

**HEREFORDSHIRE CORE STRATEGY  
REVISED PREFERRED OPTIONS  
Sustainability Appraisal Note**

Prepared for Herefordshire Council  
by  
Land Use Consultants

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# 1 Introduction

1. Herefordshire Council is producing a Core Strategy, in order to set out the vision, spatial strategy and core policies for the spatial development of the county. The Core Strategy will form part of the Local Development Framework (LDF) along with a number of other documents including the Hereford Area Plan (HAP).
2. Land Use Consultants (LUC) was appointed by Herefordshire Council in 2010 to undertake Sustainability Appraisal (SA) of both the Herefordshire Core Strategy and the Hereford Area Plan DPDs. The SA of the Hereford Area Plan will be carried out and reported on separately as that DPD is prepared.

## BACKGROUND

3. Herefordshire Council began the SA process in relation to the Core Strategy by producing the following documents:
  - SA of Herefordshire's LDF – General Scoping Report (June 2007)
  - Developing Options Paper Sustainability Appraisal (June 2008)
  - Developing Options Paper Sustainability Appraisal Addendum (March 2009)
  - Joint SA and HRA Report for the Place Shaping Paper (January 2010)

## 2010 Preferred Options

4. An initial set of preferred options for the Core Strategy was produced by the Council in 2010 and these were subject to SA by LUC, as reported on in a series of SA notes relating to the rural areas policies, the general core policies, the policies for Hereford and the policies for the market towns. In addition, an SA note considering the cumulative effects of the preferred options was also produced. The SA notes were produced separately as each set of preferred options was developed, and the preferred options and accompanying SA notes were then consulted on in stages during summer-autumn 2010.
5. The outcomes of the consultation indicated that there was considerable opposition to the scale of housing development proposed in Herefordshire. As a result of this, as well as various other factors (discussed below), the Council has revised certain aspects of the preferred options for the Core Strategy, and these revisions have been subject to SA. This note reports on the findings of this appraisal.

## 2011 Revised Preferred Options

6. The reasons for the revision of the preferred options are described in the Herefordshire LDF Core Strategy Revised Preferred Options Background Paper produced by Herefordshire Council (September 2011) and include:

- The impact of the recession and the downturn in the housing market.
  - Publication of the latest Government Household Projections, which indicate a smaller increase in the number of household likely to exist in the county in the future than previous projections.
  - The requirement for the Core Strategy to set out proposals for housing delivery over a 15 year period – as a result of delays in advancing the Core Strategy this would no longer be possible without extending or re-basing the plan period.
  - Consultation responses received in 2010 in relation to the emerging preferred options, which showed significant opposition to the scale of new housing development proposed.
7. The changes that have been made to the Core Strategy preferred options as a result of these factors are summarised below:
- The plan will cover the period 2011-2031 instead of 2006-2026.
  - The housing target for the county as a whole over the plan period has been reduced from 18,000 to 16,500.
  - The housing allocation for Hereford has been reduced by 2,000 dwellings, mainly through the reduced housing allocation for the Holmer West urban extension and the removal of the housing allocation for Whitecross.
  - The retail floorspace requirement for Hereford has been increased from 40,000sqm to 46,000sqm.
  - The employment site allocation at Holmer East has been removed.
  - The proposed new 420 place primary school at Whitecross will now be provided at the Three Elms site instead, and the existing school facilities at Holmer West will be improved instead of providing a new school there.
  - The preferred option for the Hereford relief road remains broadly as set out in the 2010 preferred option, for a western route. However, minor amendments have been made to the route (between the A465 Abergavenny and A49 Ross roads) to avoid residential properties and lessen landscape impacts.
  - The housing distribution in the rural areas has increased by 800.
  - The allocations for the market towns have been retained as similar to the 2010 preferred options, although the housing requirement for Ross-on-Wye has decreased slightly, from 1,000 to 900 new homes over the plan period, and the housing allocation for Leominster has been reduced by 200. There is also a new allocation for 5ha of employment land at Leominster's urban extension.

## Discounted options for overall spatial strategy

8. In deciding the revisions to individual elements of the Core Strategy preferred options, the Council also considered alternative approaches to the revisions and the overall spatial strategy as follows:
  1. Continue current spatial strategy as directed by the regional plan of focussing majority of development to Hereford with a plan period up to 2026 (i.e. don't make any changes to the 2010 Preferred Options).
  2. Change the plan period to 2011-2031, but don't make any other changes to the current spatial strategy, scale and distribution of houses.
  3. Reduce the level of housing in Hereford by 2000 (from 8500 to 6500) and redistribute these 2000 homes to the rural areas with an extended plan period to 2031 and retain the overall 18,000 total housing allocation.
  4. Reduce the amount of new homes to be built in Hereford, but build some or all of them in the market towns instead.
  5. Change the plan period and increase the amount of new homes in the county above the regional plan target of 18,000.
  6. Other options for changing the distribution of new homes in Herefordshire – this option would have involved all strategic sites being reduced by a smaller, but unspecified, amount.
  7. Build a partial eastern relief road.
9. These discounted options have also been subject to SA and the findings are summarised in Section 3 of this note.
10. In line with the requirements of the SEA Directive, discounted options have been considered at each stage of the Core Strategy's development, and the reasons for not taking forward particular options have been set out in the relevant SA Reports (i.e. the Joint SA and HRA Report for the Place Shaping Paper, January 2010).

## 2 Methodology

11. This section outlines the approach that has been taken to the SA. The SA process involved assessing the preferred options against the SA framework that was developed during the Scoping stage of the SA. The 20 headline SA objectives shown in **Table I** below were grouped into six themes (see **Appendix I** to this note for the full list of SA objectives and sub-objectives included in each theme):
  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.

**Table I: SA headline objectives**

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.
2	Secure a more adaptable and higher skilled workforce.
3	Maintain or enhance conditions that enable a sustainable economy and continued investment.
4	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.
5	Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all.
6	Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all.
7	Sustainable regeneration
8	Raise educational achievement levels across the County.
9	Reduce and prevent crime/fear of crime and antisocial behaviour in the county.
10	Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.
11	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.
12	Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.
13	Value, maintain, restore and expand county biodiversity.
14	Use natural resources and energy more efficiently.
15	Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.
16	Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.
17	Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.
18	Minimise local and global pollution and protect or enhance environmental resources.
19	Ensure integrated, efficient and balanced land use.
20	Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.

12. Appraisal matrices were used to score each preferred option against the headline objectives within each theme (or group of SA objectives) using the following symbols:

++	The policy is likely to have a <b>significant positive</b> impact on the SA objective(s).
+	The policy is likely to have a <b>positive</b> impact on the SA objective(s).

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

## WHAT HAS BEEN SUBJECT TO SA?

13. The 2011 revised preferred options have not been described as detailed policies in the same way that the 2010 preferred options were, but are summarised as broad changes to the 2010 preferred options in the consultation leaflet 'Help Plan the Future of Herefordshire' (September 2011). The relevant 2010 policies affected by the proposed revisions, and which therefore needed to be subject to the revised SA, are:
- Rural Areas - **Policy RAI** (the revised preferred option increases the housing numbers in rural areas and market towns by 800).
  - Rural Areas - **Policy RA5** (the revised preferred option creates more local jobs).
  - Market Towns - **Ross-on-Wye policy** (the revised preferred option reduces the total number of homes to be provided over the plan period from 1,000 to 900 and the number in the Hildesley urban extension from 350 to 200).
  - Hereford - **Policy H1: City Centre** (the revised preferred option increases the amount of retail floorspace from 40,000sqm to 46,000sqm).
  - Hereford – **Relief Road Option** (the route for the relief road has been slightly amended) *Note that this proposal comprised part of 'Policy H2: Movement' in the 2010 preferred options consultation, but at that stage the relief road was subject to SA separately from the other components of the policy. As such, the same approach has been taken here and the SA matrix for the relief road option has been updated, while the matrix which sets out the appraisal of the rest of policy H2 remains unchanged.*
  - Hereford - **Policy H3: Growth Distribution** (the revised preferred option reduces the overall amount of new homes to be built in Hereford by 2,000, mainly as a result of reduced housing allocations at Holmer West and Whitecross. It also removes the employment site at Holmer East).
  - Hereford - **Policy H4: Northern Urban Expansions** (the revised preferred option reduces the number of homes at Holmer West and removes the employment site at Holmer East. The allocation for a new primary school at Holmer West has also been removed).



- Hereford - **Policy H5: Western Urban Expansions** (the revised preferred option reduces the number of homes at Whitecross and the primary school previously planned at Whitecross will now be built at Three Elms instead).
14. The revisions that have been made to the preferred options also include changes to the proposal for Leominster (as described above, the housing allocation for the town has been reduced by 200 and a new allocation has been made for 5ha of employment land at the urban extension). However, the preferred option for Leominster was decided upon at the Place Shaping Paper stage, and was not reproduced as a policy at the 2010 preferred options stage. Although it is not therefore listed above with the policies from the 2010 stage, the proposal for Leominster (taking into account the revisions that have now been made) has also been subject to this revised SA, as described further on in this note.

## **APPRAISAL OF THE 2011 REVISED PREFERRED OPTIONS**

15. The SA undertaken in 2010 for all of the preferred was options described in the SA notes relating to the rural areas policies, the general core policies, the policies for Hereford and the policies for the market towns. The relevant SA matrices that were produced for the 2010 preferred options have been updated and amended to reflect the revisions to the preferred options that the Council is now proposing in the consultation leaflet '*Help Plan the Herefordshire of Tomorrow*', i.e. the matrices for policies:
- Rural Areas - **Policy RAI**.
  - Rural Areas - **Policy RA5**.
  - Market Towns - **Ross-on-Wye policy**.
  - Hereford - **Policy H1: City Centre**.
  - Hereford - **Relief Road Option**.
  - Hereford - **Policy H3: Growth Distribution**.
  - Hereford - **Policy H4: Northern Urban Expansions**.
  - Hereford - **Policy H5: Western Urban Expansions**.
16. As described above, the preferred option for Leominster was not produced and subject to SA as part of the 2010 preferred options stage, as it had already been decided upon at the earlier Place Shaping Paper stage. As such, an SA matrix in the format of the others produced in 2010 was not produced for this preferred option, so could not be updated here. In order to address this, and to ensure that the Leominster preferred option has been subject to SA, a new SA matrix has been produced on the basis of the preferred option from the Place Shaping stage. It also addresses the SA implications of the 2011 revisions that have now been made to the Leominster preferred option.

## APPRAISAL OF THE DISCOUNTED ALTERNATIVES FOR REVISING THE PREFERRED OPTIONS

17. The discounted alternatives or options were not subject to the same type of appraisal against each of the SA objectives, as they did not include enough detail to enable this level of appraisal. As such, a broad summary of the likely sustainability effects of each discounted option is provided further on in this note; however the options have not been scored against each SA objective or theme.

### 3 Findings

18. This section describes the findings of the SA of the revised Core Strategy preferred options set out in the consultation leaflet '*Help Plan the Future of Herefordshire*' (September 2011).

## APPRAISAL OF 2011 REVISED PREFERRED OPTIONS

19. **Table 2** below provides a summary of the SA scores for each of the revised preferred options in relation to the six sustainability themes. Note that the scores have been provided for each sustainability theme, rather than scoring each individual SA objective separately. Although separate SA scores were given for each objective when the Hereford preferred options were appraised in 2010, the other Core Strategy preferred options that had been appraised earlier (i.e. rural areas, market towns and general core policies) were scored in relation to each of the six SA themes (the appraisal was carried out in stages and the process used was amended following recommendations made at a stakeholder workshop in August 2010). As such, in order to ensure consistency and to enable meaningful comparisons to be made between the 2010 preferred options and the 2011 preferred options, the SA scores have been summarised against the six sustainability themes for each preferred option.
20. All of the SA scores in **Table 2** for the following policies have remained unchanged from the 2010 preferred options appraisal:
  - RA1: Rural Areas Policy
  - RA5: Rural Areas Policy
  - Ross-on-Wye Policy
  - H1: Hereford City Centre Policy
  - Hereford Relief Road Option
21. The following changes have been made to the SA scores for the remaining policies:
  - H3: Growth Distribution Policy – **the score for the Education and Employment theme has been reduced from a significant positive (++) to a minor positive (+)**, mainly as a result of the removal of the Holmer East employment site allocation from the preferred option.

- H4: Northern Urban Expansion – **the score for the Education and Employment theme has been changed from an uncertain significant positive (++) to an uncertain minor positive (+?) effect**, mainly due to the removal of the Holmer East employment site allocation from the preferred option, but also as a result of the fact that the new primary school at Holmer West is no longer being provided there and the extent to which expanding existing schools will meet need is uncertain.
22. A more detailed description of the SA findings for each revised preferred option (policy) is set out in **Tables 3 to 11** in **Appendix 2**. The revisions that have been proposed for the 2011 preferred options generally only affect one or two elements of each policy, therefore a lot of the SA findings remaining unchanged from the 2010 SA notes. A second row of scores has been added to the bottom of each SA matrix (**Tables 3-11**) showing the final SA scores for the 2011 revised preferred options (the row of scores at the start of each matrix show the SA findings from the 2010 preferred options stage). In most cases the changes made to the preferred options have not resulted in any differences to SA scoring and therefore the original text from the 2010 preferred options stage remains in each matrix; however, where changes have been made this has been noted in **[bold, italic and bracketed]** text.

**Table 2: Summary of SA headline objective scores for the Revised Core Strategy Preferred Options (September 2011)**

SA objectives included in theme	SA Objectives and Theme																			
	Education & Employment					Healthy & Prosperous Communities			Transport & Access		Built Environment			Resource Consumption & Climate Change			Natural Environment			
	1	2	3	7	8	5	9	10	4	6	11	19	20	12	14	16	13	15	17	18
Rural Areas Policy RA1	0					0			-		+			-			0			
Rural Areas Policy RA5	++					0			+		+			+/-			0			
Ross-on-Wye Policy	+					+?			+		++?			+?			+/-?			
Leominster Policy	++?					+?			+/-		++/-?			+/-?			--?			
H1: Hereford City Centre Policy	++					+			+/-?		++/-			+/-			+/-			
Relief Road – Western Route	+?					+/-			++/-		+/-			-			--?			
H3: Growth Distribution Policy	+					+			++		++/-			+/-			+/-			
H4: Northern Expansion Policy	+?					+			+?		+/-			+/-			+/-			
H5: Western Expansion Policy	++?					+			+/-?		++/-			+/-			+/-			

Note that sub-objectives for SA headline objectives 7 and 18 are divided into more than one theme, according to the issues that they address. However, SA headline objectives 7 and 18 have only been scored once in this summary table, under the themes that contains most of the sub-objectives (Education and Employment and Natural Environment respectively).

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

23. Most of the revisions to the preferred options relate to revised housing allocations. Although the overall housing allocation for Herefordshire has been reduced from 18,000 to 16,500, it is considered that this will be adequate to meet housing need in the county up to 2031 based on the evidence available (including Government housing projections and the draft Herefordshire housing needs study<sup>1</sup>), and therefore the SA scores relating to housing provision (objective 11) remain positive on this basis.
24. In addition, evidence<sup>2</sup> has shown that there is significant need for affordable housing provision within Herefordshire - the Strategic Housing Market Assessment (2008) estimates a net annual affordable housing need in Herefordshire of 1,113 dwellings per annum. This is more than 100% of the total housing requirements that were set out in the West Midlands RSS at that time. The affordable housing targets set out in the 2011 revised preferred options may not fully provide for the estimated need, however, it is recognised that the targets should go a long way towards meeting needs in the county. Herefordshire Council has increased the affordable housing target in particular areas which are experiencing particularly high need, such as Ledbury and Bromyard. Therefore, the SA findings are that there should still be a positive effect on provision of affordable housing within the county, even though need will not be fully met.
25. The main revision to the preferred options which has had an effect on the SA scores is therefore the removal of the allocation for an employment site at Holmer East in the Hereford Northern Expansion policy. As described above, the reduced housing allocation has not affected the SA scores, as the revised figure is still considered adequate to meet projected needs. Where potential environmental effects were identified through the SA as a result of the housing allocations, these have remained unchanged as the reduced allocations were not considered likely to reduce the potential for such effects to the extent that the SA scores would change.
26. In addition to the revisions to the SA scores from the 2010 preferred options stage, the findings of the appraisal of the preferred option for Leominster (originally set out in the Place Shaping Paper, January 2010 and now revised) are also a consideration for this updated SA. In general, the measures set out in the revised preferred option for Leominster will have positive effects in relation to the provision of homes and employment opportunities, and there should be good opportunities for sustainable transport use. However, the preferred option also proposes the development of a southern relief road for the town, with which a number of potential negative effects are associated, including ongoing high levels of car use and associated emissions. There is also the potential for significant negative effects on the natural environment and landscape as the urban extension is proposed in a particularly sensitive location; however, it is recognised that there are some measures in the preferred option that may help to mitigate adverse environmental impacts, such as the provision of additional green infrastructure and natural open space. **It is recommended that a specific target for affordable**

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<sup>1</sup> GL Hearn (June 2011) DRAFT Local Housing Requirements Study for Herefordshire Council.

<sup>2</sup> Herefordshire Council Local Development Framework Viability Study: Report of Study (February 2010) Three Dragons with Roger Tym and Partners

housing is included in the revised preferred option, as it is unclear from the present wording what the percentage of affordable housing will be.

## **APPRAISAL OF OVERALL SPATIAL STRATEGY AND DISCOUNTED OPTIONS**

### **2011 Revised Preferred Options – overall spatial strategy**

27. The overall spatial strategy for development across Herefordshire proposed in the 2011 revised preferred options is to:
- **Reduce the level of housing in Hereford by 2000 (from 8500 to 6500) and redistribute 800 of these homes to the rural areas. Reduce the number of homes to be provided in Leominster by 200 and in Ross-on-Wye by 100. This will result in a reduced overall housing allocation of 16,500 (from 18,000). The time period of the plan will now be from 2011-2031** – This approach will have positive effects in relation to housing provision, as the total allocation is still considered adequate to meet projected need across the County within the revised plan period. Positive effects in the rural areas are likely in relation to socio-economic issues, as focussing more development outside of the main urban centres should help to stimulate economic activity in rural areas and retain their viability and vitality. However, there are negative effects associated with this approach in relation to sustainable transport and climate change issues, as it is less likely that sustainable transport links will be as easily provided or used in rural areas in comparison to Hereford and the market towns. The fact that a significant amount of development is still focussed within Hereford, despite the reduced housing allocation for the city, means that there are still likely to be negative effects associated with the natural environment, in particular the effects on the River Wye.

### **Discounted options for overall spatial strategy**

28. In deciding on the overall spatial strategy for development across Herefordshire, a number of other options were considered and rejected by the Council. A broad appraisal of the likely sustainability effects of each of these discounted options is set out below. As described earlier in this note, the discounted options were not set out in enough detail to enable a detailed appraisal of their likely effects on each SA objective/theme.
1. **Continuing the current spatial strategy (as directed by the regional plan) of focussing the majority of development in Hereford with a plan period up to 2026 (i.e. not making any changes to the 2010 Preferred Options)** – this would have resulted in the sustainability effects detailed in the SA notes for the 2010 preferred options. These can be seen in the first row of scores in each of Tables 3-11 below.
  2. **Changing the plan period to 2011-2031, but not making any other changes to the current spatial strategy, scale and**

**distribution of houses** – this would have resulted in broadly the same effects as the 2010 preferred options. However, the housing allocations would be higher than the current predicted level of need between 2011-2031 (as described above, the allocations have been reduced to take into account revised estimates of housing need, and so keeping the numbers the same as in 2010 would not address this); therefore there may be some negative effects arising in relation to the economy and social effects of unoccupied housing. In addition, the adverse environmental impacts of housing development e.g. in relation to water quality and the landscape may have been increased.

3. **Reducing the level of housing in Hereford by 2000 (from 8500 to 6500) and redistributing those 2000 homes to the rural areas with an extended time period of the plan to 2031, while retaining the overall 18,000 total housing allocation** – this would have again resulted in higher levels of house building than the current predicted level of need over the plan period. As such, there may have been some negative effects arising in relation to the economy and social effects of unoccupied housing. In addition, the adverse environmental impacts of housing development e.g. in relation to water quality and the landscape may have been increased.
4. **Reducing the amount of new homes in Hereford but building some or all of them in the market towns instead** – this approach would again have resulted in higher levels of house building than the current predicted level of need over the plan period. As such, there may have been some negative effects arising in relation to the economy and social effects of unoccupied housing. In addition, the adverse environmental impacts of housing development e.g. in relation to water quality and the landscape may have been increased. The effects of concentrating the redistributed housing development in the market towns rather than in the rural areas may have been more positive in that there would have been better potential for realising opportunities for using sustainable transport links rather than travelling by car.
5. **Changing the plan period and increasing the amount of new homes in the county above the regional plan target of 18,000** – this would again have most likely resulted in more housing development than is considered necessary within the plan period (although this is uncertain as it is not clear what the plan period would be changed to), which may have increased the potential adverse environmental impacts of the housing development such as impacts on water quality and the landscape, and may have also resulted in adverse social and economic effects, for example relating to unoccupied housing.
6. **Other options for changing the distribution of new homes in Herefordshire** – this option would have involved all strategic sites being reduced by a smaller, but unspecified, amount. It is not possible to appraise the likely impacts of this approach without more information about the extent to which housing numbers would be reduced; however there may be adverse impacts in terms of housing provision if the sites

are reduced beyond the level of identified housing need over the plan period. Given the varying nature of each strategic site, it is considered more appropriate to reduce housing numbers in a targeted way rather than this generalised approach in order to allow for the particular sensitivities of each site to be addressed where necessary. In addition, if the housing provision at all strategic sites were reduced, there may be implications for the viability of providing community facilities at any of the sites to the extent currently planned.

7. **Build a partial eastern relief road** – this approach would deliver some of the same impacts (both positive and negative) of a full western relief road, for example ongoing car use may be encouraged by the provision of a more convenient road network; however congestion in the city centre should be reduced. Such effects would not, however, be experienced to the same extent as if a full relief road were to be provided to the west of the city. In addition, the Revised Preferred Options Background Paper (September 2011) states that the partial relief road would not enable the sustainable transport measures resulting from A49 detrunking through the city of Hereford. It is not possible to accurately assess the likely impacts of a partial eastern relief road without more information about where exactly it would be located. However, the eastern side of Hereford is more sensitive in terms of biodiversity and landscape than the western side; therefore it is likely that there would be negative effects in this sense. In particular, the eastern route would cross the Lugg Meadows and so may have an adverse impact on the River Wye.

## CUMULATIVE IMPACTS

29. The SEA Directive requires that the cumulative effects of a plan are considered, and this section sets out the likely cumulative effects of the Herefordshire Core Strategy preferred options. The likely sustainability effects of all of the Core Strategy preferred options in combination have been considered, including those that have not been revised since 2010 as well as those that have been revised and subject to SA again, as described in this note.
30. A summary of the likely cumulative impacts of the complete set of Core Strategy preferred options is provided below for each SA theme. **Table 12** in **Appendix 3** shows the SA scores for the complete set of Core Strategy preferred options, enabling a judgement to be made regarding the overall cumulative effect of the preferred options on each SA theme. For those policies that have been revised in the consultation leaflet '*Help Plan the Future of Herefordshire*' (September 2011), the SA scores for the 2010 preferred options are shown in the table as well as those for the 2011 revised preferred options, to enable comparison of how any changes have affected the cumulative impacts on each SA theme<sup>3</sup>. However, because only a few

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<sup>3</sup> Note that, because the preferred option for Leominster was not included in the SA for the 2010 preferred options (as described earlier in this SA note), there is no comparison row in Table 12 showing the score for that preferred option at that stage. In addition, a number of the 2010 preferred options have not been revised in the consultation leaflet, and therefore not re-appraised in



changes to the SA scores have been made as a result of the 2011 revisions to the preferred options, which affected relatively few of the policies, it can be seen that the overall cumulative impacts of the Core Strategy proposals would be broadly very similar had these revisions not been made.

### **Education and Employment**

31. A cumulative positive impact on Education and Employment is likely to result from the Core Strategy preferred options (including the revised preferred options). Most of the preferred options are likely to have either positive or significant positive impacts on the objectives within this theme and only a small number of potential negative impacts have been identified.
32. Most of the significant positive impacts associated with this theme relate to SA objective 1: Employment Opportunities; and as such there may be a cumulative significant positive effect on this particular objective individually. This is due to the measures included within a number of the Core Strategy preferred options to facilitate job creation within Herefordshire (e.g. policies E.1: Maintaining Supply of Employment Land and E.2: Employment Land Provision).
33. All of the SA objectives within the theme of Education and Employment have at least one minor negative impact associated with them, and these come from the preferred options relating to tourism, infrastructure contributions and the proposed Hereford relief road. However, the number and significance of the potential negative impacts identified is not considered to be such that the cumulative effect of the Core Strategy on this SA theme would be negative or mixed.
34. All of the changes to the SA scores that resulted from the revisions to the preferred options related to this SA theme. The removal of the Holmer East employment land allocation meant that the Education and Employment score for policy H3: Growth Distribution Policy was reduced from a significant positive to a minor positive effect and the Education and Employment score for policy H4: Northern Urban Expansion was changed from an uncertain significant positive to an uncertain minor positive effect. The change to policy H4 was also a result of the fact that the new primary school at Holmer West is no longer being provided there and the fact that there are uncertainties regarding the extent to which the current plan to expand existing schools will meet future need. However, these minor changes have not influenced the overall cumulative positive impact of the Core Strategy on the theme of Education and Employment.

### **Healthy and Prosperous Communities**

35. As with the previous SA theme, most of the Core Strategy preferred options are likely to have either a positive or significant positive impact on achieving

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this note. Where they were scored in the 2010 SA notes against individual SA objectives, an overall score for each SA theme has been used in this note to enable comparison with the revised preferred options. As such, in the summary sections there are some references to scores for particular SA objectives.

healthy and prosperous communities within Herefordshire. In particular, the preferred options for Green Infrastructure (GI 1) and Open Space, Sport and Recreation (OS 1) are likely to result in significant positive effects due to the fact that these proposals should help to encourage healthy lifestyles and increase levels of activity amongst the local population.

36. A small number of potential mixed effects have been identified, again relating to the proposed Hereford relief road, and also for the spatial option for Bromyard and two of the preferred options for minerals policies. These mixed effects are mainly associated with potential impacts on public health (SA objective 5), e.g. where development is proposed within close proximity of residential areas, and so the cumulative impact of the Core Strategy preferred options may be mixed in relation to that particular objective individually. However, the cumulative impacts on the other SA objectives within this theme, and therefore on the theme as a whole, are considered likely to be positive.
37. None of the revisions to the preferred options have affected the SA scores for this theme; therefore have not influenced the overall cumulative positive impact of the Core Strategy on achieving healthy and prosperous communities in Herefordshire.

### **Transport and Access**

38. Most of the Core Strategy preferred options are likely to have a mixed effect on this SA theme; in particular on SA Objective 4 (reducing road traffic and increasing the use of sustainable modes of transport). The negative effects associated with this objective mainly relate to the fact that a number of the policies have the potential to encourage car use by increasing the attractiveness of this option, for example through the provision of car parking facilities in new developments or by proposing improvements to the road network. However, the Core Strategy preferred options also include a number of policies which aim to increase the use of sustainable transport and reduce congestion caused by car traffic, particularly in the centre of Hereford; therefore the overall likely cumulative effect of the preferred options on SA objective 4 is mixed.
39. The cumulative impact of the preferred options on SA objective 6 (access to facilities), when considered separately from SA objective 4, is likely to be positive as most of the likely effects on this objective are positive, for example the spatial policies generally focus development within or adjacent to existing urban areas where facilities will be more easily accessible. However, the overall cumulative impact for this SA theme remains mixed due to the large number of potentially negative and mixed effects that have been identified in relation to SA objective 4.
40. None of the revisions to the preferred options have affected the SA scores for this theme; therefore have not influenced the overall mixed cumulative impact of the Core Strategy on transport and access in Herefordshire.

## **Built Environment**

41. Most of the preferred options are likely to have either a positive or significant positive effect on this SA theme, with several specifically aiming to improve the quality of the built environment within Herefordshire (e.g. NH 1: Built Environment and Streetscape and GI 1: Green Infrastructure). Most of the positive and significant positive effects associated with this theme relate to SA objective 11 (housing provision), due to the extensive provision made for both market value and affordable housing through the preferred options, and therefore a cumulative positive effect is expected in relation to this SA objective individually. Although the revisions to the preferred options have involved reducing overall housing numbers across the county by 2,000, the extent of housing provision now planned is considered adequate to meet current projected need, and so the cumulative effect of the SA scores remains positive in relation to housing provision.
42. However, a large number of mixed effects have also been identified, particularly in relation to SA objectives 19 and 20 (efficient land use and the quality of the built/historic environment). Most of these mixed effects relate to the preferred options for development in Hereford and the proposed Hereford relief road, and are mixed because, despite the fact that positive effects should arise from the overall level of housing development proposed, there may be issues (particularly in relation to the relief road) associated with development on greenfield land and disturbance to existing residential properties. As such, a cumulative mixed effect is likely in relation to these two SA objectives and for the SA theme as a whole.

## **Resource Consumption and Climate Change**

43. A relatively large number of potential negative effects (all of which are judged to be minor) have been identified in relation to this SA theme – more than for any of the other five SA themes. Most of these negative impacts relate to the preferred options for development at Hereford and the proposed Hereford relief road, although a large number are also associated with the rural areas policies due to the fact that development in rural areas may encourage ongoing car use and would therefore maintain levels of emissions from road traffic. A large number of the potential negative effects identified also relate to SA objective 12 (reducing waste production), as it is considered that waste production is likely to increase overall due to the large-scale development and the resulting increased population that the Core Strategy makes provision for; therefore a cumulative negative effect is likely in relation to this SA objective in isolation.
44. A number of potential positive and significant positive effects have also been identified, however, particularly in relation to development management policies such as WM.1: Sustainable Water Management and EN.1: Renewable Energy, which seek to protect water resources and encourage use of renewable energy thus reducing contributions to climate change. Therefore the likely cumulative effect of the Core Strategy preferred options on this SA theme is mixed.

45. None of the revisions to the preferred options have affected the SA scores for this theme; therefore have not influenced the overall mixed cumulative impact of the Core Strategy on resource consumption in Herefordshire.

### **Natural Environment**

46. Most of the likely effects of the Core Strategy preferred options on this SA theme are either mixed or negative, with some significant negative effects having been highlighted, all of which relate to the options for development at Hereford and the proposed Hereford relief road. The negative and significant negative effects are generally associated with the potential for adverse impacts on the qualifying features of the River Wye SAC (i.e. otters, fish and other freshwater species) as a result of development proposed nearby.
47. However, positive effects are also identified in relation to the preferred options that specifically aim to conserve and enhance the quality of the natural environment, such as the preferred options for landscape, biodiversity and green infrastructure. As such, the likely cumulative effect of the preferred options on the natural environment is mixed.
48. None of the revisions to the preferred options have affected the SA scores for this theme; therefore have not influenced the overall cumulative impact of the preferred options on the natural environment in Herefordshire.

Land Use Consultants

22<sup>nd</sup> July 2011

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## Appendix 1: SA Framework grouped by theme

The SA objectives and sub-objectives have been presented below under the relevant theme heading. Note that sub-objectives may be organised under different themes, according to the issues that they address (e.g. sub-objectives in SA Objectives 7, 18).

### Education and Employment

SA Objectives	
1	<p>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> <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>
2	<p>Secure a more adaptable and higher skilled workforce.</p> <p>2.1 Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs.</p> <p>2.2 Reduce inequalities in skills across the county.</p> <p>2.3 Promote the voluntary sector, lifelong learning and life/environmental skills.</p>
3	<p>Maintain or enhance conditions that enable a sustainable economy and continued investment.</p> <p>3.1 Improve the resilience and/or diversity of business and the economy.</p> <p>3.2 Provide or facilitate availability of appropriate sites and properties for new business opportunities or growth whilst using natural resources efficiently.</p> <p>3.3 Encourage and support a culture of enterprise and innovation, including social enterprise or the voluntary sector.</p> <p>3.4 Encourage corporate social and environmental responsibility, with county organisations leading by example.</p> <p>3.5 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives.</p>
7	<p>Sustainable regeneration</p> <p>7.2 Help create an appropriate range of independent, competitive and national retailers.</p> <p>7.3 Help reduce the number of vacant properties and support vitality.</p>
8	<p>Raise educational achievement levels across the County.</p> <p>8.1 Ensure that education infrastructure meets projected future demand and need.</p>

## Healthy and Prosperous Communities

SA Objectives	
5	<p>Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all.</p> <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 Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to physical sports, green space and recreation.</p>
7	<p>Sustainable regeneration.</p> <p>7.4 Support or create high quality public realm and community/amenity space that is safe and encourages positive community interaction.</p>
9	<p>Reduce and prevent crime/fear of crime and antisocial behaviour in the county.</p> <p>9.1 Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour.</p> <p>9.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour through design measures.</p> <p>9.3 Encourage respect for people and the environment.</p>
10	<p>Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.</p> <p>10.1 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>10.2 Enable the involvement of all affected parties, including hard to reach groups.</p> <p>10.3 Promote equality, fairness and respect for people and the environment.</p> <p>10.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages.</p>

## Transport and Access

SA Objectives	
4	<p>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> <p>4.1 Reduce the need to travel.</p> <p>4.2 Promote more sustainable transport patterns in areas suffering from congestion,</p> <p>4.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all.</p> <p>4.4 Increase the use of public transport, cycling and walking.</p> <p>4.5 Secure the implementation of green travel plans.</p> <p>4.6 Minimise risks associated with car travel.</p> <p>4.7 Promote a shift of freight from road to rail.</p>
6	<p>Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all.</p> <p>6.1 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>6.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all.</p> <p>6.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport and/or as a catalyst for urban and rural regeneration.</p>
7	<p>Sustainable regeneration</p> <p>7.1 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.</p>

## The Built Environment

SA Objectives	
11	<p>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> <p>11.1 Increase access to good quality housing meeting people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people).</p> <p>11.2 Increase the supply of affordable housing.</p> <p>11.3 Reduce the percentage of unfit homes/empty homes.</p> <p>11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health.</p> <p>11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction.</p> <p>11.6 Improve the wider built environment and sense of place.</p>
19	<p>Ensure integrated, efficient and balanced land use.</p> <p>19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel.</p> <p>19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design.</p> <p>19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and materials.</p>
20	<p>Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.</p> <p>20.1 Preserve, protect and enhance Conservation Areas, Listed Buildings, archaeological remains, and other features and areas of historical heritage and cultural value e.g. locally listed buildings.</p> <p>20.2 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area.</p> <p>20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place?</p> <p>20.4 Encourage cleanliness and/or improve the general appearance of the area.</p>



## Resource Consumption and Climate Change

SA Objectives	
12	<p>Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.</p> <p>12.1 Minimise the use of non re-usable materials.</p> <p>12.2 Minimise waste from households, businesses etc including hazardous waste.</p> <p>12.3 Promote re-use, recovery and recycling of waste.</p> <p>12.4 Deal with waste locally and/or through the best Practical Environmental Option.</p>
14	<p>Use natural resources and energy more efficiently.</p> <p>14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels.</p> <p>14.2 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.</p> <p>14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build.</p>
16	<p>Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.</p> <p>16.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources.</p> <p>16.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating and in transportation.</p>
18	<p>Minimise local and global pollution and protect or enhance environmental resources.</p> <p>18.5 Encourage the use of clean technologies and water minimisation techniques.</p>

## The Natural Environment

SA Objectives	
13	<p>Value, maintain, restore and expand county biodiversity.</p> <p>13.1 Protect or enhance habitats of international, national, regional or local importance.</p> <p>13.2 Protect international, national, regional or locally important terrestrial or aquatic species.</p> <p>13.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces.</p> <p>13.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value.</p> <p>13.5 Create new appropriate habitats.</p>
15	<p>Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.</p> <p>15.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings.</p> <p>15.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management.</p> <p>15.3 Ensure that environmental impacts caused by mineral operations and the transport of minerals are minimised.</p> <p>15.4 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users.</p>
17	<p>Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.</p> <p>17.1 Reduce flood risk both presently and taking into account climate change.</p> <p>17.2 Prevent inappropriate development of the floodplain, and include flood protection systems.</p> <p>17.3 Include sustainable urban drainage systems where appropriate.</p>
18	<p>Minimise local and global pollution and protect or enhance environmental resources.</p> <p>18.1 Minimise water, air, soil, groundwater, noise and light pollution from current activities and the potential for such pollution.</p> <p>18.2 Protect and enhance the quality of watercourses.</p> <p>18.3 Provide opportunities to improve soil quality or reduce contaminated land.</p> <p>18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking.</p>

## Appendix 2: SA Matrices for the Revised Preferred Options

**Table 3: Rural Areas Policy RAI**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the policy option, as included in the preferred options consultation document (July 2010).	0	0	-	+	-	0
<p><b>[This policy has been revised since the 2010 preferred options consultation, with the housing allocation for rural areas having been increased from 4,500 to 5,300.]</b></p> <p>The policy states that 'regeneration of the rural economy will be encouraged', but does not provide further guidance as to how this encouragement would be provided, or opportunities for regeneration, presumably because this is addressed in policy RA5. Therefore, the impacts of this policy on objectives to promote employment opportunities (SA Objective 1) and enable a sustainable economy (3) are considered to be negligible. <b>[Although the housing allocation has increased by 800, there is no reference to how regeneration of the rural economy will be encouraged; therefore there is no change to the SA score for these objectives.]</b></p> <p>By increasing the rural population through the provision of 4,500 new homes, the policy could have a minor negative impact on road traffic, the use of sustainable transport modes, and reducing the need to travel (SA Objective 4), as the number of residents living in areas requiring the use of private vehicle to access services is very likely to increase. However, this is only expected to result in a relatively small proportional increase in vehicle journeys, as the overall population of the rural areas is only likely to increase by a very small percentage, therefore the negative effect is not likely to be significant. This issue is expected to have a similar negative impact on SA objectives related to reducing the consumption of fossil fuels (14.1) and levels of greenhouse gas emissions (16.1). <b>[Although the housing allocation has increased by 800 and therefore the population increase would now be slightly more than the approximately 1% stated here, the overall change in terms of the sustainability impact is considered to be negligible, with the effect on these SA objectives remaining as a minor negative.]</b></p> <p>The policy is likely to have a positive impact on increasing access to good quality housing (11.1) and a positive impact on the provision of affordable housing (11.2), although no target is given for minimum levels of affordable housing in the rural areas. <b>[The increase in the housing allocation (by 800) adds to this positive effect; however not to such an extent that it would become a significant positive effect.]</b> The provision of additional homes in rural areas also provides an opportunity to reduce the percentage of unfit homes, increase the efficiency and sustainable design of homes (11.4, 11.5), and improve the wider built environment (11.6), which are addressed by other policies (e.g. Protection of Natural and Historical Assets, M4). However, as policy RAI itself does not address these elements, it is considered to have no impact on these sub objectives within the built environment topic.</p>						
	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised preferred option (September 2011).	0	0	-	+	-	0
<p><b>None of the SA scores have changed as a result of the revision to this preferred option.</b></p>						

**Table 4: Rural Areas Policy RA5**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the policy option, as included in the consultation document (July 2010).	++	0	+	+	- / +	0
<p><b>[This policy has been revised since the 2010 preferred options consultation, with a broad intention to create more local jobs in rural areas to reduce the need to travel longer distances and help the rural economy. However, no details have been provided at this stage with regards to how this would be achieved.]</b></p> <p>This policy is likely to have a significant positive impact on the provision of employment opportunities (SA objective 1) and enabling a sustainable economy (3), as well as supporting vitality and a range of retailers (7.2, 7.3), and may help to reduce skills inequalities across the County (2.2) by increasing employment opportunities outside of Hereford and the market towns. <b>[The revision to the preferred option should reinforce this already significant positive effect.]</b> It is also likely to have a positive impact on the provision of and access to services and facilities (7.1), and tourism development supported by the policy may help to promote rural areas to local people and visitors (6.2). However, it does focus employment development in the RSCs and Hubs, and may miss opportunities in some of the other rural settlements to encourage small start-up businesses, which would benefit from encouragement and provision of small scale employment land, premises and live-work units. <b>[It is not clear whether the revision to the preferred option will affect this SA score, as it is not known whether the additional local jobs which are to be created in rural areas will be focussed in the RSCs and Hubs or in other rural settlements. As such, the SA score remains unchanged].</b></p> <p>In promoting rural businesses, the policy may have a minor positive impact on sourcing goods and materials locally (19.3), where existing markets are supported or new markets created to supply such materials (e.g. food, renewable energy). <b>[The revision to the preferred option should reinforce this positive effect, although it is not expected to increase it to a significant positive effect.]</b></p> <p>By supporting development in rural areas, including business start-ups, the policy could have a negative impact on the use of fossil fuels and greenhouse gas emissions (14.1, 16.1) associated with business operation and growth. <b>[The revision to the preferred option may reinforce this potential negative effect, although it is not expected to increase it to a significant negative effect.]</b> However, the policy also supports renewable energy developments, which is likely to have a positive impact on the proportion of renewable energy generated in the County (16.2); therefore, the policy is considered to have both positive and negative impacts on these objectives. <b>[The revision to this preferred option aims to reduce travel distances, which should add to the positive part of this mixed effect by helping to reduce emissions associated with transport, although not to the extent that it is likely to become a significant positive effect.]</b></p> <p>The support for developments which capitalise on the County's natural and historic environments may have a positive impact on certain assets where these are sensitively maintained or restored (13.1, 15.1); however, increased use or insensitive development could have a negative impact on these same assets. The nature of any impact will be dependent upon individual developments; therefore, the impact of this policy alone has been assessed as having no impact in relation to the Natural Environment objectives. <b>[The revision to the preferred option will not change the impact on these objectives.]</b></p>						
	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised preferred option (September 2011).	++	0	+	+	- / +	0
<p><b>None of the SA scores have changed as a result of the revision to this policy.</b></p>						

**Table 5: Ross-on-Wye Policy**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the preferred option, as included in the consultation (July 2010).	+	+?	+	++?	+?	+/-?

***[This policy has been revised since the 2010 preferred options consultation, with the total number of homes to be provided in Ross-on-Wye having been reduced from 1,000 to 900 and the number in the Hildersley urban extension having been reduced to from 350 to 200. At the 2010 preferred options stage, the number of homes already accounted for through completions since 2006 and existing permissions was deducted from the total allocation in the SA, and the remaining figure was appraised as the amount of homes still to be built in Ross-on-Wye. Herefordshire Council has now estimated that a figure of 250 houses is already accounted for through existing permissions and allocations. As these homes have still to be built, and therefore their effects still have to be experienced, it was considered most appropriate to appraise the policy on the basis of the total housing allocation, without taking into account those homes already accounted for.]***

This policy should have positive impacts on employment (1) in that it allows for the provision of 10ha of new employment land at the Model Farm site (allocated in the UDP), within the proposed urban extension at Hildersley. This should help to create a more mixed use, self-contained extension, and help to encourage walking and cycling and reduce the need (but not necessarily the propensity) to travel to work by car. The policy option itself does not make provision for employment spaces or land within the town or further service provision (other than recreation space) within the urban extension (although the need for new non-strategic retail development, new tourist accommodation and possible locations to support local trade will be addressed within the Market Towns and Rural Areas Plan). Without provision for smaller scale employment land, there could be a negative impact on the vitality of the economy and town centre (3, 7), and the self-containment of Ross-on-Wye could be reduced, further encouraging out-commuting by residents for work and access to services (1). ***[The revision to the preferred option will not change the impact on these objectives.]***

The provision of sustainable transport links between the town centre and the urban extension at Hildersley (including the new employment land at the Model Farm business park) should have positive impacts on the health of the local population (5) by encouraging walking and cycling. It will be necessary to ensure that adequate provision is made for a growing population if local health centres do not have adequate capacity to accommodate the increased population resulting from the provision of 1,000 new homes in and around the town, in order that existing facilities do not become overloaded. ***[Although the number of new homes has been reduced by 10% to 900, the requirement to ensure that facilities can accommodate this scale of growth remains valid.]***

The provision of sustainable transport links between the town centre and the Hildersley urban extension should have additional benefits in terms of reduced road traffic and increasing accessibility for non-car drivers (4). ***[The revision to the preferred option will not change the impact on this objective.]***

Significant positive effects could result in relation to the built environment objectives (11), from the provision of a high proportion (40%) of affordable homes within all developments of 15+ properties, and by the provision of 450 new homes which should be of good quality as they will be brand new. However, it is uncertain whether this level of provision of new homes, as well as 40% affordable homes, will be achievable in the current economic climate. ***[As described above, under the revised preferred option, the assessment has now been undertaken on the basis of 900 homes still to be provided. It is assumed that the requirement for 40% to be affordable will still apply; therefore the significant positive effect on this objective has been further reinforced. The housing figures have been revised in the light of up-to-date knowledge about the current economic climate, therefore this issue is considered to have been dealt with in the revision to the preferred option.]*** In addition, there is an opportunity for all new homes to meet high levels of sustainable design and construction, which is not required by the policy as currently drafted. As the Sustainable Design core policy has not yet been drafted, it is unclear what standards of sustainable design and construction will be required in new development within the county.

The provision of sustainable transport links should help to mitigate to some extent the increased air pollution that is likely to result from an increase in vehicle traffic (18); however, the impacts on climate change of the policy are mainly uncertain

as they will depend on factors such as the design and construction methods used in the housing development, which is not currently known. This information should be included in the still to be drafted Sustainable Design policy, or failing that it should be included within the spatial options for each of the market towns. **[Although the scale of housing development will be slightly lower under the revised preferred option, the difference is not considered enough to affect this SA score.]**

The Habitats Regulations Assessment has identified the potential for significant effects on the River Wye SAC due to potential decreases in water quality as the sewage treatment works (STW) serving Ross-on-Wye discharges to the River Wye, which is already being affected by pollution. The Water Cycle Study<sup>4</sup> states that the existing STW has sufficient capacity to serve the planned increase in population; however the Environment Agency’s review of existing consented discharges showed that the SAC is already being adversely affected by discharges to the river. In combination with planned housing increases at Hereford and other towns served by STWs discharging to the River Wye, it is uncertain whether pollution levels will increase. **[Although the scale of development has decreased slightly, the fact that 900 new homes are still proposed means that these issues remain.]** In addition, the urban extension at Hildersley is within 10km of the Wye Valley and Forest of Dean Bat SACs, and it is even closer to a number of bat roosting sites identified in a study by the Herefordshire Biological Records Centre<sup>5</sup>. While the Herefordshire Biological Records Centre bat study has concluded that providing housing at Hildersley will have no adverse effects on nearby bats, it does not discuss any potential effects from light or noise associated with new development. Therefore, the Habitats Regulations Assessment has not yet been able to discount the potential for significant effects (e.g. from light and noise disturbance) on the qualifying bat species from development at the urban extension. Finally, the Habitats Regulations Assessment has identified the potential for recreation pressure on Wye Valley Woodlands SAC and the Walmore Common SAC associated with the increased population from the additional housing development at Hildersley urban extension. Both of these sites are accessible from the urban extension location. **[Although the number of homes to be provided at the urban extension has been reduced from 350 to 200, the potential effects of development there remain as described above.]**

However, the policy option states that creation of green infrastructure within the urban extension site should help to mitigate effects on biodiversity (13) by benefitting the local bat population. The option also states that the urban extension will include on-site recreation space or an off-site area through developer contributions, and the creation of green infrastructure within the site is also likely to encourage residents to use these local open spaces, and help to relieve any pressure on the SAC sites further away. Further information from the water company is needed in relation to the STW capacity and potential effects on the River Wye SAC. The landscape (15) in this area is of low sensitivity, meaning that development is directed away from areas where harm to the landscape may result. **[The shift in distribution of housing, with less at Hildersley and more within Ross-on-Wye itself is not likely to affect this objective as the development would still be either focussed in an area of low landscape sensitivity or within an existing urban area.]** Positive effects on the landscape (including open spaces) (15) are also likely to result from the inclusion of on-site recreation space within the planned urban extension at Hildersley. **[The reduced scale of development proposed at Hildersley means that the extent of recreation space provided may also decrease proportionally; however this is not yet known and the provision of any such space would still result in a positive effect on this objective.]**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised preferred option (September 2011).	+	+?	+	++?	+?	+/-?

**None of the SA scores have changed as a result of the revision to this preferred option.**

<sup>4</sup> Outline Water Cycle Study Technical Report 2<sup>nd</sup> Edition – Final Report Issued. Herefordshire Council, September 2009.

<sup>5</sup> Greater and Lesser Horseshoe Bats in South Herefordshire 2010. A study to inform Herefordshire Council’s Local Development Framework. Herefordshire Biological Records Centre, June 2010.

## Table 6: Leominster Policy

Note that there are no SA scores from the 2010 Preferred Options stage as the preferred option was decided upon at the Place Shaping Paper stage (January 2010) and was so not reproduced and appraised later in 2010. As such, the revised preferred option for Leominster has been newly appraised on the basis of the original preferred option and the revisions now made, rather than updating an existing appraisal.

***[This policy has been revised since the Place Shaping Paper consultation, with the housing allocation being reduced by 200 and a new allocation for 5ha of employment land at the urban extension being added.]***

### **Education and Employment**

The allocation of 5ha of employment land in the urban extension is likely to have a significant positive effect on the provision of sustainable employment opportunities within close proximity to the workforce (SA objective 1.1) as the site would be close to the town and would provide employment opportunities for the growing local population. However, the original preferred option states that employment provision in Leominster would occur mainly towards the end of the Plan period. It is not known whether the additional allocation of 5ha of employment land (in the 2011 revised preferred option) would result in more employment development sooner in the Plan period, or whether this development would also be planned for later on in the Plan period. If this were the case, it may be that the housing development would come forward sooner than the employment development, meaning that jobs were not available in the short-medium term for the growing local population. As such, there is some uncertainty attached to this significant positive effect.

By making contributions to educational/extra school capacity, or by possibly contributing a new school, it is considered likely that a positive effect on education achievement in Herefordshire (SA objective 8.1) will occur. However, this is uncertain because it is not clear to what extent there will be additional demand for school places from the growing population resulting from the planned housing development, or whether this demand will be able to be met, particularly as the proposal to build a new school is not confirmed as a definite part of the preferred option – this part of the preferred option is worded as ‘possible provision of a new school’.

Based on the above, an overall uncertain significant positive (++) effect on the theme of Education and Employment is likely to result from the revised preferred option for Leominster.

### **Healthy and Prosperous Communities**

The revised preferred option refers to the provision of community facilities in Leominster; however it does not specify whether this will include healthcare facilities such as pharmacies and GP surgeries. If this is the case, a positive effect is likely in relation to SA objective 5.1 as the growing population would be adequately served by new facilities which are likely to be of a high quality; however this is currently uncertain.

The provision of green infrastructure and open space should have a positive effect on encouraging healthy lifestyles (SA objective 5.3) and on the quality of the public realm (SA objective 7.4), which should encourage positive community interaction. Further positive effects in relation to healthy lifestyles are likely to result from the provision of improved walking/cycling links between the town, schools and the Enterprise Park.

Based on the above, an overall uncertain positive (+) effect on the theme of Healthy and Prosperous Communities is likely to result from the revised preferred option for Leominster.

### **Transport and Access**

The provision of community facilities and employment opportunities in and immediately adjacent to Leominster should have a positive effect in terms of a reduced need for resident of the town to travel long distances for work, school etc. (SA objective 4.1). Provision of improved walking and cycling links, particularly to and from the town centre and the main employment sites, should have further positive effects in relation to the promotion of sustainable transport patterns (SA objective 4.2) and increasing the use of sustainable transport modes (SA objective 4.4). However, a key component of the preferred option for Leominster is the provision of a southern link road, which may encourage high levels of car use amongst residents and those who work in and around Leominster, as this road may make car use a more convenient and attractive option. In this sense, a negative effect on sustainable transport may occur (SA objectives 4.2 and 4.4).

The provision of new community facilities within the town, as well as additional areas of open space, will have a positive effect on access to quality leisure and community activities (SA objective 6.1), in particular where these are accessible via the planned improved sustainable transport links.

Based on the above, an overall mixed (+/-) effect on the theme of Transport and Access is likely to result from the revised preferred option for Leominster.

### **The Built Environment**

The original preferred option for Leominster specified that 'up to 1,700' new homes would be provided. Under the revisions made to the preferred options, the allocation has been reduced by 200; however it remains unclear whether all 1,500 new homes would definitely be provided, because of the use of the term 'up to'. As such, the significant positive effect on the provision of good quality homes (SA objective 11.1) is currently uncertain. In addition, it is not known what proportion of the housing would be affordable, as the original preferred option specifies only that 'a %' of affordable housing would be provided. It is recommended that a specific target for affordable housing is included in the revised preferred option.

The provision of improved walking and cycling links within the town and the close proximity of the urban extension to the existing town should have a positive effect on integrated, efficient and balanced land use (SA objective 19).

There are a large number of listed buildings in and around Leominster, including in close proximity to the urban extension, the setting of which may be affected by development (SA objective 20.1). However, the provision of green infrastructure and open spaces in and around the town should create a high quality built environment incorporating greenspace (SA objective 20.3) and should improve the general appearance of the area (SA objective 20.4).

Based on the above, an overall uncertain mixed (++) effect on the Built Environment theme is likely to result from the revised preferred option for Leominster.

### **Resource Consumption and Climate Change**

Development on the scale proposed in Leominster is inevitably likely to result in increased waste production (SA objective 12.2); however it is unclear whether measures are to be incorporated into the new urban extension to encourage re-use and recycling of waste (SA objective 12.3). Providing for adequate waste storage to encourage recycling is not specifically addressed within the policy, and this is also not covered by the other general policies on waste within the Core Strategy.

The preferred option allows for up to 1,500 new homes to be built as part of an urban extension in Leominster; however no mention is made of the source of energy supply and whether renewable installations are to be incorporated into these residential developments (SA objective 14.1). No information is given within the policy regarding plans to use sustainable design and construction techniques for the new development (SA objective 14.2). However, it is recognised that other Core Strategy policies such as EN1: Renewable Energy and LD4: Sustainable Strategic Design will provide guidance on these matters in relation to all development in Herefordshire occurring over the Plan period.

The measures included within the preferred option in terms of sustainable transport development should help to reduce Hereford's contribution to climate change and pollution (SA objectives 16 and 18); although the planned provision of a southern link road may encourage continued car use and therefore maintain levels of emissions from vehicle traffic.

Based on the above, an overall uncertain mixed (+/-) effect on the Resource Consumption and Climate Change theme is likely to result from the revised preferred option for Leominster.

### **The Natural Environment**

The preferred option acknowledges that there is potential for the urban extension to impact upon some semi-natural habitats (SA objective 13), although it is also stated that this could be mitigated through the overall design of the scheme, although no further details are provided regarding how this would be achieved. The provision of green infrastructure and open space in and around the town may have positive effects by improving wildlife corridors and minimising habitat fragmentation (SA objective 13.3).

The potential impact of development on sensitive landscapes around Leominster (SA objective 15) is also highlighted within the preferred option, although it is again stated that this could be mitigated through the overall design of the scheme. The proposal to retain the highly sensitive landscape areas around Cockcroft Hill as natural open space may help to mitigate the potential adverse effect; however it is not clear whether the development of housing and employment land may still affect the setting of this area.

Based on the above, an overall uncertain significant negative (--) effect on the Natural Environment theme is likely to result from the revised preferred option for Leominster.



	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised preferred option (September 2011).	++?	+	+/-	++/-?	+/-?	--?

**Table 7: Policy HI - City Centre**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
<b>Scores for the preferred option HI: Hereford City Centre, (September 2010).</b>	<b>++</b>	<b>+</b>	<b>+/-?</b>	<b>++/-</b>	<b>+/-</b>	<b>+/-</b>

**[This policy has been revised since the 2010 preferred options consultation, with the amount of retail floorspace to be provided having increased from 40,000sqm to 46,000 sqm.]**

**Education and Employment**

This policy should have a positive effect on the provision of employment opportunities (SA objective 1) by encouraging the provision of new commercial and office space in appropriate city centre locations; although it does not allocate any city centre site specifically for commercial/employment use. The provision of employment opportunities may in turn increase the available opportunities for work-based training and skills development (SA objective 2.1). However, the types of employment opportunities, or commercial and office space to be provided are not specified and it is uncertain whether such opportunities would be available and therefore whether a more adaptable and higher skilled workforce (SA objective 2) would be developed.

The policy also provides for additional retail floorspace, which would be constructed (or redeveloped) in the western (Eign Gate area) and northern (old livestock market) parts of the city, providing jobs during construction and afterwards in the management and operation of the new shops. The new retail floorspace is intended to accommodate bigger name high street retailers not currently available in Hereford. Therefore, the policy should have a positive effect by enhancing conditions that enable a sustainable economy and continued investment (SA objective 3). **[The increased allocation for retail floorspace should reinforce this positive effect, although not to the extent that it would become a significant positive effect.]**

The provision of these new retail premises, which are intended to improve the retail offer within Hereford, is likely to have a significant positive effect on sustainable regeneration, as it places a strong emphasis on increasing the vitality of the city centre and creating a range of independent, competitive and national retailers (SA objective 7.2). **[The increased allocation for retail floorspace should reinforce this already significant positive effect.]** Encouraging residential provision on the upper floors of commercial premises should have further benefits for the vitality of the city centre and increasing the occupation rate of buildings (SA objective 7.3).

The policy makes provision for a new higher and further education hub, helping to meet the additional demand for education infrastructure (SA objective 8.1) that is likely to result from the housing development planned under other Core Strategy policies, and also to improve the attractiveness of the city to young people, post school age.

Based on the above, an overall significant positive effect on the theme of Education and Employment is likely to result from this policy.

**Healthy and Prosperous Communities**

The provisions made within the policy for increasing the use of sustainable modes of transport through the development of an integrated transport hub close to the railway station, pedestrian upgrading of Newmarket and Blueschool Streets and the provision of pedestrian/cycle links from the new urban village may have a positive impact on promoting healthy lifestyles among the local population (SA objective 5.3) as levels of walking and cycling, and therefore overall levels of activity, are likely to increase. The provision of sports and leisure facilities should also help to increase overall rates of activity and benefit public health. The policy also supports sustainable regeneration, by increasing the quality of public spaces (SA objective 7.4) within the city centre, specifying that valuable open spaces should be protected.

The measures proposed for the city centre may have a positive impact on reducing crime and antisocial behaviour and encouraging respect for the local area (SA objective 9) as the vitality and quality of the city centre environment should be improved and this may encourage an increased sense of pride amongst local people. The provision of new employment opportunities, including through the expansion of Hereford's retail offering, should help to reduce poverty and deprivation within Hereford by increasing overall employment and income levels (SA objective 10). **[The increased allocation for retail floorspace should reinforce this positive effect, although not to the extent that it would become a significant positive effect.]**

Based on the above, an overall positive effect on the theme of Healthy and Prosperous Communities is likely.

### **Transport and Access**

The policy should have a positive effect on increasing the proportion of journeys made by public transport, cycling and walking (SA objective 4) as it allows for the development of an integrated transport hub for sustainable modes of transport in a central location near to the train station, and will provide pedestrian/cycle links from the new urban village to the city centre and railway station, as well as improved pedestrian connections from the town centre to the northern city centre expansion area. However, the policy also promotes the construction of a new link road to the northern city centre expansion area, which may have a negative effect by encouraging continued car use, despite helping to reduce levels of congestion within the city centre.

Pedestrian upgrading of Newmarket Street and Blueschool Street and providing pedestrian links to and from the existing retail centre to the new retail areas in the northern city centre expansion area and the urban village residential development should help to improve access to and engagement in cultural and leisure facilities (SA objective 6). In addition, the supporting text to the policy states that opportunities exist to make a feature of the canal basin and its corridor within the new residential area of the urban village, which would help to promote the use of inland waterways for leisure and recreation (SA objective 6.3).

The redevelopment and construction of new homes, retail areas and new commercial and office space provides an opportunity to contribute to the development of services and facilities appropriate to the community, function, character and scale of the centre, in turn helping to provide access to sufficient services and facilities to meet future growth in Hereford (SA objective 7). ***[The increased allocation for retail floorspace should reinforce this positive effect, although not to the extent that it would become a significant positive effect.]***

Based on the above, an overall mixed (minor positive and negative) but uncertain effect on the theme of Transport and Access is likely.

### **The Built Environment**

The development of 800 new homes to the north of the city centre in the urban village, of which a third are to be affordable, should have a positive effect on improving access to affordable good quality housing (SA objectives 11.1 and 11.2).

The new urban village involves redeveloping a large area of previously developed land, and the policy also encourages the development of the upper floors of retail premises for residential use, which has a positive effect on efficient land use by optimising the use of previously developed land and buildings, focused in urban areas (SA objective 19.1). The new urban village should also have a positive effect on encouraging sustainable resource-efficient design (SA objectives 11.5 and 19.2) as sustainable design and construction techniques are encouraged. However, there is not currently a requirement for other development proposed by the policy (retail, commercial, office) to use sustainable and resource efficient design and construction techniques. ***[This score will not be affected by the change in quantity of retail allocation, as there is still no reference made to the nature of the development.]***

The policy places a strong emphasis on preserving and enhancing the historic assets of the city centre, as well as promoting tourist developments which respect the city's historic character, heritage and local distinctiveness, which should have a significant positive effect on valuing, protecting and enhancing the character of the county's historic environment and cultural heritage (SA objective 20). The new urban village should also have a positive effect on protection and enhancement of the character and built quality of Hereford (the other aspect of SA objective 20) as 'high quality sustainable design' techniques are encouraged. However, there is not currently a requirement for other development proposed by the policy (retail, commercial, office) to use high quality or sustainable and resource efficient design and construction techniques. There is also no explicit requirement for the rest of the development proposed (e.g. retail, commercial and office development) to be appropriate in scale, form or design to the setting and character of the local area. However, it is recognised that other Core Strategy policies, such as LD4: Sustainable Strategic Design and the forthcoming Design SPD will address these matters in relation to all proposals for development over the Plan period. ***[This score will not be affected by the change in quantity of retail allocation, as there is still no reference made to the nature of the development.]***

Based on the above, an overall mixed (significant positive and minor negative) effect on the Built Environment theme is likely.

### **Resource Consumption and Climate Change**

The development proposed by the policy will inevitably lead to waste production (SA objective 12.2); however it is unclear whether measures are to be incorporated into the new urban village to encourage re-use and recycling of waste (SA objective 12.3). The policy states that resource use will be minimised during construction of the new houses, but providing for adequate waste storage to encourage recycling is not specifically addressed. This is also not covered by the other general policies on waste within the Core Strategy. **[The increased retail allocation may result in an increase in the volume of waste produced through development; however the increase is not considered to be large enough to affect the related SA scores.]**

The 800 new homes to be built to the north of the city centre are to be 'highly energy efficient' (SA objective 14.1); however no mention is made of the source of energy supply and whether renewable installations are to be incorporated into the site, which could increase the positive effects in relation to this objective. The sustainable design and construction techniques required for the 800 new homes, and the re-use of upper floors of retail and commercial premises for residential use should help to minimise consumption of natural resources (SA objectives 14.2 and 14.3), but again, other types of development do not have this requirement in the policy, therefore it is unlikely that SA objective 14 would be fully achieved. However, it is recognised that other Core Strategy policies such as EN1: Renewable Energy and LD4: Sustainable Strategic Design will provide guidance on these matters in relation to all development occurring over the Plan period. **[This score will not be affected by the change in quantity of retail allocation, as there is still no reference made to the nature of the development.]**

The plans to incorporate SUDS into the new urban village development should help to reduce the city's vulnerability to the risk of flooding which is likely to increase as a result of climate change (SA objective 16). However, this requirement should apply to all the types of new development proposed in the policy and not just the residential development. The supporting text to the policy refers to associated development required in order to alleviate flooding being an essential part of the new urban village proposals (including the Yazor Brook Flood Alleviation Scheme, which is designed to divert flood waters from the Yazor Brook at Credenhill to the River Wye, to the west of the city<sup>6</sup>). Reference could be made within the policy to the essential flood alleviation requirements, although it may be intended for inclusion within the more detailed proposals in the Hereford Area Plan.

The measures included within the policy in terms of sustainable transport development should help to reduce Hereford's contribution to climate change and pollution (SA objectives 16 and 18); although the road improvements planned may encourage continued car use and therefore maintain levels of emissions from vehicle traffic.

Based on the above, an overall mixed (minor positive and negative) effect on the theme of Resource Consumption and Climate Change is likely.

### **The Natural Environment**

The policy makes very little mention of the natural environment and the need to conserve and enhance biodiversity assets (SA objective 13), aside from the statement under the sub-section 'Heritage' that natural heritage features and valuable open spaces will be protected and enhanced. Although the policy refers to Hereford city centre rather than to a rural area, this is still an important issue even in the urban context, particularly as the River Wye SAC and SSSI runs through the centre of Hereford, and this should be recognised within the policy wording. The policy does encourage the creation of open spaces and green infrastructure in relation to the new urban village, which should help improve habitat linkages and reduce fragmentation (SA objective 13.3), but this should be encouraged across the city, not just within the regeneration area.

The fact that the development proposed is within the existing urban area means that a negative impact on the quality of the rural landscape (SA objective 15) is unlikely. However, there may be impacts on the townscape within Hereford, although the precise impacts will depend on the design and visibility of the new development, particularly the new urban village. The urban village lies mainly in Hereford Character Area 5 (the Edgar Street Grid), and Appendix V of the Hereford Townscape Assessment<sup>7</sup> describes aspects of the townscape that contribute to the character of the Edgar Street Grid area which should be preserved or enhanced. It also notes that many of the industrial/commercial buildings in the character area are of limited architectural merit. Their replacement by well-designed residential or commercial/industrial schemes that respect both the historic architectural character and plan-form would contribute to the townscape character of the area. Therefore, there are opportunities for the urban village and other redevelopment proposed in Policy HI to have positive effects on the townscape within Hereford, and reference could be made within the supporting text to the

<sup>6</sup> <http://www.esgherefordshire.co.uk/development/infrastructure.aspx>

<sup>7</sup> [http://www.herefordshire.gov.uk/docs/hereford\\_rapid\\_townscape\\_assessment\\_draft\\_march\\_2010\(1\).pdf](http://www.herefordshire.gov.uk/docs/hereford_rapid_townscape_assessment_draft_march_2010(1).pdf)

recommendations of the Hereford Townscape Assessment work. **[This score will not be affected by the change in quantity of retail allocation, as the increase in the allocation for retail floorspace is not considered to be enough to affect the overall impact of retail development on the townscape in any notable way.]**

The policy should have positive effects on reducing flooding (SA objective 17) as it states that SUDS should be incorporated into the new urban village, and the provision of open space and green infrastructure should help to avoid too great a proportion of the land surface becoming impermeable as a result of development. However, again, this should apply to all types of new development proposed and not just the residential development. As also noted above, the flood alleviation scheme within the new urban village should also contribute to reducing flooding, and reference should be made within the policy to this.

Development, particularly of the housing proposed, within Hereford may have a significant negative effect on water quality (SA objective 18.1) in the River Wye as the two sewage treatment works serving Hereford (Eign and Rotherwas) both discharge into the Wye and have been identified by the Environment Agency as needing their discharge consents to be reduced, which means they are likely to have insufficient capacity to adequately treat the increased sewage arising from the new housing to be provided in Hereford. **[The increased retail floorspace allocation may reinforce this already significant negative effect, as the total allocation has increased by about 15% from the 2010 preferred option. However, as stated above, the main concern in relation to water quality is the development of housing which is likely to result in larger volumes of waste water being produced than retail developments.]**

An Air Quality Management Area (based on levels of nitrogen dioxide) has been declared within Hereford along the A49 corridor, extending from Holmer Road in the north to Belmont Road in the south and east along New Market/Blue School Street and west along Eign Street to Barton Yard. If the development proposed within the city were to result in an increase in vehicle traffic, particularly in this already heavily polluted area, for example as a result of car movements to and from the new urban village which lies just to the north of the AQMA, there may be a negative effect on air quality (SA objective 19.4). Although the measures included within the policy in relation to sustainable transport use should have some beneficial effects by reducing vehicle traffic and therefore levels of air pollution, the scale of development proposed means that there are still likely to be some adverse impacts in terms of traffic generation. **[The increased allocation for retail floorspace (being around 15% higher than in the 2010 preferred option) may reinforce this potentially negative effect by leading to further increases in traffic generation. However, an increase in retail floorspace of 15% is not considered to be enough to increase the negative effect to a significant negative effect, particularly in light of the mitigation measures already in place within the preferred option. As such, the change in terms of the SA score would be expected to be negligible.]**

Based on the above, an overall mixed effect (minor positive or significant negative) is likely to result from the policy in relation to the Natural Environment theme.

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised preferred option (September 2011).	++	+	+/-?	++/-	+/-	+/-

**None of the SA scores have changed as a result of the revision to this preferred option.**

**Table 8: Relief Road Options** (part of policy H2: Movement)

Note that (as described in the introduction to this SA note), only the relief road options have been subject to the appraisal, and not the other elements of policy H2: Movement as the rest of the policy remains unchanged following the revisions to the Preferred Options.

Scores for the preferred option, as included in the consultation document (July 2010).	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
<b>Western relief road (favoured inner corridor)</b>	+?	+/-	++/-	+/-	-	--?
<b>Eastern relief road (favoured inner corridor)</b>	+?	+/-	+/-	+/-	-	--?

*[Note that at the Preferred Options stage in 2010, the SA considered the likely effects of both the preferred western route option for the relief road, and the discounted eastern route option. The western route has now been very slightly amended from the favoured inner corridor that was appraised in 2010, by just a few metres, in order to extend the distance between the road and residential properties. These changes have been made to the southern section of the route, between the A465 Abergavenney and A49 Ross roads.]*

### **Education and Employment**

The provision of the relief road in either route option (western or eastern inner corridor) may increase employment opportunities in Herefordshire (SA objective 1), both directly as a result of jobs being created during construction of the road, and indirectly by stimulating employment in companies who are involved in the project, e.g. providing building materials. However, the extent of this potential impact will depend on whether local companies and labour are to be used in the project, and any such effects will be temporary, lasting only for the duration of the construction work. In addition, the presence of the relief road (regardless of the location) may have further indirect positive impacts on employment creation, by stimulating the local economy as a result of the improved transport links and ease of movement in and around the city. **[These effects are not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]**

Any job creation resulting from the construction project may also increase the opportunities available for work-based training and skills development (SA objective 2), although this potential effect is again uncertain as it will depend on the number and type of positions created as a result of the project and again, the potential effect would only be experienced in the short-term. **[This effect is not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]**

Neither of the relief road route options is considered likely to affect the other SA objectives (3, 7 and 8) within this theme.

Based on the above, a potential but uncertain positive effect is associated with both of the options in relation to the theme of Education and Employment.

**[Based on the above, the SA scores for the objectives in this theme remain unchanged.]**

### **Healthy and Prosperous Communities**

The construction of the relief road in either the eastern or western location should have a positive effect on public health (SA objective 5) as a result of improved air quality in Hereford due to reduced congestion in the city centre. However, the relief road (regardless of location) may also lead to some adverse effects on health by encouraging continued car use instead of switching to sustainable modes of transport such as walking and cycling which can increase levels of activity amongst the local population. Reducing the congestion in the city centre caused by longer-distance traffic movements may make driving through Hereford for shorter journeys more feasible and appealing, and the presence of the relief road in either location may encourage people to continue using a car to access the city centre. **[These effects are not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]**

Either an eastern or western relief road would help to support sustainable regeneration (SA objective 7.4) by improving the quality of the public realm within Hereford city centre, as congestion and the associated noise and pollution would be

reduced and positive community interaction encouraged. However, where the two route options for the relief road pass within close proximity of new or existing residential development around Hereford, the quality of those areas may be compromised, therefore having a negative effect on this objective. Whilst both routes would pass close to the Holmer East and Bullinghope urban expansion sites, the proposed western inner corridor route also passes near to the development planned at Whitecross, Three Elms and Holmer West and the eastern route would, pass within close proximity of the existing residents at Aylestone, which may affect levels of amenity there. **[The minor amendments made to the preferred western route will mean that the road would pass further from residential properties to the south of Hereford, although individual properties in Grafton may be affected. As such, the potential effects of the road on homes within the Bullinghope urban extension are less likely to be negative (the housing allocation for Bullinghope remains unchanged from the 2010 preferred option), particularly as this section of the relief road is already in place as the Rotherwas Relief Road. However, the route remains unchanged around the western and northern areas of the city (near to the other urban extensions); therefore the overall effect on this objective remains mixed, with both minor positive and minor negative effects likely. Although the housing allocation at the Holmer West site has been reduced and the allocation at Whitecross removed, it is not considered that this will affect the SA score as there would still be a large number of homes at Holmer West potentially affected by the road.]**

The provision of a relief road is not expected to have any direct impact on crime and anti-social behaviour (SA objective 9).

The provision of a relief road in general, either along the eastern or western route, may help to improve access to services and opportunities, including jobs, (SA objective 10.1) within Hereford itself by reducing congestion in the city and making journeys shorter and more convenient. Under the Preferred Options for development at Hereford, the main site for new employment development is at Three Elms (10ha) and Holmer East (5ha). Both of the potential routes for the relief road would enable improved access to the Holmer East site from areas to the south of the city, without having to drive through the city centre; however, only the western relief road route would pass in close proximity to the Three Elms site to the west of the city, thereby improving access to the employment to be developed there. **[The employment allocation at Holmer East has been removed from the preferred option, although the allocation for 10ha at Three Elms remains; therefore the potential impacts of the road in terms of access to jobs at Holmer East are no longer relevant. The positive effect associated with the western road in terms of access to the Three Elms employment site remains unchanged, as the minor amendments made to the route are to the south of the city and so would not affect access to Three Elms.]** The eastern route would, however, pass within close proximity of the existing residents at Aylestone, which may improve levels of accessibility for people living there.

Based on the above, a mixed (minor positive and negative) effect is likely to result from both route options in relation to the theme of Healthy and Prosperous Communities.

**[The amendments that have been made to the western route have not affected the SA scores, and so a mixed (minor positive and negative) effect is still expected in relation to Healthy and Prosperous Communities.]**

### **Transport and Access**

Both of the potential route options for the relief road would have a significant positive effect in terms of a reduction in road traffic and congestion within the heavily congested Hereford city centre (SA objective 4); however there may be negative effects on the increased use of sustainable modes of transport (SA objective 4.2) as car use may become even more appealing due to a reduction in congestion, making car journeys faster in the city and more convenient. **[These effects are not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]**

Construction of the western route would mean that the relief road would pass within close proximity to the new developments at Holmer West, Three Elms and Whitecross which are proposed under the Preferred Options for Hereford. As such, residents of these areas would be better able to access the road and make use of it to avoid the congested city centre than under the eastern route, having a more significant positive effect on reducing traffic in the city centre (SA objective 4). **[Although the housing allocation for the Holmer West site has been reduced and the allocation for housing at Whitecross removed, it is still considered that there would be a positive effect in this sense as there are still a larger number of homes to be developed which would potentially benefit from the road in terms of traffic reduction.]** The road would pass within close proximity of the proposed development sites at Bullinghope and Holmer East under either option. However, a relief road along either route is not likely to reduce road traffic in general, indeed it may increase travel by car, although this is uncertain as traffic forecast data is not available. **[The removal of the Holmer East Employment site does not have a particular effect on this objective, as the road would still improve accessibility to the Bullinghope site, and it may therefore still encourage car use for people travelling to and from the site.]**

Reducing congestion within Hereford, and therefore enhancing the quality of the urban environment due to improved air quality and visual amenity, is likely to have a positive effect on the promotion of the area to visitors (SA objective 6.2) as the city's image will be enhanced and it will be easier for visitors to access the city and move around within the central urban area. ***[These effects are not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]***

Neither of the options is considered likely to have an effect on sustainable regeneration (SA objective 7.1). ***[This remains the case in relation to the slightly revised preferred western route.]***

Based on the above, a mixed (significant positive and minor negative) effect is likely to result from the western route option, and a mixed (minor positive and negative) effect is likely to result from the eastern route option in relation to the theme of Transport and Access. ***[Based on the commentary above, the likely effects of the western route will remain unchanged from those of the 2010 preferred option in relation to Transport and Access.]***

### **The Built Environment**

The Study of Options report for the relief road<sup>8</sup> found that the western route would necessitate the demolition of at least two residential properties on Kings Acre Road to the west of Hereford, thereby having a negative effect on housing provision in that location (SA objective 11). Based on the inner western and eastern corridor routes assessed in the Study of Options report, the eastern route would not necessitate any such residential demolitions. The exact location of the western inner route is currently unclear at the south west of the city, where the proposed linkages would need to be amended from the routes currently mapped in the Study of Options report<sup>9</sup>. As such, it is uncertain whether any other properties would require demolition in this area of the route, as this cannot be confirmed at this stage. ***[The revised preferred option involves a minor amendment of the southern section of the route, which is not expected to affect the requirement to demolish the two properties to the west of the city as this section of the route remains unchanged. It is not considered likely that there would be any demolitions required to the south of the city, as the route of the road has been amended to avoid residential properties.]*** However, both options should have a positive effect on improving the quality of the wider built environment (SA objective 11.6) within Hereford, as a result of traffic congestion in the city centre being reduced.

Both of the route options could have a negative effect on efficient, integrated and balanced land use (SA objective 19), as greenfield land would be taken for construction of the relief road. ***[This effect is not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]***

The provision of the relief road in either location should have a positive effect on the quality and character of Hereford city centre (SA objective 20) as the reduction in congestion that should result would reduce levels of noise, air pollution and visual intrusion. ***[These effects are not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]*** Under the eastern route, the relief road would pass within close proximity of Rotherwas Chapel which is a Scheduled Ancient Monument, therefore may have an adverse effect on its setting (SA objective 20.1). The western route would pass within close proximity of the Huntingdon Conservation area, potentially affecting its setting (SA objective 20.1). Both routes would pass within very close proximity of a large number of listed buildings, and could have a negative effect on these features of historical and cultural value. ***[The effect of the eastern route on a SAM is no longer of relevance as the western route (now revised) has been selected as the preferred option. The potential effects of the western route on the setting of the Huntingdon Conservation Area and on the setting of a number of listed buildings remain, as this will not be affected by the minor amendments made to the southern section of the route.]***

Based on the above, a mixed (minor positive and negative) effect is likely to result from both route options in relation to the theme of the Built Environment, although the Eastern route scores slightly more positively due to no requirement for housing demolition.

***[Based on the commentary above, the mixed overall effects of the western route on the Built Environment theme remain unchanged, despite the minor amendments made to the southern section of the route.]***

### **Resource Consumption and Climate Change**

<sup>8</sup> Hereford Relief Road. Study of Options. Prepared by Amey UK plc for Herefordshire Council, September 2010.

<sup>9</sup> The favoured western route involves making use of the routes marked as SC2 and WLI which do not currently meet.



Both of the options for the route of the relief road are likely to result in waste production during construction, due to the scale of the project involving excavation of large volumes of soil and earth (SA objective 12). The Study of Options report states that excess earthwork materials would be produced for the western route, but they can be used in bunds to screen the road and reduce noise and visual impacts. This would reduce the amount of inert waste requiring disposal, thus having a minor positive effect on SA objective 12. There is no excess earthwork materials predicted for the eastern route, in fact it would require 400,000 m<sup>3</sup> of fill material, which could have a negative effect on the consumption of natural resources (SA objective 14.2). However, the construction of the relief road (in either location) would also require the use of large amounts of aggregate materials for the road surface, thus both routes would have a negative effect on the consumption of natural resources (SA objective 14.2), unless recycled or secondary aggregates were used in constructing the road. ***[The minor amendments made to the western route have not resulted in any change to these SA scores for the preferred western route.]***

Neither of the route options for the relief road is expected to have a direct effect on reducing Herefordshire's vulnerability to climate change (SA objective 16). However, Herefordshire's contribution to climate change (SA objective 16.1) could be increased if road transport remains an appealing option for transport around the county as a result of the construction of the relief road along either route, which would make travel both around and into and out of Hereford more convenient. Further adverse effects may also result from either route in relation to this objective as a result of the transportation of materials for the construction of the road itself. However, this would be a shorter-term increase in traffic during construction, and the extent of the potential adverse effect will depend on the source location of the materials used, and on the route taken to either site. ***[These effects are not influenced by the route that the road takes, and so the minor amendments made to the western route have not resulted in any change to these SA objectives.]***

Both the eastern and western options for the relief road may contribute to air pollution in Herefordshire (SA objective 18.5) by encouraging the ongoing use of vehicle transport, despite reducing the concentrated air pollution within the city centre. ***[This effect is not influenced by the route that the road takes, and so the minor amendments made to the route have not resulted in any change to this SA objective.]***

Based on the above, an overall negative effect is likely to result from both route options in relation to the theme of Resource Consumption and Climate Change.

***[Based on the commentary above, the negative effect of the western route on the Resource Consumption and Climate Change theme remains unchanged, despite the minor amendments made to the southern section of the route.]***

### **The Natural Environment**

The environmental assessment undertaken as part of the Study of Options report for the relief road concluded that the eastern route would have a more significant negative effect on biodiversity assets than the western route as it would encroach on the floodplain of the River Lugg which is a Special Wildlife Site and a SSSI (SA objectives 13.1 and 13.2), and a major tributary of the River Wye SAC. The report states that the eastern route would be unlikely to be approved as it would be unlikely to meet the Habitats Regulations, which require that development will not have an adverse effect on the integrity of European sites (SACs/SPAs). As a result, a specific Habitats Regulations Assessment (HRA) is being undertaken for the relief road options, although the findings are not yet available. The likely effects on biodiversity resulting from the western route were found to be less severe in the Study of Options, and able to be mitigated. This option would also require the River Wye to be crossed; however, if the bridge structure spans the watercourse widely and there is no direct working within the river, it may be possible to avoid direct physical impacts on the site. However, the noise, vibration and other potential non-physical effects that would result from construction activities may still have a negative effect on species at the site (SA objective 13.2), and the results of the relief road HRA should help to determine whether these effects can be avoided, or the specific mitigation requirements that need to be implemented. ***[The minor changes made to the southern section of the preferred western route will not affect the SA scores for the western route in terms of these SA objectives, as the River Wye will still need to be crossed and the route will follow a path very similar line to that assessed in the 2010 preferred option.]***

The Study of Options report for the Hereford Relief Road identified that the inner western route for the road may be constrained by significant adverse effects on the landscape character of the River Wye at the river gorge, indicating that there may be a significant negative effect on the landscape quality (SA objective 15) as a result of this option being pursued. It is assumed that the further environmental surveys planned as part of the Hereford Relief Road Stage 2 Assessment will consider the extent to which these significant negative effects can be avoided or mitigated. Conversely, the eastern route was found to have a lesser impact on landscape quality, with minimal landscape impacts around the Rivers Wye and Lugg. ***[The Background Paper for the revised preferred options states that the amendments made to the southern part***

**of the preferred western route will lessen the landscape impacts of the road; however no further detail is given regarding this judgement and the issue of landscape impacts is not specifically referred to in Appendix 4 to the Background Paper which sets out further information/reasoning regarding the preferred route for the road. In addition, the landscape impacts which resulted in the significant negative score for the western route under the 2010 preferred option related to the character of the River Wye at the river gorge, and this area would not be expected to be affected by the minor changes that have been made to the south of Hereford. As such, the landscape score for the revised western route remains unchanged from the scores attributed to the western route in 2010.]**

The eastern route for the relief road would be likely to have a significant negative impact on the risk of flooding and the resulting detriment to public well-being (SA objective 17) as a significant proportion of the route runs through areas of high flood risk (flood zones 2 and 3). The western route would pass through two small areas of high flood risk (immediately adjacent to the River Wye and at the north west of the city); however the potential negative effects in terms of flood risk are considered to be far less than along the eastern route. **[The minor changes made to the southern section of the preferred western route will not affect the SA scores for the western route in terms of these SA objectives, as the route would still pass through the two small areas of high flood risk.]**

Both of the relief road options should help to reduce air pollution within Hereford city centre, including the area where there is currently an AQMA in place, thereby having a positive impact on the reduction of pollution (SA objective 18.1). However, the construction of the relief road may also encourage the continued use of vehicle transport as a result of increasing the convenience of such travel in the Hereford area, thereby contributing to overall air pollution issues in the county. **[These effects are not influenced by the route that the road takes, and so the minor amendments made to the western route have not resulted in any change to these SA objectives.]**

The relief road Study of Options report found that the western route would require greater earthworks activities due to the topography of the land, which may have a negative effect on soil quality (SA objective 18.3). **[The minor changes made to the southern section of the preferred western route are not expected to affect the SA scores for the western route in terms of this SA objective.]**

Based on the above, an overall significant negative effect is likely to result from both route options in relation to the theme of the Natural Environment, although this is uncertain until the results of the relief road HRA are available.

**[Based on the commentary above, the uncertain significant negative effect of the western route on the Natural Environment theme remains unchanged, despite the minor amendments made to the southern section of the route.]**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised western preferred route (September 2011).	+?	+/-	++/-	+/-	-	--?

**None of the SA scores have changed as a result of the revision to this preferred option.**

**Table 9: Policy H3 – Growth Distribution**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the preferred option H3: Growth Distribution, as included in the consultation document (September 2010).	++	+	++	++/-	+/-	+/-
<p><b><i>[This preferred option has been revised, with the overall amount of new homes to be built in Hereford having been reduced by 2,000 (from 8,500 to 6,500), including reductions at Holmer West (from 1,000 to 500 homes) and the removal of the allocation at Whitecross and the removal of the Holmer East employment site allocation.]</i></b></p> <p><b><u>Education and Employment</u></b></p> <p>The location of new employment provision to the north of the city should help to balance out the job opportunities available geographically with the location of the available workforce (SA objective 1) and to enhance accessibility for employees via sustainable transport modes from a wider range of residential areas (SA objective 1.2). The provision of employment opportunities may in turn increase the available opportunities for work-based training and skills development (SA objective 2.1) although the potential for this benefit is dependent on the nature of the employment provision which is not specified. <b><i>[The revision to the preferred option has included the removal of the Holmer East employment site at the north of the city, therefore this positive effect would largely be removed.]</i></b></p> <p>The allocation of specific areas of employment land, including 5ha at Holmer east, 10ha at Three Elms and continued development at Rotherwas, should have a significant positive effect on enabling a sustainable economy and continued investment (SA objective 3). <b><i>[The removal of the Holmer East employment site at the north of the city means that this effect is no longer considered to be significant, but would instead be classed as a minor positive effect.]</i></b> The policy states that development will adhere to high standards of sustainable construction and will include the use of renewable energy, which indicates that there could be positive effects on the efficient use of natural resources within employment sites and properties (SA objective 3.2). <b><i>[Despite the employment land allocation having been reduced, this positive effect would remain as the other employment land to be developed should still adhere to the standards specified.]</i></b></p> <p>The growth planned within Hereford may offer opportunities to reduce the number of vacant properties, if disused buildings can be redeveloped for commercial or residential use, having a positive effect on sustainable regeneration (SA objective 7.3). <b><i>[Although the scale of development proposed for Hereford has been reduced, this opportunity and the associated positive effect should still exist.]</i></b></p> <p>The provision of new and expanded education facilities for residents (which should be of a good quality, being newly provided) may help to raise education attainment and should help to meet current and future demand (SA objective 8.1) which is likely to increase as a result of the extensive housing development planned within Hereford and in rural service centres in proximity to Hereford. <b><i>[Although the housing allocation for Hereford has been reduced, a large number of new homes will still be developed over the revised plan period to 2031, meaning that the development of new education facilities will still be required, therefore this positive effect is still expected. In addition, while the allocation in Hereford itself has reduced, the housing allocation for rural areas (including the rural areas in close proximity to Hereford) has increased, so the demand for school and college places for those living outside of the city itself will actually increase slightly, somewhat offsetting the lower increase in demand from Hereford residents.]</i></b></p> <p>Based on the above, an overall significant positive effect on the Education and Employment theme is likely. <b><i>[The revisions to the preferred option, in particular the removal of the employment site allocation at Holmer East, means that this effect is now likely to be a <u>minor positive effect</u>.]</i></b></p> <p><b><u>Healthy and Prosperous Communities</u></b></p> <p>The provision of green infrastructure and recreation facilities within new development across Hereford should increase the opportunities available for sport and physical activity and encouraging walking and cycling in place of car use will have further health benefits and encourage local people to have more active and healthy lifestyles (5.3). The growth</p>						

proposed through the policy should have a positive impact on sustainable regeneration, with the development proposed being an opportunity to pursue design and construction techniques that will result in the provision of high quality public spaces (SA objective 7.4).

***[Although the scale of development proposed for Hereford has been reduced, this positive effect should still exist as large numbers of new homes, along with employment land, are still planned.]***

The policy is not expected to have a direct effect on preventing crime and antisocial behaviour (SA objective 9). The provision of new and expanded community facilities within new development should have a positive impact on social inclusion and reducing exclusion, and the increased linkages planned (e.g. walking and cycling routes) should enhance levels of access to these facilities (SA objective 10.1) particularly for more deprived households who may not have access to a car. ***[Although the scale of development proposed for Hereford has been reduced, this positive effect should still exist.]***

Based on the above, an overall positive effect on Healthy and Prosperous Communities is likely.

### **Transport and Access**

The emphasis that the policy places on achieving a modal shift away from dependency on private car use should have a significant positive effect on reducing car traffic and increasing the proportion of journeys made by sustainable modes of transport (SA objective 4). The fact that development is proposed in three different areas around the city should help to reduce the need to travel (SA objective 4.1) and the heavily congested city centre should experience a reduction in traffic volumes as measures such as improved walking and cycling links are put in place (SA objective 4.2), in combination with the relief road proposed in Policy H2. ***[This positive effect should still exist as development is still to be dispersed around different parts of the city and in addition, the scale of development proposed for Hereford has been reduced.]***

The pattern in which development is to be distributed should enhance people's ability to access services and facilities (SA objective 6) as development is not focussed on one side of the city only, and a larger number of residential properties will be within reasonable proximity of one of the newly provided employment opportunities and facilities to be developed. The improvement of transport links and a reduction in city centre congestion may make the city more appealing for tourists and local visitors (SA objective 6.2), as will the provision of improved recreation facilities. ***[This positive effect should still exist as development is still to be dispersed around different parts of the city and in addition, the scale of development proposed for Hereford has been reduced.]***

The provision of new and expanded education, community and recreation provision at three broad locations across Hereford is expected to be in compliance with the part of the policy that states that a high level of sustainable will be achieved, including the use of renewable energy, therefore having a positive impact on sustainable regeneration (SA objective 7.1).

Based on the above, an overall significant positive effect on Transport and Access is likely.

### **The Built Environment**

The provision of a total of 4,500 new homes in urban extensions to Hereford is likely to have a significant positive effect on the provision of housing (SA objective 11). ***[The number of new homes to be provided has been reduced by 2,000, including the removal of the allocation at Whitecross, therefore the effect on this objective is now expected to be reduced to a minor positive effect.*** The fact that the housing to be provided is new means that it should be of a high quality (SA objective 11.1) and 35% is to be affordable, which should increase the number of people able to access the new homes (SA objective 11.2). ***[The provision of 6,500 new homes throughout Hereford, with 35% being affordable, should still contribute positively to the delivery of high quality and accessible housing, although to a lesser extent now that the allocation has been reduced by 2,000.*** The measures included within the policy to improve energy efficiency and minimising resource usage through sustainable construction should have a positive effect on reducing fuel poverty (SA objective 11.4). The increased connectivity between different areas of the city, by providing walking and cycle linkages, should help to enhance the sense of community within the city, and as the new development planned should be of a high quality due to the use of sustainable construction techniques, the quality of the overall built environment should be improved (SA objective 11.6). ***[Although the scale of development proposed for Hereford has been reduced, these positive effects should still exist.]***

The development planned lies outside of the existing built up area, and will take place mainly on greenfield land which may offer few opportunities for reusing existing buildings, therefore having a negative effect on the efficient use of land (SA objective 19). ***[Although the number of new homes to be developed in the urban extensions has been reduced, and the emphasis is now on smaller non-strategic sites including many within the existing built form,***

**some new development is still planned on greenfield land, so this potential negative effect remains.]** However, the measures in place to ensure the accessibility of sites by sustainable transport modes, (e.g. the provision of walking and cycle routes) should have a positive effect on integration and reducing the need to travel (SA objective 19.1). The use of sustainable construction will improve resource efficiency within the new development (SA objective 19.2).

The policy aims to integrate new development within the existing urban environment and the countryside, which should mean that it is designed so as to be appropriate in form, scale and design in relation to its setting (SA objective 20.2). The new development is likely to contribute to overall improvements in the quality of the built environment (SA objective 20.3) and should help to enhance the overall character and appearance of the city (SA objective 20.4), as it is required to be constructed to high standards and to be in keeping with its surroundings. **[Although the scale of new development has been reduced, these positive effects are still considered likely to remain.]**

Based on the above, an overall mixed (significant positive or minor negative) effect on the Built Environment theme is likely to result from this policy.

### **Resource Consumption and Climate Change**

No detail is given in the policy with regards to what 'sustainable construction' will include, for example whether there will be specific measures in place to minimise waste production in the new development, therefore the likely impacts of the development proposed on waste reduction and rates of recycling are uncertain. However, development of the scale proposed in this policy will inevitably result in an increase in waste production overall, therefore having a negative effect on levels of waste from households and businesses (SA objective 12.2). **[Although the scale of development proposed for Hereford has been reduced, this negative effect is still likely as 6,500 new homes are still proposed, along with an increase in employment land.]** Providing space for adequate waste storage in new development to encourage recycling is not specifically addressed in the policy. This is also not covered by the other general policies on waste within the Core Strategy, but could be included in the general sustainable design policy which is still to be drafted.

The policy states that the new housing to be developed will be built using sustainable construction techniques and will include the use of renewable energy, which should have a positive effect on the efficient use of energy and other natural resources (SA objective 14), although the type and proportion of renewable energy that may be utilised is not specified at this stage. **[Although the scale of development proposed for Hereford has been reduced, this positive effect is still likely.]**

Increasing the proportion of journeys that can be undertaken by walking and cycling instead of by car, e.g. by providing walking and cycle routes to increase connectivity between different areas of the city, is likely to reduce greenhouse gas emissions from transport (SA objective 16.1). However, depending on the type of activities to be undertaken on the allocated employment land, there may be an increase in emissions from industry, although these would be strictly regulated under the Environment Agency's environmental permitting regime. **[The removal of the allocation for an employment site at Holmer East means that the likelihood of this negative effect occurring is reduced although it remains possible as other employment allocations have been retained.]** The fact that renewable energy usage is to be incorporated into the new development should have a positive impact on increasing the proportion of energy overall that is sourced from renewable and low carbon sources (SA objective 16.2); however the amount of energy that is to be produced in this way is not specified and it may be a relatively minor proportion of the overall increase in energy consumption that will inevitably occur from large-scale development, as proposed through this policy. **[Although the scale of development proposed for Hereford has been reduced, this may still be the case if the proportion of renewable energy produced is not comparable to the increase in consumption.]**

The emphasis placed on public transport use should help to reduce air pollution (SA objective 18), as the developments are to be integrated with the existing urban area and links such as cycle and walking routes should connect developments with other areas.

Based on the above, an overall mixed (minor positive and negative) effect on the Resource Consumption and Climate Change theme is likely to result from this policy.

### **The Natural Environment**

The policy makes very little reference to the natural environment and of the need to conserve and enhance biodiversity in and around the city. The provision of green infrastructure within new development should have a positive impact on species protection (SA objective 13.2) by increasing habitat connectivity and maintaining wildlife corridors (SA objective 13.3). None of the development sites that are identified within the policy are immediately adjacent to a designated nature conservation site; however all development within reasonably close proximity of the River Wye SAC may result

in increased pressure from recreation activities from the growing local population, or from noise and vibration from any increase in vehicle traffic that may still occur despite the measures in place to encourage sustainable transport use. As such, negative effects on a designated European site may occur (SA objectives 13.1 and 13.2) and this is being considered in more detail through the Habitats Regulations Assessment for the Core Strategy. **[Although the scale of development proposed for Hereford has been reduced, extensive development in areas that are reasonably close to the River Wye SAC is still proposed, therefore the potential for negative effects still exists.]**

The policy requires the planned urban extensions to be well integrated with the surrounding countryside, which should have a positive effect on landscape quality (SA objective 15), although the term ‘landscape’ is not directly used. However, the fact that large-scale development is proposed at locations on the outskirts of the city, in close proximity to the open countryside, means that an adverse effect on the landscape cannot be ruled out. The specific landscape character areas that would be affected are considered under Policies H4-H6 below. **[The housing allocations for the urban extensions have been significantly reduced, indicating that an adverse effect on landscape character is even less likely. However, significant development in the urban extensions, in particular to the south of the city, means that the potential for an adverse impact on landscape character still remains.]**

If the sustainable construction techniques that the policy refers to are to include the use of SUDS (SA objective 17.3), there should be positive effects on reducing the risk of flooding within Hereford (SA objective 17.1); however this is not specified within the policy wording. The quality of the River Wye SAC and the designated species within it, which runs through the city centre, may be significantly negatively affected by any increase in demand for waste water treatment (SA objective 18.2), as the two sewage treatment works that serve the city discharge into the river, and have been identified by the Environment Agency as needing their discharge consents to be reduced, which means they are likely to have insufficient capacity to adequately treat the increased sewage arising from the new housing to be provided in Hereford. **[Although the scale of development proposed for Hereford has been reduced, meaning that the demand for waste water treatment is likely to increase by a lower amount, it will still increase notably with the development of 6,500 new homes, so the potential for this negative effect remains.]**

Based on the above, an overall mixed (minor positive and significant negative) effect on the Natural Environment theme is likely to result from this policy.

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised preferred option (September 2011).	+	+	++	++/-	+/-	+/-

**The SA score for Education and Employment has been changed as a result of the revision to this policy, from a significant positive to a minor positive effect, largely due to the removal of the Holmer East employment site from the preferred option.**

**Table 10: Policy H4 - Northern Urban Expansions**

Core Strategy Policy	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the preferred option H4: Northern Urban Expansion, as included in the consultation document (September 2010).	++?	+	+?	++/-	+/-	+/-

***[This preferred option has been revised, with the number of homes to be provided at Holmer West having been reduced from 1,000 to 500 and with the removal of the employment site allocation at Holmer East.]***

**Education and Employment**

The provision of 5ha of employment land at Holmer east should have a significant positive impact on employment provision (SA objective 1) and the fact that this is to be located relatively close to the housing development and Park and Ride site planned at Holmer west should enhance the accessibility of the site to potential employees, particularly via sustainable modes of transport such as walking and cycling (SA objective 1.2). However, the A49 presents a physical barrier between the sites, and so walking and cycling routes will need to be able to cross this busy road safely and conveniently if easy access by sustainable transport modes is to be enabled (SA objective 1.2). It is not clear what type of employment-related activities would be located at Holmer east, e.g. what type of commercial or industrial enterprises might offer employment opportunities, therefore it is not certain whether there would be opportunities to diversify from the existing available job opportunities available in and around Hereford (SA objective 1.4). ***[The removal of the employment site allocation at Holmer East from the preferred option means that the significant positive effect on employment provision is no longer expected. In addition, the associated effects on the accessibility sub-objectives are also removed.]***

The provision of employment opportunities may in turn increase the opportunities available for work-based training and skills development (SA objective 2.1), although the extent of this potential effect is uncertain without more information about the nature of employment opportunities that are likely to be provided at the site, and therefore the likelihood of them entailing training and personal development opportunities. ***[The removal of the employment site allocation at Holmer East from the preferred option means that the potential positive effect is removed.]***

It is not currently clear from the policy whether the employment site at Holmer east will be developed to high environmental standards; this issue is currently referred to only in relation to the housing proposed at Holmer west. As such, the likely effect of the policy on the maintenance of a sustainable economy (SA objective 3) is unclear. The policy should specify that all development to take place within the northern urban expansion is to be completed to high environmental standards, e.g. using energy efficient design etc., rather than just the residential development at Holmer West. ***[The removal of the employment site allocation at Holmer East from the preferred option means that the effect on this objective is now negligible.]***

The neighbourhood community hub that is to be provided within Holmer west is to include retail facilities; therefore a positive effect in terms of the range of independent, competitive and national retailers (SA objective 7.2) is likely, depending on the type and number of shops that are developed. ***[The Council has confirmed that the community hub will still be provided, despite the reduction in the housing allocation for Holmer West (from 1,000 to 500. Although it will be of a smaller-scale due to the reduced housing allocation, this will be in proportion with the smaller level of population increase that is expected and as such, the positive effect on this objective remains unchanged.)***

The provision of a new 420 place primary school should help to meet the increasing demand for school places that is expected to result from the development of 1,000 new homes at Holmer west (SA objective 8.1); however it is not clear whether provision will be made to meet demand for secondary/higher education places as the policy states that expansion may be needed at Aylestone College, and it is not clear whether the capacity for such expansion exists or whether this will be a requirement of the development taking place. ***[The reduction in the housing allocation for Holmer West (from 1,000 to 500) indicates that demand for school places in the area will decrease, although the development of 500 new homes will still have an effect on demand. At this point the Council intends to remove the allocation for a new primary school on the Holmer West site and instead provide funding for existing schools to expand. However, it is not clear to what extent this expansion will take place or whether this refers to both secondary schools as well as primary; therefore the effect in relation to SA objective 8.1 is currently uncertain.]***

Based on the above, an overall significant positive effect is likely in relation to the theme of Education and Employment,

although there are currently some uncertainties associated with the effects. ***[The revisions that have been made to the preferred option mean that the overall effect is now considered to be an uncertain positive effect.]***

### **Healthy and Prosperous Communities**

The provision of a health centre and child outreach centre within the urban extension should ensure that residents of the new housing developed at Holmer west have access to health services nearby (SA objective 5.1), which they should be able to access via walking or cycling due to the provision of greenways which would also help to increase overall levels of activity amongst local people by increasing the proportion of all journeys that can be undertaken on foot or by bicycle (SA objective 5.3). Incorporating sports and play facilities and open spaces within the Holmer west site will also help to ensure that facilities are available for local people to participate in activities locally. ***[It has been confirmed by Herefordshire Council that, despite the reduced housing allocation for Holmer West (from 1,000 to 500), the neighbourhood hub with health and recreation facilities will still be provided. As such, the effect on this objective remains unchanged.]***

The new development should have a positive effect on the overall quality of the public realm (SA objective 7.4), as the development should be of a high quality and the provision of open spaces will help to ensure that the development comprises a well-designed and visually attractive environment.

The policy is not expected to have a direct effect on preventing crime and antisocial behaviour (SA objective 9), although opportunities to 'design out' crime could be included within the new developments.

The provision of new and expanded community facilities within the new development should have a positive impact on social inclusion and reducing exclusion, and the increased linkages planned such as walking and cycling routes should enhance levels of access to these facilities (SA objective 10.1) particularly for more deprived households who may not have access to a car. ***The Council has confirmed that the community hub will still be provided, despite the reduction in the housing allocation for Holmer West (from 1,000 to 500. Although it will be of a smaller-scale due to the reduced housing allocation, this will be in proportion with the smaller level of population increase that is expected and as such, the effect on this objective remains unchanged.)***

Based on the above, an overall positive effect is likely to result from this policy in relation to the theme of Healthy and Prosperous Communities. ***[Because of the uncertainties associated with the development proposed at the urban extensions, i.e. whether the community facilities will still be provided despite the reductions in housing numbers, the positive effect has changed to uncertain.]***

### **Transport and Access**

The measures included within the policy to encourage sustainable transport use should have a positive impact on the reduction of traffic and congestion by increasing the proportion of journeys made by sustainable transport (SA objective 4). The park and ride facility which is proposed in close proximity to the site should have further positive effects, reducing the flow of vehicle traffic into and out of the city centre. A reduction in traffic congestion should help to improve road safety and reduce the number and risk of accidents (SA objective 4.6). The Holmer east site lies in close proximity to the railway line; therefore depending on the provision of appropriate infrastructure and on the nature of activities to be located at the allocated employment land there, there may be opportunities to transport freight via rail rather than road. ***[The removal of the Holmer East employment site allocation means that the effects relating to the transportation of employees to and from the site will no longer be relevant, although the park and ride is still planned at the Holmer West urban extension.]***

The provision of new community facilities within the urban extension will increase the type and quality of facilities available and will increase levels of access to such services for local people (SA objective 6.1). The fact that the services will be provided within the same site as the residential development should ensure that they are accessible via transport modes such as walking or cycling rather than relying on car travel. ***[The positive effect remains unchanged because the Council has confirmed that the community hub at the Holmer West site is still planned, and although it will be of a smaller-scale due to the reduced housing allocation, this will be in proportion with the smaller level of population increase that is expected.]***

Although the policy states that energy efficiency standards will be met within the residential development at Holmer west, it does not mention whether such standards are to be incorporated into the supporting development such as shops and community facilities or at the employment site at Holmer east; therefore the likely effect on sustainable regeneration (SA objective 7.1) is uncertain. The policy should specify that such measures will be implemented in all development proposed, not just the housing development. ***[The removal of the Holmer East employment site allocation means that this uncertainty is no longer relevant. The positive effect in relation to energy efficiency standards at Holmer West is still likely, although on a smaller scale due to the reduced housing allocation there.]***



Based on the above, an overall positive effect is likely in relation to the theme of Transport and Access, although some uncertainties are associated with some of the objectives. ***[The overall score remains an uncertain positive effect, although the uncertainties relate to different issues, as outlined above.]***

### **The Built Environment**

The provision of 1,000 new homes at Holmer west will have a significant positive effect on housing provision (SA objective 11.1), and the fact that 35% are to be affordable will have additional positive impacts by increasing the proportion of people to whom they will be available (SA objective 11.2). ***[The reduced housing allocation at Holmer West (to 500 new homes) is part of the overall reduction in housing numbers across the county, with the new allocation still being considered adequate to meet projected demand. As 500 new homes are still proposed in Holmer West, which contributes to this overall figure, the significant positive SA score remains unchanged.]*** The high energy efficiency standards to be met by the development should help to reduce energy costs and fuel poverty (SA objective 11.4) and will have a positive effect in terms of the use of sustainable design techniques (SA objective 11.5). ***[Although the scale of development at Holmer West is now smaller, a positive effect on these objectives should still result.]***

The location of the housing means that access to the city centre to the south should be relatively convenient, particularly as greenways are to be provided to link the site with the main urban area, thereby having a positive effect in terms of the appropriate location of development (SA objective 19.1). However, the fact that the development is proposed on greenfield land will have an adverse effect on reusing previously developed land and the potential to reuse existing buildings will be much lower than if development was taking place on brownfield land (SA objective 19.1). ***[Although the scale of development at Holmer West is now smaller, meaning that a smaller amount of development will take place on greenfield land, a minor negative effect on these objectives may still result.]*** The proposal states that the housing to be developed will meet high standards of energy efficiency; therefore will have a positive effect in terms of the use of sustainable and resource efficient design (SA objective 19.2), although other aspects are not covered such as waste minimisation, re-use of materials, water efficiency etc.

There are a number of listed buildings and a Scheduled Ancient Monument (SAM) in close proximity to the Holmer West urban extension, the setting of which may be adversely affected by development (SA objective 20.1) depending on its design and precise location in relation to such features, and these would need to be considered within the detailed master planning for the urban extensions. ***[The reduced scale of the housing development at Holmer West mean that this effect is now less likely, but still remains possible.]*** The development does seek to incorporate open spaces and green infrastructure which should help to increase the overall quality of the local environment and have some positive effects on biodiversity and sense of place (SA objective 20.3).

Based on the above, a mixed (significant positive and minor negative) effect is likely to result from this policy in relation to the Built Environment theme. ***[Based on the revisions to the preferred options, as outlined above, this SA score remains unchanged.]***

### **Resource Consumption and Climate Change**

The policy does not make any specific mention of the issue of waste production or disposal. Development on the scale proposed within the policy will inevitably result in an increase in waste production (SA objective 12.2); however it is not clear whether measures such as recycling facilities or storage space for recyclable materials are to be included in the development and therefore whether a positive effect on the promotion of re-using, recovering and recycling may be achieved (SA objective 12.3). This is also not covered by the other general policies on waste within the Core Strategy. ***[The scale of development proposed to the north of Hereford has been reduced significantly; however an increase in waste production will still result from the development of 500 houses at Holmer West, therefore the uncertain effect remains.]***

It is inevitable that development on the scale proposed here will result in an overall increase in energy consumption. However, the policy states that the 1,000 new homes to be provided will be built to energy efficiency standards (SA objective 14.1), but does not refer to any similar requirements in relation to the employment site at Holmer east or for the community facilities to be developed to support the housing. There is also no mention of incorporating renewable energy installations within the development. ***[The employment site allocation at Holmer east has been removed completely, therefore the uncertainty in relation to energy use there is no longer relevant. In addition, the scale of development proposed to the north of Hereford has been reduced significantly. However, the development of 500 new homes to high energy efficiency standards should still have a positive effect on this objective.]***

The requirement for SUDS to be incorporated into the green infrastructure planned for the development will help to reduce vulnerability to impacts of flooding, which is likely to increase as a result of climate change, and the provision of the

green infrastructure will help to retain a certain proportion of land as permeable, in order to maintain and increase rates of infiltration (SA objective 16).

The promotion of sustainable transport use should help to reduce greenhouse gas emissions from road transport (SA objective 16.1) and therefore have a positive effect in terms of reducing levels of air pollution (SA objective 18). However, the actual potential for decreases in road traffic likely to result from the sustainable transport measures proposed in the policy and in Policy H2 is uncertain. ***[The Council has confirmed that, despite the significantly reduced scale of development proposed at the north of Hereford, the measures outlined are still planned at Holmer West. As such, this effect remains unchanged.]***

Based on the above, an overall mixed (minor positive and negative) effect is likely in relation to the theme of Resource Consumption and Climate Change. ***[The mixed effect remains, but is now uncertain.]***

### **The Natural Environment**

The policy makes little mention of the need to conserve and enhance natural environmental assets in and around the northern urban expansion area. Neither of the development sites that are identified within the policy are immediately adjacent to a designated nature conservation site; however, they do direct development within reasonably close proximity of the River Wye SAC, which may come under increased pressure from recreation activities from the growing local population, or from noise and vibration from any increase in vehicle traffic that may still occur despite the measures in place to encourage sustainable transport use. As such, negative effects on a designated European site may occur (SA objectives 13.1 and 13.2) and this is being considered in more detail through the Habitats Regulations Assessment for the Core Strategy. However, the provision of green space should have positive effects on biodiversity (SA objective 13.2) and increase habitat connectivity (SA objective 13.3). ***[The removal of the employment site allocation at Holmer East and the reduction in the housing allocation for Holmer West mean that adverse effects on the River Wye as a result of development are less likely; however the potential for an adverse effect remains, and this is again being considered in more detail through the HRA.]***

According to the Hereford Urban Fringe Analysis<sup>10</sup>, the Holmer West site is in an area of medium-high landscape sensitivity, meaning that development here may have a negative effect on the quality of the landscape (SA objective 15). The Herefordshire Landscape Character Assessment<sup>11</sup> identifies the area in which the Holmer east and west sites lie as being of the 'Principle Settled Farmlands' type, which comprises rolling lowland topography with scattered low-density settlements. It states that development within this landscape character type should be of low density in order to be in keeping with the landscape character. Despite this, the policy itself does not make any mention of the landscape, although the supporting text recognises the requirement to mitigate any potential adverse effects on sensitive landscapes, built settings and vistas. This wording should be brought into the policy itself, as a requirement for the development. ***[The reduced scale of development proposed means that an adverse effect is less likely, particularly as the reduction was in part to take account of landscape concerns and the local topography; however the possibility still remains as 500 new homes are still planned at Holmer West.]***

The requirement for SUDS to be incorporated into the green infrastructure planned for the development will help to reduce vulnerability to flooding, which is likely to increase as a result of climate change (SA objectives 17.1 and 17.3), and the provision of the green infrastructure will help to retain a certain proportion of land as permeable, in order to maintain and increase rates of infiltration. However, the south and east of the Holmer west site is at particular risk from flooding, thus it is not certain if SUDS will be sufficient to reduce flooding in those areas. ***[The reduced scale of development proposed at Holmer West means that it may be easier to locate development within the site so that it is at a lesser risk from flooding, although this is uncertain and the potential for a negative effect remains.]*** SUDS should also be required in the new employment development proposed at Holmer East. ***[The removal of the employment site allocation at Holmer East means that this is no longer relevant.]***

The Herefordshire Landscape Character Assessment states that the 'Principle Settled Farmlands' landscape is often land with good quality soils. As such, development on this greenfield land may have an adverse effect on maintaining soil quality (SA objective 18) if the large-scale development proposed leads to the loss of good quality soils in this area. ***[The reduced scale of development proposed to the north of Hereford means that such an adverse effect is less likely, although still possible.]*** As discussed for Policy H3, the quality of the River Wye SAC and the designated species within it, may be significantly negatively affected by any increase in demand for waste water treatment (SA objective 18.2), as the two sewage

<sup>10</sup> Herefordshire Council (2010) Urban Fringe Sensitivity Analysis: Hereford and the Market Towns.

<sup>11</sup> Landscape Character Assessment. Supplementary Planning Guidance 2004. Updated 2009, Herefordshire Council.

treatment works that serve the city discharge into the river, and have been identified by the Environment Agency as needing their discharge consents to be reduced, which means they are likely to have insufficient capacity to adequately treat the increased sewage arising from the new housing to be provided in Hereford. **[The reduced scale of development means that the negative effects may not be as significant as under the original preferred option; however the demand for waste water treatment is still expected to increase as a result of the 500 new homes planned at Holmer West, and the capacity for this is still insufficient. As such, a significant negative effect remains.]**

Based on the above, an overall mixed (minor positive and significant negative) effect is considered likely in relation to the Natural Environment. **[This score remains unchanged.]**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the revised preferred option (September 2011).	+?	+	+?	+/-	+/-	+/-

**The uncertain significant positive effect associated with Education and Employment is now an uncertain effect due to the removal of the employment site allocation at Holmer East.**

**Table 11: Policy H5 - Western Urban Expansions**

	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
Scores for the preferred option H5: Western Urban Expansion, as included in the consultation document (September 2010).	++?	+	+/-?	++/-	+/-	+/-
<p><b>[This preferred option has been revised, with the number of homes to be provided at the Whitecross urban extension having been reduced significantly, from 1,500 to 300. However, the allocation of 1,000 homes at the Three Elms urban extension has been retained.]</b></p> <p><b>Education and Employment</b></p> <p>The provision of 10ha of employment land should have a significant positive impact on employment provision (SA objective 1) and the fact that this is located relatively close to the housing development planned should enhance the accessibility of the site to potential employees, particularly via sustainable modes of transport such as walking and cycling (SA objective 1.2). <b>[The removal of the housing allocation at Whitecross means that the employment land would be easily accessible by fewer people; however the allocation at Three Elms for 1,000 new homes has been retained. As such, the positive effect on objective 1.2 is likely to remain.]</b> It is not clear what type of employment activities would be located at the site, e.g. what type of commercial or industrial enterprises might offer employment opportunities; therefore it is not clear whether there would be opportunities to diversify from the existing available job opportunities available in and around Hereford (SA objective 1.4).</p> <p>The provision of employment opportunities may increase the available opportunities for work-based training and skills development (SA objective 2.1), although this will be largely dependent on the type of activities taking place at the site and is therefore uncertain at present.</p> <p>It is not clear from the policy whether the employment site will be developed to high environmental standards; this issue is only referred to in relation to the housing development. As such, the likely effect of the policy on the maintenance of a sustainable economy (SA objective 3) is unclear. The policy should specify that all development to take place within the western urban expansion is to be completed to high environmental standards, e.g. using energy efficient design, rather than just the residential development.</p> <p>The neighbourhood community hub that is to be provided within is to include retail facilities; therefore a positive effect in terms of the range of independent, competitive and national retailers (SA objective 7.2) is likely, depending on the type and number of shops that are developed. <b>[At this stage, Herefordshire Council intends to retain the community hub within the Three Elms site; however the potential positive effect remains uncertain as there is still no information available regarding the type and number of shops to be developed there.]</b></p> <p>The provision of a new 420 place primary school within the Whitecross area and the expansion of Whitecross High School should help to meet the increasing demand for school places that is expected to result from the development of a total of 2,500 new homes at Three Elms and Whitecross as well as the 1,000 new homes to be provided at Holmer West (SA objective 8.1). <b>[The housing allocation at Whitecross has been removed and the allocation at Holmer West has been significantly reduced, with the total housing allocation at the urban extensions to the west and north of Hereford now standing at 1,500 instead of 3,500. It has been confirmed by Herefordshire Council that, despite this reduction in the housing allocations, the proposal for a new school will still remain; however this will be provided at the Three Elms site instead of at Whitecross. As such, this positive effect has been changed to an uncertain effect as it is not yet clear whether the school will be easily accessible for residents of Whitecross.]</b></p> <p>Based on the above, an overall significant positive effect is likely in relation to the theme of Education and Employment, although there are currently some uncertainties associated with the effects. <b>[The uncertain significant positive effect on this theme remains unchanged.]</b></p> <p><b>Healthy and Prosperous Communities</b></p> <p>The provision of a health centre and children’s outreach centre within the urban extension should help to ensure that residents of the new housing developed at Whitecross and Three Elms have access to health services nearby, as well as the residents of the existing residential areas of Kings Acre and Whitecross (SA objective 5.1), which they should be able to</p>						

access via walking or cycling due to the provision of greenways which would also help to increase overall levels of activity amongst local people (SA objective 5.3). Incorporating sports and play facilities and open spaces within the new development will also help to ensure that facilities are available for local people to participate in healthy activities in the local area. **[Herefordshire Council has confirmed that, despite the removal of the housing allocation for the Whitecross urban extension, the planned services will still be provided at the Three Elms site, therefore this score remains unchanged.]**

The new development should have a positive effect on the overall quality of the public realm (SA objective 7.4), as buildings developed should be of a high quality and the provision of open spaces will help to ensure that the development comprises a visually attractive environment. **[This positive effect is likely to remain, despite the reduced scale of the development now planned at the urban extensions.]**

The policy is not expected to have a direct effect on preventing crime and antisocial behaviour (SA objective 9), although opportunities exist to 'design out' crime within new development. The provision of new and expanded community facilities within new development should have a positive impact on social inclusion and reducing exclusion, and the increased linkages planned (e.g. walking and cycling routes) should enhance levels of access to these facilities (SA objective 10.1) particularly for more deprived households who may not have access to a car. **[The Council has confirmed that the removal of the housing allocation for the Whitecross urban extension will not affect the proposals to develop these services, therefore the positive effect remains unchanged.]**

Based on the above, an overall positive effect is likely in relation to the theme of Healthy and Prosperous Communities. **[This effect remains unchanged.]**

#### **Transport and Access**

The measures included within the policy to encourage sustainable transport use should have a positive impact on the reduction of traffic and congestion by increasing the proportion of journeys made by sustainable transport (SA objective 4). The provision of a park and ride facility will be key in influencing the levels of car use to and from the development site and the car share scheme referred to in the supporting text should further reduce road traffic, although this is unlikely to be developed until after the housing has been built, meaning that traffic levels on the A438/A4103 are unlikely to decrease in the short term. A reduction in traffic congestion should help to improve road safety and reduce the number and risk of accidents (SA objective 4.6). However, the employment land provided within the new livestock market development is to be accessed via the planned western relief road, which indicates that car use may remain high in terms of employee transport.

The provision of new community facilities within the urban extension will increase the type and quality of facilities available and will increase levels of access to such services for local people (SA objective 6.1). The proximity of the services to the residential development proposed should ensure that they are accessible via walking or cycling. **[The Council has confirmed that, despite the removal of the housing allocation for the Whitecross urban extension, the community hub will still be provided, as will a park and ride facility providing sustainable access into the town centre, therefore the positive effect remains unchanged.]**

Although the policy states that energy efficiency standards will be met in the residential development, it does not mention whether such standards are to be incorporated into the supporting development such as shops and community facilities; therefore the likely effect on sustainable regeneration (SA objective 7.1) is uncertain. The policy should specify that such measures will be implemented in all development proposed, not just the housing development.

Based on the above, an overall mixed (minor positive and negative) effect is likely in relation to the theme of Transport and Access, although some uncertainties are associated with some of the objectives. **[This effect remains unchanged.]**

#### **The Built Environment**

The provision of a total of 2,500 new homes in the two urban extensions should have a significant positive effect on housing provision (SA objective 11.1), and the fact that 35% are to be affordable will have additional positive impacts by increasing the proportion of people to whom they will be available (SA objective 11.2). **[The housing allocations in the urban extensions have been significantly reduced, to a total of 1,300; however as discussed at the start of the SA note, the reduced housing allocations are still considered adequate to meet projected needs in the county. This scale of housing development is still considered to have a significant positive effect on housing provision, and 35% of it will still be affordable.]** The high energy efficiency standards to be met by the development should help to reduce energy costs and fuel poverty (SA objective 11.4) and will have a positive effect in terms of the use of sustainable design techniques (SA objective 11.5). **[Despite the reduced scale of the development proposed, these positive effects are still considered likely.]**

The location of the housing sites means that access to the city centre to the east should be relatively convenient, particularly as greenways are to be provided to link the sites with the main urban area, thereby having a positive effect in terms of the appropriate location of development (SA objective 19.1). However, the fact that all of the development (housing, employment, park and ride facility) is proposed on greenfield land will have an adverse effect on re-using previously developed land and on the potential to reuse existing buildings (SA objective 19.1). **[Although the allocation for housing development at Whitecross has been removed, large-scale development is still proposed on greenfield land at Three Elms, therefore this negative effect still remains likely.]** The proposal states that the housing to be developed will meet high standards of energy efficiency; therefore it will have a positive effect on the use of sustainable and resource efficient design (SA objective 19.2), although other aspects are not covered such as waste minimisation, re-use of materials, water efficiency etc. and this is also not a requirement for the employment land development. The fact that the area is to be developed as 'neighbourhoods' which suitably reflect the historic character of the surrounding area should have a positive effect on integrating the land use (SA objective 19).

There are a number of listed buildings in close proximity the Whitecross and Three Elms urban extensions, the setting of which may be adversely affected by development (SA objective 20.1) depending on its design and precise location in relation to such features, and these would need to be considered within the detailed master planning for the urban extensions. **[The reduced scale of the development proposed means that such an effect is less likely, but it remains possible.]** The development does seek to incorporate open spaces and green infrastructure which should help to increase the overall quality of the local environment and have some positive effects on biodiversity and sense of place (SA objective 20.4).

Based on the above, a mixed (significant positive and minor negative) effect is likely to result from this policy in relation to the Built Environment theme. **[This score remains unchanged.]**

#### **Resource Consumption and Climate Change**

The policy does not make any specific mention of the issue of waste production or disposal. Development on the scale proposed within the policy will inevitably result in an increase in waste production (SA objective 12.2); however it is not clear whether measures such as recycling facilities or storage space for recyclable materials are to be included in the development and therefore whether a positive effect on the promotion of re-using, recovering and recycling may be achieved (SA objective 12.3). This is also not covered by the other general policies on waste within the Core Strategy. **[Although the allocation for housing development at Whitecross has been removed, the overall increase in housing in the western urban expansion is still considered to be of a large enough scale to have a negative effect on waste production.]**

It is inevitable that development on the scale proposed here will result in an overall increase in energy consumption. However, the policy states that the 2,500 new homes to be provided will be built to energy efficiency standards (SA objective 14.1), but does not refer to any similar requirements in relation to the employment land or for the community facilities to be developed to support the housing. There is also no mention of incorporating renewable energy installations within the development. **[Although the allocation for housing development at Whitecross has been removed, the overall increase in housing in the western urban expansion is still considered to be of a large enough scale to have a negative effect on energy consumption.]**

The provision of green infrastructure within the development will help to retain a certain proportion of land as permeable, in order to maintain and increase rates of infiltration and therefore reduce the risk of flooding (SA objective 16). However, some parts of the Three Elms site are constrained by flooding, although this is expected to be alleviated by the Yazor Brook Flood Alleviation Scheme.

The promotion of sustainable transport use should help to reduce greenhouse gas emissions from transport (SA objective 16.1) and air pollution (SA objective 18). However, the actual potential for decreases in road traffic likely to result from the sustainable transport measures proposed in the policy and in Policy H2 is uncertain.

Based on the above, an overall mixed (minor positive and negative) effect is likely in relation to the theme of Resource Consumption and Climate Change. **[This score remains unchanged.]**

#### **The Natural Environment**

The policy makes little mention of the need to conserve and enhance natural environmental assets in and around the western urban expansion area, although it does state that the setting of the Huntingdon Conservation Area, Yazor Brook and Huntingdon Lane in particular should be retained. Neither of the development sites that are identified within the policy are immediately adjacent to a designated nature conservation site; however they do direct development within reasonably close proximity of the River Wye SAC which may come under increased pressure from recreation activities from the growing local population, or from noise and vibration from any increase in vehicle traffic that may still occur despite the

measures in place to encourage sustainable transport use. As such, negative effects on a designated European site may occur (SA objectives 13.1 and 13.2) and this is being considered in more detail through the Habitats Regulations Assessment for the Core Strategy. However, the provision of green space should have positive effects on biodiversity (SA objective 13.2) and increase habitat connectivity (SA objective 13.3). **[The scale of the development proposed has been reduced e.g. through the removal of the housing allocation at Whitecross; however there may still be negative effects on the River Wye SAC as a result of the overall increase in the local population from development to the west of the city. This is again being considered in more detail through the HRA.]**

According to the Hereford Urban Fringe Analysis, the Whitecross site is in an area of medium-high landscape sensitivity, meaning that development here may have a significant negative effect on the quality of the landscape (SA objective 15). The Herefordshire Landscape Character Assessment (LCA) identifies the area in which the Whitecross site lies as being of the 'Principle Timbered Farmlands' type, where prominent tree cover (linear trees, woodland and hedgerows) characterises the landscape. It states that modern development comprising groups of new houses would not be appropriate in this landscape. Three Elms site lies within the 'Principle Settled Farmlands' type, which comprises rolling lowland topography with scattered low-density settlements. The LCA states that development within this landscape character type should be of low density in order to be in keeping with the landscape character. Despite this, the policy itself does not make any mention of the landscape, although the supporting text makes a brief reference to the need to incorporate the development into the surrounding landscape and the need to protect the setting of the Huntingdon Conservation Area (SA objective 20.1). This wording should be brought into the policy itself, as a requirement for the development. **[The housing allocation on greenfield land at Whitecross has been removed, largely on the basis of landscape concerns; therefore the significant negative effect has been reduced to a minor negative effect.]**

The provision of green infrastructure within the development will help to reduce vulnerability to flooding by retaining a certain proportion of land as permeable, in order to maintain and increase rates of infiltration (SA objectives 17.1 and 17.3). However, the Three Elms area is currently constrained by flooding, which should be alleviated by the future Yazor Brook Flood Alleviation Scheme if this is delivered in advance or at the same time as the new housing.

The Herefordshire Landscape Character Assessment states that the 'Principle Settled Farmlands' landscape is often land with good quality soils. As such, development on this greenfield land may have an adverse effect on maintaining soil quality (SA objective 18) if the large-scale development proposed at the Three Elms site leads to the loss of good quality soils in this area. As discussed for Policy H3, the quality of the River Wye SAC and the designated species within it, may be significantly negatively affected by any increase in demand for waste water treatment (SA objective 18.2), as the two sewage treatment works that serve the city discharge into the river, and have been identified by the Environment Agency as needing their discharge consents to be reduced, which means they are likely to have insufficient capacity to adequately treat the increased sewage arising from the new housing to be provided in Hereford. **[Although the housing allocation at Whitecross has been removed, the number of houses still proposed at Three Elms could have a negative effect due to the lack of capacity in the sewage treatment works.]**

Based on the above, an overall mixed (minor positive and significant negative) effect is considered likely in relation to the Natural Environment. **[This score remains unchanged.]**

Core Strategy Policy	SA Objective Topics					
	Education & Employment	Healthy & Prosperous Communities	Transport & Access	Built Environment	Resource Consumption & Climate Change	Natural Environment
SA Objectives covered by Topic	1, 2, 3, 7, 8	5, 7, 9, 10	4, 6, 7	11, 19, 20	12, 14, 16, 18	13, 15, 17, 18
Scores for the revised preferred option (September 2011).	++?	+	+/-?	++/-	+/-	+/-

**The SA scores for this preferred option remain unchanged.**

## Appendix 3: Cumulative Effects Summary

Table 12: Summary of SA Scores for Herefordshire Core Strategy Preferred Options 2010 and those that have been revised in the 2011 consultation leaflet 'Help Plan the Future of Herefordshire' (September 2011)

Herefordshire Core Strategy Preferred Options (2010 and revised 2011)	SA Objectives and Theme					
	Education & Employment <i>SA objectives 1, 2, 3, 7 and 8</i>	Healthy & Prosperous Communities <i>SA objectives 5, 9 and 10</i>	Transport & Access <i>SA objectives 4 and 6</i>	Built Environment <i>SA objectives 11, 19 and 20</i>	Resource Consumption & Climate Change <i>SA objectives 12, 14 and 16</i>	Natural Environment <i>SA objectives 13, 15, 17 and 18</i>
NH.1: Landscape	0	0	+	0	0	++
NH.2: Biodiversity	0	0	+	0	0	++
NH.3: Built Environment and Streetscape	0	0	+	++	0	0
NH.4: Archaeology	0	0	+	++	0	0
GI.1: Green Infrastructure	0	++	++	++	0	++
OS.1: Open Space	0	++	++	0	0	++
OS.2: Sport and Recreation Facilities	0	++	++	0	0	0
OS.3: Protection of Existing Sports and Recreation Facilities	0	++	++	0	0	0
AH.1: Affordable Housing	0	++	0	++	0	0
GT.1: Gypsy and Traveller Sites	0	+	+	++	0	0
SC.1: Social and Community Infrastructure	++	+	++	+	-	+



Herefordshire Core Strategy Preferred Options (2010 and revised 2011)	SA Objectives and Theme					
	Education & Employment SA objectives 1, 2, 3, 7 and 8	Healthy & Prosperous Communities SA objectives 5, 9 and 10	Transport & Access SA objectives 4 and 6	Built Environment SA objectives 11, 19 and 20	Resource Consumption & Climate Change SA objectives 12, 14 and 16	Natural Environment SA objectives 13, 15, 17 and 18
<b>E.1: Maintaining Supply of Employment Land</b>	++	0	0	0	0	+
<b>E.2: Employment Land Provision</b>	++	+	+	0	+ / -	+
<b>M.1: Movement</b>	+	0	+ / -	+	-?	-
<b>W.1: Waste Streams and Targets</b>	0	0	0	0	+	-?
<b>W.2: Location of New Waste Facilities</b>	+	0	0	0	+	-?
<b>W.3: Existing and Permitted Waste Treatment Sites</b>	+	0	0	0	+	0
<b>W.4: Anaerobic Digesters</b>	+	0	0	0	++	0
<b>W.5: Waste Minimisation and Management in Development</b>	0	0	0	0	++	0
<b>MN.1: Minerals Safeguarding Areas</b>	+	0	0	+	0	0
<b>MN.2: Criteria for the Assessment of Minerals Related Development</b>	+	+	0	+	-	+/- ?
<b>MN.3: Small-scale Non-aggregate Building Stone and Clay Production</b>	+	+/-?	0	++	+/-	+/- ?

Herefordshire Core Strategy Preferred Options (2010 and revised 2011)	SA Objectives and Theme					
	Education & Employment SA objectives 1, 2, 3, 7 and 8	Healthy & Prosperous Communities SA objectives 5, 9 and 10	Transport & Access SA objectives 4 and 6	Built Environment SA objectives 11, 19 and 20	Resource Consumption & Climate Change SA objectives 12, 14 and 16	Natural Environment SA objectives 13, 15, 17 and 18
<b>MN.4: Secondary (Reused and Recycled) Aggregates</b>	+	+/-?	0	++	++	+/-?
<b>MN.5: Moreton on Lugg Railhead</b>	0	0	++	0	++	0
<b>MN.6: Apportionment</b>	+	0	0	0	0	0
RA.1: Housing Allocation (2010 PO)	0	0	-	+	-	0
<b>RA.1: Housing Allocation (revised PO)</b>	0	0	-	+	-	0
<b>RA.2: Rural Service Centres / Hubs</b>	0	0	+/-	+	-	-
<b>RA.3: Other Settlements Outside of the RSCs and Hubs</b>	0	+	+/-	+/-	-	0
<b>RA.4: Open Countryside</b>	+	0	+/-	+	-	+/-
RA.5: Rural Economy (2010 PO)	++	0	+	+	+/-	0
<b>RA.5: Rural Economy (revised PO)</b>	++	0	+	+	+/-	0
<b>Spatial Policy Option for Bromyard</b>	+	+/-	+/-	++?	+?	-?
<b>Spatial Option for Ledbury</b>	+	+?	+/-	++?	+?	+
Spatial Option for Ross-on-Wye (2010 PO)	+	+?	+	++?	+?	+/-?

Herefordshire Core Strategy Preferred Options (2010 and revised 2011)	SA Objectives and Theme					
	Education & Employment SA objectives 1, 2, 3, 7 and 8	Healthy & Prosperous Communities SA objectives 5, 9 and 10	Transport & Access SA objectives 4 and 6	Built Environment SA objectives 11, 19 and 20	Resource Consumption & Climate Change SA objectives 12, 14 and 16	Natural Environment SA objectives 13, 15, 17 and 18
<b>Spatial Option for Ross-on-Wye (revised PO)</b>	+	+	+	++?	+	+/-?
<b>Spatial Option for Leominster (revised PO)</b>	++?	+	+/-	++/-?	+/-?	--?
H1: Hereford City Centre Policy (2010 PO)	+	+	+/-	++?	+/-	+/-
<b>H1: Hereford City Centre Policy (revised PO)</b>	++	+	+/-?	++/-	+/-	+/-
<b>H2: Hereford Movement Policy</b>	+	+	++/-	+	+/-	+/-
H3: Growth Distribution Policy (2010 PO)	+	+	++	++/-	+/-?	+/-
<b>H3: Growth Distribution Policy (revised PO)</b>	+	+	++	++/-	+/-	+/-
H4: Northern Expansion Policy (2010 PO)	++?	+	+	++/-	+/-	+/-
<b>H4: Northern Expansion Policy (revised PO)</b>	+	+	+	+/-	+/-	+/--
H5: Western Expansion Policy (2010 PO)	+	+	+/-	++/-	+/-	+/--
<b>H5: Western Expansion Policy (revised PO)</b>	++?	+	+/-?	++/-	+/-	+/--
H6: Southern Expansion Policy	+	+	+/-	++/-	+/-	+/--

Herefordshire Core Strategy Preferred Options (2010 and revised 2011)	SA Objectives and Theme					
	Education & Employment SA objectives 1, 2, 3, 7 and 8	Healthy & Prosperous Communities SA objectives 5, 9 and 10	Transport & Access SA objectives 4 and 6	Built Environment SA objectives 11, 19 and 20	Resource Consumption & Climate Change SA objectives 12, 14 and 16	Natural Environment SA objectives 13, 15, 17 and 18
Relief Road – Favoured Western Route (2010 PO)	+/-?	++/-	++/-	+/-	-	+/--
Relief Road – Favoured Western Route (revised PO)	+	+/-	++/-	+/-	-	--?
Relief Road – Favoured Eastern Route	+/-	+/-	+/-	+/-	-	+/--
EC1: Economy	++	++	+	+/-?	+/-?	+
LD4: Sustainable Strategic Design	+	+	+/-?	+	+/-?	+/-
EC2: Tourism	+/-?	+	+/-	+	+/-?	+
WMI: Sustainable Water Management	+	+	0	+	++	++
ENI: Renewable Energy	+	0	0	+/-?	++?	+/-?
IDI: Infrastructure Contributions	+/-	+	+/-	+/-	+	+/-