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Sustainability Appraisal of the Hereford Area Plan and Rural Area Site Allocation Development Plan Documents

Prepared by LUC
May 2017

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1 Introduction

Introduction

- 1.1 This Sustainability Appraisal Report has been prepared by LUC on behalf of Herefordshire Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Hereford Area Plan Development Plan Document (DPD) and the Rural Area Site Allocations DPD. Both documents are currently at the Issues and Options stage of the plan-making process. This SA Report should therefore be read in conjunction with those documents.

Geographical Context for the Herefordshire DPDs

- 1.2 Herefordshire is a large, predominately rural, landlocked county situated in the south western corner of the West Midlands region, on the border with Wales. Herefordshire shares boundaries with five English local authorities (Worcestershire, Shropshire and Gloucestershire County Councils, and Malvern Hills and Forest of Dean District Councils) and three Welsh local authorities (Monmouthshire County Council, Powys County Council, and the Brecon Beacons National Park Authority).
- 1.3 The county area covers 217,973 hectares. High hill ranges, including the Malvern Hills and Black Mountains, encircle much of the county at its perimeter. Away from these areas, the landscape is one of gentle rolling hills, dissected by wide river valleys with lower-lying plains in the centre. River crossing points have provided a natural focus for the development of many settlements, with others dispersed across Herefordshire's rich and diverse landscape.
- 1.4 The meandering river valley landscape which is the county's principal geographical feature is that of the River Wye; which enters Herefordshire near the Welsh town of Hay-on-Wye, flowing east to Hereford before leaving the county at the Wye Gorge, downstream of Ross-on-Wye. Herefordshire contains parts of two protected landscapes of national importance: the Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty (AONB).
- 1.5 At the county's heart is the city of Hereford which is the main centre for civil and ecclesiastical administration, health, education and leisure facilities, shopping and employment. The five market towns of Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye surround the city. Outside these urban areas, villages and smaller settlements, farms and other isolated properties characterise much of Herefordshire.

Herefordshire Development Plan Documents

- 1.6 The [Herefordshire Local Plan Core Strategy 2011-2031](#) was adopted in October 2015 and forms part of the Local Plan for Herefordshire. The Core Strategy does not allocate land directly but proposes broad strategic directions for growth in sustainable locations. A Hereford Area Plan and other DPDs and Neighbourhood Development Plans (NDPs) will follow the Core Strategy and will allocate large, medium and small sites to meet the identified development requirements for the county. The Core Strategy together with the Hereford Area Plan DPD, the Minerals and Waste Local Plan, the Travellers' Sites DPD, the Rural Area Site Allocations DPD, and NDPs prepared by Town or Parish Councils, will form the statutory Development Plan for Herefordshire¹.
- 1.7 The Core Strategy proposes to help deliver 16,500 homes over the 2011-31 plan period. Strategic housing allocation sites have been identified around Hereford and the five market towns

¹ In addition, a separate Bromyard DPD may be prepared, however it is also possible that the parish of Bromyard and Winslow may be covered within the Rural Area Site Allocations DPD.

(Bromyard, Leominster, Ledbury, Ross-on-Wye, Kington), with provision also for almost a third of all housing to be directed to the rural areas to help to sustain local services, generate new services, and support local housing provision for local communities. In addition to the housing allocations, the Core Strategy provides for a supply of 148ha of employment land over the plan period with strategic employment sites identified at Hereford, Leominster, Ledbury and Bromyard.

- 1.8 The Core Strategy has a vision and 12 objectives aligned under the themes of promoting social progress (supporting strong communities by meeting housing, education and health, transport and infrastructure needs), economic prosperity (supporting new jobs, area regeneration, business, tourism and retail) and environmental quality (addressing climate change, protecting and enhancing the environmental assets of the county). The Hereford Area Plan DPD and other DPDs and NDPs must build on the principles and objectives set out in the Core Strategy regarding the development and use of land in Herefordshire.
- 1.9 The **Hereford Area Plan DPD** will set out the detailed proposals for the delivery of sustainable growth in the historic city of Hereford including housing, employment and urban regeneration. It will include specific policies and proposals for housing; employment; town centre/retail/leisure; environmental enhancement/conservation/protection; and other significant proposals (e.g. the provision of a new university).
- 1.10 The **Rural Area Site Allocations (RASA) DPD** will enable the delivery of Policies RA1 and RA2 in the Local Plan – Core Strategy in those areas that are not producing a neighbourhood development plan (NDP). There are currently 107 NDPs² in production within Herefordshire, but some parishes have decided not to produce an NDP, and these are the areas which the DPD will be concentrated on. The DPD will include a combination of settlement boundaries and site allocations for those places within the document to enable proportionate growth. The RASA DPD is not intended to replace any NDP which has been adopted or has made significant progress towards adoption. It also does not provide an opportunity to revisit the rural housing strategy within the Core Strategy which has been subject to examination in February 2015.
- 1.11 This report will focus on the SA of both the Hereford Area Plan DPD and the Rural Area Site Allocations DPD due mainly to their timelines for preparation running in parallel but also as they both relate to residential and employment development within the County.

Sustainability Appraisal and Strategic Environmental Assessment

Introduction

- 1.12 Sustainability Appraisal 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.
- 1.13 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive³, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). 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)⁴. The purpose of SEA, as defined in Article 1 of the SEA Directive 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'*.
- 1.14 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as

² As at March 2017.

³ SEA Directive 2001/42/EC

⁴ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

advocated in the [National Planning Practice Guidance](#)), whereby users can comply with the requirements of the SEA Directive through a single integrated SA process – this is the process that is being undertaken in Herefordshire. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Directive’.

Habitats Regulations Assessment

- 1.15 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site.
- 1.16 The HRA for the Hereford Area Plan DPD and the Rural Area Site Allocations DPD will be undertaken separately to the SA and will need to consider the potential for adverse effects on the integrity of European sites both alone and in combination with development proposed in neighbouring authorities’ plans. The findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations proposed in the DPDs on biodiversity).
- 1.17 The adopted Herefordshire Local Plan Core Strategy was subject to HRA by the Council throughout its preparation, and that HRA work will be drawn on as appropriate throughout the HRA of the Hereford Area Plan and the Rural Area Site Allocations DPDs.

Meeting the requirements of the SEA Directive

- 1.18 **Table 1.1** below signposts how the requirements of the SEA Regulations have been met within this SA Report.

Table 1.1 Meeting the Requirements of the SEA Directive

SEA Directive Requirements	Covered in this SA Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapters 1 and 3, and Appendix 1.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Chapter 3.
c) The environmental characteristics of areas likely to be significantly affected;	Chapter 3.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	Chapter 3.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Chapter 3 and Appendix 1.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapters 4-5 and Appendices 3-4.
g) 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;	Chapters 4-5.

SEA Directive Requirements	Covered in this SA Report
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2.
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	To be prepared at a later stage in the plan process.
j) a non-technical summary of the information provided under the above headings	To be prepared at a later stage in the plan process.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Addressed throughout the SA report.
Consultation:	
<ul style="list-style-type: none"> authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4) 	Consultation on the SA Scoping Report was undertaken between November and December 2016. Consultation responses received have been addressed in this SA Report (as explained in Appendix 5).
<ul style="list-style-type: none"> authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) 	Consultation is being undertaken for 8 weeks between May 2017 and June 2017 and will continue to be undertaken for all future iterations of the DPDs.
<ul style="list-style-type: none"> other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	N/A
Provision of information on the decision:	
When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:	To be addressed after the DPDs are adopted.
<ul style="list-style-type: none"> the plan or programme as adopted a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Art. 9) 	
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be addressed after the DPDs are adopted.

Structure of the SA Report

1.19 This chapter has described the background to the production of the Hereford Area Plan DPD and the Rural Area Site Allocations DPD, and the requirement to undertake SA and other assessment processes. The remainder of this report is structured into the following sections:

- **Chapter 2** explains the methodology for the SA.
- **Chapter 3** sets out the sustainability context for development in Herefordshire.
- **Chapter 4** describes the SA findings of the options for the Hereford Area Plan DPD.
- **Chapter 5** describes the SA findings of the options for the Rural Area Site Allocations DPD.
- **Chapter 6** summarises the key findings from the SA and describes the next steps to be undertaken in the plan making process.

1.20 The appendices to the SA Report are structured as follows:

- **Appendix 1** sets out the review of relevant plans, policies and programmes.
- **Appendix 2** presents maps of the baseline information.
- **Appendix 3** presents the detailed SA matrices of the options for the Hereford Area Plan DPD.
- **Appendix 4** presents the detailed SA matrices of the options for the Rural Area Site Allocations DPD.
- **Appendix 5** presents the consultation comments received in relation to the SA Scoping Report and describes how these comments were addressed in the SA.

2 Methodology

Introduction

- 2.1 The methodology set out in this chapter describes the approach that has been taken to the SA of the Hereford Area Plan DPD and the Rural Area Site Allocations DPD to date. In addition to complying with legal requirements, the approach being taken to the SA of the DPDs is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process. **Table 2.1** sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 2.1 Corresponding stages in plan making and SA

Step 1: Evidence Gathering and engagement
SA stages and tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
1: Identifying other relevant policies, plans and programmes, and sustainability objectives
2: Collecting baseline information
3: Identifying sustainability issues and problems
4: Developing the SA framework
5: Consulting on the scope of the SA
Step 2: Production
SA stages and tasks
Stage B: Developing and refining options and assessing effects
1: Testing the Plan objectives against the SA Framework
2: Developing the Plan options
3: Evaluating the effects of the Plan
4: Considering ways of mitigating adverse effects and maximising beneficial effects
5: Proposing measures to monitor the significant effects of implementing the Plan
Stage C: Preparing the Sustainability Appraisal Report
1: Preparing the SA Report
Stage D: Seek representations on the Plan and the Sustainability Appraisal Report
1: Public participation on Plan and the SA Report
2(i): Appraising significant changes
Step 3: Examination
SA stages and tasks
2(ii): Appraising significant changes resulting from representations
Step 4 & 5: Adoption and Monitoring
SA stages and tasks
3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the Plan
1: Finalising aims and methods for monitoring
2: Responding to adverse effects

SA Stage A: Scoping

- 2.2 The SA process began in November 2016 with the production of a Scoping Report for the Hereford Area Plan DPD and the Rural Area Site Allocations DPD.
- 2.3 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to the DPDs were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
 - Baseline information was collected on environmental, social and economic issues. This baseline information provides the basis for predicting and monitoring the likely effects of the DPDs and helps to identify alternative ways of dealing with any adverse effects identified.
 - Key sustainability issues for the County were identified.
 - A Sustainability Appraisal framework was presented, comprising the SA objectives against which options and, subsequently, sites and policies would be appraised. The SA framework provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. It sets out a series of sustainability objectives and associated questions that can be used to 'interrogate' options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the County with regard to social, economic and environmental considerations. During the SA, the performances of the DPD options are assessed against these SA objectives and appraisal questions. The SA objectives are grouped into six themes to enable related sustainability issues to be considered together during the appraisal (see **Table 2.2**). The six themes are as follows:
 1. Education and employment.
 2. Healthy and prosperous communities.
 3. Transport and access.
 4. Built environment.
 5. Resource consumption and climate change.
 6. Natural environment.
- 2.4 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping Report for the DPDs was published in November 2016 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and English Heritage [now Historic England]).
- 2.5 **Appendix 5** lists the comments that were received during the scoping consultation and describes how these were assessed in the SA report. The wording of some of the objectives has been revised since the Scoping Report to take into account the suggestions of the statutory consultees. The content of Objective 21: *Minimise pollution* in the Scoping Report sought to minimise pollution of water, groundwater, air, soil, noise and light. However, this objective was deemed to cover too many issues and has been divided into three separate objectives to ensure each issue is thoroughly appraised in the SA (Objective 20: *Value, protect and enhance the quality of watercourses and maximise the efficient use of water*; Objective 22: *Minimise noise, light and air pollution*; and, Objective 23: *Value, protect and enhance soil quality and resources*).

Table 2.2 SA Framework for the Hereford Area Plan DPD and the Rural Area Site Allocations DPD

SA Objective	Appraisal Question	SEA Topic covered by objective
Education and Employment		
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	<p>1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors.</p> <p>1.2 Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport.</p> <p>1.3 Encourage fair and decent work conditions and increase median weekly earnings.</p> <p>1.4 Help to increase diversity of job opportunities.</p>	Material assets ⁵
2. Maintain or enhance conditions that enable a sustainable economy and continued investment.	<p>2.1 Improve the resilience and/or diversity of business and the economy.</p> <p>2.2 Provide or facilitate availability of appropriate sites and properties for new business opportunities or growth whilst using natural resources efficiently.</p> <p>2.3 Encourage and support a culture of enterprise, innovation and lifelong learning, including social enterprise or the voluntary sector.</p> <p>2.4 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives.</p> <p>2.5 Support lifelong learning and training to attract and retain a highly skilled workforce.</p>	Material assets, population
3. Sustainable regeneration	<p>3.1 Help create an appropriate range of independent, competitive and national retailers.</p> <p>3.2 Help reduce the number of vacant properties and support vitality.</p>	Material assets
4. Raise educational achievements throughout the county	4.1 Ensure that education infrastructure meets projected future demand and need.	Material assets, population
Healthy and Prosperous Communities		
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically, and encourage healthy living for all.	<p>5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport.</p> <p>5.2 Help to reduce inequalities in health.</p> <p>5.3 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 developments.</p> <p>5.4 Avoid or minimise adverse effects on the quality and extent of existing recreational assets.</p>	Population, human health
6. Improve public realm.	6.1 Support or create high quality public realm and community/amenity space that is safe and encourages positive community interaction.	Material assets, population
7. Reduce and prevent crime/fear of crime and anti-social behaviour in the county.	<p>7.1 Enhance community safety and security through design measures, and reduce crime or fear of crime and anti-social behaviour.</p> <p>7.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour through design measures.</p>	Population

⁵ 'Material assets' is listed as one of the topics to be considered in the SEA, but there is no clear definition of what this topic should cover in the SEA Directive or Regulations, and it has been variously defined in different SEA reports as relating to natural resources, e.g. minerals, or built infrastructure, e.g. transport infrastructure. For the purposes of this SEA, the material assets topic is assumed to include resources such as water, minerals and waste, as well as built infrastructure, including transport and waste infrastructure, but also economic and employment infrastructure and interests.

SA Objective	Appraisal Question	SEA Topic covered by objective
	7.3 Encourage respect for people and the environment.	
8. Reduce poverty and, promote equality and social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.	<p>8.1 Ensure easy and equitable access to and provision of services and opportunities, including jobs and learning, and avoid negative impacts on different groups of people because of their ethnicity, gender, religion, disability, sexuality or age.</p> <p>8.2 Enable the involvement of all affected parties, including hard-to-reach groups.</p> <p>8.3 Promote equality, fairness and respect for people and the environment.</p> <p>8.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages.</p>	Population, human health
Transport and Access		
9. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking.	<p>9.1 Reduce the need to travel.</p> <p>9.2 Promote more sustainable transport patterns in areas suffering from congestion.</p> <p>9.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all.</p> <p>9.4 Increase the use of public transport, cycling and walking.</p> <p>9.5 Secure the implementation of green travel plans.</p> <p>9.6 Minimise risks associated with car travel.</p> <p>9.7 Promote a shift of freight from road to rail.</p>	Material assets
10. Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all.	<p>10.1 Maintain or increase the type or quality of facilities (including open space) in areas where there is need, ensuring easy and equitable access by sustainable modes of transport.</p> <p>10.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all.</p> <p>10.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport and/or as a catalyst for urban and rural regeneration.</p>	Material assets, population
11. Improve access to services and facilities.	11.1 Support viability or develop services and facilities appropriate to the community, function, character and scale of the centre and existing facilities using sustainable, resource-efficient designs.	Material assets, population
Built Environment		
12. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments.	<p>12.1 Increase access to good quality housing to meet people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people).</p> <p>12.2 Increase the supply of affordable housing.</p> <p>12.3 Reduce the percentage of unfit homes/empty homes.</p> <p>12.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health.</p> <p>12.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction.</p> <p>12.6 Improve the wider built environment and sense of place.</p>	Population, material assets
13. Ensure integrated, efficient and balanced land use.	13.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas which are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to	Soil

SA Objective	Appraisal Question	SEA Topic covered by objective
	<p>travel.</p> <p>13.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design.</p> <p>13.3 Promote ways of meeting local needs by encouraging local sourcing of food, goods and materials.</p>	
14. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.	<p>14.1 Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including Conservation Areas, Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g. locally listed buildings.</p> <p>14.2 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area.</p> <p>14.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space and biodiversity, and promote local distinctiveness and sense of place.</p> <p>14.4 Encourage cleanliness and/or improve the general appearance of the area.</p>	Cultural heritage, including architectural and archaeological heritage
Resource Consumption and Climate Change		
15. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	<p>15.1 Minimise the use of non-reusable materials.</p> <p>15.2 Minimise waste from households, businesses etc. including hazardous waste.</p> <p>15.3 Promote re-use, recovery and recycling of waste.</p> <p>15.4 Deal with waste locally and/or through the best Practical Environmental Option.</p>	Material assets
16. Use natural resources and energy more efficiently.	<p>16.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels.</p> <p>16.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all e.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials, etc.</p> <p>16.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build.</p>	Material assets, air, water, soil
17. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	<p>17.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources.</p> <p>17.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating, etc.</p>	Climatic factors
Natural Environment		
18. Value, maintain, restore and expand county biodiversity.	<p>18.1 Protect and enhance habitats of international, national, regional or local importance.</p> <p>18.2 Protect international, national, regional or locally important terrestrial or aquatic species.</p> <p>18.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces.</p> <p>18.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value.</p> <p>18.5 Create new appropriate habitats.</p>	Biodiversity, fauna, flora
19. Value, protect, enhance and restore the landscape quality of Herefordshire,	19.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings.	Landscape, fauna, flora

SA Objective	Appraisal Question	SEA Topic covered by objective
including its rural areas and open spaces.	19.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management. 19.3 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users.	
20. Value, protect and enhance the quality of watercourses and maximise the efficient use of water	20.1 Protect and enhance the quality of watercourses. 20.2 Maximise the efficient use of water.	Water
21. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	21.1 Reduce flood risk both presently and taking into account climate change. 21.2 Prevent inappropriate development of the floodplain, and include flood protection systems. 21.3 Include sustainable drainage systems (SuDS) where appropriate.	Water
22. Minimise noise, light and air pollution.	22.1 Minimise air, noise and light pollution from current activities and the potential for such pollution. 22.2 Help achieve the objectives of Air Quality Management Plans by increasing the use of public transport, cycling and walking.	Air
23. Value, protect and enhance soil quality and resources.	23.1 Provide opportunities to improve soil quality or reduce contaminated land. 23.2 Avoid the loss of the best and most versatile agricultural land by prioritising the location of housing and employment developments to previously developed sites in preference to greenfield locations.	Soil

SA Stage B: Developing and refining options and assessing effects

- 2.6 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.
- 2.7 Regulation 12 (2) of the SEA Regulations requires that:
"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—
(a) implementing the plan or programme; and
(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme
- 2.8 It should be noted that any alternatives considered to the plan need to be 'reasonable'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.
- 2.9 It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan.

Identification and appraisal of the options for the Hereford Area Plan DPD

- 2.10 Policy SS2 of the Herefordshire Local Plan Core Strategy identifies Hereford as the focus for new development to support its role as the main centre in the county. Hereford has a minimum 6,500 new homes and 15ha of new employment land to deliver within the plan period. The distribution of this housing and employment land has been set out in policy HD1 as follows:
- 800 new dwellings in Hereford City Centre (Policy HD2).
 - 500 dwellings at the Northern Expansion Area (Policy HD4).
 - 1,000 dwellings and 10ha of employment land at the Western Urban Expansion Area (Policy HD5).
 - 1,000 dwellings and 5ha of employment land at the Southern Urban Expansion Area (Policy HD6).
- 2.11 The remaining housing requirement of approximately 3,200 dwellings will be provided through the implementation of existing commitments, windfall development and the development of non-strategic sites allocated through the Hereford Area Plan or Neighbourhood Development Plans. The Council is undertaking a “call for sites” process in parallel with the consultation on the Hereford Area Plan Issues and Options Paper and its SA to provide an opportunity to submit sites for consideration as plan allocations. Any sites which are identified during this process will be subject to SA at a later stage.
- 2.12 High level options for the policies to be included in the Hereford Area Plan DPD are identified in the Issues and Options document and are subject to SA in this report. Reasonable alternative options for the DPD policies were identified by the Council. Options relating to the consultation questions from the Hereford Area Plan DPD Issues and Options document are outlined in **Table 2.3**

Table 2.3 Reasonable alternative options for the Hereford Area Plan DPD

Consultation Question	Option
Housing	
Do you agree that the HAP should only identify sites for a minimum of ten or more dwellings?	Option A – Only identify sites capable of accommodating 10 or more dwellings.
	Option B – Include sites that can accommodate less than 10 dwellings.
Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?	Option A – Include a boundary.
	Option B – No boundary.
Which option should be considered when planning for Houses of Multiple Occupation (HMOs)?	Option A – To set out a criteria based policy to guide the development of HMOs, referring to the consideration of matters such as: <ul style="list-style-type: none"> • The impact on the amenity of adjoining premises and on the character of the area; • The provision for car parking and the traffic situation; • The standard of accommodation, including private amenity space; • Intensification of existing HMOs; • Flexible planning conditions to allow for HMOs to be returned to a single dwelling house without planning permission; • Design.
	Option B - To set a restrictive policy for HMOs, stating that they generally will not be permitted in residential areas which are predominantly in single family occupation (although justifying this in the light of national planning policy guidance through the National Planning Policy Framework may prove difficult).

Consultation Question	Option
	Option C - To seek the approval of the Council for making an Article 4 Direction which would remove the permitted development rights in relation to changes of use from dwelling houses to small HMOs. In conjunction with this, to provide a small criteria-based policy through which to guide planning applications for this type of development, large or small.
Allotments	
Do you think there is a need for more allotment provision, for example as part of new housing developments or on existing open spaces?	Option A - The HAP should seek more allotment provision. Option B - The HAP should not seek any further allotment provision.
Transport	
Is there a need for more parking to be identified? If so, what form should new parking take?	Option A - Yes- more parking should be identified Option B - No- no more parking needs to be identified Option C - Yes- more parking should be identified in the form of multi-storey provision Option D - Yes- more parking should be identified in the form of park and choose provision Option E - Yes- more parking should be identified in the form of other
Employment	
Should the Hereford Area Plan identify more land for new employment development? If so, what type of development should be identified?	Option A - Yes- more land for employment should be identified Option B - No- do not identify any more land for employment Option C - Yes- more employment land should be identified in the form of offices Option D - Yes- more employment land should be identified in the form of manufacturing Option E - Yes- more employment land should be identified in the form of warehousing Option F - Yes- more employment land should be identified in the form of other
Should the Hereford Area Plan allow for a broader range of activities on existing employment sites of poorer quality? If so, what would be considered appropriate alternative uses on existing employment sites of poorer quality?	Option A - Yes- the HAP should allow for other uses on poorer quality employment sites Option B - No- the HAP should not allow for other uses on any existing employment sites Option C - Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of leisure uses Option D - Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of sports/recreational uses Option E - Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of retail uses Option F - Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of other
City centre and retail	
Should the Hereford Area Plan identify further land for new retail development?	Option A - The HAP should seek further retail development. Option B - There is no need for the HAP to identify any further retail development.

Consultation Question	Option
Tourism	
Should additional hotel and/or conference facilities be provided in Hereford?	Option A - The HAP should seek additional hotel and conference facilities.
	Option B - The HAP does not need to seek any additional hotel or conference facilities.
Heritage/Built Environment	
Do you think more specific and detailed policies for the historic environment and heritage assets than those in the Core Strategy are required in the Hereford Area Plan?	Option A - The HAP should include Hereford-specific policies for the historic environment and heritage assets.
	Option B - The existing policies in the Core Strategy are sufficient.

- 2.13 The SA findings are summarised in **Chapter 4** of this report and the detailed SA matrices can be found in **Appendix 3**.

Identification and appraisal of the options for the Rural Area Site Allocation DPD

- 2.14 Policy RA1 outlines that a minimum of 5,300 new dwellings are expected to be provided within the rural areas between 2011 and 2031 to meet the county's housing needs. New dwellings will be broadly distributed across the county's rural areas on the basis of seven Housing Market Areas (HMAs) (see **Table 2.4**).

Table 2.4 Rural housing distribution

Rural HMA	Approximate number of dwellings 2011-2031	Indicative housing growth target (%)
Bromyard	364	15
Golden Valley	304	12
Hereford	1,870	18
Kington	317	12
Ledbury	565	14
Leominster	730	14
Ross-on-Wye	1,150	14
TOTAL	5,300	

- 2.15 Policy RA2 refers to 119 settlements across the county which will be the main focus of proportionate housing development in the rural areas. Residential development will be directed within and adjacent to these existing settlements. Areas outside those highlighted within policy RA2 are considered to be within open countryside where only limited growth will be supported (in line with policies RA3, RA4 and RA5).
- 2.16 The Rural Area Site Allocations DPD Issues and Options document proposes a range of options for the scope of the DPD which are outlined in **Table 2.5** below.

Table 2.5 Reasonable alternative options for the scope of the Rural Area Site Allocations DPD

Range of options for the scope of the Rural Area Site Allocations DPD	
Option 1	Do nothing and rely on Neighbourhood Development Plans (NDPs) and policy RA2.
Option 2	DPD coverage to include all parishes with an RA2 settlement but not within a designated neighbourhood area.
Option 3	DPD coverage to include all parishes without a designated neighbourhood area (as Option 2) and parishes who have formally requested to withdraw from the neighbourhood development plan process.
Option 4	DPD coverage of those parishes within Option 3 plus those who have made no progress since the neighbourhood area designation.

Range of options for the scope of the Rural Area Site Allocations DPD	
Option 5	DPD coverage to include all within Option 4 plus those parishes who have made little progress or little activity during the past 12 months.
Option 6	DPD coverage to include all within Option 4 plus those who have not reached draft plan (Reg14) stage by the preferred options stage of the Rural Area Site Allocation DPD.
Option 7	Produce a separate Bromyard Development Plan Document.
Option 8	Produce a separate Bromyard Housing Market Area (HMA) DPD to cover the town of Bromyard and those parishes within the HMA highlighted within Option 5.

- 2.17 In addition to reasonable alternatives for the scope of the Rural Area Site Allocations DPD, the Council also proposed a number of options relating to the policies to be included in the DPD (see **Table 2.6**).

Table 2.6 Reasonable alternative options for the policies of the Rural Area Site Allocations DPD

Question	Option
Settlement boundary	
In line with the Core Strategy, is the defining of settlement boundaries within the RASA DPD appropriate?	Option A – Yes
	Option B – No
Housing	
What size and type of housing allocations should be provided for in the RASA DPD?	Option A – A range of site sizes for housing allocations.
	Option B – Small sites which contribute to the government objectives of providing housing under half a hectare.
	Option C – Larger sites which contribute to providing a range and mix of housing including affordable housing.
	Option D – Sites specifically for affordable housing and/or starter homes.
Employment	
Should the RASA DPD include allocated sites specifically for employment growth?	Option A – Yes
	Option B – No
Local Green Space/Amenity Space	
Should the RASA DPD designate Local Green Space where appropriate?	Option A – Yes
	Option B – No

- 2.18 The SA findings for all reasonable alternative options for the Rural Area Site Allocations DPD are summarised in **Chapter 5** of this report and the detailed SA matrices can be found in **Appendix 4**.

SA Stage C: Preparing the Sustainability Appraisal Report

- 2.19 This SA Report describes the process that has been undertaken to date in carrying out the SA of the Hereford Area Plan and the Rural Area Site Allocations DPDs. It sets out the findings of options included in the Issues and Options document, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the plan as it is drafted in full.

SA Stage D: Consultation on the Hereford Area Plan and the Rural Area Site Allocations DPDs and this SA Report

- 2.20 Herefordshire Council is inviting comments on the Hereford Area Plan and the Rural Area Site Allocations DPDs and this SA Report. This SA Report is being published for an 8 week consultation period from May to June 2017.

SA Stage E: Monitoring implementation of the Local Plan

- 2.21 Recommendations for monitoring the social, environmental and economic effects of implementing the Hereford Area Plan DPD and the Rural Area Site Allocations DPD will be presented in the next iteration of the SA Report, once a Preferred Approach for the DPDs has been identified.

Appraisal methodology

- 2.22 The reasonable options for the DPDs set out in the Issues and Options document have been appraised against the 23 SA objectives in the SA framework (see Table 2.2), with scores being attributed to each option or preferred approach to indicate its likely sustainability effects on each objective.

++	The option or policy is likely to have a significant positive effect on the SA objective(s).
++/-	The option or policy is likely to have a mixed effect (significant positive and minor negative) on the SA objective(s).
+	The option or policy is likely to have a positive effect on the SA objective(s).
0	The option or policy is likely to have a negligible or no effect on the SA objective(s).
-	The option or policy is likely to have a minor negative effect on the SA objective(s).
-/+	The option or policy is likely to have a mixed effect (significant negative and minor positive) on the SA objective(s).
--	The option or policy is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option or policy will have on the SA objective(s), due to a lack of data.
+/- or +/-	The option or policy is likely to have a mixture of positive and negative effects on the SA objective(s).

Figure 2.1 Key to symbols and colour coding used in the SA of the Hereford Area Plan and Rural Area Site Allocations DPDs

- 2.23 Where a potential positive or negative effect is uncertain, a question mark has been added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).
- 2.24 The likely effects of policies and site allocations need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of policy or site allocation on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

- 2.25 The SA findings for the reasonable alternative options in the DPDs are summarised in **Chapters 4** and **5**. Detailed appraisal matrices for the proposed options for the Hereford Area Plan DPD are presented in **Appendix 3** and the options for the Rural Area Site Allocations DPD are presented in **Appendix 4**.

Difficulties encountered

- 2.26 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process and these are outlined below.
- 2.27 The DPDs, particularly at the early Regulation 18 consultation stage⁶, are high level documents and this is reflected in the relatively high level nature of this SA Report. The policy options lack detail and therefore are subject to greater uncertainty than will be the case at the Regulation 19 Publication stage, once full policy wording has been drafted. Similarly, both DPDs lack detail about the locations of site allocations which again will be addressed at the Preferred Options stage.

⁶ Of the Town and Country Planning (Local Planning) (England) Regulations 2012

3 Sustainability Context for Development in Herefordshire

Review of Relevant Plans, Policies and Programmes (PPP)

- 3.1 The Hereford Area Plan DPD and the Rural Area Site Allocations DPD are not being prepared in isolation, and are greatly influenced by other plans, policies and programmes, and by broader sustainability objectives. The DPDs need to be consistent with international and national guidance and strategic planning policies, and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and local levels.
- 3.2 Schedule 2 of the SEA Regulations requires:
 - (1) "an outline of the...relationship with other relevant plans or programmes"; and
 - (5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"
- 3.3 It is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international, national and local plans, policies and programmes that are of relevance to the DPDs so that any potential links can be built upon and any inconsistencies and constraints addressed.
- 3.4 During the Scoping stage of the SA, a review was undertaken of the plans, policies and programmes that are relevant to the DPDs. This review has been revised and updated in light of comments received during the Scoping Report consultation. The updated review can be seen in full in **Appendix 1** and the key findings are summarised below.

Key international plans, policies and programmes

- 3.5 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the DPDs. These processes should be undertaken iteratively and integrated into the production of the DPDs in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 3.6 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the international directives have been included in **Appendix 1** for completeness.
- 3.7 **Table 3.1** lists the international plans and programmes which are of relevance to the DPDs.

Table 3.1 Key international plans and programmes reviewed for the SA of the DPDs

INTERNATIONAL
IPCC's Fifth Assessment Report on Climate Change (IPCC, 2014)
Johannesburg Declaration on Sustainable Development (2002)
Aarhus Convention (1998)
Bern Convention (1979)

Ramsar Convention – Convention on Wetlands of International Importance (1971)
EU DIRECTIVES
SEA Directive 2001
The Birds Directive 2009
The Habitats Directive 1992
The Water Framework Directive 2000
The Floods Directive 2007
The Drinking Water Directive 1998
The Bathing Water Quality Directive 2006
The Air Quality Directive 2008
The Noise Directive 2000/14/EC
The Waste Framework Directive 2008
The Landfill Directive 1999
The Nitrates Directive 1991
The Industrial Emissions Directive 2010
The Packaging and Packaging Waste Directive 1994
The Urban Waste Water Directive 1991
EUROPEAN
EU Seventh Environmental Action Plan to 2020
EU Biodiversity Strategy to 2020
European Spatial Development Perspective (1999)
European Landscape Convention (Florence, 2002)
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)

Key national plans, policies and programmes

- 3.8 The most significant development in terms of the policy context for the DPDs has been the publication of the National Planning Policy Framework (NPPF) which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:

“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”

- 3.9 The NPPF also requires Local Plans to be ‘aspirational but realistic’. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.10 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and

- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

3.11 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and,
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

3.12 **Table 3.2** lists the national plans and programmes which are of relevance to the DPDs.

Table 3.2 Key national plans and programmes reviewed for the SA of the DPDs

NATIONAL
DCLG (2012) <i>National Planning Policy Framework</i>
DCLG (2015) <i>Planning Policy for Traveller Sites</i>
DCLG (2014) <i>National Planning Policy for Waste</i>
DEFRA (2013) <i>National Waste Management Plan for England</i>
HM Government (2013) <i>Waste prevention programme for England: Prevention is better than cure – The role of waste prevention in moving to a more resource efficient economy</i>
HM Government (2009) <i>The UK Low Carbon Transition Plan</i>
HM Government (2011): <i>The Carbon Plan: Delivering our low carbon future</i>
DECC (2009) <i>The UK Renewable Energy Strategy</i>
DEFRA (2013) <i>The National Adaptation Programme – Making the Country Resilient to a Changing Climate</i>
DEFRA (GP3): <i>Underground, Under threat – Groundwater Protection: Policy and Practice</i>
Environment Agency (2011) <i>The National Flood and Coastal Erosion Risk Management Strategy for England</i>
DEFRA (2008) <i>Future Water: The Government’s Water Strategy for England</i>
Environment Agency (2009) <i>Water for People and the Environment: Water Resources Strategy for England and Wales</i>
DEFRA (2009) <i>Safeguarding our Soils: A Strategy for England</i>
DEFRA (2007) <i>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland</i>
DEFRA (2011) <i>Biodiversity 2020: A strategy for England’s wildlife and ecosystem services</i>
DEFRA (2011) <i>Securing the Future: Delivering UK Sustainable Development Strategy</i>
DECC (2014) <i>Community Energy Strategy</i>
DECC (2012) <i>The Energy Efficiency Opportunity in the UK</i>
DoH (2010) <i>Healthy Lives, Healthy People: our Strategy for public health in England</i>

DCLG (2011) <i>Laying the Foundations: A Housing Strategy for England</i>
DfT (2013) <i>Door to Door: A Strategy for Improving Sustainable Transport Integration</i>
WHITE PAPERS
DEFRA (2011) <i>The Natural Choice: Securing the value of nature</i>
DEFRA (2011) <i>Planning our Electric Future: A White Paper for Secure, Affordable and Low-Carbon Electricity</i>
DEFRA (2011) <i>Water for Life</i>
NATIONAL LEGISLATION
Flood and Water Management Act 2010
Climate Change Act 2008
Housing Act 2004
REGULATIONS
The Conservation of Habitats and Species Regulations (2010) (as amended)

Key local plans, policies and programmes

- 3.13 At the sub-regional and local levels there are a wide range of plans and programmes that are specific to Herefordshire which provide further context for the DPDs. These plans and programmes relate to issues such as the economy, transport, climate change and green infrastructure. Some of the key documents are discussed below. A full list can be found in **Appendix 1**.

Herefordshire Local Plan - Core Strategy

- 3.14 The Hereford Area Plan and Rural Area Site Allocations DPDs will sit alongside the adopted [Herefordshire Local Plan - Core Strategy](#) (adopted 2015) as part of the statutory Development Plan for Herefordshire. The Core Strategy provides the strategic planning framework for the county's future development needs up to 2031. The Core Strategy requires a minimum of 16,500 homes between 2011 and 2031, with at least 6,500 new homes in Hereford and 5,300 homes in rural areas. Neighbourhood Plans should allocate land for the relevant housing need in their area and those areas without Neighbourhood Plans will have land allocated through the Rural Area Site Allocations DPD. The Core Strategy sets a target of 148ha of new employment land over the plan period.

Herefordshire Local Transport Plan 4 (LTP4) 2016-2031

- 3.15 The [Herefordshire Local Transport Plan 4](#) was adopted in May 2016 and covers the period 2016-2031. It sets out the Council's strategy for supporting economic growth, improving health and wellbeing and reducing environmental impacts of transport. Objectives of the plan include ensuring transport infrastructure enables economic growth and reducing single occupant, short-distance car journeys.

Waste Management Strategy for Herefordshire and Worcestershire 2004-2034

- 3.16 The aim of the joint [Waste Management Strategy for Herefordshire and Worcestershire 2004-2034](#) (2011) is to decrease waste production and increase the recovery of value from waste, by treating it as a resource. The strategy is guided by a number of principles, including commitment to the waste hierarchy and waste prevention, minimising the use of landfill and consideration of social, environmental and economic impacts.

Invest Herefordshire – Herefordshire's Economic Vision (2017)

- 3.17 [Invest Herefordshire – Herefordshire's Economic Vision](#) identifies a series of private sector investment opportunities that will contribute to the growth of the county. It also sets out what the public sector will provide in terms of creating the conditions to encourage economic growth. The economic vision has four key roles: (1) to support the growth of the Herefordshire economy by identifying priority projects; (2) to attract investment to Herefordshire and guide it within the county; (3) to raise the profile of Herefordshire and the investment opportunities; and (4) to provide Herefordshire with clear priorities for negotiations.

Herefordshire Local Flood Risk Management Strategy (2016) (Draft for consultation)

- 3.18 The draft [Herefordshire Local Flood Risk Management Strategy](#) (2016) sets out the framework for how the Council will work with other local flood risk management authorities and the general public to better understand and manage existing and future flood risks from all potential sources of flooding.

Wye Valley AONB Management Plan 2015-2020

- 3.19 The [Wye Valley AONB Management Plan 2015-2020](#) (2016) is intended to provide guidance and strategic objectives to support and steer positive landscape change. Aims include conservation and enhancement of landscape, biodiversity and heritage assets as well as guiding sustainable land management and development.

Malvern Hills AONB Management Plan 2014-2019

- 3.20 The purpose of the [Malvern Hills AONB Management Plan 2014-2019](#) (2014) is to help all those involved in managing the AONB to conserve its special qualities, manage pressures on these qualities and improve the AONB for current and future generations of people who live in and visit the area. Aims include conservation, enhancement and wise use of biodiversity, geodiversity, landscape and resources within the AONB. Aims also include supporting tourism and reducing the impact of car traffic in the AONB.

River Wye SAC Nutrient Management Plan (2014)

- 3.21 The 2010 HRA for the Herefordshire Local Plan - Core Strategy identified likely significant effects on water quality as a result of the plan at that stage. In light of this result, Herefordshire Council established a Water Steering Group comprising officers from the Council, Natural England, the Environment Agency and Dwr Cymru Welsh Water.
- 3.22 The key outcome of the Water Steering Group discussions has been extensive joint working on the production of a [River Wye SAC Nutrient Management Plan](#) (NMP). The NMP sets out measures which could be implemented in order to ensure the favourable conservation status of the SAC in respect of phosphate levels as soon as possible and at the latest by 2027 taking into account the existing river phosphate levels and existing water discharge permits. The NMP also seeks to identify actions that would enable additional development (beyond existing consents) to proceed during the period 2013 to 2031 of the type and amount, and in the locations specified in or pursuant to the emerging Herefordshire Core Strategy and other relevant development plans.
- 3.23 The NMP comprises three parts: Evidence Base, Options Appraisal and Action Plan. The Environment Agency commissioned consultants to carry out the first two parts. The [Evidence Base](#) has been produced using source apportionment modelling software to identify the phosphate contributions from the different sources within the catchment. The evidence base also contains the predicted impact of growth in Powys and Herefordshire on the SAC. The Options Appraisal section explores some of the measures available to reduce the phosphate loads. The [Action Plan](#) was published in November 2014 and aims to be a 'living document' in that it will undergo regular review and be adapted through time to take account of new evidence. Actions include reviewing the discharge permitting process and community engagement. The first review of the Action Plan is anticipated to be completed later in 2017. An NMP Board has been established comprising a range of partner organisations with the aim of identifying and delivering the actions that achieve the phosphorous conservation target of the River Wye SAC.

Neighbouring Local Plans

- 3.1 Throughout the preparation of the DPDs and the SA process, consideration will be given to the Local Plans being prepared by the authorities around Herefordshire. The development proposed in those authorities could give rise to in-combination effects with the effects of the DPDs, and the effects of the various plans may travel across local authority boundaries.

Shropshire Local Development Framework: Adopted Core Strategy 2006-2026

- 3.2 Shropshire lies to the north of Herefordshire. The [Adopted Core Strategy 2006-2026](#) (2011) sets out Shropshire Council's vision, strategic objectives and the broad spatial strategy to guide future development and growth in Shropshire, until 2026. It aims to deliver more sustainable places at all levels and in both urban and rural settings. It places particular importance on ensuring that

Shropshire’s market towns and rural settlements become more sustainable and resilient. The Core Strategy aims to deliver 27,500 new homes in the plan period and around 290ha employment land. Shropshire also has a [Site Allocations and Management of Development Plan](#), adopted in 2015, which identifies specific sites for delivering development.

Powys Local Development Plan 2011-2026

- 3.3 Powys lies to the west of Herefordshire. The [Powys Local Development Plan 2011-2026](#) sets out Powys County Council’s policies for development and land use in Powys, excluding the Brecon Beacons National Park, up to 2026. The LDP provides land to meet the housing requirement of 2,500 dwellings, including 949 affordable homes, over the plan period. The LDP also provides for 45ha employment land and includes policies to meet the needs of the local economy. The LDP also aims to support the character, distinctiveness and heritage of Powys. The Council is currently consulting on proposed further changes to the LDP.

Monmouthshire Local Development Plan 2011-2021

- 3.4 Monmouthshire lies to the southwest of Herefordshire. The vision of the [Monmouthshire Local Development Plan 2011-2021](#) (adopted 2014) is to make Monmouthshire a place where people live in inclusive, cohesive, prosperous and vibrant communities, the distinctive character of the natural and built environment is protected and enhanced and where people enjoy more sustainable, healthy lifestyles. The LDP makes provision for development of 4,950 dwellings over the plan period. In addition, the LDP provides for 37ha new employment land at Magor and around 5-6ha new employment land at Abergavenny, Chepstow and Monmouth.

Forest of Dean Adopted Core Strategy

- 3.5 The Forest of Dean lies to the southeast of Herefordshire. The [Forest of Dean Adopted Core Strategy 2012-2026](#) (2012) is the principal document in the Forest of Dean’s Local Development Framework. The vision of the Core Strategy is to make the Forest of Dean a thriving, sustainable community with a high quality environment, a developing local economy, housing which meets the needs of residents and safer communities. The Core Strategy aims to deliver 5,162 dwellings and approximately 85ha employment land by 2026. New housing and employment provision is to be focused in Lydney, Cinderford, Coleford and Newent.

South Worcestershire Development Plan

- 3.6 South Worcestershire lies to the east of Herefordshire. The [South Worcestershire Development Plan](#) (2016) sets the strategic planning policies for the administrative areas of Malvern Hills District council, Wychavon District Council and Worcester City Council (South Worcestershire Councils), from 2006 to 2030. Objectives of the plan relate to economic success shared by all, stronger, safer communities, a better environment and improving health and wellbeing. The Development Plan provides for about 28,400 dwellings and about 280ha employment land over the plan period.

- 3.7 **Table 3.3** lists the local plans and programmes which are of relevance to the DPDs.

Table 3.3 Key local plans and programmes reviewed for the SA of the DPDs

LOCAL
Herefordshire Council (2015) <i>Herefordshire Core Strategy 2011 – 2031</i>
Herefordshire Council (2011) <i>Waste Strategy for Herefordshire and Worcestershire 2004-2034</i>
Herefordshire Council (2016) <i>Herefordshire Local Transport Plan 4 2016-2031</i>
Herefordshire Council (2005) <i>Biodiversity Action Plan</i>
Herefordshire Council (2017) <i>Invest Herefordshire – Herefordshire’s Economic Vision</i>
Malvern Hills AONB Partnership (2014) <i>Malvern Hills AONB Management Plan 2014-2019</i>
Wye Valley AONB Partnership (2015) <i>Wye Valley AONB Management Plan, 2015-2020</i>
Environment Agency & Natural England (2014) <i>River Wye SAC Nutrient Management Plan (NMP)</i>
Environment Agency (2015) <i>Water for life and livelihoods: The Severn River Basin District Management</i>

<i>Plan</i>
Herefordshire Council (2016) <i>Draft Local Flood Risk Management Strategy</i>
Herefordshire Council (2009) <i>Strategic Flood Risk Assessment for Herefordshire</i>
Environment Agency Wales (2010) <i>The Wye and Usk Catchment Flood Management Plan and The Severn Catchment Flood Management Plan</i>
Herefordshire Council (2005) <i>Biodiversity Action Plan</i>
Shropshire Council (2011) <i>Shropshire Local Development Framework: Adopted Core Strategy 2006-2026</i>
Powys Council (at Examination stage) <i>Powys Local Development Plan 2011-2026</i>
Monmouthshire Council (2014) <i>Monmouthshire Local Development Plan 2011-2021</i>
Forest of Dean District Council (2012) <i>Forest of Dean Adopted Core Strategy</i>
Malvern Hills District Council, Worcester City Council and Wychavon District Council (2016) <i>South Worcestershire Development Plan</i>

Baseline Information

- 3.8 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.
- 3.9 Annex 1 of the SEA Directive requires information to be provided on:
- (a) *the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;*
- (b) *the environmental characteristics of areas likely to be significantly affected;*
- (c) *any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].*
- 3.10 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter relationship between these factors. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included, for example information about housing, social inclusiveness, transport, energy, waste and economic growth. Baseline information, largely based on that collated for the SA of the adopted Core Strategy and the Scoping Report of the DPDs, is presented in following paragraphs.

The Plan Area

- 3.11 The county town of Hereford is the main urban centre in Herefordshire. There are five market towns in the county, namely:
- Bromyard;
 - Kington;
 - Ledbury;
 - Leominster; and,
 - Ross-on-Wye.
- 3.12 The market towns of Kington, Ledbury, Leominster and Ross-on-Wye are not included in either the Hereford Area Plan or the Rural Area Site Allocations DPDs as they are producing their own neighbourhood development plans. The parish of Bromyard and Winslow has formally withdrawn from the neighbourhood development plan process and, therefore the market town of Bromyard will either be covered in a separate DPD or included within the Rural Area Site Allocations DPD.

There are also a number of smaller towns and villages scattered across Herefordshire, some of which will be included in the Hereford Area Plan and the Rural Area Site Allocations DPDs.

- 3.13 The Hereford Area Plan will include the parishes of Hereford City, Belmont Rural and Holmer & Shelwick, as well as the parts of Dinedor and Lower Bullingham parishes which include the Hereford Enterprise Zone (see **Appendix 2** for maps). The main urban area of Hereford lies primarily in Hereford City parish. The Rural Area Site Allocations DPD will apply to all other parishes, with the exception of those that are currently undertaking an NDP or those with no settlements listed in the Core Strategy.. The parishes included in the Rural Area Site Allocations DPD are listed in **Table 3.4**.

Table 3.4 Parishes and parish groups included in the Rural Area Site Allocations DPD

Parishes	Group Parish Councils
Sellack	Stapleton Group
Monkland and Stretford	Kinnersley and District Group
Birley with Upper Hill	Thornbury Group
Hope Mansett	Much Cowarne Group
Pipe and Lyde	Brockhampton Group
Hapton Charles	Eastnor and Donnington Group
Much Dewchurch	Acton Beauchamp Group
Dinmore	North Bromyard Group
Stoke Lacy	
Stoke Edith	
Marstow	
Linton	
Aston Ingham	
Mathon	
Coddington	

Social baseline information

Population

- 3.14 In 2015, Herefordshire had a population of 188,100, with an almost even split between females (50.5%) and males (49.5%)⁷. This is expected to grow to approximately 205,632 by 2031⁸. Hereford City, and Holmer and Shelwick parishes are home to almost a third (29%) of the population of Herefordshire⁹.
- 3.15 Some 21.3% of Herefordshire residents are aged 65 years or older, which is a higher proportion than both the West Midlands as a whole (16.9%) and England (16.3%). The mean age of residents in Herefordshire is 43 years old and the median age is 44 years old, both of which are about 4-5 years older than the West Midlands and England averages. This pattern is reflected in Hereford City and Holmer and Shelwick parishes¹⁰.
- 3.16 93.7% of Herefordshire's population is white English/Welsh/Scottish/Northern Irish/British. This is less diverse than both the West Midlands (79.2%) and England (79.8%). This pattern is also reflected in Hereford City and Holmer and Shelwick parishes¹¹.
- 3.17 Details of population density (number of persons per hectare) are not available at the parish level. The population density of Herefordshire is 0.8 persons per hectare. This is substantially lower than

⁷ Nomis labour market profile – Herefordshire.

⁸ Herefordshire Council (2015) Herefordshire Local Plan Core Strategy 2011-2031

⁹ ONS (2011) Neighbourhood Statistics, Key Figures for 2011 Census

¹⁰ *Ibid*

¹¹ *Ibid*

the West Midlands average of 4.3 persons per hectare and the England average of 4.1 persons per hectare¹² which reflects the rural nature of the county.

Trend/key sustainability issue:

The age structure of the population currently shows a higher than average level of retired people. This will have implications for the economy, service provision, accommodation and health.

Large proportion of the population living in rural areas.

Housing

- 3.18 In 2011, Herefordshire contained 81,528 dwellings, of which 24,236 (29.7%) were located in Hereford City and Holmer and Shelwick parishes. Approximately 67.7% of dwellings in Herefordshire are owner occupied, which is slightly higher than the West Midlands (64.9%) and England (63.3%) averages. Only 0.98% of housing in Herefordshire is in shared ownership. Socially rented accommodation accounts for 13.9% dwellings in Herefordshire, whereas 15.5% of dwellings are privately rented. Herefordshire has less socially rented housing than both the West Midlands (19.0%) and England (17.7%). In Hereford City and Holmer and Shelwick parishes, the most common tenure is owner occupied housing. Holmer and Shelwick parish has a much higher proportion of owner occupied households, accounting for 91% of all households. A higher proportion of housing is socially rented in Hereford City (21%), which is more than in the West Midlands and England. Social housing only accounts for 1.5% dwellings in Holmer and Shelwick¹³. There is a high demand for affordable housing in Hereford, particularly in comparison to the rest of the county¹⁴.
- 3.19 Herefordshire has a much higher proportion of detached households (42.3%) than both the West Midlands (23.8%) and England (22.4%). Some 27.8% households are semi-detached and 17.6% are terraced. Flats, maisonettes or apartments make up 11.4% of households and the remainder of households are mobile or temporary structures, shared dwellings or other private rented accommodation¹⁵. Hereford City has a much lower proportion of detached households compared to the county average, at 16.9%. The most common housing type in Hereford City is semi-detached housing, which accounts for 34.0% of all households. Holmer and Shelwick parish consists primarily of detached housing (72.9%) with almost all other dwellings consisting of semi-detached housing (19.8%)¹⁶. In 2007-2008, 3.3% of dwellings in Herefordshire were vacant (excluding second homes) and 1.1% dwellings were second homes¹⁷.
- 3.20 In Q2 2013, the median house price in Herefordshire was £181,500¹⁸. Housing in Herefordshire is less affordable than the England average, with a median house price to median earnings ratio of 8.91:1, compared to 7.25:1 across England¹⁹. Herefordshire has the worst housing affordability ratio in the West Midlands²⁰.
- 3.21 The Local Housing Requirements Study Update²¹ identified an objectively assessed need of an additional 15,400 to 16,200 homes between 2011 and 2031. The Core Strategy (2015) provides for a minimum of 16,500 homes in this period. Of the 16,500 homes required by the Core Strategy, 6,500 of these are allocated to Hereford, 4,700 of them to other urban areas (Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye) and 5,300 of them to rural settlements. Of the total housing need, the Housing Requirement Study Update identified a net need for 3,457 affordable homes between 2012 and 2017.

¹² *Ibid*

¹³ ONS (2011) Neighbourhood Statistics, Tenure tables KS402EW

¹⁴ Herefordshire Council (2010) Hereford Area Plan Scoping Report

¹⁵ ONS (2011) Neighbourhood Statistics, Households tables QS402EW

¹⁶ *Ibid*

¹⁷ ONS (2009) Neighbourhood Statistics, Vacant Dwellings (2007-2008)

¹⁸ GL Hearn (2014) Local Housing Requirements Study Update, Herefordshire Council

¹⁹ DCLG (2016) Tables 576 to 578: ratio of house price to earnings (by lower quartile and median by local authority, from 1997)

²⁰ Herefordshire Council (2015) Herefordshire Local Plan Core Strategy

²¹ GL Hearn (2014) Local Housing Requirements Study Update, Herefordshire Council

Trend/key sustainability issue:

There is a need for affordable housing, particularly in Hereford, due to average house prices being higher than the regional and national averages.

Social inclusion and deprivation

- 3.22 The English Indices of Deprivation 2015²² is a measure of multiple deprivation in small areas or neighbourhoods, called Lower-layer Super Output Areas (LSOA), in England. Seven domains of deprivation are measured: Income Deprivation; Employment Deprivation; Health Deprivation and Disability; Education, Skills and Training Deprivation; Crime; Barriers to Housing and Services; and Living Environment Deprivation. Each domain contains a number of indicators. The seven domains are combined to give a multiple deprivation score. There are 116 LSOAs in Herefordshire and 32,844 nationally²³.
- 3.23 Herefordshire contains one LSOA in the 10% most deprived in the country (Herefordshire 017D) (see **Appendix 2**). This lies within the Hereford City parish boundary. Four of the 20% most deprived LSOAs in the country surround this and also lie within the Hereford City parish. Two of the 10% least deprived LSOAs lie to the east of Hereford, within the Hereford City parish. Three of the 20% least deprived LSOAs also lie within the Hereford City parish boundary, one to the northwest, one to the northeast and one to the east, which borders the two LSOAs in the 10% least deprived. Those parishes included in the Rural Area Site Allocations DPD fall between the most and least deprived, being mostly within the 50% most deprived in the country²⁴.
- 3.24 Between 2011 and 2012, the number of households in fuel poverty in Herefordshire increased by nearly 2% to 16.4%²⁵. In 2016, the Department for Business, Energy & Industrial Strategy published detailed statistics on the level of fuel poverty in 2014, which shows that the area's fuel poverty fell to 15.1%. This is higher than fuel poverty rates for the West Midlands (12.1%) and England (10.6%)²⁶. A household is considered to be fuel poor if they have required fuel costs that are above the national median level and were they to spend that amount, they would be left with a residual income below the poverty line²⁷.

Trend/key sustainability issue:

While the overall level of deprivation is low in the county, there are pockets of high deprivation in Hereford City.

A higher than average number of households are considered to be fuel poor in the county.

Health

- 3.25 Residents of Herefordshire experience varied health. About 13.2% of children in the county live in poverty²⁸. This is lower than the national average of 28% of children living in poverty²⁹. Life expectancies for both men and women are higher than the national average, at 83.6 years for

²² The English Indices of Deprivation (2015), DCLG

²³ DCLG (2015) Indices of Deprivation 2015 explorer, available at: <http://dclgapps.communities.gov.uk/imd/idmap.html>, accessed 14/10/16

²⁴ DCLG (2015) Indices of Deprivation 2015 explorer, available at: <http://dclgapps.communities.gov.uk/imd/idmap.html>, accessed 14/10/16

²⁵ Herefordshire Council (2016) Facts and Figures about Herefordshire, available at: <https://factsandfigures.herefordshire.gov.uk/about-a-topic/environment-conservation-and-sustainability/fuel-poverty-and-domestic-energy-efficiency.aspx>, accessed 17/10/16

²⁶ Department for Business, Energy & Industrial Strategy (2014) Sub-regional fuel poverty data: low income high costs indicator

²⁷ Department for Business, Energy & Industrial Strategy (2016) Fuel poverty statistics, available at: <https://www.gov.uk/government/collections/fuel-poverty-statistics>, accessed 17/10/16

²⁸ Public Health England (2015) Herefordshire Health Profile 2015

²⁹ Child Poverty Action Group (2016) Child Poverty facts and figures, available at: <http://www.cpag.org.uk/child-poverty-facts-and-figures>, accessed 17/10/16

women and 79.4 years for men³⁰. Health inequalities exist, as the average life expectancy for men in the least deprived areas is 5.2 years more than those in the most deprived areas. Women in the least deprived areas can expect to live 4.2 years longer than those in the most deprived areas³¹.

- 3.26 Obesity rates in year 6 children are 16.8%, which is less than the England average, and 23.7% of adults are classed as obese. Alcohol-specific hospital stays and levels of smoking for those under 18 are worse than the England average, although these are better than the England average for adults³². 61.3% adults in Herefordshire are physically active, which is greater than both the West Midlands (55.5%) and England as a whole (57.0%). Participation in sport at least once a week has generally been increasing year on year since 2011/12³³. The local priorities for health and wellbeing in Herefordshire include reducing alcohol-related harm, stopping smoking and improving the dental health of children³⁴.
- 3.27 There are 30 GP surgeries in Herefordshire, four of which are in Hereford (see **Appendix 2**). There are also 30 dental surgeries in the county. There are seven hospitals within Herefordshire. The primary NHS hospital is the County Hospital in Hereford, which has an accident and emergency department. This hospital has been upgraded from 'inadequate' to 'requires improvement' by the Care Quality Commission³⁵. There is one private hospital, two specialist mental health hospitals and three community hospitals³⁶.

Education, skills and training

- 3.28 There are over 100 publicly funded primary, secondary and special schools in Herefordshire. Some 59% of pupils achieve 5 or more GCSEs at grades A*-C or equivalent, including English and mathematics. This is better than the West Midlands (55%) and England (56.6%) averages. 33.6% of Herefordshire residents have qualifications equivalent to NVQ level 4 and above. This is higher than the figure for the West Midlands as a whole (31.2%) but lower than the rate for England (37.1%)³⁷.
- 3.29 In 2019, it is hoped that a new university will open in Hereford: the New Model in Technology and Engineering. As the name suggests, this university will focus on training in engineering and technology, with a strong practical aspect³⁸.

Crime

- 3.30 Herefordshire generally has low levels of crime. In 2013/14, police recorded 45 crimes per 1,000 people, which was lower than the average of 66 crimes per 1,000 people across England and Wales. Over 50% of crimes that were recorded were committed in Hereford. There appears to be a correlation between crime and the most deprived areas of Herefordshire³⁹. In 2013/14, about 88% of people thought their local area had been safe over the last three months⁴⁰.
- 3.31 The most common type of crime in Herefordshire in 2013-2014 was criminal damage and arson, followed by violence with injury offences⁴¹.

³⁰ Herefordshire Council (2016) Facts and Figures about Herefordshire, available at: <https://factsandfigures.herefordshire.gov.uk/about-a-topic/health-and-well-being/life-expectancy.aspx>, accessed 17/10/16

³¹ Public Health England (2015) Herefordshire Health Profile 2015

³² *Ibid*

³³ Sport England (2016) Local Sport Profile for Herefordshire

³⁴ Public Health England (2015) Herefordshire Health Profile 2015

³⁵ Updated in November 2016.

³⁶ NHS Choices website, available at: <http://www.nhs.uk/service-search/Hospital/Herefordshire/Results/3/-2.746/52.102/7/10126?distance=25>, accessed 17/10/16

³⁷ ONS (2011) Neighbourhood Statistics, Qualifications Gained

³⁸ <http://nmite.org.uk/about/>

³⁹ Herefordshire Council (2016) Facts and Figures about Herefordshire, available at:

<https://factsandfigures.herefordshire.gov.uk/about-a-topic/community-safety/overall-crime-levels.aspx>, accessed 17/10/16

⁴⁰ Herefordshire Community Safety Partnership (2014) Herefordshire Community Safety Strategic Plan 2014-2017

⁴¹ ONS (date not available) Neighbourhood Statistics, Key figures for crime and safety

Culture, leisure and recreation

- 3.32 Leisure activities contribute to the quality of life of residents, providing amenity and opportunities for enhancing intellectual, spiritual and physical wellbeing. Additionally, they represent a tourism asset and their provision can result in economic benefits to the area.
- 3.33 Herefordshire has a range of cultural and leisure opportunities, including Eastnor Castle and Hampton Court Castle, a number of houses and gardens to visit, as well as its characteristic market towns. Hereford city is home to the Hereford Museum and Art Gallery and The Old House, a well preserved example of a 17th century timber framed building.
- 3.34 Many visitors to Herefordshire come for its countryside, including the Wye Valley in the south of the county and the wealth of walking opportunities across the county. There is a network of public rights of way (PROW) across the countryside including promoted routes such as the Wye Valley Walk and the Three Rivers Ride (see **Appendix 2**). The Offa's Dyke Path, a National Trail, passes through the county near Kington. National Cycle Network (NCN) routes 44 and 46 start from Hereford. Route 44 is local but route 46 offers a cycle route between Hereford and Abergavenny. Route 825 passes through Kington and route 423 offers a scenic link between Goodrich and south east Wales⁴². The county also contains Queenswood Country Park near Bodenham. This includes an arboretum, semi-natural ancient woodland (a SSSI) and a Local Nature Reserve (LNR).
- 3.35 Herefordshire has a number of leisure centres managed by Halo, on behalf of Herefordshire Council. There are Halo leisure facilities in Bromyard, Kington, Ledbury, Leominster, Hereford, Ross-on-Wye and Wigmore⁴³.
- 3.36 Herefordshire Council has prepared a number of Playing Pitch Assessments, which review provision in various parts of the county. Of the areas to be considered in the DPDs relevant to this SA, only Hereford has its own Playing Pitch Assessment⁴⁴, which states that there are a total of 119 pitches for football, cricket, rugby and hockey in the area (public and private). There are also 21 tennis courts, five bowling greens, four golf courses and the county's only athletics track.
- 3.37 The Herefordshire Play Facilities Study⁴⁵ identified 145 sites in the county that have equipped provision for children and young people of which 48% are in the rural parishes and 52% are in urban areas.

Economic baseline information

Economy and employment

- 3.38 Of those residents of working age (16-64), 81.2% are economically active. This is higher than the proportion for the West Midlands (74.8%) and England as a whole (77.8%). Of those in work, the most common types of employment are skilled trades, professional and associate professional and technical occupations and managers, directors and senior officials. Of those residents of working age in Herefordshire, 1.1% are claiming out of work benefits, which is lower than both the West Midlands (2.3%) and England (1.8%). The average gross weekly pay in Herefordshire is £459, which is lower than both the West Midlands (£492.50) and England (£529.60)⁴⁶.
- 3.39 There are 71,000 employee jobs in Herefordshire, 66.2% of which are full time and 33.8% of which are part time. The industries that employ the most people are wholesale and retail trade: repair of motor vehicles and motorcycles, manufacturing and human health and social work⁴⁷.
- 3.40 There are 9,055 businesses in Herefordshire, across 9,810 local units (sites or workplaces). The majority (89.9%) of businesses are micro, with up to 9 people in the business. Some 8.5% of businesses are small (10-49 people), 1.3% are medium (50-249 people) and 0.2% are large (250 people or more)⁴⁸.

⁴² Sustrans (2016) National Cycle Network map

⁴³ <https://www.herefordshire.gov.uk/leisure-and-culture/sports-and-sporting-venues/sports-facilities-information>

⁴⁴ Ruth Jackson, on behalf of Herefordshire Council (2012) Hereford Area; Herefordshire Playing Pitch Assessment

⁴⁵ Ruth Jackson, on behalf of Herefordshire Council (2012) Herefordshire Play Facilities Study

⁴⁶ Nomis labour market profile – Herefordshire.

⁴⁷ *Ibid*

⁴⁸ *Ibid*

Trend/key sustainability issue:

Gross weekly earnings remain lower than the regional and national averages.

Reliance on traditional employment sectors, whereas Herefordshire has aspirations to attract business in technology and knowledge intensive sectors.

Retail and tourism

- 3.41 Over 4.7 million people visit Herefordshire each year, bringing £411 million to the local economy. This supports about 8,480 jobs in the tourism industry. Tourism is strong in all the market towns, which are characteristic of the region. These provide attractions as well as places to stay, eat and shop⁴⁹.
- 3.42 The main retail and cultural centre of Herefordshire is Hereford city, although market towns also play a key role. Hereford cathedral contains nationally important treasures, such as the Mappa Mundi and the Magna Carta, which draw many visitors each year. Other key attractions include Hereford Racecourse, Hereford Football Club, and the Courtyard Theatre. There are a number of festivals in Hereford throughout the year, which attract both locals and visitors. These include the Borderlines Film Festival and Herefordshire Art Week.
- 3.43 There are only around 25 hotels in Herefordshire, offering approximately 820 bedrooms (excluding guest houses / bed and breakfasts, etc.). The majority of these hotels are located around Hereford and Ross-on-Wye⁵⁰.

Transport and accessibility

- 3.44 The primary road network in Herefordshire generally radiates out from Hereford and Leominster (see **Appendix 2**). The A49 and A438 provide north-south and east-west links across the county respectively, via Hereford. The A44 provides an east-west link via Leominster. The A465 connects Hereford with Abergavenny and the A438 links Hereford with parts of Eastern Wales. The A40 changes into the M50 at Ross-on-Wye, offering residents access to the motorway network. Hereford is a hotspot for congestion in the county, particularly around the main river crossing of the A49 and the bridge at St Martin’s Street, which is controlled by traffic lights⁵¹.
- 3.45 There are no commercial airports within Herefordshire, with the nearest airports being at Birmingham and Cardiff. There are four train stations within Herefordshire at Hereford, Leominster, Colwall and Ledbury. These are served by the following services:
 - Arriva Trains Wales services from Milford Haven to Manchester Piccadilly.
 - Arriva Trains Wales service from Cardiff to Holyhead.
 - Great Western Railway service from Hereford to London Paddington.
 - London Midland service from Hereford to Birmingham.
- 3.46 Two further stations lie just outside the county boundaries, near Leintwardine - Hopton Heath train station and Bucknell train station.
- 3.47 Bus operators for the main services in Herefordshire are given in **Table 3.5**. Generally, urban areas (Hereford and the market towns) have a more extensive range of bus services and these are more frequent than rural areas.

Table 3.5 Bus operators and main services in Herefordshire

Bus operators	Bus services
Arriva Midlands North	738/740

⁴⁹ Herefordshire Council and Invest Herefordshire (2011) Economic Development Strategy for Herefordshire 2011-2016

⁵⁰ Bridget Baker Consulting Ltd (2012) Marches LEP Board Research into Hotel demand across the MArches

⁵¹ Herefordshire Council (2016) Herefordshire Council Transport Plan 2016 - 2031

Aston Coaches	417, 675
Belfitt Mini Coach Hire	24B
D R M (Bromyard)	420, 469, 476, 672, 674
First (in Herefordshire)	71/71A/71B, 420, 426, 437, 446, 453, 454, 477, 492
H & H Coaches / James Bevan	35
Lugg Valley Primrose Travel/Lugg Valley Travel	490, 492, 494, 495/496, 501, 502, 802
Sargeants Bros. Coaches	41, 461/462
Stagecoach in South Wales	X4, 39/39A, 39B,
Stagecoach in Wye and Dean	32, 33, 34, 36, 44, 132
Yeomans Canyon Travel	39/39A, 412, 440, 447, 449

- 3.48 The majority of households in Herefordshire own either one (41.6%) or two (30.4%) cars or vans. Car ownership is generally higher in Herefordshire than in the West Midlands and England, as 11.7% households own three or more compared to 8.0% in the West Midlands and 7.4% in England. In the City of Hereford parish, more households have at least one car (46.4%) but 26.2% households have no car, compared to 16.4% county-wide. Car ownership is much higher in Holmer and Shelwick parish, with 78.0% households owning either one or two cars and only 6.0% not owning a car or van⁵².
- 3.49 The most common method of travel to work is driving a car or van, which is a trend seen across the country. Some 6.3% of people in Herefordshire work from home, which is greater than in the West Midlands (3.0%) and England (3.5%). Nearly 10% of people in Herefordshire walk to work, which is similar to England as a whole, although higher than for the West Midlands. In Hereford, slightly less people drive to work (37.4%) and slightly more travel to work on foot (15.3%). More people also cycle to work (5.2%) compared to 2.5% in Herefordshire as a whole. Conversely, more people drive to work in Holmer and Shelwick (52.6%) and fewer people travel to work on foot (5.5%)⁵³.
- 3.50 In 2014 there were 83 road casualties in Herefordshire, an increase of 36% since 2013. This may have been linked to an increased traffic flow of 2.4% across the country, compared to 2013. In 2014, 11 collisions lead to 13 fatal casualties⁵⁴ in Herefordshire.

Trend/key sustainability issue:

High reliance on private cars.

Traffic congestion in Hereford and strain on existing infrastructure.

Environmental baseline information

Biodiversity and geodiversity

- 3.51 Herefordshire is a largely rural county and as such has a rich biodiversity offering (see **Appendix 2**). The countryside consists primarily of arable fields, interspersed with pasture and woodland. There are four sites of international importance for nature conservation within Herefordshire: the River Wye Special Area of Conservation (SAC), which passes through the county from Symonds Yat to Clifford, via Hereford; Wye Valley Woodlands SAC, which sit alongside the River Wye in the southern tip of the county; Downton Gorge SAC and River Clun SAC, which lie in the northern part of the county.
- 3.52 There are three National Nature Reserves (NNRs) within Herefordshire: Moccas Park, The Flits and Downton Gorge. There are also a number of NNRs bordering, or close to the boundary of Herefordshire, to the south and west. There are seven Local Nature Reserves (LNRs) in Herefordshire. These include Queenswood, which is part of the Queenswood Country Park.

⁵² ONS (2011) Neighbourhood Statistics, Car or Van Availability, table QS416EW

⁵³ ONS (2011) Neighbourhood Statistics, Method of Travel to Work, Table QS701EW

⁵⁴ Herefordshire Council (2014) Herefordshire 2014 Road Casualties Summary Report

Queenswood LNR partially coincides with Dinmore Hill Woods SSSI. There are a total of 77 Sites of Special Scientific Interest (SSSIs) in Herefordshire. Some of these are cross-boundary, including the River Teme SSSI, River Wye SSSI, Malvern Hills SSSI and Upper Wye Gorge SSSI.

- 3.53 There are 685 Local Wildlife Sites (LWS) in Herefordshire. These are spread across the county but there is generally a higher density of LWS in the west. There are also 122 Local Geological Sites in the county.
- 3.54 The county includes a range of Biodiversity Action Plan (BAP) Priority Habitats, including lowland deciduous woodland, lowland meadows and pasture and lowland dry acid grassland.
- 3.55 Herefordshire Council have published an Ecological Network map⁵⁵, which identifies the key areas for biodiversity in the county. This shows core areas for biodiversity, buffers around those core areas, biodiversity corridors and stepping stones, and sustainable land use areas (areas with proposals for habitat restoration or creation).

Trend/key sustainability issue:

Herefordshire contains many areas of high ecological value including sites of international and national importance which are under pressure from the adaptation and diversification of farming and forestry employment.

Air quality

- 3.56 The Environment Act 1995 introduced the National Air Quality Strategy and the requirement for local authorities to determine if statutory air quality objectives (AQOs) are likely to be exceeded. All local authorities now report to DEFRA on an annual basis, and have the obligation to declare Air Quality Management Areas (AQMAs) and develop action plans for improvement of air quality if objectives are likely to be exceeded.
- 3.57 There are two designated AQMAs in Herefordshire (see **Appendix 2**). Bargates Leominster AQMA encompasses the junction between the A44 Bargates and B4361 Dishley Street/Cursneah Road in Leominster. The annual mean objective for nitrogen dioxide is being exceeded at this AQMA⁵⁶.
- 3.58 The annual mean objective for nitrogen dioxide is also being exceeded at Hereford AQMA. This AQMA consists of part of the A49 corridor from Holmer Road in the north, to Belmont Road in the south and extending along New Market/Blueschool Street and along Eign Street⁵⁷.

Trend/key sustainability issue:

Poor air quality is experienced in certain parts of Herefordshire due to high concentrations of Nitrogen Oxide, and two AQMAs have been declared in Hereford and Leominster.

Water resources and flooding

- 3.59 Herefordshire lies largely within the River Wye management catchment. Operational river catchments in the county include the Wye catchment, the Arrow, Lugg and Frome catchment and the Monnow catchment:
- The River Wye flows through Herefordshire and Hereford city. The source of the River Wye lies in the Cambrian Mountains and the river flows from the west to the southeast of the county. After leaving Herefordshire, the river flows south to join the River Severn.
 - The River Lugg flows from Pool Hill in Wales, through Leominster to join the River Wye near Hampton Bishop.
 - The River Arrow flows from west to east to join the River Lugg just south of Leominster.

⁵⁵ Herefordshire Biological Records Centre (2013) Herefordshire Ecological Network Map

⁵⁶ DEFRA (date not available) AQMAs declared by Herefordshire Council, available at: https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=126, accessed 17/10/16

⁵⁷ *Ibid*

- The River Dore flows through Hereford to join the River Monnow, which forms the southern border of the county.
 - The River Monnow runs along the county's southern boundary to join the River Wye near Symonds Yat.
 - The River Frome flows roughly north to south through Herefordshire, passing through Bromyard then joining the River Lugg east of Hereford.
- 3.60 A small area of the county, around Ledbury, lies within the Severn Vale management catchment and the Leadon operational catchment. The River Leadon flows north to south through Ledbury, to join the River Severn⁵⁸. In addition, the River Teme which runs from west to east in the north of the county is also within the catchment of the River Severn. The River Teme is also designated as a Surface Water Safeguarding Zone to ensure the protection of drinking water in the area.
- 3.61 The Wye catchment contains 22 natural rivers, all of which have achieved 'good' chemical status. Only 5 of these rivers are recorded as being of good ecological status, whilst 11 are of moderate and six of poor status. A total of 21 rivers are expected to achieve good status by 2027. The main reasons for not achieving good status are: sewage discharge, barriers to fish migration, impoundment for water storage, and changes in nutrient and sediment loads from agriculture⁵⁹. The River Wye SAC Nutrient Management Plan (2014) is seeking to address issues of water quality, particularly in terms of nutrient loading.
- 3.62 The Arrow, Lugg and Frome catchment contains 35 natural rivers. Whilst all of these have achieved good chemical status, only six have achieved good ecological status. Of the remaining rivers, 18 are of moderate ecological status, eight are of poor and three are of bad status. By 2027, all rivers are expected to achieve good status.
- 3.63 The Monnow catchment contains ten natural rivers. All of these have achieved good chemical status, but only three have achieved good ecological status. Six rivers are of moderate ecological status and one is of poor status. All ten rivers are expected to achieve good status by 2027.
- 3.64 The Leadon catchment contains eight natural rivers. Whilst all of these are of good chemical status, none are of good ecological status. Five rivers are of moderate ecological status and three of poor status, but a total of seven rivers are expected to achieve good status by 2027.
- 3.65 There are a number of Groundwater Source Protection Zones in the county including at Leominster and Hereford.
- 3.66 Fluvial flooding (from rivers) is the largest single source of flooding in Herefordshire, accounting for 25% of flooding (see **Appendix 2**). Land drainage accounts for 11% of flooding and the source of flooding is unknown for 43% of reported flooding. It is thought that the unknown sources of flooding are likely to be largely fluvial or land drainage. Herefordshire Council has prepared a Strategic Flood Risk Assessment to assess levels and types of flooding in the county⁶⁰ and a new Assessment is currently being prepared to inform the development plan documents currently in production. Areas of high flood risk are primarily within the Lower Wye sub-catchment (including Hereford) extending along the River Wye between Belmont and Monmouth, with a significant amount of properties at risk from flooding events (1,253 properties). The catchment with the greatest proportional flood risk is the Upper Lugg with approximately 17% of properties at risk. Smaller settlements with a significant history of flood disruption include Bosbury, Eardisland, Ewyas Harold, Hampton Bishop, Hereford, Kington, Leintwardine, Leominster and Ross-on-Wye.
- 3.67 Water supply and wastewater treatment in Herefordshire is managed by Welsh Water (Dŵr Cymru) and Severn Trent Water. There are nine Wastewater Treatment Works in the county (at Eign, Rotherwas, Fownhope, Kingsland, Leominster, Ivington, Ross-on-Wye, Bredwardine and Kington), one Sewage Pumping Station at Bromyard, and three Water Pumping Stations (at Leominster, Ross-on-Wye, and Bredwardine). Welsh Water's 2014 Water Resources Management Plan identifies Hereford as being in water surplus (i.e. supply is greater than demand) and

⁵⁸ Environment Agency (2016) Catchment Data Explorer, available at: <http://environment.data.gov.uk/catchment-planning/ManagementCatchment/3077>, accessed: 18/10/16

⁵⁹ *Ibid*

⁶⁰ Herefordshire Council (2009) Strategic Flood Risk Assessment

identifies a number of measures to increase the efficiency of water provision⁶¹. The River Wye Abstraction Licensing Strategy⁶² demonstrates that there will be water available for licensing in the entirety of the catchment, with the exception of in dry, low rainfall conditions, when abstraction licenses are likely to be restricted. New consumptive licenses in the Wye are likely to be restricted.

Trend/key sustainability issue:

Significant improvements to water quality in the country are required to meet the target of 'Good Ecological Status' in all natural water bodies, or 'Good Ecological Potential' in all heavily modified water bodies, as required by the Water Framework Directive.

Herefordshire is affected to varying degrees by fluvial and surface water flooding which is primarily associated with the River Wye. The effects of climate change may increase the incidence of flooding within the county.

Soil

- 3.68 The Agricultural Land Classification (ALC) system⁶³ provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors together with interactions between them form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be best and most versatile agricultural land.
- 3.69 The majority of Herefordshire consists of grade 2 and grade 3 agricultural land (see **Appendix 2**). There are scattered areas of grade 1 land and some areas of lower quality, grades 4 and 5 land, particularly in the west of the county. Larger settlements, such as Hereford, Leominster, Ross-on-Wye, Ledbury and Bromyard do not have associated ALC grades as they are predominantly in urban use.

Trend/key sustainability issue:

The majority of Herefordshire consists of best and most versatile agricultural land, which could be lost to development.

Historic environment

- 3.70 There are a number of heritage designations in Herefordshire, from individual buildings and structures of interest to the distinctive character of the market towns (see **Appendix 2**). There are 5,894 Listed Buildings in Herefordshire, 32 of which are on the Heritage at Risk register. There are 265 Scheduled Monuments, 36 of which are on the Heritage at Risk register and 25 Registered Parks and Gardens, of which only Shobdon is considered to be at risk.
- 3.71 There are 64 Conservation Areas in Herefordshire, including country house estates, the historic centre of Hereford, market towns and villages. Of these, three are listed on the Heritage at Risk Register: Kington, Ross-on-Wye / Bridstow and Widemarsh Common.
- 3.72 There are a number of documents in the Herefordshire Core Strategy evidence base that further describe and explore the historic environment of the area. These include 'A Characterisation of

⁶¹ Dŵr Cymru Welsh Water (2014) Water Resources Management Plan

⁶² Environment Agency (2016) River Wye Abstraction Licensing Strategy

⁶³ Natural England (2013) Agricultural Land Classification (ALC) system

the Historic Townscape of Central Hereford⁶⁴ and 'Rapid Townscape Assessments' for Ledbury, Ross-on-Wye and Hereford. Of these towns, only Hereford is included in the DPDs relevant to this Scoping Report.

Trend/key sustainability issue:

There are areas of significant historical importance in Herefordshire and aesthetic quality, settings and important views should be preserved and enhanced. These are continuously facing pressures for change.

Landscape

- 3.73 Herefordshire is characterised by being a largely rural area, consisting mainly of farmland with scattered woodland and settlements. The area has varied topography, with a number of hills and ridges. Herefordshire's varied landscape is reflected by the fact that it lies within five National Character Areas (NCAs):
 - 98: Clun and North West Herefordshire Hills.
 - 99: Black Mountains and Golden Valley.
 - 100: Herefordshire Lowlands.
 - 101: Herefordshire Plateau.
 - 104: South Herefordshire and Over Severn⁶⁵.
- 3.74 The Herefordshire Landscape Character Assessment Supplementary Planning Document (SPD)⁶⁶ identifies a hierarchy of landscape character units below NCA level. There are 12 Sub-Regional Character Areas, the largest and most central of which being Central Herefordshire, which includes the city of Hereford. There are 22 Landscape Types (excluding urban areas) as well as several Landscape Description Units and Land Cover Parcels, which are at a fine-grain scale.
- 3.75 The Wye Valley Area of Outstanding Natural Beauty (AONB) and the Malvern Hills AONB lie partially within Herefordshire (see **Appendix 2**). The Wye Valley AONB broadly follows the River Wye, ending just southeast of Hereford and the Malvern Hills AONB incorporating an area east and northeast of Ledbury. The Shropshire Hills AONB lies almost adjacent to the north-western part of Herefordshire, near Leintwardine. There are no national parks or Green Belt designations in or adjacent to the county.
- 3.76 The Urban Fringe Sensitivity Analysis⁶⁷ characterises the areas surrounding Hereford and each of the five market towns. It identifies areas of low, medium-low, medium, high-medium and high sensitivity, depending on how vulnerable key landscape characteristics are to change. **Table 3.6** provides details on the landscape sensitivity analysis of Hereford.

Table 3.6 Landscape sensitivity analysis of Hereford

Sensitivity	Area
Land with low sensitivity	None of the land around the periphery of Hereford was assessed as falling into the lowest category of sensitivity.
Land with medium-low sensitivity	Holmer – Shelwick Grafton – Lower Bullingham Stretton Sugwas – Huntington
Land with medium sensitivity	Holmer – Shelwick King's Acre Stretton Sugwas – Huntington

⁶⁴ Herefordshire Council and English Heritage (2010) A Characterisation of the Historic Townscape of Central Hereford

⁶⁵ Natural England (2013-2014) National Character Area profiles

⁶⁶ Herefordshire Council and NHS Herefordshire (2004) Landscape Character Assessment

⁶⁷ Herefordshire Council and NHS Herefordshire (2010) Urban Fringe Sensitivity Analysis: Hereford and the Market Towns

Sensitivity	Area
	Burghill – Pipe & Lyde
Land with high-medium sensitivity	Holmer – Shelwick Aylestone Hill – Hampton Bishop Grafton – Lower Bullingham Breinton King’s Acre Burghill – Pipe & Lyde
Land with high sensitivity	Holmer – Shelwick Aylestone Hill – Hampton Bishop River Wye Corridor Dinedor/Grafton – Lower Bullingham Grafton – Lower Bullingham Ruckhall – Merryhill Belmont Breinton Stretton Sugwas – Huntingdon

Trend/key sustainability issue:

The county has significant areas of landscape importance including the Wye Valley AONB and the Malvern Hills AONB, and areas of high landscape sensitivity around Hereford.

Mineral resources

- 3.77 The majority of mineral deposits in Herefordshire consist of superficial river sand and gravel deposits, which are largely related to the course of the main rivers in the county, such as the River Wye and the River Lugg (see **Appendix 2**). There are also areas of glacial sand and gravel resources, as well as limestone⁶⁸. Herefordshire is largely underlain by Devonian Old Red Sandstone, which is a source of building stone. There are small amounts of coal in the area and the area generally has low hydrocarbon productivity⁶⁹.
- 3.78 Herefordshire is in the process of preparing a Minerals and Waste Local Plan, to guide minerals and waste development and use until 2031. During summer 2016, a ‘call for sites’ stage was undertaken which was aimed at identifying site proposals for minerals and waste uses and aspirations for existing sites⁷⁰. A separate SA Scoping report will be prepared for that DPD.

Resource use / waste and recycling

- 3.79 In 2014/15, Herefordshire Council collected 85,277 tonnes of waste, of which 75,911 tonnes was household waste. Of the total household waste collected, 30,331 tonnes (40%) was sent for recycling, composting or reuse. About 61% of non-household waste was recycled⁷¹.
- 3.80 Herefordshire Council operate a kerbside recycling scheme. Households have a black wheeled bin for general rubbish and a green wheeled bin for mixed recycling. Recycling centres can be found at 21 locations in Herefordshire (see **Appendix 2**) including:

⁶⁸ British Geological Survey and Environment Transport Regions (1999) Herefordshire and Worcestershire Mineral Resources map

⁶⁹ British Geological Survey and Environment Transport Regions (1999) Herefordshire and Worcestershire: Resources and Constraints

⁷⁰ <https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/minerals-and-waste-local-plan>

⁷¹ DEFRA (2015) ENV18 – Local authority collected waste: annual results tables

- Hereford.
- Bromyard.
- Kington.
- Ledbury.
- Leominster.
- Ross-on-Wye.

Climate change, energy consumption and energy efficiency

- 3.81 Climate change has the potential not only to affect the environment, but also the social and economic aspects of life in Herefordshire. Although the precise nature of environmental changes is not fully understood, changes to precipitation patterns (and river flow) and flooding have significant implications, particularly for the city of Hereford. Conversely, predicted dry, hot summers will cause problems of low flows for some of the rivers in the area. Additionally, climate change could have a significant impact on agriculture and wildlife throughout the whole area.
- 3.82 The latest DECC figures⁷² are set out in **Table 3.7** and show generally decreasing trends for CO₂ emissions (kilotonnes) in Herefordshire 2005-2014. The decreasing trend in emissions reflects the decrease in overall emissions for the UK during this period driven mainly by reductions in emissions from power stations, industrial combustion and passenger cars. The reduction from power stations is driven by change in the fuel mix used for electricity generation with a reduction in the amount of coal, which is a carbon intensive fuel. Emissions for many Local Authorities are heavily influenced by activities at industrial sites, and changes at a single site can have a big impact on emissions trends⁷³.
- 3.83** In addition, the latest DECC figures⁷⁴ for energy consumption (in thousand tonnes of oil equivalent (ktoe)) per consuming sector and household in Herefordshire are set out in **Table 3.8**. There has been a general decreasing trend in energy consumption as well as CO₂ emissions. This also reflects a steady year on year decrease in total energy consumption in Great Britain with the only anomaly occurring between 2009 and 2010, when there was a small increase due to the particularly cold winter that year, resulting in a higher consumption of fuels used for heating purposes. The decreasing trend has been attributed to the impacts of the recession, as well as energy efficiency improvements and declining use particularly in the industrial and commercial sector of petroleum products and gas⁷⁵.

Table 3.7 Source of CO₂ Emissions in Herefordshire per Sector (2005-2014)

Year	Industry and Commercial (kt CO ₂)	Domestic (kt CO ₂)	Transport (kt CO ₂)	Total (kt CO ₂)
2005	683.0	479.1	469.9	1,704.5
2006	685.1	483.9	461.2	1,698.3
2007	668.7	468.0	467.4	1,666.8
2008	656.4	468.7	445.4	1,630.1
2009	606.5	431.7	432.4	1,531.3
2010	652.7	465.8	431.0	1,606.3
2011	603.4	398.3	420.1	1,476.0
2012	608.6	422.6	414.5	1,495.6

⁷² DECC (2016) UK local authority and regional carbon dioxide emissions national statistics: 2005-2014

⁷³ Local Authority carbon dioxide emissions estimates 2013. Statistical Release. DECC, June 2015.

⁷⁴ DECC (2016) Total final energy consumption at regional and local authority level

⁷⁵ Sub-national total final energy consumption statistics. Regional and local authority level statistics (2012 data), DECC, September 2014.

Year	Industry and Commercial (kt CO ₂)	Domestic (kt CO ₂)	Transport (kt CO ₂)	Total (kt CO ₂)
2013	616.1	408.6	410.3	1,483.0
2014	589.9	347.8	419.6	1,398.2

Table 3.8 Energy Consumption in Herefordshire per Sector (2005-2014)

Year	Industry and Commercial (ktoe)	Domestic (ktoe)	Transport (ktoe)	Total (ktoe)
2005	160.2	139.3	135.8	444.2
2006	152.8	137.9	136.8	436.6
2007	149.9	133.3	139.4	431.8
2008	143.3	131.9	136.9	422.9
2009	138.0	125.8	134.1	409.7
2010	146.0	130.1	132.5	423.6
2011	136.6	117.1	130.0	396.9
2012	132.3	117.1	127.8	395.6
2013	137.9	116.1	127.3	403.6
2014	143.9	112.0	130.2	406.5

Trend/key sustainability issue:

Herefordshire is likely to experience more extreme impacts as a result of climate change – wetter winters with greater incidences of flooding, and warmer, drier summers with greater incidences of low flow rivers (during the summer months). Climate change is also likely to affect biodiversity, and social and economic aspects of life.

Key Sustainability Issues and Likely Evolution without the Plan

- 3.84 A set of key sustainability issues for Herefordshire was identified during the Scoping stage of the SA and was presented in the Scoping Report. It is also a requirement of the SEA Directive that consideration is given to the likely evolution of the environment in the plan area if the DPDs were not implemented. This analysis is presented in **Table 3.9** in relation to each of the key sustainability issues.

Table 3.9 Key sustainability issues and likely evolution without the Hereford Area Plan and Rural Site Allocation DPDs

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan and Rural Site Allocation DPDs
Population	
The age structure of the population currently shows a higher than average level of retired people. This will have implications for the economy, service provision, accommodation and health.	The age structure of the county is changing with an increasing elderly population. The adopted Core Strategy supports the retention of young people in the county through the provision of appropriate housing and the improvement of higher education, skills development and training facilities. Without the allocation of additional residential and employment sites in appropriate locations

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan and Rural Site Allocation DPDs
<p>Large proportion of the population living in rural areas.</p>	<p>(through the two new DPDs), it is less likely that the county will retain or attract young working people resulting in unchanged population characteristics for the area.</p> <p>The amount of people living in rural areas is expected to increase as the adopted Core Strategy specifies a target of 5,300 new dwellings to be provided primarily in seven rural Housing Market Areas. A number of policies in the Core Strategy aim to address the issue of access to services in rural communities. The two new DPDs are expected to take into account the need to travel and access to services when allocating sites and so this issue will be less well addressed without these documents.</p>
Housing	
<p>There need for affordable housing, particularly in Hereford, due to average house prices being higher than the regional and national averages.</p>	<p>The need for affordable housing would increase as house prices are expected to rise. Affordable housing and the right type of housing may not be delivered in the most appropriate locations where there is the most need. Policy H1 of the Core Strategy provides targets for the provision of affordable housing. These targets would not be met without the allocation of sites within the two new DPDs.</p>
Social inclusion and deprivation	
<p>While the overall level of deprivation is low in the county, there are pockets of high deprivation in Hereford City.</p> <p>A higher than average number of households are considered to be fuel poor in the county.</p>	<p>The adopted Core Strategy contains policies for employment development which will help to address deprivation. The two new DPDs offer the opportunity to allocate sites for employment where there is the greatest need. Without the implementation of the DPDs, this issue would be less well addressed.</p>
Economy and employment	
<p>Gross weekly earnings remain lower than the regional and national averages.</p> <p>Reliance on traditional employment sectors, whereas Herefordshire has aspirations to attract business in technology and knowledge intensive sectors.</p>	<p>Policy E1 in the adopted Core Strategy supports proposals which enhance employment provision and help diversify the economy of Herefordshire. The two new DPDs offer the opportunity to allocate new employment sites which may attract technology and knowledge intensive sectors (that may otherwise not have occurred without implementation of the DPDs).</p>
Transport and accessibility	
<p>High reliance on private cars.</p> <p>Traffic congestion in Hereford and strain on existing infrastructure.</p>	<p>New development may increase congestion but the two new DPDs offer the opportunity to allocate new, housing and employment sites that could encourage the use of sustainable transport and are allocated following consideration of their impacts on transport patterns through the SA. Without the implementation of the DPDs this issue may be less well addressed.</p>
Biodiversity and geodiversity	
<p>Herefordshire contains many areas of high ecological value including sites of international and national importance which are under pressure from the adaptation and diversification of farming and</p>	<p>Although the adopted Core Strategy has a policy on the protection of biodiversity and geodiversity (Policy LD2), the implementation of the DPDs can help to conserve and enhance biodiversity by directing site allocations away from sensitive locations. Without the implementation of the DPDs this issue would be less well addressed.</p>

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan and Rural Site Allocation DPDs
forestry employment.	
Air quality	
Poor air quality is experienced in certain parts of Herefordshire due to high concentrations of Nitrogen Oxide, and two AQMAs have been declared in Hereford and Leominster.	The Core Strategy supports improvements to air quality particularly within urban areas. Without action from the DPDs to direct new development in Hereford and the rural areas to sustainable locations (close to sustainable transport modes), the trend for private car ownership and travel is likely to continue with associated emissions of air pollutants likely to increase.
Water resources and flooding	
<p>Significant improvements to water quality in the country are required to meet the target of 'Good Ecological Status' in all natural water bodies, or 'Good Ecological Potential' in all heavily modified water bodies, as required by the Water Framework Directive.</p> <p>Herefordshire is affected to varying degrees by fluvial and surface water flooding which is primarily associated with the River Wye. The effects of climate change may increase the incidence of flooding within the county.</p>	Policy SD3 of the adopted Core Strategy states that development proposals should not lead to the deterioration of EU Water Framework Directive water body status. Policy SS7 seeks to minimise the risk of flooding and to make use of sustainable drainage systems. The two new DPDs are expected to take water quality and flooding into account in the allocation of sites and so this issue will be less well addressed without the implementation of these documents.
Soil	
The majority of Herefordshire consists of best and most versatile agricultural land, which could be lost to development.	Policy SS7 of the adopted Core Strategy seeks to protect the best agricultural land where possible. The two new DPDs offer the opportunity to allocate residential and employment sites in Herefords and the rural areas on brownfield or previously developed land, thereby avoiding prime quality agricultural land. Without the implementation of the DPDs this issue would be less well addressed.
Historic environment	
There are areas of significant historical importance in Herefordshire and aesthetic quality, settings and important views should be preserved and enhanced. These are continuously facing pressures for change.	Policy LD4 of the adopted Core Strategy seeks to protect, conserve and enhance heritage assets and their settings. The two new DPDs offer the opportunity to allocate sites following consideration of their impacts on the historic environment through the SA. Without the implementation of the DPDs this issue may be less well addressed.
Landscape	
The county has significant areas of landscape importance including the Wye Valley AONB and the Malvern Hills AONB, and areas of high landscape sensitivity around Hereford.	Policy LD1 of the adopted Core Strategy seeks to conserve and enhance the natural, historic and scenic beauty of important landscapes and features. However, without the site allocations to be made in the two new DPDs, further development may not come forward in the most appropriate locations and impacts on the landscape could be inappropriate.
Climate change	
Herefordshire is likely to experience	Climate change is likely to have an ongoing effect

Key sustainability issue	Likely evolution of the issue without implementation of the Hereford Area Plan and Rural Site Allocation DPDs
<p>more extreme impacts as a result of climate change – wetter winters with greater incidences of flooding, and warmer, drier summers with greater incidences of low flow rivers (during the summer months). Climate change is also likely to affect biodiversity, and social and economic aspects of life.</p>	<p>regardless of the implementation of the two new DPDs. The adopted Core Strategy sets out policies relating to mitigating and adapting to climate change. Without the implementation of the DPDs, site allocations may be less well planned and could potentially be located in vulnerable areas.</p>

4 Sustainability Appraisal Findings of the Options for the Hereford Area Plan DPD

- 4.1 This chapter describes the appraisal findings for the policy options set out in the Hereford Area Plan DPD Issues and Options document. A summary table illustrating the SA scores for each option in the Hereford Area Plan DPD is provided in **Table 4.11** at the end of this chapter.

Housing

Size of sites

Housing	
Do you agree that the HAP should only identify sites for a minimum of ten or more dwellings?	Option A – Only identify sites capable of accommodating 10 or more dwellings.
	Option B – Include sites that can accommodate less than 10 dwellings.

Table 4.1 Summary of policy options relating to the size of sites

SA Objective	Site Size Option A	Site Size Option B
1. Employment	0	0
2. Sustainable Economy	0	0
3. Sustainable Regeneration	0	0
4. Education	++/-	+/-
5. Health	++/-	+/-
6. Public Realm	0	0
7. Crime	0	0
8. Poverty and Equality	+	+/-
9. Sustainable Transport	++?	-?
10. Access to Culture, Recreation, and Leisure	+/-	+/-
11. Access to Services	+/-	+/-
12. Housing	++	+/-
13. Efficient Use of Land	0	+
14. Built Environment	--/+?	+/-?
15. Waste	0	0
16. Natural Resources	0	0
17. Climate Change	++?	-?
18. Biodiversity	--/+?	+/-?
19. Landscape	--/+?	+/-?
20. Water	0	0
21. Flooding	--/+?	+/-?
22. Pollution	++?	-?
23. Soil	--?	+/-?

- 4.2 A significant positive effect is expected for SA objective 12 (**Housing**) for Option A as it will provide a greater range of housing types and tenures than Option B, including affordable homes. A minor positive effect is identified for SA objective 8 (**Poverty and Equality**) for Option A as the provision of affordable housing will help to address housing deprivation in the city. A mixed effect (minor positive/minor negative) is expected for Option B for SA objectives 12 (**Housing**) and 8 (**Poverty and Equality**) as the larger sites will provide affordable housing however, this is not a requirement for sites that accommodate 10 dwellings or less (Core Strategy Policy H1 Affordable Housing). Mixed effects (minor positive/minor negative) are expected for Option A for SA objectives 10 (**Access to Culture, Recreation and Leisure**) and 11 (**Access to Services**) as services and facilities may be provided alongside housing at larger sites to meet the needs of the

growing population, however, larger development sites are more likely to be located on the peripheral and away from existing services and facilities. Mixed effects (minor positive/minor negative) are also identified for Option B for these objectives as it is possible that the smaller sites may be located within urban areas, for example as infill developments, and close to existing services and facilities, however, the level of financial contributions for the provision or improvement of these services is likely to be less than that from the development of larger sites.

- 4.3 Significant positive effects are expected for Option A while minor negative effects are identified for Option B for SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**), 22 (**Pollution**). Option A supports the allocation of a number of large development sites and could help to reduce levels of car use amongst residents at the sites which would have indirect benefits for reducing traffic-related emissions and maintaining and improving local air quality, as larger sites are likely to be more self-contained, with jobs, services and facilities located alongside homes. Allocating sites of all sizes could mean that opportunities to reduce levels of car use amongst residents are lost as fewer larger sites would be more likely to be self-contained, in comparison to more widely distributed development. Effects are uncertain as it will depend on the location of the site.
- 4.4 Mixed effects (significant positive/minor negative) are identified for Option A for SA objectives 4 (**Education**) and 5 (**Health**) as focussing development in a small number of larger sites could result in increased pressure on schools and healthcare facilities, potentially resulting in those facilities becoming overloaded. However, it may also be easier to provide new facilities through funding as part of larger developments. Mixed effects (minor positive/minor negative) are expected for Option B as allocating all sites including smaller sites that can accommodate 10 dwellings or less is likely to disperse development in the city which is less likely to mean that there are significant increases in pressures on schools and healthcare facilities. However, it may also be more difficult to deliver new facilities as part of smaller developments.
- 4.5 Potential mixed effects (significant positive/minor negative) are identified for Option A while potential mixed effects (minor positive/minor negative) are expected for Option B for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**), 21 (**Flooding**). Option A allows for the allocation of housing sites capable of accommodating 10 or more dwellings which would mean that any effects on the natural or historic environment would be concentrated in a small number of locations and the scale of impacts may be particularly large. Development of sites of all sizes as proposed by Option B would mean that effects on the natural or historic environment would be less concentrated than under Option A and the scale of impacts may be less at smaller sites. Positive effects are identified for both options as effects will depend mainly on the specific location and design of the developments and it may be possible to incorporate mitigation.
- 4.6 A potential significant negative effect is identified for Option A for SA objective 23 (**Soil**) as the development of larger sites is likely to result in the combined loss of a large area of greenfield land, concentrated in a small number of locations. A potential mixed effect (minor positive/minor negative) is expected for Option B as there is also a risk of development occurring at greenfield sites however, it is possible that some development may be able to be accommodated on smaller brownfield sites within the city. For this reason Option B is also likely to have a potential minor positive effect on SA objective 13 (**Efficient Use of Land**) as it may be possible to reuse existing buildings and materials.

Settlement boundary

Housing

Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?

Option A – Include a boundary.

Option B – No boundary.

Table 4.2 Summary of policy options relating to defining a settlement boundary

SA Objective	Boundary Option A	Boundary Option B
1. Employment	+	-
2. Sustainable Economy	++	--
3. Sustainable Regeneration	+	-
4. Education	+	-
5. Health	+	-
6. Public Realm	0	0
7. Crime	0	0
8. Poverty and Equality	+	-
9. Sustainable Transport	++/-	-
10. Access to Culture, Recreation, and Leisure	+	-
11. Access to Services	+	-
12. Housing	+/-	+/-
13. Efficient Use of Land	+	-
14. Built Environment	+/-	+/-
15. Waste	0	0
16. Natural Resources	0	0
17. Climate Change	++/-	-
18. Biodiversity	+	-
19. Landscape	++	-
20. Water	0	0
21. Flooding	+	-
22. Pollution	++/-	-
23. Soil	++	-

- 4.7 Positive effects are expected for Option A for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Regeneration**) as defining a settlement boundary provides greater certainty to investors and developers in terms of where employment development is more likely to be considered acceptable. This approach would also provide a higher number of residents with easily accessible employment opportunities and will encourage the reuse of brownfield sites which will reduce the number of vacant sites and improve the vitality of the city. Negative effects are identified for Option B for these objectives as this approach provides reduced certainty to developers and investors in terms of where employment development is considered acceptable which may affect economic growth. Furthermore, employment development will occur at various locations around the county which may affect the vitality of Hereford city and may be provided at locations which are not sustainable in terms of accessibility.
- 4.8 Significant positive effects are identified for SA objectives 19 (**Landscape**) and 23 (**Soil**) for Option A as defining a settlement boundary is likely to encourage the reuse of brownfield sites within the city and limit urban sprawl to the wider countryside thereby protecting best and most versatile agricultural land, the open and undeveloped nature of the countryside, and designated and other landscapes which are sensitive to new development. Minor negative effects are identified for Option B as this approach may result in the development of greenfield land which is likely to have an adverse effect on the rural character of the countryside and the setting of important landscapes such as the Malvern Hills AONB and the Wye Valley AONB.
- 4.9 Mixed effects (significant positive/minor negative) are expected for SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**) and 22 (**Pollution**) for Option A as it supports a compact pattern of development within a settlement boundary which is likely to encourage residents to undertake journeys by more active and sustainable modes of transport given the shorter journey times involved thereby reducing greenhouse gas emissions and benefiting local air quality. The minor negative effect is expected as it is also possible that focusing new developments to a defined area which already experiences poor air quality and traffic congestion may to a certain extent further contribute to these problems. Minor negative effects are identified for Option B for these objectives as this option supports a less plan-led approach which may promote development at less sustainable locations thereby encouraging continued private car use and the emission of greenhouse gases.

- 4.10 Mixed effects (minor positive/minor negative) are identified for both options for SA objectives 12 (**Housing**) and 14 (**Built Environment**). For objective 12, Option A would provide more certainty about the delivery of housing but the boundary restriction may exclude sites that could be considered suitable for housing delivery during the plan period. Option B would allow for the development of housing in any location without restriction however, this approach may allow for new residential developments to be sited in unsustainable locations. For objective 14, Option A is likely to help protect the countryside which often provides the setting for historic assets, however, this approach may force development to be contained within smaller areas which may influence or change the character of these areas. Conversely, Option B would limit the potential for adverse impacts on character in terms of changes to local building density or massing which might result from confining development to a smaller area over the plan period, however, this approach may result in ad hoc developments in the countryside impacting on the setting of important heritage assets.
- 4.11 Minor positive effects are identified for Option A for SA objectives 4 (**Education**), 5 (**Health**), 8 (**Poverty and Equality**), 10 (**Access to Cultural, Recreation and Leisure**), and 11 (**Access to Services**) as focusing new development within a settlement boundary is more likely to ensure that residents will have a good level of access to a range of services and facilities. Option B will have a minor negative effect on these objectives as development will be delivered at a range of locations (including those which are unsustainable) which will provide varying levels of access to services and facilities.
- 4.12 Minor positive effects are identified for Option A for SA objectives 13 (**Efficient Use of Land**), 18 (**Biodiversity**), and 21 (**Flooding**) as this approach may encourage the reuse of brownfield sites within the city and limit development within the countryside which would protect against habitat loss and fragmentation, and reduce flood risk. Option B will have a minor negative effect on these objectives as this approach is likely to lead to a higher rate of development on greenfield sites in the countryside thereby contributing to habitat loss and fragmentation, and to a greater area of impermeable surfaces.
- 4.13 The remaining objectives for both options are not likely to be affected and therefore negligible effects are identified.

Houses of Multiple Occupation (HMO)

Housing

Which option should be considered when planning for Houses of Multiple Occupation (HMOs)?

Option A – To set out a criteria based policy to guide the development of HMOs, referring to the consideration of matters such as:

- The impact on the amenity of adjoining premises and on the character of the area;
- The provision for car parking and the traffic situation;
- The standard of accommodation, including private amenity space;
- Intensification of existing HMOs;
- Flexible planning conditions to allow for HMOs to be returned to a single dwelling house without planning permission;
- Design.

Option B - To set a restrictive policy for HMOs, stating that they generally will not be permitted in residential areas which are predominantly in single family occupation (although justifying this in the light of national planning policy guidance through the National Planning Policy Framework may prove difficult).

Option C - To seek the approval of the Council for making an Article 4 Direction which would remove the permitted development rights in relation to changes of use from dwelling houses to small HMOs. In conjunction with this, to provide a small criteria-based policy through which to guide planning applications for this type of development,

Housing

large or small.

Table 4.3 Summary of policy options relating to HMOs

SA Objective	HMO Option A	HMO Option B	HMO Option C
1. Employment	0	0	0
2. Sustainable Economy	0	0	0
3. Sustainable Regeneration	0	0	0
4. Education	0	0	0
5. Health	0	0	0
6. Public Realm	+	0	0
7. Crime	0	0	0
8. Poverty and Equality	+	-	-
9. Sustainable Transport	-	0	0
10. Access to Culture, Recreation, and Leisure	0	0	0
11. Access to Services	0	0	0
12. Housing	++	-	-
13. Efficient Use of Land	+	-	-
14. Built Environment	0	0	0
15. Waste	0	0	0
16. Natural Resources	0	0	0
17. Climate Change	0	0	0
18. Biodiversity	0	0	0
19. Landscape	0	0	0
20. Water	0	0	0
21. Flooding	0	0	0
22. Pollution	0	0	0
23. Soil	0	0	0

- 4.14 Positive effects are identified for SA objectives 8 (**Poverty and Deprivation**) and 12 (**Housing**) as Option A supports a criteria-based policy to guide the development of HMOs which will diversify housing tenures in Hereford and will ensure the provision of good quality housing to meet the needs of local people thereby reducing housing deprivation. Minor negative effects are identified for Options B and C for these objectives. Option B identifies a more restrictive approach that is likely to prevent HMOs being located in residential areas that are predominantly in single family occupation while Option C seeks to remove permitted development rights in relation to changes of use from dwelling houses to small HMOs. Both options are likely to decrease access to suitable housing for some members of society which generally include young and single people, and those on low incomes.
- 4.15 A minor positive effect is identified for SA objective 6 (**Public Realm**) for Option A as it requires proposals for HMOs to consider the impact on the amenity of adjoining premises and on the character of the area, as well as the provision of private amenity space. A minor negative effect is identified for Option A for SA objective 9 (**Sustainable Transport**) as it requires proposals for HMOs to consider the provision of car parking which could be viewed as encouraging ongoing private car use.
- 4.16 Options B and C are likely to have minor negative effects on SA objective 13 (**Efficient Use of Land**) as the restrictive nature of these options could result in an increase in vacant properties, thereby reducing the efficiency of land use. A minor positive effect is expected for Option A for this objective as it supports the provision of planning conditions to allow HMOs to be returned to a single dwelling house without planning permission which increases the flexibility of a property's tenure and could therefore reduce the likelihood of the property being vacant.
- 4.17 The remaining objectives for the three options are not likely to be affected and therefore negligible effects are identified.

Allotments

Allotments

Do you think there is a need for more allotment provision, for example as part of new housing developments or on existing open spaces?

Option A - The HAP should seek more allotment provision.

Option B - The HAP should not seek any further allotment provision.

Table 4.4 Summary of policy options relating to allotments

SA Objective	Allotments Option A	Allotments Option B
1. Employment	0	0
2. Sustainable Economy	0	0
3. Sustainable Regeneration	+	0
4. Education	0	0
5. Health	+/-	0
6. Public Realm	+	0
7. Crime	0	0
8. Poverty and Equality	+	0
9. Sustainable Transport	0	0
10. Access to Culture, Recreation, and Leisure	+/-	0
11. Access to Services	0	0
12. Housing	+	0
13. Efficient Use of Land	+	0
14. Built Environment	0	0
15. Waste	+	0
16. Natural Resources	0	0
17. Climate Change	+	0
18. Biodiversity	+	0
19. Landscape	+	0
20. Water	0	0
21. Flooding	+	0
22. Pollution	+	0
23. Soil	+	0

- 4.18 No significant positive or negative effects are identified for either option.
- 4.19 Minor positive effects are expected for SA objectives 3 (**Sustainable Regeneration**), 6 (**Public Realm**), 12 (**Housing**) and 19 (**Landscape**) for Option A as allotments, particularly where they are located on brownfield sites, would improve the quality of the local landscape, contribute to the regeneration of the city, and encourage an improved sense of place. Option A would have a minor positive effect on SA objective 8 (**Poverty and Equality**) as allotments provide opportunities for social inclusion and encourage a greater sense of community. They also provide a cheap source of food for people on low incomes thereby helping to alleviate poverty.
- 4.20 Minor positive effects are also expected for Option A for objectives 13 (**Efficient Use of Land**) and 22 (**Pollution**) as the provision of additional allotments will provide a local and sustainable source of food, thereby reducing 'food miles' which will benefit local air quality. Minor positive effects are also likely for SA objectives 15 (**Waste**) and 23 (**Soil**) as allotments encourage the use of green waste as compost and will improve soil quality.
- 4.21 The provision of additional allotments in the city can make a valuable contribution to conserving and enhancing local biodiversity by providing species' refuge in urban environments and a minor positive effect is identified for Option A for SA objective 18 (**Biodiversity**).
- 4.22 The provision of additional allotments in Hereford will provide greenfield land at which surface water infiltration can occur reducing the potential for increased flood risk. Therefore, minor positive effects are expected for SA objectives 17 (**Climate Change**) and 21 (**Flooding**).
- 4.23 Mixed effects (minor positive and minor negative) are identified for Option A for SA objectives 5 (**Health**) and 10 (**Access to Culture, Recreation and Leisure**) as allotments provide an important recreational asset within communities however, if developed on existing open space may reduce open space provision and access.

- 4.24 The remaining objectives for Option A are not likely to be affected and therefore negligible effects are identified. As Option B will not provide any additional allotments, negligible effects have been identified for all objectives.

Transport

Transport	
Is there a need for more parking to be identified? If so, what form should new parking take?	Option A – Yes- more parking should be identified
	Option B – No- no more parking needs to be identified
	Option C – Yes- more parking should be identified in the form of multi-storey provision
	Option D – Yes- more parking should be identified in the form of park and choose provision
	Option E – Yes- more parking should be identified in the form of other

Table 4.5 Summary of policy options relating to transport

SA Objective	Transport Option A	Transport Option B	Transport Option C	Transport Option D	Transport Option E
1. Employment	+/-	0	+/-	+/-	+/-
2. Sustainable Economy	+/-	0	+	+	+/-
3. Sustainable Regeneration	0	0	0	0	0
4. Education	0	0	0	0	0
5. Health	-?	0	+	+	-?
6. Public Realm	0	0	+	+	0
7. Crime	0	0	0	0	0
8. Poverty and Equality	0	0	0	0	0
9. Sustainable Transport	--	0	-	+	--
10. Access to Culture, Recreation, and Leisure	+/-	0	+/-	+/-	+/-
11. Access to Services	+/-	0	+/-	+/-	+/-
12. Housing	0	0	0	0	0
13. Efficient Use of Land	+/-?	0	+	+	+/-?
14. Built Environment	-?	0	+/-?	+/-?	-?
15. Waste	0	0	0	0	0
16. Natural Resources	-?	0	-	-	-?
17. Climate Change	--	0	-	+	--
18. Biodiversity	-?	0	-?	-?	-?
19. Landscape	-?	0	+/-	+/-	-?
20. Water	0	0	0	0	0
21. Flooding	-	0	-	-	-
22. Pollution	--	0	-	+	--
23. Soil	-	0	-	-	-

- 4.25 Options A and E are likely to experience significant negative effects for SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**) and 22 (**Pollution**) as they support the provision of car parks which may be seen to encourage private car use by increasing the attractiveness and convenience of car travel thereby contributing to air pollution. Option C is also likely to have a negative effect on these objectives for that same reason however the effect is reduced as it is anticipated that the multi-storey car parks will be located on the outskirts of the city (as stated in the Issues and Options document) and therefore will have benefits in terms of reducing congestion and air pollution in the city. A minor positive effect is identified for Option D as it supports car parking provision at park and choose facilities which will encourage less commuter traffic entering the city and reduce reliance on private cars accessing the central area by way of connection with public transport, walking and cycling routes which will have a positive effect on reducing greenhouse gas emissions.
- 4.26 Minor positive effects are identified for Options C and D for SA objective 13 (**Efficient Use of Land**) as, according to the Issues and Options document, these options will allow for the

redevelopment of some existing smaller car parking sites in the city. Uncertain mixed effects (minor positive/minor negative) are expected for Options A and E as these options may result in car parks being located near urban areas which are accessible by sustainable transport, however, this approach may also result in valuable land in the city being allocated for car parking.

- 4.27 Mixed effects (minor positive/minor negative) are identified for all options in relation to SA objectives 1 (**Employment**), 10 (**Access to Culture, Recreation and Leisure**) and 11 (**Access to Services**). Options A, C, D and E seek to allocate more parking spaces in Hereford which could lead to increasing the accessibility of employment opportunities, cultural and leisure activities, and services and facilities. However, it is possible that by providing parking facilities for private cars it reduces the appeal of using sustainable transport to access these amenities.
- 4.28 Minor positive effects are expected for Options C and D in relation to SA objective 2 (**Sustainable Economy**) and 6 (**Public Realm**) as these options support the rationalising of car parking provision in the city by redeveloping some existing parking sites and providing car parking at multi-storeys or park and choose facilities on the outskirts of the city which will reduce the volume of traffic entering the city and improve the central area’s townscape and public realm thereby improving the attractiveness of the city for investment. Mixed effects are identified for Options A and E for objective 2 (**Sustainable Economy**) as the provision of additional parking which, depending on how this is delivered, may either encourage investment by ensuring there is sufficient car parking facilities or may discourage investment by increasing congestion in the city from car traffic.
- 4.29 Options C and D are expected to have minor positive effects in relation to SA objective 5 (**Health**) as locating car parking facilities on the outskirts of the city will reduce traffic congestion thereby improving local air quality and people’s health. Option D also encourages accessing the city centre by walking and cycling routes which will support more active travel and healthy lifestyles. Options A and E will have minor negative effects as they support the provision of additional car parks which may encourage ongoing car use by increasing the attractiveness and convenience of car travel thus contributing to the existing poor air quality experienced in Hereford.
- 4.30 Mixed effects are identified for Options C and D for SA objectives 14 (**Built Environment**) and 19 (**Landscape**) as redeveloping some existing car parking sites will enhance the built and landscape quality of the city, however, developing new multi-storey car parks or park and choose facilities on the outskirts of the city may affect the character and setting of designated landscapes, the wider landscape, or historic assets either during their construction or operation. Minor negative but uncertain effects are expected for Options A and E for these objectives as the provision of new car parking could potentially impact on the quality or setting of the historic environment or designated landscapes.
- 4.31 Minor negative effects are likely for Options A, C, D and E for SA objectives 16 (**Natural Resources**), 18 (**Biodiversity**), 21 (**Flooding**) and 23 (**Soil**) as the development of new car parking facilities may occur on greenfield land (23) which will reduce the area of permeable surfaces thereby increasing flood risk (21) and may negatively impact on biodiversity either during the construction or operation of the car parks (18). The new car parks will also use a large amount of aggregates during construction (16).
- 4.32 The remaining objectives for all options are not likely to be affected and therefore negligible effects are identified.

Employment

Type of employment land

Employment

Should the Hereford Area Plan identify more land for new employment development? If so, what type of development should be identified?

Option A – Yes- more land for employment should be identified

Option B – No- do not identify any more land for employment

Option C – Yes- more employment land should be identified in the form of offices

Option D – Yes- more employment land should be identified in the form of manufacturing

Employment	
	Option E – Yes- more employment land should be identified in the form of warehousing
	Option F – Yes- more employment land should be identified in the form of other

Table 4.6 Summary of policy options relating to employment land

SA Objective	Employment Option A	Employment Option B	Employment Option C	Employment Option D	Employment Option E	Employment Option F
1. Employment	++	++	++	++	++	++
2. Sustainable Economy	++	++	++	++	++	++
3. Sustainable Regeneration	++	++	++	++	++	++
4. Education	0	0	0	0	0	0
5. Health	0	0	0	0	0	0
6. Public Realm	+	+	+	0	0	+
7. Crime	0	0	0	0	0	0
8. Poverty and Equality	+	+	+	+	+	+
9. Sustainable Transport	+?/-?	+?/-?	+?/-?	+?/-?	+?/-?	+?/-?
10. Access to Culture, Recreation, and Leisure	0	0	0	0	0	0
11. Access to Services	0	0	0	0	0	0
12. Housing	0	0	0	0	0	0
13. Efficient Use of Land	0	0	0	0	0	0
14. Built Environment	+/-?	0	+/-?	--/+?	--/+?	+/-?
15. Waste	0	0	0	0	0	0
16. Natural Resources	0	0	0	0	0	0
17. Climate Change	+/-?	+?/-?	+/-?	--?/+	+/-?	+/-?
18. Biodiversity	+?/-	0	+?/-	--/+?	--/+?	+?/-
19. Landscape	+?/-	0	+?/-	--/+?	--/+?	+?/-
20. Water	+?/-	0	+?/-	--/+?	+?/-	+?/-
21. Flooding	+?/-	0	+?/-	--/+?	--/+?	+?/-
22. Pollution	+/-?	+?/-?	+/-?	--?/+	+/-?	+/-?
23. Soil	+?/-	0	+?/-	--/+?	--/+?	+?/-

- 4.33 Significant positive effects are identified for all options for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Sustainable Regeneration**). Options A, C, D, E and F all seek to identify more employment land in various forms which will increase the supply and diversity of employment opportunities within Hereford and improve the resilience of Hereford’s economy further strengthening its role as the main focus for employment provision in the county. This is also likely to act as a catalyst for sustainable regeneration of the city. Option B does not seek to identify any further land for employment development other than the 15ha at the Western and Southern Urban Expansion Areas which will also provide employment opportunities, enhance economic growth by enticing businesses to invest in the city and support sustainable regeneration of these areas.
- 4.34 Mixed effects are expected for all options for SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**) and 22 (**Pollution**) as both the options which support the delivery of further land for employment development and Option B are located within Hereford which is served by sustainable modes of transport thereby providing employees with the opportunity to commute using sustainable forms of travel however, it is also possible that employees may access the employment sites by private car which may increase road traffic congestion and the release of greenhouse gas emissions. Mixed effects (significant negative/minor positive) are expected for Option D for objectives 17 and 22 as manufacturing is more likely to contribute to noise and air pollution than other types of employment.
- 4.35 Mixed effects (minor positive/minor negative) are also identified for Options A, C, D, E and F for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**), 20 (**Water**), 21 (**Flooding**), and 23 (**Soil**) as these options seek to identify and therefore develop more employment land which could negatively impact on biodiversity, landscape, and the historic, water and soil environments. Significant negative effects are likely for Options D and E for objectives 14 and 19 as the development of manufacturing and warehousing structures are likely to have greater negative impact on the historic environment and the landscape as they are generally larger buildings which may affect the setting of historic assets or landscape

designations. Significant negative effects are also identified for Options D and E for objectives 18, 21 and 23 as the development of these structures requires a larger footprint than other types of employment which may reduce the amount of greenfield land and habitats thereby minimising the area of impermeable surfaces. A potential significant negative effect is also expected for Option D for objective 20 as the outputs from manufacturing may include chemicals that can leach into watercourses. Minor positive effects are included for all mixed effects for these options as it is possible at this stage to allocate land that has limited adverse effects on biodiversity, landscape, and the historic, water and soil environments.

- 4.36 Minor positive effects are expected for SA objective 8 (**Poverty and Equality**) and 6 (**Public Realm**) as they help to reduce employment deprivation in the city and will improve public realm in the areas where they are located.
- 4.37 The remaining objectives for all options are not likely to be affected and therefore negligible effects are identified.

Alternative uses on existing employment sites of poorer quality

Employment	
Should the Hereford Area Plan allow for a broader range of activities on existing employment sites of poorer quality? If so, what would be considered appropriate alternative uses on existing employment sites of poorer quality?	Option A – Yes- the HAP should allow for other uses on poorer quality employment sites
	Option B – No- the HAP should not allow for other uses on any existing employment sites
	Option C – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of leisure uses
	Option D – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of sports/recreational uses
	Option E – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of retail uses
	Option F – Yes- a broader range of activities on existing employment sites of poorer quality should be identified in the form of other

Table 4.7 Summary of policy options relating to employment sites of poor quality

SA Objective	Option A	Option B	Option C	Option D	Option E	Option F
1. Employment	+?/-?	0	+/-?	+/-?	+/-?	+?/-?
2. Sustainable Economy	+?/-?	0	+/-?	+/-?	+/-?	+?/-?
3. Sustainable Regeneration	+?	0	+	+	++	+?
4. Education	0	0	0	0	0	0
5. Health	0	0	+	+	0	0
6. Public Realm	+?	0	+	+	+	+?
7. Crime	0	0	0	0	0	0
8. Poverty and Equality	+?/-?	0	+/-?	+/-?	+/-?	+?/-?
9. Sustainable Transport	0	0	0	0	0	0
10. Access to Culture, Recreation, and Leisure	+?	0	+	+	0	+?
11. Access to Services	+?	0	0	0	+	+?
12. Housing	0	0	0	0	0	0
13. Efficient Use of Land	++	0	++	++	++	++
14. Built Environment	+?	0	+?	++?	+?	+?
15. Waste	0	0	0	0	0	0
16. Natural Resources	++	0	++	++	++	++
17. Climate Change	+?	0	+	+	+	+
18. Biodiversity	+?	0	+?	++?	+?	+?
19. Landscape	+?	0	+?	++?	+?	+?
20. Water	0	0	0	0	0	0
21. Flooding	+	0	+	+	+	+
22. Pollution	+?	0	+	+	+	+
23. Soil	++	0	++	++	++	++

- 4.38 Significant positive effects are expected for SA objectives 13 (**Efficient Use of Land**), 16 (**Natural Resources**) and 23 (**Soil**) for Options A, C, D, E and F. These options support the redevelopment of existing employment sites rated “moderate” or “poor”⁷⁶ to non-employment uses which will optimise the reuse of previously developed land and buildings, reduce development pressure on greenfield sites, and support the remediation of contaminated land. Minor positive effects are also identified for SA objective 21 (**Flooding**) for these options as they support the redevelopment of brownfield sites which will minimise flood risk by reducing development of permeable greenfield sites.
- 4.39 Positive effects are identified for Options A, C, D, E and F for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**), 3 (**Sustainable Regeneration**) and 8 (**Poverty and Equality**) as these options will provide a range of job opportunities which will reduce employment deprivation, improve the resilience and diversity of the economy, and support regeneration. Option E (retail use) is expected to have a significant positive effect for SA objective 3 as it is likely to contribute more to the vitality of Hereford by offering opportunities for independent, competitive and national retailers to occupy the former designated employment sites. These positive effects are combined with minor negative effects for SA objectives 1(**Employment**), 2 (**Sustainable Economy**) and 8 (**Poverty and Equality**) for Options A, C, D, E and F as the redevelopment of these types of sites may result in job losses from existing uses.
- 4.40 Positive effects are identified for Options A, C, D, E and F for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**) and 19 (**Landscape**) as the redevelopment of the sites provides opportunities to enhance the built environment, biodiversity and landscape quality of the city. A significant positive effect is identified for Option D (sport/recreational uses) for objectives 14, 18 and 19 as this option may provide open space which can contribute to the local green infrastructure network and the setting of historic assets.
- 4.41 Minor positive effects are identified for Options C and D for SA objective 5 (**Health**) and for Options A, C, D and F for SA objective 10 (**Access to Culture, Recreation and Leisure**) as they support the redevelopment of existing employment sites to non-employment uses including leisure, sports or recreation. Options A, E and F are likely to have minor positive effects for SA objective 11 (**Access to Services**) as these options support the redevelopment of existing employment sites to non-employment uses including retail.
- 4.42 Industrial, light industrial or warehousing type uses are generally the employment uses which are located on poorer quality employment sites. Therefore, minor positive effects are identified for SA objectives 6 (**Public Realm**), 17 (**Climate Change**) and 22 (**Pollution**) for Options A, C, D, E and F as these options support the redevelopment of poorer quality existing employment sites to other uses which will improve public realm and reduce the amount of greenhouse gas emissions from industrial sources.
- 4.43 The remaining objectives for all options are not likely to be affected and therefore negligible effects are identified.

City centre and retail

City centre and retail

Should the Hereford Area Plan identify further land for new retail development?

Option A - The HAP should seek further retail development.

Option B - There is no need for the HAP to identify any further retail development.

⁷⁶ See *Herefordshire County Employment Land Study* (Drivers Jonas Deloitte, 2012). Available at: https://www.herefordshire.gov.uk/downloads/file/1604/employment_land_study_2012

Table 4.8 Summary of policy options relating to the city centre and retail

SA Objective	Retail Option A	Retail Option B
1. Employment	++	+
2. Sustainable Economy	++	+
3. Sustainable Regeneration	++	+
4. Education	0	0
5. Health	0	0
6. Public Realm	+	+
7. Crime	0	0
8. Poverty and Equality	+	+
9. Sustainable Transport	+	+
10. Access to Culture, Recreation, and Leisure	0	0
11. Access to Services	++	+
12. Housing	+?/?	+?/?
13. Efficient Use of Land	+?/?	+?/?
14. Built Environment	+	+
15. Waste	0	0
16. Natural Resources	-	+?/?
17. Climate Change	+	+?/?
18. Biodiversity	0	0
19. Landscape	+?/?	+?/?
20. Water	0	0
21. Flooding	+?/?	+?/?
22. Pollution	+	+
23. Soil	0	0

- 4.44 Significant positive effects are expected for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Sustainable Regeneration**) as Option A proposes additional land for retail development which will provide employment opportunities in city centre locations (e.g. at Berrington Street/Aubrey Street or at the Old Market) that are within close proximity to settlements and/or sustainable transport nodes. The provision of additional retail developments will contribute to the regeneration of different areas of the city and improve the resilience of Hereford's economy further strengthening it as the county's principal retail centre. Although Option B does not seek to identify any further land for retail development other than at Eign Gate and as part of the Edgar Street Regeneration Area in accordance with Policy HD2, the provision of retail development as part of these regeneration schemes will also provide employment opportunities and improve the resilience/diversity of the economy. Therefore, minor positive effects are expected for Option B for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Sustainable Regeneration**).
- 4.45 A further significant positive effect is identified for Option A for SA objective 11 (**Access to Services**) as it will deliver an increased range of services and facilities provided in the city centre. A minor positive effect is identified for Option B as the provision of retail at Eign Gate and Edgar Street will also positively impact on this objective.
- 4.46 Option A supports the delivery of further land for retail development which will provide additional employment opportunities in the city centre that are easily accessible by sustainable modes of transport and thus will have benefits in terms of reducing air pollution. Option B does not seek to identify any further land for retail development other than at Eign Gate and Edgar Street which are also within the city centre and are well served by public transport thereby benefiting local air quality. Therefore, both options will have a minor positive effect on SA objectives 8 (**Poverty and Equality**), 9 (**Sustainable Transport**), 17 (**Climate Change**) and 22 (**Pollution**) as they help to reduce employment deprivation, unsustainable travel and air pollution in the city centre.
- 4.47 Minor positive effects are identified for SA objectives 14 (**Built Environment**) and 6 (**Public Realm**) for both options as either allocating additional land for retail development or limiting the provision of new retail to Edgar Street and Eign Gate will enhance the quality of the built environment and support city centre vitality leading to an improved public realm.

- 4.48 For SA objective 12 (**Housing**), a potential minor positive effect is identified for both options as the allocation of additional retail land (Option A) or the more efficient use of existing retail buildings (Option B) may provide a potential source of housing supply through the use of the upper floors of the retail buildings (as stated in the Issues and Options document).
- 4.49 Mixed effects (uncertain minor positive/uncertain minor negative) are identified for Option A for SA objectives 13 (**Efficient Use of Land**), 19 (**Landscape**) and 21 (**Flooding**) as the provision of additional new retail developments may occur on either previously developed land or greenfield land. Minor positive effects are expected for Option B for these objectives as limiting the provision of new retail developments may encourage the reuse of previously developed land or buildings thereby reducing the amount of greenfield land in the county being developed.
- 4.50 Option B is likely to have a minor positive effect on SA objective 16 (**Natural Resources**) as it limits the provision of new retail development sites which may encourage the reuse of existing buildings and minimise the need for new developments. Conversely, a minor negative effect is expected for Option A as it supports new retail development.
- 4.51 The remaining objectives for both options are not likely to be affected and therefore negligible effects are identified.

Tourism

Tourism	
Should additional hotel and/or conference facilities be provided in Hereford?	Option A - The HAP should seek additional hotel and conference facilities.
	Option B - The HAP does not need to seek any additional hotel or conference facilities.

Table 4.9 Summary of policy options relating to tourism

SA Objective	Tourism Option A	Tourism Option B
1. Employment	++	0
2. Sustainable Economy	++	0
3. Sustainable Regeneration	+	0
4. Education	0	0
5. Health	+/-	0
6. Public Realm	0	0
7. Crime	0	0
8. Poverty and Equality	+	0
9. Sustainable Transport	+	0
10. Access to Culture, Recreation, and Leisure	++	0
11. Access to Services	+	0
12. Housing	0	0
13. Efficient Use of Land	+/-	0
14. Built Environment	+	0
15. Waste	0	0
16. Natural Resources	+	0
17. Climate Change	+	0
18. Biodiversity	-	0
19. Landscape	-	0
20. Water	0	0
21. Flooding	-	0
22. Pollution	+	0
23. Soil	0	0

- 4.52 Significant positive effects are expected for SA objectives 1 (**Employment**) and 2 (**Sustainable Economy**) as Option A seeks to provide addition tourism infrastructure in Hereford City which will increase employment opportunities that are easily accessible by public transport. Ensuring there is sufficient availability and a range of hotel accommodation to meet the likely increased demand by visitors is also expected to improve the resilience of the local economy.

- 4.53 A further significant positive effect is identified for Option A in relation to objective 10 (**Access to Culture, Recreation and Leisure**) as the Herefordshire Economic Vision (2017) suggests two broad proposals for hotel development in Hereford, one of which is for a business hotel and sports/leisure complex at Hereford Racecourse which will provide facilities for a range of outdoor and indoor sporting activities while the other proposal is for a hotel at the Hereford football ground at Edgar Street which will incorporate conferencing and hospitality amenities. The provision of additional tourism infrastructure in the City will benefit both residents and visitors and therefore a significant positive effect is identified for this objective.
- 4.54 Minor positive effects are expected for Option A for several objectives. Option A supports the provision of additional tourism infrastructure which may help to act as a focus for regeneration by enhancing the character and distinctiveness of an area (3 **Sustainable Regeneration** and 14 **Built Environment**). Providing tourism infrastructure in appropriate locations is likely to help improve access to employment opportunities and leisure facilities in the county thereby addressing several indicators of deprivation (8 **Poverty and Equality**). Locating new tourism infrastructure in Hereford City will ensure that new hotel developments will be located in close proximity to the City's services and facilities (11 **Access to Services**) and will also be accessible by sustainable modes of transport (9 **Sustainable Transport**) which will minimise the consumption of fossil fuels by private car use (16 **Natural Resources**) thereby reducing greenhouse gas emissions (17 **Climate Change**) and helping to improve air quality in the city (22 **Pollution**).
- 4.55 SA objectives 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**) are likely to have minor negative effects as the two locations suggested for hotel development in the Economic Vision would result in the loss of some greenfield land which may lead to loss of biodiversity and landscape quality, and an increased risk of flooding due to the area of permeable surfaces being minimised.
- 4.56 Mixed effects (minor positive/minor negative) are identified for objective 5 (**Health**) as the two broad proposals for hotel development suggested in the Economic Vision include a business hotel and sports/leisure complex at Hereford Racecourse that will provide facilities for a range of outdoor and indoor sporting activities which would encourage healthy living. However, the other proposal is for a hotel development at the Hereford football ground at Edgar Street which, if developed, would result in the loss of an existing recreational asset. Mixed effects (minor positive/minor negative) are also identified for objective 13 (**Efficient Use of Land**) as the development of Hereford Racecourse and the Hereford football ground would result in the loss of some greenfield land, however, these sites are located in urban areas which are accessible by sustainable modes of transport, thereby reducing the need to travel.
- 4.57 The remaining objectives for Option A are not likely to be affected and therefore negligible effects are identified. As Option B will not deliver any further hotel or conference facilities in the city, negligible effects have been identified for all objectives.

Heritage/Built Environment

Heritage/Built Environment

Do you think more specific and detailed policies for the historic environment and heritage assets than those in the Core Strategy are required in the Hereford Area Plan?

Option A - The HAP should include Hereford-specific policies for the historic environment and heritage assets.

Option B - The existing policies in the Core Strategy are sufficient.

Table 4.10 Summary of policy options relating to heritage/built environment

SA Objective	Heritage Option A	Heritage Option B
1. Employment	0	0
2. Sustainable Economy	+?	+?
3. Sustainable Regeneration	+	+
4. Education	0	0
5. Health	+	+
6. Public Realm	+	+
7. Crime	0	0
8. Poverty and Equality	0	0
9. Sustainable Transport	0	0
10. Access to Culture, Recreation, and Leisure	+	+
11. Access to Services	0	0
12. Housing	+	+
13. Efficient Use of Land	+	+
14. Built Environment	++	++/-
15. Waste	+	+
16. Natural Resources	+	+
17. Climate Change	+	+
18. Biodiversity	+	+
19. Landscape	++	+
20. Water	0	0
21. Flooding	+	+
22. Pollution	0	0
23. Soil	+	+

- 4.58 Significant positive effects are expected for SA objective 14 (**Built Environment**) for both options (mixed effects of significant positive/minor negative for Option B) as the existing Core Strategy policies seek to protect, conserve and enhance formally designated heritage assets and their settings while the Hereford Area Plan DPD provides an opportunity to specifically protect and enhance Hereford’s heritage assets including non-designated assets. The minor negative effect is expected for Option B as the existing Core Strategy policies do not refer to the protection of non-designated heritage assets. A significant positive effect is also expected for SA objective 19 (**Landscape**) for Option A as specific policies on Hereford’s historic environment would ensure that the identity of the city, as contributed by heritage assets, is maintained which would benefit Hereford’s local character and distinctiveness. Furthermore, the Hereford Area Plan DPD provides an opportunity to guide the enhancement of specific heritage assets within the city including City Wall and Blackfriars Friary.
- 4.59 Minor positive effects are identified for both options for the majority of the remaining SA objectives. This is because the existing policies in the Core Strategy help to address most sustainability objectives at a county-wide level whilst the Hereford Area Plan DPD provides an opportunity to ensure that heritage assets in Hereford and any proposals for their conservation or enhancement are addressed in a comprehensive and integrated way.
- 4.60 Minor positive effects are expected for SA objective 2 (**Sustainable Economy**) as both options support the preservation and enhancement of heritage assets which can make a positive contribution to the city’s character and distinctiveness thereby improving the attractiveness of the area to investors. Similar positive effects are identified for SA objectives 3 (**Sustainable Regeneration**) and 6 (**Public Realm**) as the Core Strategy supports the use of heritage assets as a focus for regeneration while specific policies in the Hereford Area Plan DPD could provide more detailed guidance on the proposed enhancement of the historic city centre including at Widemarsh Street and High Town. SA objectives 5 (**Health**) and 18 (**Biodiversity**) are also likely to experience minor positive effects as both options seek to protect heritage assets including, for example, Registered Parks and Gardens which can support biodiversity and also be used by the public for recreation and thereby help to improve health and wellbeing. Both options are likely to have positive impacts on increasing the type or quality of cultural facilities and encouraging appreciation for the County’s heritage by protecting and enhancing local sites of heritage value (10 **Access to Culture, Recreation and Leisure**).

- 4.61 Both options are also likely to have minor positive effects in relation to SA objectives 12 (**Housing**), 13 (**Efficient Use of Land**), 15 (**Waste**), 16 (**Natural Resources**), 17 (**Climate Change**), 21 (**Flooding**) and 23 (**Soil**) as the existing Core Strategy policies support the retention, repair and sustainable use of heritage assets while the specific policies in the Hereford Area Plan DPD provide an opportunity to support and encourage the reuse of Hereford City's historic buildings. This approach will support the provision of housing (12), optimise the use of previously developed buildings and land (13), reduce demand for construction energy, materials and waste (15), minimise the need for new buildings (16), and reduce development pressure on greenfield sites which will minimise the risk of flooding and development on best and most versatile agricultural land (17, 21, 23).
- 4.62 The remaining objectives for both options are not likely to be affected and therefore negligible effects are identified.

Table 4.11 Summary table of the SA scores for all options in the Hereford Area Plan DPD

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
Site Size Option A	0	0	0	++/-	++/-	0	0	+	++?	+/-	+/-	++	0	--/+?	0	0	++?	--/+?	--/+?	0	--/+?	++?	--?
Site Size Option B	0	0	0	+/-	+/-	0	0	+/-	-?	+/-	+/-	+/-	??	+/-?	0	0	-?	+/-?	+/-?	0	+/-?	-?	+/-?
Boundary Option A	+	++	+	+	+	0	0	+	++/-	+	+	+/-	+	+/-	0	0	++/-	+	++	0	+	++/-	++
Boundary Option B	-	--	-	-	-	0	0	-	-	-	-	+/-	-	+/-	0	0	-	-	-	0	-	-	-
HMO Option A	0	0	0	0	0	+	0	+	-	0	0	++	+	0	0	0	0	0	0	0	0	0	0
HMO Option B	0	0	0	0	0	0	0	-	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0
HMO Option C	0	0	0	0	0	0	0	-	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0
Allotments Option A	0	0	+	0	+/-	+	0	+	0	+/-	0	+	+	0	+	0	+	+	+	0	+	+	+
Allotments Option B	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Transport Option A	+/-	+/-	0	0	-?	0	0	0	--	+/-	+/-	0	+/-?	-?	0	-?	--	-?	-?	0	-	--	-
Transport Option B	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Transport Option C	+/-	+	0	0	+	+	0	0	-	+/-	+/-	0	+	+/-?	0	-	-	-?	+/-	0	-	-	-
Transport Option D	+/-	+	0	0	+	+	0	0	+	+/-	+/-	0	+	+/-?	0	-	+	-?	+/-	0	-	+	-
Transport Option E	+/-	+/-	0	0	-?	0	0	0	--	+/-	+/-	0	+/-?	-?	0	-?	--	-?	-?	0	-	--	-
Employment Option A	++	++	++	0	0	+	0	+	+?/-?	0	0	0	0	+/-?	0	0	+/-?	+?/-	+?/-	+?/-	+?/-	+?/-	+?/-
Employment Option B	++	++	++	0	0	+	0	+	+?/-?	0	0	0	0	0	0	0	+?/-?	0	0	0	0	+?/-?	0
Employment Option C	++	++	++	0	0	+	0	+	+?/-?	0	0	0	0	+/-?	0	0	+/-?	+?/-	+?/-	+?/-	+?/-	+?/-	+?/-
Employment Option D	++	++	++	0	0	0	0	+	+?/-?	0	0	0	0	--/+?	0	0	--?/+	--/+?	--/+?	--/+?	--/+?	--?/+	--/+?
Employment Option E	++	++	++	0	0	0	0	+	+?/-?	0	0	0	0	--/+?	0	0	+/-?	--/+?	--/+?	+?/-	--/+?	+/-?	--/+?
Employment Option F	++	++	++	0	0	+	0	+	+?/-?	0	0	0	0	+/-?	0	0	+/-?	+?/-	+?/-	+?/-	+?/-	+/-?	+?/-
Employment Option A	+?/-?	+?/-?	+?	0	0	+?	0	+?/-?	0	+?	+?	0	++	+?	0	++	+?	+?	+?	0	+	+?	++
Employment Option B	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Employment Option C	+/-?	+/-?	+	0	+	+	0	+/-?	0	+	0	0	++	+?	0	++	+	+?	+?	0	+	+	++
Employment Option D	+/-?	+/-?	+	0	+	+	0	+/-?	0	+	0	0	++	+++?	0	++	+	+++?	+++?	0	+	+	++
Employment Option E	+/-?	+/-?	++	0	0	+	0	+/-?	0	0	+	0	++	+?	0	++	+	+?	+?	0	+	+	++
Employment Option F	+?/-?	+?/-?	+?	0	0	+?	0	+?/-?	0	+?	+?	0	++	+?	0	++	+	+?	+?	0	+	+	++
Retail Option A	++	++	++	0	0	+	0	+	+	0	++	+?	+?/-?	+	0	-	+	0	+?/-?	0	+?/-?	+	0
Retail Option B	+	+	+	0	0	+	0	+	+	0	+	+?	+?	+	0	+?	+?	0	+?	0	+?	+	0
Tourism Option A	++	++	+	0	+/-	0	0	+	+	++	+	0	+/-	+	0	+	+	-	-	0	-	+	0
Tourism Option B	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Heritage Option A	0	+?	+	0	+	+	0	0	0	+	0	+	+	++	+	+	+	+	++	0	+	0	+
Heritage Option B	0	+?	+	0	+	+	0	0	0	+	0	+	+	++/-	+	+	+	+	+	0	+	0	+

5 Sustainability Appraisal Findings of the Options for the Rural Area Site Allocations DPD

- 5.1 This chapter describes the appraisal findings for the policy options set out in the Rural Area Site Allocations DPD Issues and Options document. A summary table illustrating the SA scores for each option in the Rural Area Site Allocations (RASA) DPD is provided in **Table 5.13** at the end of this chapter. Maps depicting the parishes within each option are provided in **Appendix 2**.

Scope of the Rural Area Site Allocations DPD

Option 1 - Do nothing and rely on neighbourhood development plans (NDPs) and policy RA2

Table 5.1 Summary of scores for Option 1

SA Objective	Scope Option 1
1. Employment	-
2. Sustainable Economy	-
3. Sustainable Regeneration	-
4. Education	0
5. Health	-
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	-
9. Sustainable Transport	-
10. Access to Culture, Recreation, and Leisure	-
11. Access to Services	-
12. Housing	-?
13. Efficient Use of Land	-
14. Built Environment	-
15. Waste	0
16. Natural Resources	0
17. Climate Change	-
18. Biodiversity	-
19. Landscape	-
20. Water	0
21. Flooding	-
22. Pollution	-
23. Soil	0

- 5.2 It is expected that reducing the scope of the RASA DPD to rely upon neighbourhood development plans (NDPs) and Policy RA2 in the Core Strategy would have mostly minor negative effects on the objectives against which this option has been appraised. The negative effects are expected mainly given that this approach would result in a less plan-led response to development in Herefordshire in those 28 settlements where NDPs have not or will not be produced. This would result in a pattern of development that would be reactive to planning applications submitted in the county and therefore the influence of local planning policy to guide development which is proportionate and sustainably located would be reduced.

- 5.3 Locally distinctive policies to ensure employment opportunities are directed to suitable locations would not be in place thereby resulting in minor negative effects for SA objectives 1 (**Employment**) and 2 (**Sustainable Economy**). This approach is also less likely to result in development which would be sustainable in terms of its location thereby limiting the potential for positive effects relating to the vitality and viability of local and town centres in Herefordshire. Therefore, a minor negative effect is expected for SA objective 3 (**Regeneration**).
- 5.4 A minor negative effect is identified for SA objective 12 (**Housing**) as it is likely that the pattern of development promoted through this approach would not be a plan-led approach which would result in uncertainty relating to the provision of the required level of new housing in rural locations in the county over the plan period.
- 5.5 Option 1 would fail to include locally distinctive policies to ensure proportional growth is met and as such development in the county is more likely to be reactionary to planning applications and not plan-led. This approach is expected to be potentially detrimental in terms of providing reduced access to services and facilities particularly by more sustainable modes of transport in the county. Therefore, minor negative effects have been identified in relation to SA objectives 5 (**Health**), 8 (**Poverty and Equality**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 17 (**Climate Change**), and 22 (**Pollution**).
- 5.6 Further adverse impacts are likely on the wider environment both built and natural due to the increased potential for disproportionate levels of growth which would not necessarily be guided to sustainable locations through local level policies. Minor negative effects have therefore been recorded for SA objectives 13 (**Efficient Use of Land**), 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**).
- 5.7 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Option 2 - DPD coverage to include all parishes with an RA2 settlement but not within a designated neighbourhood area

Table 5.2 Summary of scores for Option 2

SA Objective	Scope Option 2
1. Employment	+
2. Sustainable Economy	+
3. Sustainable Regeneration	+
4. Education	+
5. Health	+
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	+
9. Sustainable Transport	+
10. Access to Culture, Recreation, and Leisure	+
11. Access to Services	+
12. Housing	++
13. Efficient Use of Land	+
14. Built Environment	+
15. Waste	0
16. Natural Resources	0
17. Climate Change	+
18. Biodiversity	+
19. Landscape	+
20. Water	0
21. Flooding	+
22. Pollution	+
23. Soil	0

- 5.8 As at March 2017, 107 neighbourhood areas have been designated within Herefordshire. Neighbourhood development plans which are adopted within these areas will make provision for rural housing. At present there are a total of 18 parish areas containing an RA2 listed settlement which are not within a designated neighbourhood area in the county. These areas include 28 settlements. The approach proposed by Option 2 would allow for full development plan coverage of all RA2 settlements through either neighbourhood development plans or the RASA DPD. It is expected that this approach would encourage new development to be allocated proportionately at rural settlements and also at more sustainable locations within these settlements. More certainty is expected to be provided for developers in terms of development allocations.
- 5.9 A significant positive effect is identified for SA objective 12 (**Housing**) as this option will ensure that the 18 parish areas not currently covered by a neighbourhood area will have additional planning policy to guide local residential development. By helping to maintain a five year land supply within the county this option will also mean that the policies of the Core Strategy will remain enforceable over the plan period. Therefore, residential development is likely to be provided in more sustainable locations and may also be required to be built to a higher standard thereby making housing in Herefordshire more 'liveable'.
- 5.10 Minor positive effects are identified for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Regeneration**) as this approach is likely to encourage more appropriate siting of employment development sites which will encourage sustained economic growth in rural areas thereby contributing to the vitality of local centres in rural locations.
- 5.11 Further minor positive effects have been identified for Option 2 as it is likely to result in improved access to essential services and facilities in the county which might also help to encourage use of more active and sustainable modes of transport. These positive effects relate to SA objectives 4 (**Education**), 5 (**Health**), 8 (**Poverty and Equality**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 17 (**Climate Change**), and 22 (**Pollution**).
- 5.12 As this option would help to encourage a more plan-led process which will provide a proportionate level of development at the rural settlements of Herefordshire, minor positive effects are also expected for SA objectives 13 (**Efficient Use of Land**), 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**). It is likely that reducing the potential for speculative planning applications will help to reduce the overall loss of greenfield land in Herefordshire as well as protecting areas valued for their biodiversity and landscape quality from disproportionate levels of development.
- 5.13 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Option 3 - DPD coverage to include all parishes without a designated neighbourhood area (as Option 2) and parishes who have formally requested to withdraw from the neighbourhood development plan process

Table 5.3 Summary of scores for Option 3

SA Objective	Scope Option 3
1. Employment	+?
2. Sustainable Economy	++?
3. Sustainable Regeneration	+?
4. Education	+
5. Health	+
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	+/-?
9. Sustainable Transport	+
10. Access to Culture, Recreation, and Leisure	+
11. Access to Services	+
12. Housing	++?
13. Efficient Use of Land	+
14. Built Environment	+?
15. Waste	0
16. Natural Resources	0
17. Climate Change	+
18. Biodiversity	+?
19. Landscape	+?
20. Water	0
21. Flooding	+?
22. Pollution	+
23. Soil	0

- 5.14 Option 3 would result in full coverage of all RA2 settlements in Herefordshire through either neighbourhood development plans or the RASA DPD. The approach proposed by Option 3 would allow for DPD coverage of all parishes that include a Policy RA2 settlement but are not within a designated neighbourhood area. At present there are a total of 18 parish areas containing an RA2 listed settlement which are not within a designated neighbourhood area in the county. These areas include 28 settlements. Option 3 would also include within the RASA DPD seven additional parishes which have formally requested to withdraw from the neighbourhood development plan process. It is expected that this approach would help to encourage new development to be provided proportionately at rural settlements and also at the more sustainable locations of these settlements. As the parish of Bromyard and Winslow has formally requested to withdraw from the neighbourhood development plan process it will be included in Option 3 which would result in the market town of Bromyard being covered by the RASA DPD thereby placing it at a different level of policy to the other market towns of the county (all of whom are producing neighbourhood development plans).
- 5.15 An uncertain significant positive effect and uncertain minor positive effects are expected for SA objectives 2 (**Sustainable Economy**), 1 (**Employment**) and 3 (**Sustainable Regeneration**) respectively, as this approach is likely to encourage more appropriate siting of employment development sites which will encourage sustained economic growth in rural areas thereby contributing to the vitality of local centres in rural locations. Furthermore, this approach will also address the allocation of 5 hectares of employment land and policies regarding the town centre and primary shopping areas of Bromyard town. An uncertain effect is identified for these objectives as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the delivery of employment development in the town.
- 5.16 An uncertain significant positive effect is expected for SA objective 12 (**Housing**). The positive effect has been recorded as the DPD will provide additional planning policy to guide residential development to sustainable locations and will help to ensure a five year land supply of residential properties. The uncertain effect is identified as it is unknown whether placing Bromyard at a

different level of policy to the other four market towns will impact on the delivery of housing in the town (500 new homes).

- 5.17 Uncertain minor positive effects are expected for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**). Option 3 provides an opportunity for those parishes without a designated neighbourhood area and those that have formally withdrawn from the neighbourhood plan process to be addressed by policies in the DPD thereby encouraging a more plan-led process allowing for proportional growth to occur while being sensitive to the natural and built environment. The uncertain effect is identified as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the protection and enhancement of the town's historic environment, biodiversity assets, or landscape.
- 5.18 It is expected that minor positive effects would result for SA objectives 4 (**Education**), 5 (**Health**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 17 (**Climate Change**) and 22 (**Pollution**) as a result of the plan-led approach proposed by this option. Such an approach is expected to place new development in areas which are more easily accessible to essential services and facilities particularly by more active and sustainable modes of transport.
- 5.19 A mixed effect (minor positive/minor negative) is expected for SA objective 8 (**Poverty and Equality**). The minor positive effect is identified as this option is expected to improve access to employment opportunities and other services and facilities in the county through the appropriate siting of new development which would help to reduce deprivation. As Bromyard is the only market town not to produce a NDP and assuming that producing a NDP allows for local people to play a more significant and proactive role in the planning of their area, an uncertain minor negative effect is also expected for this objective.
- 5.20 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Option 4 - DPD coverage of those parishes within Option 3 plus those who have made no progress since the neighbourhood area designation

Table 5.4 Summary of scores for Option 4

SA Objective	Scope Option 4
1. Employment	+?
2. Sustainable Economy	++?
3. Sustainable Regeneration	+?
4. Education	+
5. Health	+
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	+/-
9. Sustainable Transport	+
10. Access to Culture, Recreation, and Leisure	+
11. Access to Services	+
12. Housing	++?
13. Efficient Use of Land	+
14. Built Environment	+?
15. Waste	0
16. Natural Resources	0
17. Climate Change	+
18. Biodiversity	+?
19. Landscape	+?
20. Water	0
21. Flooding	+?
22. Pollution	+
23. Soil	0

- 5.21 Option 4 would include within the coverage of the RASA DPD the 18 parishes without a designation as a neighbourhood area, the seven parishes which have formally requested to withdraw from the NDP process, and the four additional parishes which have made no progress with their NDP since the neighbourhood area designation. This approach would ensure full development plan coverage of all RA2 settlements through either NDPs or the DPD which will help to encourage a plan-led approach to development in rural settlements of Herefordshire thereby promoting a proportionate level of development at more sustainable locations. As the parish of Bromyard and Winslow has formally requested to withdraw from the neighbourhood development plan process it will be included in Option 4 which would result in the market town of Bromyard being covered by the RASA DPD thereby placing it at a different level of policy to the other market towns of the county (all of whom are producing neighbourhood development plans).
- 5.22 An uncertain significant positive effect and uncertain minor positive effects are expected for SA objectives 2 (**Sustainable Economy**), 1 (**Employment**) and 3 (**Sustainable Regeneration**) respectively, as this approach is likely to encourage more appropriate siting of employment development sites which will encourage sustained economic growth in rural areas thereby contributing to the vitality of local centres in rural locations. Furthermore, this approach will also address the allocation of 5 hectares of employment land and policies regarding the town centre and primary shopping areas of Bromyard town. An uncertain effect is identified for these objectives as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the delivery of employment development in the town.
- 5.23 An uncertain significant positive effect is expected for SA objective 12 (**Housing**). The positive effect has been recorded as the DPD will provide additional planning policy to guide residential development to sustainable locations and will help to ensure a five year land supply of residential properties. The uncertain effect is identified as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the delivery of housing in the town (500 new homes).
- 5.24 Uncertain minor positive effects are expected for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**). Option 4 provides an opportunity for those parishes without a designated neighbourhood area, those who have made no progress with their NDP since the neighbourhood area designation, and those that have formally withdrawn from the neighbourhood plan process to be addressed by policies in the DPD thereby encouraging a more plan-led process allowing for proportional growth to occur while being sensitive to the natural and built environment. The uncertain effect is identified as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the protection and enhancement of the town's historic environment, biodiversity assets, or landscape.
- 5.25 A mixed effect (minor positive/minor negative) is identified for SA objective 8 (**Poverty and Equality**). The positive effect is expected as this option ensures that new affordable housing is delivered at sustainable locations which would help to address housing deprivation. However, a minor negative effect is identified for this option as including the four additional parishes which have not yet withdrawn from the NDP process may undermine any future work being produced locally and reduce the potential for local involvement in planning policy.
- 5.26 It is expected that minor positive effects would result for SA objectives 4 (**Education**), 5 (**Health**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 17 (**Climate Change**) and 22 (**Pollution**) as a result of the plan-led approach proposed by this option. Such an approach is expected to place new development in areas which are more easily accessible to essential services and facilities particularly by more active and sustainable modes of transport.
- 5.27 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Option 5 - DPD coverage to include all within Option 4 plus those parishes who have made little progress or little activity during the past 12 months

Table 5.5 Summary of scores for Option 5

SA Objective	Scope Option 5
1. Employment	+?
2. Sustainable Economy	++?
3. Sustainable Regeneration	+?
4. Education	+
5. Health	+
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	+/-
9. Sustainable Transport	+
10. Access to Culture, Recreation, and Leisure	+
11. Access to Services	+
12. Housing	++?
13. Efficient Use of Land	+
14. Built Environment	+?
15. Waste	0
16. Natural Resources	0
17. Climate Change	+
18. Biodiversity	+?
19. Landscape	+?
20. Water	0
21. Flooding	+?
22. Pollution	+
23. Soil	0

- 5.28 Option 5 would include within the coverage of the RASA DPD all parishes without a designation as a neighbourhood area, parishes who have formally requested to withdraw from the NDP process and those which have made no progress with their NDP since the neighbourhood area designation or which have made little progress or little activity during the past 12 months. As such this approach would also ensure more complete development plan coverage of the RA2 settlements through either neighbourhood development plans or the DPD. It is likely that this option would help to promote proportionate levels of development at more sustainable locations in rural settlements through a plan-led approach. As the parish of Bromyard and Winslow has formally requested to withdraw from the neighbourhood development plan process it will be included in Option 5 which would result in the market town of Bromyard being covered by the RASA DPD thereby placing it at a different level of policy to the other market towns of the county (all of whom are producing neighbourhood development plans).
- 5.29 An uncertain significant positive effect and uncertain minor positive effects are expected for SA objectives 2 (**Sustainable Economy**), 1 (**Employment**) and 3 (**Sustainable Regeneration**) respectively, as this approach is likely to encourage more appropriate siting of employment development sites which will encourage sustained economic growth in rural areas thereby contributing to the vitality of local centres in rural locations. Furthermore, this approach will also address the allocation of 5 hectares of employment land and policies regarding the town centre and primary shopping areas of Bromyard town. An uncertain effect is identified for these objectives as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the delivery of employment development in the town.
- 5.30 An uncertain significant positive effect is expected for SA objective 12 (**Housing**). The positive effect has been recorded as the DPD will provide additional planning policy to guide residential development to sustainable locations and will help to ensure a five year land supply of residential properties. The uncertain effect is identified as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the delivery of housing in the town (500 new homes).

- 5.31 Uncertain minor positive effects are expected for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**). Option 5 provides an opportunity for all parishes included within Option 4 plus those parishes who have made little progress or little activity during the past 12 months to be addressed by policies in the DPD thereby encouraging a more plan-led process allowing for proportional growth to occur while being sensitive to the natural and built environment. The uncertain effect is identified as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the protection and enhancement of the town's historic environment, biodiversity assets, or landscape.
- 5.32 A mixed effect (minor negative/minor positive) is identified for SA objective 8 (**Poverty and Equality**) as local involvement in the planning process is likely to be both undermined and promoted by this option. The minor negative effect is expected for this objective as decision making would be taken away from a number of parishes where no progress has been made with their NDP since the neighbourhood area designation. The minor positive effect is identified as this option will provide affordable housing at sustainable and easily accessible rural locations, and will also provide some parishes with the opportunity to withdraw from the NDP process of their own accord where it has been determined that continuing their plan is not advantageous.
- 5.33 Minor positive effects have been recorded for SA objectives 4 (**Education**), 5 (**Health**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 17 (**Climate Change**) and 22 (**Pollution**) as a result of the plan-led approach proposed by this option. Such an approach is expected to place new development in areas which are more easily accessible to essential services and facilities particularly by more active and sustainable modes of transport.
- 5.34 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Option 6 - DPD coverage to include all within Option 4 plus those who have not reached draft plan (Reg14) stage by the preferred options stage of the Rural Area Site Allocation DPD

Table 5.6 Summary of scores for Option 6

SA Objective	Scope Option 6
1. Employment	+?
2. Sustainable Economy	++?
3. Sustainable Regeneration	+?
4. Education	+
5. Health	+
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	+/-
9. Sustainable Transport	+
10. Access to Culture, Recreation, and Leisure	+
11. Access to Services	+
12. Housing	++?
13. Efficient Use of Land	+
14. Built Environment	+?
15. Waste	0
16. Natural Resources	0
17. Climate Change	+
18. Biodiversity	+?
19. Landscape	+?
20. Water	0
21. Flooding	+?
22. Pollution	+
23. Soil	0

- 5.35 Option 6 would include within the coverage of the RASA DPD all parishes without a designation as a neighbourhood area, parishes who have formally requested to withdraw from the NDP process, those which have made no progress with their NDP since the neighbourhood area designation, and those who have not reached draft plan (Reg14) stage by the preferred options stage of the RASA DPD. This approach would also ensure more complete development plan coverage of the RA2 settlements through either neighbourhood development plans or the DPD. It is likely that this option would help to promote proportionate levels of development at more sustainable locations at rural settlements through a plan-led approach. As the parish of Bromyard and Winslow has formally requested to withdraw from the neighbourhood development plan process it will be included in Option 6 which would result in the market town of Bromyard being covered by the RASA DPD thereby placing it at a different level of policy to the other market towns of the county (all of whom are producing neighbourhood development plans). Given the approach is similar to Options 3, 4 and 5, many of the effects previously noted are applicable.
- 5.36 An uncertain significant positive effect and uncertain minor positive effects are expected for SA objectives 2 (**Sustainable Economy**), 1 (**Employment**) and 3 (**Sustainable Regeneration**) respectively, as this approach is likely to encourage more appropriate siting of employment development sites which will encourage sustained economic growth in rural areas thereby contributing to the vitality of local centres in rural locations. Furthermore, this approach will also address the allocation of 5 hectares of employment land and policies regarding the town centre and primary shopping areas of Bromyard town. An uncertain effect is identified for these objectives as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the delivery of employment development in the town.
- 5.37 An uncertain significant positive effect is expected for SA objective 12 (**Housing**). The positive effect has been recorded as the DPD will provide additional planning policy to guide residential development to sustainable locations and will help to ensure a five year land supply of residential properties. The uncertain effect is identified as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the delivery of housing in the town (500 new homes).
- 5.38 Uncertain minor positive effects are expected for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**). Option 6 provides an opportunity for all parishes within Option 4 plus those who have not reached draft plan (Reg14) stage by the preferred options stage of the RASA DPD to be addressed by policies in the DPD thereby encouraging a more plan-led process allowing for proportional growth to occur while being sensitive to the natural and built environment. The uncertain effect is identified as it is unknown whether placing Bromyard at a different level of policy to the other four market towns will impact on the protection and enhancement of the town's historic environment, biodiversity assets, or landscape.
- 5.39 A mixed effect (minor positive/minor negative) is identified for SA objective 8 (**Poverty and Equality**). The positive effect is expected as this option ensures that new affordable housing is delivered at sustainable locations which would help to address housing deprivation. However, a minor negative effect is expected as including the settlements identified in Option 4, in addition to the parishes where draft plan stage has not been reached by the preferred options stage, within the DPD may undermine any future work being produced locally and reduce the potential for local involvement in planning policy.
- 5.40 Minor positive effects have been recorded for SA objectives 4 (**Education**), 5 (**Health**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 17 (**Climate Change**) and 22 (**Pollution**) as a result of the plan-led approach proposed in this option. Option 6 is likely to result in new development being sited in locations which are accessible to essential services and facilities particularly by more active and sustainable modes of transport.
- 5.41 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Option 7 - Produce a separate Bromyard Development Plan Document

Table 5.7 Summary of scores for Option 7

SA Objective	Scope Option 7
1. Employment	+
2. Sustainable Economy	++
3. Sustainable Regeneration	+
4. Education	+
5. Health	+
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	+/-
9. Sustainable Transport	+
10. Access to Culture, Recreation, and Leisure	+
11. Access to Services	+
12. Housing	++
13. Efficient Use of Land	+
14. Built Environment	+
15. Waste	0
16. Natural Resources	0
17. Climate Change	+
18. Biodiversity	+
19. Landscape	+
20. Water	0
21. Flooding	+
22. Pollution	+
23. Soil	0

- 5.42 Option 7 would result in the production of the RASA DPD to ensure proportionate growth is achieved at the rural parishes as well as the production of a separate Bromyard DPD to guide development in the administrative area of Bromyard and Winslow. Although this approach would result in the market town of Bromyard being placed at a different level of policy to the other market towns of Herefordshire, it is expected that providing a separate Bromyard DPD would mitigate against any uncertainty in relation to the provision of development, thereby allowing for a holistic and coordinated plan approach to development in the town.
- 5.43 Positive effects are expected for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Sustainable Regeneration**) as the development of two separate DPDs will allow for a proportionate level of economic growth in the town and within the rural areas which will help ensure the vitality of local centres. A significant positive effect is expected for objective 2 as this option will address the delivery of 5 hectares of employment land in Bromyard which will improve the resilience of the local economy.
- 5.44 A further significant positive effect is likely for this option in relation to the provision of new homes which will meet local need and help to maintain a five year land supply within the county. The proportionate growth target of 500 dwellings within Bromyard town will be more likely to be met if the Bromyard DPD is in place considering that a NDP is not expected to be adopted to allocate appropriate sites. Therefore, a significant positive effect is expected for SA objective 12 (**Housing**).
- 5.45 A mixed effect (minor positive/minor negative) is expected for SA objective 8 (**Poverty and Equality**). The positive effect is identified as this option will address housing deprivation in the county by ensuring that new affordable housing is delivered at sustainable and easily accessible locations both at Bromyard and at rural settlements. The minor negative effect is identified for this option as Bromyard would be the only market town to not have a locally produced neighbourhood development plan thereby reducing local involvement in the planning process.
- 5.46 The full coverage of the county by planning policy at this level would help to allow new development to be sustainably sited in terms of accessibility to essential services and facilities particularly by more active and sustainable modes of transport. Minor positive effects have

therefore been recorded for SA objectives 4 (**Education**), 5 (**Health**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 17 (**Climate Change**) and 22 (**Pollution**) as a result of this plan-led approach.

- 5.47 The sustainable siting of new development as guided by both DPDs is likely to reduce the potential for adverse impacts on the quality of the natural and built environments. The Bromyard DPD, in particular, may offer potential for development to proceed with consideration for the specific sensitivities of the market town and its surroundings and therefore, minor positive effects have been recorded for SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**).
- 5.48 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Option 8 - Produce a separate Bromyard Housing Market Area (HMA) DPD to cover the town of Bromyard and those parishes within the HMA highlighted within Option 5

Table 5.8 Summary of scores for Option 8

SA Objective	Scope Option 8
1. Employment	++
2. Sustainable Economy	++
3. Sustainable Regeneration	++
4. Education	+
5. Health	+
6. Public Realm	0
7. Crime	0
8. Poverty and Equality	+/-
9. Sustainable Transport	+
10. Access to Culture, Recreation, and Leisure	+
11. Access to Services	+
12. Housing	++
13. Efficient Use of Land	+
14. Built Environment	+
15. Waste	0
16. Natural Resources	0
17. Climate Change	+
18. Biodiversity	+
19. Landscape	+
20. Water	0
21. Flooding	+
22. Pollution	+
23. Soil	0

- 5.49 Option 8 would result in the production of the RASA DPD to ensure proportionate growth is achieved at the rural parishes as well as the production of a separate Bromyard Housing Market Area (HMA) DPD to guide development in the administrative area of Bromyard and Winslow, and the six surrounding parishes which are not preparing an NDP (Thornbury Group, Bredenbury, Avenbury, Brockhampton Group, Hatfield and District, and Stoke Lacy). As such it would produce many similar sustainability effects to Option 7 although it is noted that this option would extend the coverage of the DPD for Bromyard to include those parishes within the Bromyard HMA which are not preparing an NDP. Although this approach would result in the market town of Bromyard being placed at a different level of policy to the other market towns of Herefordshire, it is expected that providing a separate Bromyard HMA DPD would mitigate against any uncertainty in relation to the provision of development, thereby allowing for a holistic and coordinated plan approach to development in the town and the six other parishes surrounding Bromyard which are not producing an NDP.

- 5.50 Significant positive effects are expected for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Sustainable Regeneration**) as this option will address the delivery of 5 hectares of employment land in Bromyard and provide an opportunity to look at employment land provision within the wider Bromyard Housing Market Area and beyond the administrative boundary of Bromyard town.
- 5.51 A further significant positive effect is likely for this option in relation to the provision of new homes which will meet local need and help to maintain a five year land supply within the county. The proportionate growth target of 500 dwellings within Bromyard town will be more likely to be met if the Bromyard HMA DPD is prepared. Therefore, a significant positive effect is expected for SA objective 12 (**Housing**).
- 5.52 A mixed effect (minor positive/minor negative) is expected for SA objective 8 (**Poverty and Equality**). The positive effect is identified as this option will address housing and employment deprivation by ensuring that new affordable housing and employment land are delivered within the Bromyard Housing Market Area and will not be limited to Bromyard town. However, a minor negative effect is identified for this option as Bromyard would be the only market town to not have a locally produced neighbourhood development plan thereby reducing local involvement in the planning process.
- 5.53 The full coverage of the county by planning policy at this level would help to allow new development to be sustainably sited in terms of accessibility to essential services and facilities particularly by more active and sustainable modes of transport. As a result of this plan-led approach, minor positive effects have been recorded for SA objectives 4 (**Education**), 5 (**Health**), 9 (**Sustainable Transport**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 17 (**Climate Change**) and 22 (**Pollution**).
- 5.54 The production of both DPDs is likely to reduce the potential for adverse impacts on the historic environment, biodiversity and landscape designations, and loss of greenfield land which would increase the area of impermeable surfaces in Herefordshire. At Bromyard a high number of environmental sensitivities have been identified around the market town in the Core Strategy and the production of a separate DPD to include the Bromyard HMA which would consider this settlement and the surrounding area holistically and in a coordinated manner is expected to have minor positive effects on SA objectives 14 (**Built Environment**), 18 (**Biodiversity**), 19 (**Landscape**) and 21 (**Flooding**).
- 5.55 The remaining objectives are not likely to be affected and therefore negligible effects are identified.

Policy Options for the Rural Area Site Allocations DPD

Settlement boundary

Settlement boundary

In line with the Core Strategy, is the defining of settlement boundaries within the RASA DPD appropriate?

Option A – Yes settlement boundaries should be defined.

Option B – No settlement boundaries should not be defined.

Table 5.9 Summary of options relating to defining a settlement boundary

SA Objective	Boundary Option A	Boundary Option B
1. Employment	+	-
2. Sustainable Economy	++	--
3. Sustainable Regeneration	+	-
4. Education	+	-
5. Health	+	-
6. Public Realm	0	0
7. Crime	0	0
8. Poverty and Equality	+	-
9. Sustainable Transport	++	-
10. Access to Culture, Recreation, and Leisure	+	-
11. Access to Services	+	-
12. Housing	+/-	++/-
13. Efficient Use of Land	+	-
14. Built Environment	+/-	+/-
15. Waste	0	0
16. Natural Resources	0	0
17. Climate Change	++	-
18. Biodiversity	+	-
19. Landscape	++	-
20. Water	0	0
21. Flooding	+	-
22. Pollution	+	-
23. Soil	0	0

- 5.56 It is expected that defining the settlement boundaries in Herefordshire through the RASA DPD would generally have a positive effect on the objectives against which it has been appraised. The definition of boundaries would provide more certainty to developers in relation to the likelihood of planning permission being granted. This would also result in a more plan-led approach to employment development which would provide opportunities to coordinate new development at proportionate levels with infrastructure demands. Therefore, a significant positive effect has been recorded for SA objective 2 (**Sustainable Economy**) for Option A. A minor positive effect is expected for SA objective 1 (**Employment**) for Option A as this approach would also allow for an increase in the number of accessible employment opportunities.
- 5.57 Limiting the area which is likely to be acceptable for the majority of development through the definition of settlement boundaries in the county is expected to lead to a more compact pattern of development, preventing sprawl and linear development which might otherwise impinge upon the openness of the countryside. This would also help to place essential services and facilities within closer proximity of residents in Herefordshire and significant positive effects have therefore been identified for Option A in relation to SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**), 19 (**Landscape**) and 22 (**Pollution**).
- 5.58 Additional minor positive effects are expected in relation to SA objectives 3 (**Sustainable Regeneration**), 4 (**Education**), 5 (**Health**), 8 (**Poverty and Equality**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 18 (**Biodiversity**) and 21 (**Flooding**). It is expected that the plan-led approach that Option A would promote would help to form a more compact development pattern at the county's settlements which will provide the majority of services and facilities within close proximity of residential properties, thereby creating critical mass which would encourage repeat visits and improved vitality and viability of such service centres. Preventing sprawl is also expected to reduce the loss of greenfield sites in the countryside which would help limit flood risk, habitat loss and fragmentation.
- 5.59 Mixed effects (minor positive/minor negative) have been identified for SA objectives 12 (**Housing**) and 14 (**Built Environment**) for Option A. Defining settlement boundaries through the RASA DPD would result in a decreased area of land being acceptable to provide new housing to meet local needs over the plan period and the containment of this development within a

smaller space might result in 'cramming' as such adversely impacting upon established local character. However, Option A would allow for some windfall sites to help meet residential requirements and may have the overall effect of making such properties more 'liveable' through sustainable siting allowing for improved access to essential services and facilities. It also expected that the protection of the open countryside and sensitive landscapes in Herefordshire through Option A may act to protect the setting of local heritage assets.

- 5.60 Option B would result in no boundaries being defined for settlements in the county through the RASA DPD. Mostly negative sustainability effects have been identified for this option. A significant negative effect has been recorded for this option in relation to SA objective 2 (**Sustainable Economy**) given the reduced certainty developers would be provided with in relation to obtaining planning permissions in Herefordshire. An associated minor negative effect is also likely for SA objective 1 (**Employment**). Only one further significant effect has been recorded for Option B. A significant positive effect is expected for SA objective 12 (**Housing**) as the lack of settlement boundaries may make a larger area acceptable for this type of development meaning that the objectively assessed need may be more easily met. The overall effect on this objective is mixed, however, given that certainty of achieving planning permissions may be reduced through this option and that new homes may be less 'liveable' due to potential for increased distances to essential services and facilities.
- 5.61 Further minor negative effects are expected for a number of objectives as Option B would allow for increased levels of sprawl and linear development on greenfield land in the countryside, thereby increasing journey times to essential services and facilities in the county. This approach is also expected to have the added effect of reducing the critical mass and associated vitality and viability of the rural settlements. The minor negative effects expected relate to SA objectives 3 (**Sustainable Regeneration**), 4 (**Education**), 5 (**Health**), 8 (**Poverty and Equality**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), 13 (**Efficient Use of Land**), 18 (**Biodiversity**), 19 (**Landscape**) and 20 (**Flooding**). Minor negative effects are also expected for SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**) and 22 (**Pollution**) as this approach is likely to perpetuate continued private car usage in the county given that journey times to essential services and facilities are likely to be relatively long in comparison to that which might be achieved by limiting most development to the area within the settlement boundaries.
- 5.62 The remaining objectives for both Options A and B are not likely to be affected by the provision of development within or outside of the potential rural settlement boundaries and therefore negligible effects have been identified.

Housing

Housing

What size and type of housing allocations should be provided for in the RASA DPD?

Option A – A range of site sizes for housing allocations.

Option B – Small sites which contribute to the government objectives of providing housing under half a hectare.

Option C – Larger sites which contribute to providing a range and mix of housing including affordable housing.

Option D – Sites specifically for affordable housing and/or starter homes.

Table 5.10 Summary of options for housing

SA Objective	Housing Option A	Housing Option B	Housing Option C	Housing Option D
1. Employment	0	0	0	0
2. Sustainable Economy	0	0	0	0
3. Sustainable Regeneration	0	0	0	0
4. Education	+	-	+	0
5. Health	+	-	+	0
6. Public Realm	+	-	+	0
7. Crime	0	0	0	0
8. Poverty and Equality	++	+/-	++/-	++
9. Sustainable Transport	0	0	0	0
10. Access to Culture, Recreation, and Leisure	+	+/-	+	0
11. Access to Services	+	+/-	+	0
12. Housing	++	+/-	++/-	++?
13. Efficient Use of Land	0	0	0	+
14. Built Environment	0	0	0	0
15. Waste	0	0	0	0
16. Natural Resources	0	0	0	0
17. Climate Change	0	0	0	0
18. Biodiversity	+	-	+	0
19. Landscape	0	0	0	0
20. Water	0	0	0	0
21. Flooding	0	0	0	0
22. Pollution	0	0	0	0
23. Soil	0	0	0	0

- 5.63 Providing for varying sizes and types of housing allocations through the RASA DPD is expected to have significant effects upon SA objective 12 (**Housing**). It is expected that the four options proposed have potential to deliver homes which would best meet the requirements of the population in Herefordshire to varying degrees. As Option A would provide a range of sizes of housing sites for allocation it is expected it would allow for both larger and smaller developers (including those providing custom and self-builds) to commit to development in the county which would help deliver a varied mix of new homes in Herefordshire thereby meeting local need. The Core Strategy has set the housing figure to be provided at the rural settlements as 5,300 dwellings and it is expected that Option A would help to meet this figure and also deliver a range of new homes (in terms of mix and tenure) meaning a significant positive effect is expected for SA objective 12.
- 5.64 Option C would provide a higher number of larger sites through allocations in the RASA DPD. This would mean larger developers would be more likely to operate in the county considering the potential for viability constraints otherwise. Larger sites would also mean that affordable houses would be more likely to be delivered given the requirements of Policy H1 of the Core Strategy. This policy has set a threshold for the requirement for contribution towards this type of development at 10 dwellings with a combined floor space of more than 1000m². As such a specific local housing need would be met through this approach. Option C may, however, result in a lower number of smaller sites being delivered which could be to the detriment of meeting the needs of those who would require custom and self-build properties. Overall, a mixed effect (significant positive/minor negative) is therefore likely for this option for SA objective 12.
- 5.65 Option D would allow for the specific allocation of affordable housing through the RASA DPD and does not address the size of housing allocation sites. It is expected that this approach would help deliver housing (including affordable homes as part of the total provision) of a varied mix meaning a significant positive is likely for SA objective 12. This effect has been recorded as uncertain given that viability issues may result at sites allocated for affordable housing only unless the Council became more involved in the process most likely as the developer.
- 5.66 Option B would provide only smaller sites for allocation through the RASA DPD. It is not expected that this approach would help to provide an appropriate level of affordable housing given viability issues. It is likely that at smaller sites there would be reduced requirement to provide any

element of affordable housing given that the Core Strategy through Policy H1 has set the threshold for this type of provision at 10 homes with a combined floor space of more than 1000m². It is also expected that this approach would only directly address the issues of those wishing to undertake custom and self-build properties in the county which usually proceed at smaller sites. An overall mixed effect (minor positive/significant negative) is therefore likely on SA objective 12 for Option B.

- 5.67 As social inclusion and the indicators of deprivation are related partly through home-ownership and homelessness in the county, the scores recorded for SA objective 12 have been reflected for SA objective 8 (**Poverty and Equality**) for each option. As such, a significant positive effect is likely for both Options A and D with mixed overall effects recorded for Options B (minor positive/significant negative) and C (significant positive/minor negative). The significant positive effects recorded for Options A, C and D relate specifically to the ability of these options to provide a higher number of affordable homes which are expected to address the requirements of some of those residents with the greatest housing need in Herefordshire.
- 5.68 Many of the remaining effects which have been identified for Options A, B, C and D relate to the potential for new housing delivery in the county to deliver financial contributions and/or local improvements through the use of Section 106 and/or Community Infrastructure Levy agreements. As Option A would provide for varied sized sites and Option C would provide for an increased number of larger sites in the county, it is likely that these allocations through the RASA DPD would be able to secure increased levels of financial contributions from Section 106 or Community Infrastructure Levy agreements. Such increased levels of financial contributions are likely to be secured at larger schemes given the improved potential for higher profitability and viability of such schemes. These contributions are likely to help make residential developments more acceptable in planning terms. Therefore, minor positive effects are expected for Options A and C in relation to SA objectives 4 (**Education**), 5 (**Health**), 6 (**Public Realm**), 10 (**Access to Culture, Recreation, and Leisure**), 11 (**Access to Services**), and 18 (**Biodiversity**). These contributions are unlikely to be secured through Option B or would be provided at lower levels given the smaller sizes of site which would result and therefore, minor negative effects are expected for SA objectives 4 (**Education**), 5 (**Health**), 6 (**Public Realm**), and 18 (**Biodiversity**). Mixed effects (minor positive/minor negative) are identified for Option B for SA objectives 10 (**Access to Culture, Recreation, and Leisure**) and 11 (**Access to Services**) as these sites may provide access to services and facilities, however, the level of financial contributions for the provision or improvement of these services is likely to be less than that from the development of larger sites. As Option D relates to the allocation of sites specifically for affordable housing it is unlikely to affect the size of those sites allocated for market properties and therefore a negligible effect has been recorded for these objectives.
- 5.69 Option D is expected to have a minor positive effect on SA objective 13 (**Efficient Use of Land**) as it is expected that developments with a higher proportion of starter homes might make use of brownfield land which has been released for this purpose (as stated in the Issues and Options document). It is not expected that any of the other options considered would have a direct impact on this objective given that they relate only to the size of housing sites to be allocated through the RASA DPD and not the overall provision of housing at the rural settlements which has been set through the Core Strategy. It is recognised that delivery at varying levels of housing at the rural settlements may impact upon the overall area of greenfield land which may be developed in Herefordshire.
- 5.70 Given the relatively focussed nature of the options considered, negligible effects are expected for the remaining objectives.

Employment

Employment

Should the RASA DPD include allocated sites specifically for employment growth?

Option A – Yes

Option B – No

Table 5.11 Summary of options relating to employment

SA Objective	Employment Option A	Employment Option B
1. Employment	++	-
2. Sustainable Economy	++	-
3. Sustainable Regeneration	+	-
4. Education	+	-
5. Health	0	0
6. Public Realm	0	0
7. Crime	0	0
8. Poverty and Equality	0	0
9. Sustainable Transport	-	+/-
10. Access to Culture, Recreation, and Leisure	0	0
11. Access to Services	0	0
12. Housing	0	0
13. Efficient Use of Land	0	0
14. Built Environment	0	0
15. Waste	0	0
16. Natural Resources	0	0
17. Climate Change	-	+/-
18. Biodiversity	0	0
19. Landscape	-	+
20. Water	0	0
21. Flooding	0	0
22. Pollution	-	+/-
23. Soil	0	0

- 5.71 As Option A would result in the allocation of sites specifically for employment development in the county through the RASA DPD it is expected that it would directly encourage economic growth in line with the Herefordshire Economic Vision (2017) and an associated improved level of access to local employment opportunities and diversification of the rural economy. As such significant positive effects have been identified for SA objectives 1 (**Employment**) and 2 (**Sustainable Economy**).
- 5.72 It is expected that facilitating improved economic growth in the county would also allow for improved education opportunities in Herefordshire for example through training rollouts which may be associated with higher knowledge employment opportunities as part of local economic diversification. A minor positive effect is therefore expected for SA objective 4 (**Education**). The allocation of employment sites within the RASA DPD would also help to ensure employment development would be of a proportionate level which could stimulate future growth at the rural settlements of the county. Ensuring that such locations have the critical mass to sustain repeat visits by local residents is likely to promote vitality and viability in these areas meaning a minor positive effect is recorded for SA objective 3 (**Sustainable Regeneration**).
- 5.73 Minor negative effects are expected for SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**), 19 (**Landscape**). Option A could potentially lead to the diversification of the rural economy and therefore increased growth at these locations. These negative effects are expected as residents may be required to travel to locations which are not served by sustainable modes of transport and are increasingly far away from the closest higher order settlements. Development at less developed rural settlements may also impinge upon the landscape character of the county.
- 5.74 Failure to provide for employment allocations in the RASA DPD through Option B is expected to allow for a less sustainable approach to employment development in Herefordshire given that it would not deliver such growth through a plan-led process. This approach is likely to provide less certainty in relation to this type of development as well as the co-ordination of new development with associated infrastructure which might be required. Minor negative effects have therefore been identified for SA objectives 1 (**Employment**), 2 (**Sustainable Economy**) and 3 (**Sustainable Regeneration**). An associated minor negative effect is expected for SA objective

4 (**Education**) as training schemes and education programs which might otherwise have accompanied new employment opportunities may not be delivered.

- 5.75 As Option B would not allocate employment land at rural settlements through the RASA DPD it may mean that some employment development may be redistributed to the more developed locations of Herefordshire which are likely to be more accessible by sustainable modes of transport. This approach is, however, likely to be less controlled and may be reactive to planning permissions submitted for this type of development meaning employment growth may also occur at less sustainable locations in the county. Mixed overall effects (minor positive/minor negative) have therefore been recorded for SA objectives 9 (**Sustainable Transport**), 17 (**Climate Change**) and 22 (**Pollution**).
- 5.76 Negligible effects have been recorded for the remaining objectives for both options. The impact these options have upon employment allocation sites is expected to only have a limited number of direct sustainability effects.

Local Green Space/Amenity Space

Local Green Space/Amenity Space

Should the RASA DPD designate Local Green Space where appropriate?	Option A – Yes
	Option B – No

Table 5.12 Summary of options relating to local green space/amenity space

SA Objective	Green Space Option A	Green Space Option B
1. Employment	0	0
2. Sustainable Economy	0	0
3. Sustainable Regeneration	0	0
4. Education	0	0
5. Health	+	-
6. Public Realm	++	-
7. Crime	0	0
8. Poverty and Equality	++	--
9. Sustainable Transport	0	0
10. Access to Culture, Recreation, and Leisure	+	-
11. Access to Services	0	0
12. Housing	0	0
13. Efficient Use of Land	0	0
14. Built Environment	+	-
15. Waste	0	0
16. Natural Resources	0	0
17. Climate Change	0	0
18. Biodiversity	+	-
19. Landscape	++	--
20. Water	0	0
21. Flooding	+	-
22. Pollution	0	0
23. Soil	0	0

- 5.77 Using the RASA DPD to designate local green space for protection of such areas in line with the NPPF is expected to have mostly positive effects in terms of ensuring the sustainability of development in Herefordshire. Significant positive effects have been identified in relation to SA objectives 6 (**Public Realm**), 19 (**Landscape**), with a minor positive effect for SA objective 14 (**Built Environment**). Option A would give increased protection to open spaces which may be of importance in terms of natural beauty and this is expected to result in an associated positive effect in relation to protecting the setting of local heritage assets. As this option would also take into consideration the opinion of the local community given that such designations would reflect open spaces which are of specific local importance, a significant positive effect has also been

recorded for SA objective 8 (**Poverty and Equality**). Option A is expected to promote local inclusivity which may help to improve the perception of equality in the county.

- 5.78 The protection of local green areas as per the guidance of the NPPF can be enacted through this approach where such assets have recreational value or where a richness of wildlife is identified. As such Option A may help to encourage improved levels of activity and wellbeing amongst the local population and may also help to protect local habitats or habitat connectivity. Minor positive effects are therefore expected in relation to SA objectives 5 (**Health**), 10 (**Access to Culture, Recreation, and Leisure**) and 18 (**Biodiversity**). The preservation of open green areas through this approach would also help to prevent a disproportionate rise in the area of impermeable surfaces in Herefordshire and therefore a minor positive effect is also expected for objective 21 (**Flooding**).
- 5.79 Failure to designate locally important areas as Local Green Space, as proposed by Option B, would mean that a policy opportunity to preserve such open areas as important community assets which contribute to local character would not be taken. These areas may also have potential benefits for local public health, community interaction and habitat provision and wildlife. As SA objective 19 (**Landscape**) directly relates to open spaces the negative effect expected on this objective is likely to be significant. The negative effects expected for SA objectives 5 (**Health**), 6 (**Public Realm**), 14 (**Built Environment**) and 18 (**Biodiversity**) are likely to be minor.
- 5.80 A further significant negative effect for Option B would be likely for SA objective 8 (**Poverty and Equality**) as this approach would fail to suitably address the community need and potential community input into the protection of locally important open spaces through the appropriate designation process as per NPPF guidance as part of the RASA DPD. This approach additionally fails to promote social inclusion in the planning process while increasing the vulnerability of development at areas which might contribute to this aim. A minor negative effect has also been identified for SA objective 21 (**Flooding**) as this approach would increase the vulnerability of certain greenspaces in terms of future development which would increase the overall area of impermeable surfaces in the county.
- 5.81 Given that this policy topic would not encourage new development of certain type or offer policy guidance to influence development in terms of its design or location in the county, its scope and potential effects are relatively limited. Therefore, negligible effects are expected for the remaining objectives for Options A and B.

Table 5.13 Summary table of the SA scores for all options in the Rural Area Site Allocation DPD

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
Scope Option 1	-	-	-	0	-	0	0	-	-	-	-	-?	-	-	0	0	-	-	-	0	-	-	0
Scope Option 2	+	+	+	+	+	0	0	+	+	+	+	++	+	+	0	0	+	+	+	0	+	+	0
Scope Option 3	+?	++?	+?	+	+	0	0	+/-?	+	+	+	++?	+	+?	0	0	+	+?	+?	0	+?	+	0
Scope Option 4	+?	++?	+?	+	+	0	0	+/-	+	+	+	++?	+	+?	0	0	+	+?	+?	0	+?	+	0
Scope Option 5	+?	++?	+?	+	+	0	0	+/-	+	+	+	++?	+	+?	0	0	+	+?	+?	0	+?	+	0
Scope Option 6	+?	++?	+?	+	+	0	0	+/-	+	+	+	++?	+	+?	0	0	+	+?	+?	0	+?	+	0
Scope Option 7	+	++	+	+	+	0	0	+/-	+	+	+	++	+	+	0	0	+	+	+	0	+	+	0
Scope Option 8	++	++	++	+	+	0	0	+/-	+	+	+	++	+	+	0	0	+	+	+	0	+	+	0
Boundary Option A	+	++	+	+	+	0	0	+	++	+	+	+/-	+	+/-	0	0	++	+	++	0	+	+	0
Boundary Option B	-	--	-	-	-	0	0	-	-	-	-	++/-	-	+/-	0	0	-	-	-	0	-	-	0
Housing Option A	0	0	0	+	+	+	0	++	0	+	+	++	0	0	0	0	0	+	0	0	0	0	0
Housing Option B	0	0	0	-	-	-	0	+/-	0	+/-	+/-	+/-	0	0	0	0	0	-	0	0	0	0	0
Housing Option C	0	0	0	+	+	+	0	++/-	0	+	+	++/-	0	0	0	0	0	+	0	0	0	0	0
Housing Option D	0	0	0	0	0	0	0	++	0	0	0	++?	+	0	0	0	0	0	0	0	0	0	0
Employment Option A	++	++	+	+	0	0	0	0	-	0	0	0	0	0	0	0	-	0	-	0	0	-	0
Employment Option B	-	-	-	-	0	0	0	0	+/-	0	0	0	0	0	0	0	0	+/-	0	+	0	0	+/-
Green Space Option A	0	0	0	0	+	++	0	++	0	+	0	0	0	+	0	0	0	+	++	0	+	0	0
Green Space Option B	0	0	0	0	-	-	0	--	0	-	0	0	0	-	0	0	0	-	--	0	-	0	0

6 Conclusions and Next Steps

Conclusions

- 6.1 The options relating to the consultation questions from the Hereford Area Plan DPD and Rural Area Site Allocation DPD Issues and Options documents have been subject to a detailed appraisal against the SA objectives which were developed at the scoping stage of the SA process. In general, the scope and policy options have been found to have a wide range of positive and significant positive effects on the SA objectives, although a number of potentially minor and significant negative impacts are also associated with some options.
- 6.2 The policy options lack detail and therefore are subject to greater uncertainty than will be the case at the Regulation 19 Publication stage⁷⁷, once full policy wording has been drafted. Similarly, both DPDs lack detail about the locations of site allocations which again will be addressed at the Preferred Options stage.

Next steps

- 6.3 To meet the requirements of the SEA Directive, this SA Report is being published for consultation alongside the DPD Issues and Options documents for an eight week consultation period from May to June 2017. Further SA work and revised SA Reports will accompany consultation on subsequent stages of the DPDs. The SA Reports will be updated to reflect the emerging policies and site allocations, and to take account of any consultation responses received at each stage.

⁷⁷ Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012