within close proximity to the strategic road network.</p> |
| MLPCS015 Plashes Farm | <p>This site has scored 'red' at Sieve 2 and therefore has not been included in the site options due to the lack of information to conclusively determine economic viability and deliverability.</p> <p>In addition this site scored 'very high' for two criteria ancient</p> |

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| | <p>woodland, as the site contains three areas and is adjacent to three additional areas of ancient woodland; and for international and national ecological designations as the site is adjacent to Plashes Wood SSSI (Site of Special Scientific Interest) in Sieve 3.</p> <p>The site is also considered likely to have a ‘high’ impact on recreation as the site contains three PRoW; sensitive land uses as the site is adjacent to Plashes Farm; sustainable transport as the site is not located within close proximity of the rail network or a navigable waterway; and sustainable transport and pollution to the environment as the site is not located within close proximity to the strategic road network.</p> <p>The site is considered to have an overall moderate-high landscape and visual sensitivity to mineral extraction.</p> |
| MLPCS016 Water Hall Quarry - Howe Green Area | <p>This site has scored 'red' at Sieve 2 and therefore has not been included in the site options due to the lack of information to conclusively determine economic viability and deliverability.</p> <p>It is considered that this site could have a high impact on the ecological status of water bodies as the site contains one watercourse which also runs down its eastern boundary; recreation as the site contains two PRoW and is within close proximity of an additional PRoW; sensitive land uses as the site is adjacent to residential properties; sustainable transport as the site is not located within close proximity to the rail network or a navigable waterway; and sustainable transport and pollution to the environment as the site is not located within close proximity of the strategic road network.</p> <p>The site has not been assessed by the County Council's Highways as no details of access arrangements have been provided.</p> |
| MLPCS019 Pipers End | <p>This site has scored 'red' at Sieve 2 and therefore has not been included in the site options due to the lack of information to conclusively determine economic viability and deliverability.</p> <p>It is considered that this site could have a high impact on the ecological status of water bodies as the site contains two watercourses and is adjacent to two additional watercourses; sensitive land uses as the site is adjacent to a number of residential properties; sustainable transport as the site is not located within close proximity to the rail network or a navigable waterway; and sustainable transport and pollution to the environment as the site is not located within close proximity to the strategic road network.</p> |

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| | The site is considered to have an overall moderate landscape and visual sensitivity to mineral extraction. |
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8.32. The County Council wishes to ensure full public consultation also takes place on all sites promoted to the County Council. Therefore all sites and areas forming the assessment work, but not included in the recommended option, will be subject to specific public consultation in the form of an 'Omissions Consultation' to ensure sites/areas are given fair assessment. An omission site is a parcel of land that has been assessed and subsequently rejected.

9. Sustainability Appraisal

9.1. A Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) is a requirement under the SEA Directive. The purpose of Sustainability Appraisal is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans.

9.2. A SA Framework for assessing the potential sustainability effects of the MLP has been developed through formal consultation.

9.3. The SA Framework has also been used to assess the four site option combinations. The assessment concludes that all four options have some significant negative effects. The scoring of each individual SA objective does not differ across the four site option combinations.

9.4. In preparing the new MLP, the county council is also required by law to carry out a **Habitats Regulations Assessment** (HRA) to comply with the Habitats Regulations. The HRA refers to the assessment of the potential effects of a development plan on one or more European sites³.

9.5. The report concluded that none of the policies or potential site allocations in the Minerals Local Plan are considered likely to have a significant effect on the European sites within 10km of Hertfordshire.

9.6. However, the screening concluded that there are uncertain significant effects which have been identified in relation to potential air pollution. All of the site option combinations, along with the policies that permit development outside of the allocated sites and preferred areas have the potential for air pollution effects, in combination with each other.

9.7. The Site Selection Study also included a criterion for sustainable transport and pollution to the environment (dust, air, water). Site scored high 'red' where sites or areas were located within an Air Quality Management Area, or were not in close proximity to a strategic road network. This included 003 Land at Ware Park, 005 Nashe and Fairfolds (Withdrawn), 008 Hatfield Furze Field, 011 Water Hall Quarry – Farm Fields, 012 Water Hall Quarry – Broad Green,

³ This includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). In addition to potential SPAs (pSPAs), candidate SACs (cSACs), Sites of Community Importance (SCIs) and Ramsar sites.

014 Water Hall Bunkers Hill, 015 Plashes Farm, 016 Water Hall Howe Green, 017 Robins Nest Hill and 019 Pipers End.

10. Highways Impact Study

- 10.1. Highways comments were provided by the County Council's Highways team in regards to each individual site, these comments helped to inform the assessment undertaken by Land Use Consultants.
- 10.2. Further highways analysis is being undertaken on each of the four site option combinations to assess the highways implications and combined effects of the site combinations.

11. Health Impact Assessment

- 11.1. A Health Impact Assessment (HIA) is also being prepared as an evidence base document to support the Draft Minerals Local Plan.
- 11.2. The HIA will be a high level assessment starting with a baseline position to screen and scope the policies contained within the Draft Plan. The HIA will focus on policies; the HIA will not screen individual specific sites at this stage, as it will be dependent on detailed site information. It is therefore recommended that further screening of specific sites should be carried out during the planning application process.
- 11.3. The HIA will use the comprehensive health profile for Hertfordshire (2016) to provide the baseline position. The HIA will assess the proposed policies using the Health Priorities as set out in the Health and Wellbeing Strategy (2016-2020). The health implications will also be assessed using:
 - The Equality Impact Assessment (EqIA) for determining any impacts on protected characteristics
 - Sustainability Appraisal (SA) Objectives 9.1 Health, Well-being and Amenity of Residents, 9.2 Recreation (loss) and 9.3 Recreation (provision)
 - Site Selection Criteria for proximity of allocated residential or built development, Sensitive land uses, Sustainable transport and pollution to the environment (dust, air, water).

12. Analysis of Options

- 12.1. The estimated tonnages for each of the four options would make sufficient contribution to meet the required tonnage for the MLP.
- 12.2. Paragraph 145 of the NPPF states that *'Minerals planning authorities should plan for a steady and adequate supply of aggregates by ensuring that large landbanks bound up in very few sites do not stifle competition'*.
- 12.3. In order to prevent a large landbank in a single site and potentially stifle competition, it is important to identify a spread of sites/areas.

12.4. The following four site options look at a number of different scenarios. All options are finely balanced.

| Option 1 | Option 2 |
|--|--|
| <ul style="list-style-type: none"> • Pynesfield • Broad Green • Robins Nest Hill • Land at BAe (Preferred Area) • Hatfield Aerodrome • Land Adjoining Coopers Green Lane • Southfield Wood • Land at Rickneys (Preferred Area) | <ul style="list-style-type: none"> • Broad Green • Furze Field • Land at BAe (Preferred Area) • Hatfield Aerodrome • Land Adjoining Coopers Green Lane • Land at Rickneys (Preferred Area) |
| Option 3 | Option 4 |
| <ul style="list-style-type: none"> • Furze Field • Hatfield Aerodrome • Land Adjoining Coopers Green Lane • Land at Rickneys (Preferred Area) • Land at Ware Park | <ul style="list-style-type: none"> • Furze Field • Hatfield Aerodrome • Land Adjoining Coopers Green Lane • Briggens Estate (Preferred Area) |

12.5. **Option 1** is made up of seven sites and two existing preferred areas. This is the conclusion of the consultant's assessment of the sites and areas put forward. The total tonnage of this option is 21,750,000 tonnes. The deliverability of option 1 is reduced due to the uncertainty in:

- Economic viability
- Land ownership constraints

12.6. **Option 2** comprises four sites and two existing preferred areas. This option is based upon option 1 with the sites identified as undeliverable removed. The total tonnage of this option is 19,900,000 tonnes. The deliverability of some of the sites in Option 2 is also uncertain due to:

- Lack of promotion by interested parties for the preferred areas, and
- Environmental constraints previously identified through planning history

12.7. **Option 3** comprises four sites and one existing preferred area. The total tonnage is 21,050,000 tonnes. Due to the questions over deliverability in Option 1 and 2, Option 3 incorporates a different site grouping to provide a variation. The deliverability of some of the sites in Option 3 are uncertain due to:

- Lack of promotion by interested parties for the preferred areas, and
- Environmental constraints previously identified through planning history

- 12.8. **Option 4** includes three sites and one new proposed preferred area. The total tonnage is 25,750,000 tonnes. The deliverability of the sites/areas in Option 4 are more certain due to:
- active promotion by industry,
 - positive planning history,
 - no landownership constraints, and
 - no reliance on a single site/area to meet the future requirements
- 12.9. It should be emphasised that all four options have constraints and that the assessment has had to look at what represents the best (or “least worst”) overall mix of factors in terms of the conclusion. All mineral extraction will involve some disturbance and harm to the area in which it takes place.
- 12.10. Sites would be subject to the necessary regulatory procedures for example environmental permits undertaken by other regulatory bodies (such as Environment Agency) which fall outside the remit of the County Council as Minerals and Waste Planning Authority. It is important to note that the detailed site assessments undertaken for the purposes of allocating sites within the Minerals Local Plan do not replace the need for further assessments required as a part of any planning application for a minerals site.

13. Recommended Site Option

- 13.1. Having considered the conclusions of reports and assessments undertaken, on balance the most appropriate option to take forward to the Draft Minerals Local Plan is Option 4. Option 4 comprises Furze Field, Hatfield Aerodrome, Land Adjoining Coopers Green Lane (all three being specific sites) and Briggens Estate (as a preferred area). This option would provide:
- The necessary tonnage to meet the plan requirement
 - Flexibility in regards to timing of sites coming forward
 - The identification of specific sites, preferred areas and/or areas of search (in order of priority) in line with national policy
- 13.2. Option 4 has a higher tonnage than the other options, and provides flexibility to ensure a continuity of supply is met, for example, in the event that an identified site does not come forward or there is an identified need for the mineral that is unlikely to be met in a timely way from the specific sites then the land identified as a preferred area could help to address any shortfall.

14. Brick Clay

- 14.1. Of the two sites put forward for Brick Clay extraction, the consultant’s report concluded that the site known as Harry’s Field, would be the most appropriate site option for allocation in the Minerals Local Plan. However, there is some uncertainty in regards to the deliverability of this site, in addition to further information received that the Brickworks has ceased production. The report also concluded that the site at Roundhill Wood had a number of potential high impacts and therefore would not be suitable for allocation.

14.2. Paragraph 146 of the NPPF introduced a requirement for Mineral Planning Authorities to provide a stock of permitted reserves of at least 25 years for brick clay whilst taking account of the need for provision of brick clay from a number of different sources to enable appropriate blends to be made.

Therefore, to address this requirement the MLP will:

- Identify any permitted reserves,
- Safeguard resources through defined Mineral Safeguarding Areas and
- Identify any future permitted reserves through the annual update of the Local Aggregates Assessment

15. Next Steps

15.1. The timetable for the stages of work are outlined below:

| | |
|-------------------------------|---|
| 19 July 2017 | Member Briefing Workshop - focusing on the process and work undertaken in regards to site selection and why we need to identify a number of sites, apportionment figures etc. No decisions would be taken at the workshop, the purpose would be to inform Members of the technical work undertaken in an informal environment ahead of sites being reported to Members in September |
| 7 September 2017 | Environment, Planning and Transport Panel to consider site options for Minerals Local Plan and recommend a preferred option |
| 25 September | Cabinet to confirm the preferred option for the Minerals Local Plan |
| 1 November 2017 | Environment, Planning and Transport Panel with the Draft MLP Plan (including policies and sites) for consultation and Omissions Consultation |
| 13 November 2017 | Cabinet to agree the Draft MLP Plan (including policies and sites) for consultation and Omissions Consultation |
| 21 November 2017 | County Council to agree the Draft MLP Plan (including policies and sites) for consultation and Omissions Consultation |
| December 2017 – February 2018 | Regulation 18 - Draft Minerals Local Plan Consultation and Omissions Consultation |

16. Financial Implications

- 16.1. Plan production is the normal business of the Minerals and Waste Policy Team and the cost of plan production can be covered by existing budgets. The estimated costs for the Minerals Local Plan review are set out in the Minerals and Waste Development Scheme (adopted November 2016). The budget for the next three years has been based on previous plan production costs.

17. Equalities Impact Assessment (EqIA)

- 17.1. When considering proposals placed before Members it is important that they are fully aware of, and have themselves rigorously considered, the equality implications of the decision that they are making.
- 17.2. Rigorous consideration will ensure that proper appreciation of any potential impact of that decision on the County Council's statutory obligations under the Public Sector Equality Duty. As a minimum this requires decision makers to read and carefully consider the content of any Equalities Impact Assessment (EqIA) produced by officers.
- 17.3. The Equality Act 2010 requires the County Council when exercising its functions to have due regard to the need to (a) eliminate discrimination, harassment, victimisation and other conduct prohibited under the Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics under the Equality Act 2010 are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief, sex and sexual orientation.
- 17.4. An Equality Impact Assessment (EqIA) has been undertaken for the review of the Minerals Local Plan and an addendum undertaken for each stage of the plan production (Appendix 4). The Minerals Local Plan review EqIA concludes that potential equality impacts may arise during stakeholder events and consultations and proposes a range of reasonable mitigations to minimise the potential impacts.
- 17.5. An addendum to the EqIA will be developed to inform the Draft Plan Consultation which will include sites/areas.

Appendix 1 – Call for Sites Maps

Appendix 2 – Maps of Preferred Areas

Appendix 3 – LUC Site Selection Report – March 2017

Appendix 4 – EqIA's

Background documents referred to and used in writing this report:

The National Planning Policy Framework (2012), DCLG

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

The National Planning Practice Guidance (2014), DCLG

<https://www.gov.uk/government/collections/planning-practice-guidance>

Town and Country Planning (Local Planning) (England) Regulations 2012

http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf