



Shaping our Place 2026

# Core Strategy: Developing Options Paper Sustainability Appraisal Addendum

March 2009

Local Development Framework



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## **1. Purpose of the Report**

This report is an addendum to the first volume of the Sustainability Appraisal (SA) of Herefordshire Council's Core Strategy, June 2008. This report updates Stage B of the SA process which has assessed the compatibility of the plan objectives against one another and assessed the predicted effects of the Core Strategy Place Shaping and Policy Options as contained in the Developing Options Paper (June 2008).

## **2.0 Appraisal of the Compatibility of Plan Objectives and Assessment of Options**

2.1 An officer appraisal was undertaken to identify if there were any compatibility issues with the plan objectives as they appear in the Core Strategy Developing Options Paper June 2008. The appraisal shows that the objectives are generally compatible with each other, apart from 2 and 5, 4 and 6 and 6 and 10 (see Appendix B1) where some possible conflicts have been identified. These issues will need to be addressed in any revisions to the objectives as the Core Strategy progresses.

2.2 An officer assessment of the Place Shaping Options was undertaken and then consulted on with internal council departments for comment. These comments were integrated and forwarded to the plan writers who have incorporated the recommendations into the emerging Place Shaping document along with the consultation responses on the Core Strategy Developing Options paper, June 2008 and currently available evidence base.

2.3 A workshop was undertaken with Development Management Officers for the Core Strategy Policy Option predicting effects. As with the Place Shaping Options the comments were forwarded to the Plan writers who have integrated the recommendations into the emerging Policy Options along with the consultation responses and currently available evidence base.

2.4 The workshop group were asked to consider a set of questions when assessing each of the Policy Options. The questions considered were:

- Are the Options distinct and clear? (Reasonable)
- What are their likely adverse effects, can they be prevented, reduced, offset? (SA)
- Can positive effects be enhanced? (SA)
- Can the effects be quantified? (SA)
- Who are the winners and losers? (Community Engagement)

In other words the group considered "How do the Options perform?"

2.5 They were also asked to reach a consensus on whether the Options were moving towards sustainability, were neutral or moving away from sustainability.

2.6 The outcomes from the tests of reasonableness, community engagement and sustainability on Place Shaping can be viewed in Appendix B3 Part 2 and Policy Options in Appendix B3 Part 3. The last row in each table also has the results of the Habitat Regulations Assessment (HRA). A separate report on the HRA process is available.

- 2.7 Natural England and the Countryside Council for Wales have shown support of the process being undertaken by Herefordshire Council for its SA process and continued engagement with them and other key stakeholders will be maintained throughout the SA and HRA process right through to submission.

### **3.0 Uncertainty and Risks**

- 3.1 When assessing the predicted effects of the Place Shaping and Policy Options against the principles of sustainable development, professional judgement was used along with workshop group consensus to what the overall effect might be and as a result errors in judgement may exist. However, it is considered that these risks are negligible since the process is iterative and will be regularly reviewed and updated. It is considered that the integration and incorporation of the SA process into the writing and assessment of the Core Strategy and involvement of key stakeholders will enable any possible inaccuracies or uncertainty/risk to be reduced, as far as is possible.

### **4.0 Recommendations**

- 4.1 The purpose of the SA is to set out the effects of the plan in terms of environmental, social and economic aspects. Throughout this process many conclusions and recommendations have been made and these are noted in the appendices attached to this report. These will be taken into account in developing the emerging Core Strategy Place Shaping Options.

### **5.0 Further Work**

- 5.1 The remaining tasks are likely to include a review of significant changes to the Core Strategy Options which will establish if any additional SA assessments are needed as a result of consultation, evidence base, SA and HRA changes. Following this, further SA stages will be undertaken going into more detail with available evidence base. It is envisaged that a similar format for assessment will be used in terms of workshops and officer appraisal with continued advice from Planning Advisory Service (PAS) and engagement with key stakeholders. The framework that will be used to assess the emerging Options can be viewed in Appendix A3, Sustainability Framework of the Local Development Framework SA General Scoping Report which can be found on the Council's website.
- 5.2 The above remaining task of Stage B, evaluating the effects of the Core Strategy; considering ways of mitigating adverse effects and maximising beneficial effects; and proposing measures to monitor the significant effects of implementing the Core Strategy are expected to be covered in the Summer 2009 paper. The remaining Stages C to E of the SA process, as set out in the General Scoping Report, June 2007 will be covered in what is likely to be the final volume of the SA for the Core Strategy, at submission stage, timetabled for Summer 2010.

|   | Plan Objective 1  | Plan Objective 2   | Plan Objective 3   | Plan Objective 4   | Plan Objective 5   | Plan Objective 6  | Plan Objective 7   | Plan Objective 8  | Plan Objective 9  | Plan Objective 10  |
|---|---|--|--|--|--|---|--|---|---|--|
| <b>Core Strategy Objectives</b>   | To ensure sufficient homes, with a mix of house types and tenures, are built in sustainable locations | To improve the health, well-being and quality of life of Herefordshire residents ..  | To meet the needs and aspirations of all generations through the provision and/or improvement of higher education, skills development and training facilities..  | To locate development in sustainable locations where access to employment, shopping, education, health, recreation, leisure and other services are available by public transport, walking and cycling ..   | To ensure improved accessibility and movement from rural areas to urban areas and within urban areas to key services, places of work and recreation..  | To diversify and strengthen the employment base ...   | To enhance the County's service centres and thus the economy ..  | To develop Herefordshire as a destination for quality leisure visits and more sustainable tourism ...   | To work with partners to deliver well designed places, spaces and buildings ...   | To conserve, promote, utilise and enjoy our natural, built, historic and cultural assets for the fullest benefits to the whole community ...   |
| <b>Plan Objective 1: To ensure sufficient homes, with a mix of house types and tenures, are built in sustainable locations in the period to 2026, to meet the housing needs of all sections of the community in accordance with the Regional Plan</b>   |   | Objective 1 and 2 are generally compatible. Developer contributions may help provide for and improve services/facilities. However, new housing may place a strain on existing services if not matched with new/additional provision. | Objective 1 and 3 are compatible, although not directly related. although developer contributions may support education and skills development in the future.  | Objective 1 and 4 are compatible providing sustainably located new housing is in the same areas that employment, retail, health services are also planned to be located. New homes will directly contribute towards new health, open space and education facilities. | Objective 1 and 5 are compatible providing sustainable locations include those served or able to be served by public transport. Contributions raised by housing development may contribute to financing transport infrastructure schemes and improvements. | Objective 1 and 6 are compatible since employment and housing should be planned together - one supporting the other. For higher value technology industries, executive homes may be required. | Objective 1 and 7 are compatible as it will be providing the housing for the counties communities that will support the economy of their local area - providing housing and employment are located in juxtaposition. | Objective 1 and 8 are compatible although not directly. One indirect connection may be with regards to holiday homes pushing the value of properties up in an area, beyond that affordable for the local community. | Objective 1 and 9 are directly compatible providing climate change and water supply issues are resolved and impacts on European sites acceptable. | Objective 1 and 10 are compatible providing the location and appearance of new dwellings does not detract from existing environmental/historic assets.   |
| <b>Plan Objective 2: To improve the health, well-being and quality of life of Herefordshire residents by improving access to, provision and use of, improved public open spaces, recreation, education, cultural and health facilities in urban and rural areas.</b>  |   |  | Objective 2 and 3 are directly compatible as improved health and well being and education will improve skills and training for all members of the community, the young and those seeking life long learning. | Objective 2 and 4 are compatible. Links to public transport in objective 4 will also aid reductions in air emissions improving the quality of the air particularly helping those with respiratory problems.  | These objectives may or may not be compatible depending on outcomes. A new distributor road could increase air pollution in some parts of the county but also could reduce pollution in the centre of Hereford   | Objective 2 and 6 are compatible as Objective 2 with its aim to improve education will support the aims of objective 6  | Objective 2 and 7 are compatible providing new services are located in sustainable centres and support existing centres.   | Objective 2 and 8 are compatible because improvements to benefit residents are also likely to be appreciated and used by tourists.  | Objective 2 and 9 are compatible in respect of design of new buildings.   | Objective 2 and 10 are directly compatible as natural assets will directly contribute towards well being and health benefits.  |
| <b>Plan Objective 3: To meet the needs and aspirations of all generations through the provision and/or improvement of higher education, skills development and training facilities. Thereby retaining young people in the County, ensuring life-long learning for all generations and supporting the economy.</b> |   |  |  | Objective 3 and 4 are compatible. Development located in sustainable locations with good public transport links will be essential to enable improvements and provision of higher education, skills and other training facilities that will support the economy.      | Objective 3 and 5 are compatible because improved accessibility to higher education establishments and other training facilities, will promote their utilisation.  | Objective 3 and 6 are compatible. The establishment of a higher education facility and other training establishments in the County will help towards diversifying the economy.                | Objective 3 and 7 are compatible provided new services are located in existing service centres or where new services will support an existing population sustainably.  | Objective 3 and 8 may be related in terms of education/skills training in the tourism industry.   | Objective 3 and 9 are compatible in design terms.   | Objective 3 and 10 are not incompatible they are likely to complement each other slightly in terms of educational facilities utilising the natural, built, historic and cultural assets of the County. The County's assets may also be a source of aspirations for life long learning, training and education. |

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| <p><b>Plan Objective 4: To locate development in sustainable locations where access to employment, shopping, education, health, recreation, leisure and other services are available by public transport, walking and cycling - in order to reduce the need to travel, particularly by private car; and thus lessen the trend of harmful impacts from traffic growth, and promote active travel to improve quality of life and protect the environment.</b></p> |  |  |  |  | <p>These objectives are indirectly compatible - Improved accessibility and movement will support the location of development in sustainable locations</p> | <p>Objective 4 and 6 could potentially have some conflict. Given the rural nature of the county, the location required for some industries may not necessarily be sustainable in public transport terms.</p> | <p>Objective 4 and 7 are compatible. Locating new development in existing service centres will help to support their vitality and vibrancy.</p> | <p>Objective 4 and 8 are compatible. In locating tourist development in sustainable locations and encouraging sustainable modes of travel to and within them, impacts on the environment will be managed.</p> | <p>Objective 4 and 9 are indirectly compatible.</p> | <p>Objective 4 and 10 are compatible. By locating development in sustainable places and developing an integrated public transport, walking and cycling routes to reduce the need to travel ; loss and damage to the County's environment assets are likely to be reduced and provide opportunities to enhance future green space.</p> |
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| <p><b>Plan Objective 5: To ensure improved accessibility and movement from rural areas to urban areas and within urban areas to key services, places of work and recreation; through the better provision and integration of safe, affordable and frequent travel choices and traffic management throughout Herefordshire; and the provision of an outer distributor road for Hereford, in order to improve the quality of life for County residents, businesses and visitors alike.</b></p> |  |  |  |  |  | <p>Objective 5 and 6 are generally compatible. Industry will be attracted by a good transport network. Although some rural businesses may struggle in terms of employee accessibility to public transport.</p> | <p>Objective 5 and 7 are compatible. The enhancement of the service centres would not be possible without improvements to the accessibility between rural and urban areas.</p>                 | <p>Objective 5 and 8 are generally compatible. Improved transport accessibility will support the tourist industry although again, in very rural areas greater number of tourists could place pressure on the local environment in terms of increased car usage.</p>  | <p>There is no direct relationship between these objectives.</p>  | <p>Objective 5 and 10 are compatible as improved accessibility between areas may improve the utilisation and enjoyment of our natural, cultural, built and historic assets.</p> |
| <p><b>Plan Objective 6: To diversify and strengthen the employment base by attracting higher value added industries and cutting edge environmental technologies to Herefordshire; as well as enabling local businesses to start, grow and diversify, in order to raise resident incomes.</b></p>   |  |  |  |  |  |  | <p>Objective 6 and 7 are compatible. If service centres are enhanced and links between them improved businesses are more likely to be attracted to the area, so strengthening the economy.</p> | <p>Objective 6 and 8 are compatible as tourism can play a major part in bolstering the economy.</p>  | <p>Objective 6 and 9 are compatible, especially when mixed developments are being planned. Employment provision needs to be integrated into place shaping</p> | <p>Objective 6 and 10 may be incompatible but will depend on finding suitable locations for new employment that comply with the aims set out in objective 10.</p>               |
| <p><b>Plan Objective 7: To enhance the County's service centres and thus the economy by: providing better linkages between Hereford, the market towns and their catchment villages; improving the economic resilience and integration of village-based services; and implementing the Edgar Street Grid proposals in Hereford.</b></p>   |  |  |  |  |  |  |  | <p>Objective 7 and 8 are compatible. Enhancing the service centres and improving links between Hereford and the Market Towns and villages, which are visitor attractions in themselves, will assist in developing the County as a quality tourist destination. The improved linkages are likely to attract development which will interest and benefit the visitor as well as residents.</p> | <p>Objective 7 and 9 are not directly related.</p>  | <p>Objective 7 and 10 are compatible in that improved linkages between centres will support historic and cultural asset appreciation.</p>                                       |



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| <p><b>Plan Objective 8: To develop Herefordshire as a destination for quality leisure visits and more sustainable tourism by utilising the opportunities provided by, and contributing to the maintenance and restoration of, our high quality natural and built environment through increased provision of tourist accommodation in urban areas and visitor information/facilities in rural areas.</b></p>                                 |  |  |  |  |  |  |  |  | <p>Objective 8 and 9 are compatible with respect to incorporating design and climate change issues into new tourist development.</p> | <p>Objective 8 and 10 are generally compatible as conserved assets will promote tourism. New accommodation will need to respect existing assets.</p>                   |
| <p><b>Plan Objective 9: To work with partners to deliver well designed places, spaces and buildings which use land efficiently, reduce the consumption of natural resources through sustainable construction methods, increase the use of renewable forms of energy, reduce waste and pollution and addressing the wider impacts of climate change including flood risk and the availability of water supply and sewage facilities.</b></p> |  |  |  |  |  |  |  |  |  | <p>Objective 9 and 10 are compatible provided sustainability issues are at the forefront of considerations as new development sites may impact on existing assets.</p> |

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| <p><b>Plan Objective 10: To conserve, promote, utilise and enjoy our natural, built, historic and cultural assets for the fullest benefits to the whole community by safeguarding the County's current stock of environmental capital from loss and damage, reversing negative trends and ensuring best condition as well as enhancing and appropriately managing future green space.</b></p> |  |  |  |  |  |  |  |  |  |  |
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**Appendix B3 – Predicting the Effects of the Place Shaping Options**

**Shaping our Place Options**

**Hereford**

**What role should Hereford have in the future?**

| Hereford Role                                   | Options   |  |
|---|---|--|
|   | <p><b>Option 1: Continue to plan for the City to maintain and enhance its current role as a traditional county/market town, providing a range of facilities and services for the rural hinterland.</b></p>      | <p><b>Option 2: Develop Hereford as a city with a specific role which builds upon its identified strengths, whilst at the same time complementing the roles of the market towns, for example, developing a role which specialises in sectors such as retail, employment or education.</b></p>  |
| <p><b>The Reasonableness Test</b></p>           | <p>It is reasonable to consider Hereford's role in the historic, traditional market town sense as this continues the status quo.</p>  | <p>This option is also reasonable, as it focuses Hereford's role whilst supporting the other market towns in the County. Using the strengths of places is likely to create a plan which is locally distinctive for each of the places in Herefordshire.</p>  |
| <p><b>The Community Engagement Test</b></p>     | <p>Many local people will like the City to remain as it is, either from fear of change or simply thinking that why change something that is working well already, "if it ain't broke, don't fix it" theory.</p> | <p>Many local people may resist such a move as they may want the diversity the city currently offers. However, many may also see this as an opportunity to develop the city's strengths and minimise negative constraints to bring investment into the city to encourage local spending and retention of young people in the county.</p> |
| <p><b>The Sustainability Appraisal Test</b></p> |   |  |

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| <b>Economic</b>         | A range of facilities and services are likely to continue to attract a variety of business investment into the area. This caters for a range of skills needed for employment opportunities. Overall economically Option 1 is moving towards sustainability.   | A focussed growth in areas of strength in the City may mean that other services not awarded the same level of investment may wither. Employment opportunities may be more constrained by a focus on a role approach for the City and give young people even more reason to look elsewhere for the employment opportunities that they want. Particular skill sets may be developed in a focussed role for the City whether it is financial services, retail or education. Overall economically Option 2 is neutral.   |
| <b>Social</b>           | Socially people are likely to continue to feel that they are in an established local community. A variety of facilities and services being enhanced is most likely to reach out to the needs of most people in the community. Overall socially Option 1 is moving towards sustainability.   | Local employees may feel that their jobs are less secure if they are in a sector which is not earmarked for growth and investment. Migration patterns and demographics may change as people find work, moving in and out of County or between sectors. Higher value new employment may create the investment needed for a higher education facility. Overall socially Option 2 is neutral as more information is needed on the impacts.  |
| <b>Environmental</b>    | Hereford currently suffers from congestion during peak times due to the limitations of the existing river crossing. Additional development without improvements to the transport network will further impair efficiency. However, future development may provide additional funding which could be used to enhance the existing transport network including where appropriate; improvements to both to the public transport network including encouraging walking and cycling and to the highway network. With growth in a range of sectors any pollution emissions are likely to be known from previous experience and can be safeguarded against more quickly. Environmentally the option depends on implementation and as such is neutral until the information becomes available. | A focused role may bring significant investment into the region and potentially greater volumes of traffic. Therefore, it would be important to ensure sustainable modes of travel into and out of the City/County. A focused sector may allow greater understanding of the types of pollution they may create so that a planned response can be catered for. However, if it is a new sector to be accepted into the County, prior knowledge of its environmental adversity may be limited and safeguarding against any potential pollutants may be hindered. Focussing on a specific role may also lead to resident population needing to travel to other services centres outside the County to obtain other functions not readily available thus including car commuting. Overall environmentally Option 2 is neutral, as more information is needed. |
| <b>General comments</b> | Housing – need to encourage and support the provision of car free schemes, alternative travel considered for city centre development to meet local needs and affordability. Smaller units are required if seeking to attract further educational facilities to retain young people.   |  |

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| <b>Conclusions and Recommendations</b> | <p>Option 1 is neutral and requires an implementation strategy before the Option can be considered further. However, maintaining Hereford's role as a multi-functional centre is likely to be socially, environmentally and economically more sustainable than a specialist role.</p>  | <p>More research is needed on how the vitality of Hereford will be affected by a focused approach. More information is needed on what type of focus Hereford is likely to have to be able to predict any impact on traffic and pollutant levels are likely. Overall this option is neutral because more information is needed.</p>   |
| <b>Habitat Regulation Assessment</b>   | <p>Development of services and facilities is likely to place pressure on water levels and quality, air pollution (including that caused by transport and institutions), disturbance and erosion. Improvements to transport networks including public transport and for walking and cycling are likely to improve air pollution concerns.</p> | <p>Effects on air quality due to transport emissions is a concern as there is potential for higher migration in this option. Higher value employment sectors may reduce manufacturing industries associated with institutional emissions and commercial combustion emissions improving air quality. However, any increase in development is likely to affect air quality by increasing energy usage. Improvements to public transport and connections between places may assist in reducing traffic emissions.</p> |

**How and in which direction should Hereford grow?**

| Hereford Housing                         | Options   |  |   |  |
|--|---|--|---|--|
|  | Option 1: Allocate growth to the south  | Option 2: Allocate growth to the west  | Option 3: Allocate growth through a combination of areas to the south and west  | Option 4: Disperse the growth to a number of similar areas in various locations around the City  |
| <b>The Reasonableness Test</b>           | It is reasonable to consider growth in any direction in Hereford.   |  |   |  |
| <b>The Community Engagement Test</b>     | The public may consider the congestion already experienced in this part of the city to be exasperated by further development especially without investment into infrastructure, including public transport and other modes of sustainable travel. | Members of the public may consider that land to the west of Hereford has a quality of landscape that they may feel would be better protected and not developed. Small developments are likely to be supported. | The Public may prefer two small sites either side of the City. However similar traffic and landscape concerns would apply | A fair way of dividing the housing amongst residents so long as there is evidence of need in these areas and facilities to support the growth are provided; for example doctors, dentists, shops, play grounds, schools etc. |
| <b>The Sustainability Appraisal Test</b> |   |  |   |  |

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| <p><b>Economic</b></p> | <p>Quick access to the M50 gives those businesses with a need for good access to the road network the ideal location to set up operations. Growth in terms of housing will also provide additional potential employees. However, this could attract commuters from outside of Herefordshire. Overall economically Option 1 is moving towards sustainability</p>   | <p>Links to the strategic road network are not as well developed in the west than elsewhere in the County. Limitations in the existing public transport provision may lead to an increase in car use. In addition it may also restrict growth in this area for business and other facilities that will be needed by the growth areas. There could be an opportunity for live/work units here for these reasons. Overall economically Option 2 is moving away from sustainability.</p> | <p>A combination of growth may be better than concentrating growth in the south or the west as a balance between the needs of businesses, traffic and new homes is more likely to be achieved. Economically Option 3 is moving towards sustainability.</p> | <p>Spreading growth may result in people having to travel further for employment opportunities, facilities and services. Provision of these by developers may be limited if growth is divided into smaller pieces of land. Economic benefit may also be spread more evenly across the County. A mix of housing and employment should be considered to reduce this. There is likely to be less opportunity for developer contributions under this option. Overall economically Option 4 is moving away from sustainability.</p> |
| <p><b>Social</b></p>   | <p>South Hereford is an area that suffers from relative deprivation and difficulty in accessing services. Growth could enable new service provision and easier access as part of section 106 agreements. Affordability issue due to the above economic assessment and attracting inward migration, therefore provision of affordable homes will be important. Overall socially Option 1 is moving towards sustainability.</p> | <p>Growth to the west of the City could incorporate services and facilities that could also serve rural settlements to the west. Facilities and services in these western areas are currently few and far between and growth to the west of the City may provide the opportunity for the rural settlements to access facilities and services without the need to come into Hereford City reducing the distance travelled improving air</p>  | <p>A distribution of the growth between the south and west may allow a balance of the services needed in both these parts of the city to be provided with developer contributions. Option 3 socially is moving towards sustainability.</p>                 | <p>Development of smaller sites may exacerbate existing congestion issues, with short and medium term disturbance to existing residents with construction work. Smaller development sites with few remaining constraints are likely to be brought forward for development quicker than larger sites. Affordable housing sites could be allocated to achieve a better mix in the City and support economic growth and greater</p>   |

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|  |  | <p>quality and access to services. However, it may also detrimentally affect existing services. Overall Socially this option is neutral.</p> |  | <p>opportunities for brownfield infill rather than development on greenfield. However opportunities for developer contributions are limited with this option. Socially Option 4 is moving away from sustainability because of the potential to create more local congestion and pollution hotspots.</p> |
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| <b>Environmental</b>                   | <p>Growth to the south has assets of environmental quality such as special wildlife sites, schedule ancient monuments, recreational open space areas, potential mineral reserves, good quality landscape and is relatively close to the River Wye, a Special Area of Conservation.</p> <p>Inappropriate development in or around these areas has the potential to be very damaging. However, these should be viewed as opportunities for bespoke development that uses its assets to best effect to add value and enhance quality of place, whilst still protecting those assets of highest, recognised value. More information is needed to ascertain the impacts upon the environmental assets and therefore overall environmentally Option 1 is neutral.</p> | <p>Areas to the west of Hereford City have a range of environmental assets. Mineral reserves, special wildlife sites, quality landscape, special areas of conservation and recreational open space. Careful development would need to be constructed in order not to impact upon assets and provide a quality place created to add and enhance value and well being for the local and wider community. More information is needed on what the impacts of development would be on these assets and therefore overall Option 2 environmentally is neutral.</p> | <p>A combination of growth to the south and the west adds extra pressure to create places of added quality to the City as there is the potential that inappropriate, insensitive design and place making would have more adverse effects over this larger area than options A and B. Environmentally Option 3 is dependant on implementation and as such is neutral.</p> | <p>Similarly to option C smaller development sites have the potential to have a greater adverse effect on quality areas of the built and natural environment as the developments would be spread over a larger area with less potential for substantial developer contributions for enhancement and mitigation schemes. Individual briefs for sites would ensure that developers knew what was expected on a site prior to any investment. Fragmentation of habitats may occur with this option being detrimental for biodiversity. Similarly to Option 3 environmental implications are dependant on implementation and as such environmentally Option 4 is neutral.</p> |
| <b>Conclusions and Recommendations</b> | <p>Overall this option is moving towards sustainability. This is dependant on good access being maintained to the M50, the development of affordable homes, and advice from the Green</p>   | <p>Overall this option is neutral as the limitations in the infrastructure need to be overcome to make economic factors beneficial and more information is needed to ascertain what the impacts</p>  | <p>Overall the option is moving towards sustainability providing that design and individuality of place is maintained and enhanced.</p>  | <p>Overall this option is moving away from sustainability. Developer contributions are likely to be limited, congestion and pollution hotspots may increase and there is the potential for environmental</p>  |

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|                                      | Infrastructure Study and dependant on the environmental assets being used as a resource rather than as a constraint.  | upon the environmental assets are likely to be, as it is dependant on them being used as a resource rather than a constraint. |  | assets to be adversely affected.  |
| <b>Habitat Regulation Assessment</b> | Increased development is likely to increase transport and residential emissions affecting air quality; place pressure on water levels and water quality.. The presence of minerals also places pressure for aggregate extraction. |   | The HRA issues are similar for Option 3 as for Options 1 and 2 because in combination, developments occurring in a variety of directions are still likely to place the same amount of pressure on the issues raised. | Option 4 places the greatest pressure on transport emissions affecting air quality. Growth in development is likely to place pressure on water supply affecting water levels and water quality. |

**What type of employment should be Hereford's focus for growth?**

| <b>Hereford Employment</b>           | <b>Options</b>  |   |   |
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|                                      | Option 1: Continue a policy of supporting a wide range of employment sectors building upon existing strengths   | Option 2: Develop policies to encourage the strengthening of the economy by identifying and focusing specialist areas such as food and drink production or tourism  | Option 3: Develop policies to encourage diversification into new employment sectors such as research and development, offices and high-tech industries  |
| <b>The Reasonableness Test</b>       | It is reasonable to consider basing Hereford economic growth on its existing strengths.   | It is reasonable to consider specialist markets, but being sure not to be exclusive to new businesses.  | It is reasonable to consider diversification in employment sectors, especially with a changing economic climate.  |
| <b>The Community Engagement Test</b> | Local residents are likely to support this option as it means that the status quo will continue. However the local business community may see a lack of an opportunity to widen the business base in the city that could assist in supporting their businesses. | The local community may consider that a specialised area for the city may result in less support for other existing local businesses unique to Hereford. However, local business may also consider that measures to strengthen the economy would be beneficial. | Similarly to Option 2, local residents are likely to feel indifferently about new businesses coming into the area as they may consider it a threat to existing establishments. However, they may consider that new employment sectors could enhance and support their business, creating a thriving City with new |

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|  |  |  | employment opportunities. |
| <b>The Sustainability Appraisal Test</b> |  |  |                           |

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| <b>Economic</b>      | A wide remit of business support will encourage a wide range of skills to be encouraged into the area. Economically Option 1 is moving towards sustainability.  | A specialist economic focus for the City could create a bespoke economic City. However, some industries pay their employees less well than others, even though these industries can bring multi million pound investments into a local area. A focus on one or two areas would need to ensure that other secondary and tertiary businesses would thrive from the investment. Economically the Option 2 is moving towards sustainability however this is dependant on secondary and tertiary economic growth being considered. | Similarly to Option 2 new employment sectors have the potential to be very economically rewarding to a locality. However, equally, this could create very specialist fields that are not necessarily geared to existing skills and resources. This could provide employment for younger people to encourage them to stay within or return to the County as it diversifies and responds to local needs. Higher skills levels in employment could lead to increased spending in the local economy. Economically this option is moving towards sustainability as it creates a diverse range of employment opportunity for all. |
| <b>Social</b>        | A wide range of strengthened employment opportunities is likely to suit a range of skills in the local population, making it more appealing for more people of a range of ages and occupation to be encouraged to stay in the area. Overall socially Option 1 is moving towards sustainability. | Specialist areas in the City may leave out those people in the City and wider County that have skills associated with traditional employment occupations. However, a new focus of economic growth could encourage companies to move to and invest in the City, which could have positive knock on effects for access to employment opportunity and social well being. Overall socially the option is neutral as employment opportunity is dependant on what businesses are attracted.   | The County as a whole loses its younger generation to other areas. Attracting a diverse range of new employment sectors is likely to create a better demographic mix and help towards reversing the trend of young people leaving the County for jobs. A wider diverse range of sectors is likely to improve social cohesion and accessibility and therefore Option 3 is moving towards sustainability.   |
| <b>Environmental</b> | Environmentally a wider strengthened economic base is unlikely to bring the economic benefit that a larger one off economic investment may bring for  | A specialist economic sector could potentially bring investment to enhance and safeguard the environmental assets of the City and County. If the specialist sector were   | Investment provided by business moving into an area by means of this option is more likely to provide funding for much improved environmental projects for urban and  |

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|  | opportunities to improve the built and natural environment. When compared with other options environmental improvements are likely to be less significant however is still likely to move towards sustainability.                   | to be of an environmental nature within itself, the benefits could be wide reaching, from employment to education. Environmentally Option 2 is dependant on what sector is attracted and as further research is needed, is neutral.   | rural areas alike than perhaps option 1 is able to offer. This diverse economic range for environmental improvement therefore results in Option 3 moving towards sustainability.  |
| <b>General Comments</b>                | Options need to continue to support tourism business growth given the character of Hereford and the Market Towns – whilst recognising the need to grow other key areas, for example in high technology sectors.                     |   |   |
| <b>Conclusions and Recommendations</b> | Overall this option is moving towards sustainability. This is dependant on wide economic investment that will create opportunities for skills development and access for all and measures to strengthen environmental improvements. | Overall the option is neutral. More research is needed on the types of economic sectors that are likely to be attracted.  | Overall this option is moving towards sustainability. This is dependant on a diverse economic base, a diverse range of employment opportunity for increased social cohesion and investment for improvements to the environment. |
| <b>Habitat Regulation Assessment</b>   | A wide range of businesses have the potential to have a range of emission and pollution outcomes. More people and development may increase transport emissions affecting air quality and water levels and quality.                  | Issues for the HRA are similar as for Option 1 and in addition tourism activities could increase disturbance. The food and drink industry could also increase agricultural practice and associated fertiliser use, nitrogen enrichment and runoff potentially leading to eutrophication issues. | Issues for the HRA are similar as for Option 1 and in addition research and development, offices and high-tech industries have the potential to cause institutional emissions affecting air quality.                            |

#### How do you want Hereford to improve as a centre?

| Hereford Centre                | Options  |   |
|--------------------------------|--|---|
|                                | Option 1: Continue with the current UDP policy stance of planning for the town centre as a whole       | Option 2: Define specific “Quarters” or areas within the City for example retail, office, commercial, heritage and craft areas to provide a focus for specific activities and improve integration with the Edgar Street Grid (ESG) redevelopment. |
| <b>The Reasonableness Test</b> | This option is reasonable when considered with the employment sector option above which looks to use a | It is reasonable to consider a quarters approach to land use in the city, however the risk is that if the quarters  |

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|  | similar approach. However, Clarification on the UDP reference is required. This is using one set of planning policies to cover the whole city centre as opposed to 'quarters' or areas.   | come through in piecemeal development rather than an integrated approach to the city's regeneration, then some services would be provided whilst others would not, creating an economic imbalance.   |
| <b>The Community Engagement Test</b>     | Residents may consider that the town centre is already working. Therefore strengthening certain sectors and allowing development would be appropriate. However, businesses in the City may feel that some shops are struggling, and the ESG development may threaten this viability and the City Centre further. In this instance they may feel a new integrated approach may be better suited to the changing nature of the City Centre. | Residents are likely to feel that it will be easier to find what they are looking for if development is specified in certain areas. Developers are likely to endorse it too, as they will see the potential location for their business with the benefits and constraints identified up front. However, the ESG development may concern the community with regards to the prosperity of the historic core. |
| <b>The Sustainability Appraisal Test</b> |   |  |

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| <b>Economic</b>                        | It would be reasonable to predict that economic growth would be supported under this Option, as a planned centre is likely to attract investment. Economically Option 1 is moving towards sustainability. This Option would seek to integrate/link ESG and investment opportunities into the town centre as a whole.  | Specific areas in the City for different uses could improve profitability for businesses of all types, as they will be located with both competitors and compatible businesses. Investment into the City would likely increase as a result of a clear image for the City. Economically Option 2 is moving towards sustainability.  |
| <b>Social</b>                          | Continuing to plan for the town centre as a whole is likely to improve the centre and develop it in keeping with the character of place, consider sustainable modes of transport linkages and enable the centre to remain vibrant and viable. Overall socially Option 1 is moving towards sustainability.   | Option 2 is likely to have greater positive impacts for integrated linkages between the well defined use areas enabling good legibility between zoned areas. This will make the shopping and service use a more enjoyable experience. Good access and legibility may lead to more spending and more investment. However, anti social behaviour may occur in some quarters where uses don't benefit from an evening economy. Overall Option 2 is socially moving towards sustainability.  |
| <b>Environmental</b>                   | This option allows the centre to be developed as a whole and as such mixed uses are likely to result creating a vibrant daytime and evening economy reducing the risk of anti social behaviour. The historic core is likely to be well integrated, protecting the character of place. Overall Option 1 is moving towards sustainability.                          | Defined quarters could integrate sustainable transport more easily. For example, the creation of well integrated dual use pathways between quarters to encourage walking and cycling, enhancing well-being and improving biodiversity. However, the character of the historic core may be negatively affected by the development of the centre in quarters as Hereford has not historically grown this way and many quarters could be difficult to define clearly. Overall environmentally Option 2 is neutral.                    |
| <b>General Comments</b>                | Need housing options within the City to keep an evening economy "alive" out of normal business hours. Live work units for areas with parking difficulties.  |  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. Interest from retailers is recommended in planning for this option and consideration for how the centre will integrate sustainable modes of travel will be necessary to safeguard the character and sense of place. Crime should be designed out and the benefits of green infrastructure should be maximised. | Overall Option 2 is moving towards sustainability. This is dependant on the raising of the image of the City, the creation and success of integrated linkages between the creation of legible places and well integrated sustainable modes of travel, including green infrastructure for safe and enjoyable walking and cycling. Care will be needed in the design and connection of zones to ensure that the character of place is not adversely affected. Especially as Hereford has not traditionally been defined in quarters. |
| <b>Habitat Regulation Assessment</b>   | Both options are similar, sustainable modes of travel may enable reductions in air pollution issues. Growth is likely   |  |

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|  | to place pressure on water levels and quality and air quality. |
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**What range of shops should Hereford offer?**

| Hereford Shops                           | Options   |   |
|--|---|---|
|  | Option 1: Protect the existing shopping provision of mixed unit size and frontages which provide a range of smaller independent and specialist shops – using primary/secondary shopping frontage policies; whilst supporting the Edgar Street Grid development as a preferred location for larger units and provision for larger national retailers | Option 2: Devise policies for the City, which seek to increase the range and mix of retail offer across the City, including the Edgar Street Grid development   |
| <b>The Reasonableness Test</b>           | It is reasonable to consider primary and secondary shopping frontages as way for Hereford City to protect its current shopping provision.   | It is also reasonable to consider enhancing the range and mix of retail offer across the City.  |
| <b>The Community Engagement Test</b>     | Local people will like to continue to have a distinctive centre whilst recognising that it is essential to support the ESG development to ensure that the traditional and new work together to enhance the retail offer to locals. However, they may be concerned at the effect ESG may have on the historic city centre retail facility.           | Local people will consider that this option will allow a greater choice to be delivered at the local level so that they will be tempted to shop more locally for the products that they seek, reducing their travelling costs and also providing them with more opportunities for work. However, the community may consider that the ESG development may negatively impact upon the character of the historic core. |
| <b>The Sustainability Appraisal Test</b> |   |   |



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|--|---|---|
| <b>Economic</b>                        | A limited number of national retailers attracted to the City may revitalise the independent stores of Hereford City, bringing investment and spending into the City. Protection of the existing will allow for Hereford to retain its character. However, national retailers are unable to invest in Hereford due to the traditional layout of stores and footprints being too small. The ESG site is likely to be able to provide such an opportunity for them to establish here. However the ESG development may potentially detrimentally affect the character of the historic core. Overall Option 1 economically is neutral. | Increasing the range of shops available for local residents will be advantageous as this may reverse the current trend of shoppers travelling to other major cities, outside of the County. This would need to be sensitive to the traditional smaller independent shop to ensure they would not be priced out of the market by other shops but create a more competitive market that allows business and the economy to be buoyant. Overall economically Option 2 is neutral.                              |
| <b>Social</b>                          | The sense of place and legibility of the town centre that can be created by shop frontages is important for the well-being of local people. Local independent stores keep local people in employment, whilst ESG will bring new retail and leisure uses, raising self confidence and sense of purpose. A locally distinctive centre will increase a sense of community, however, concern regarding the impact of ESG on the historic core and potential for empty units in city centre.. Overall Option 1 socially is neutral.  | Similarly to Option 1 this option will give a boost to the retail employment sector keeping local people in work, offer a greater shopping experience, providing greater choice. However, those areas with little night-time activity may develop areas of anti social behaviour. Option 2 socially is moving towards sustainability.   |
| <b>Environmental</b>                   | The local independent stores are likely to sell local produce and will encourage the use of these products to assist in lowering contributions to climate change. A greater variety of local shops will encourage people to shop locally, reducing emissions from transport. The ESG development will also provide plenty of scope for sustainable construction. However it may detrimentally affect the character of the historic core. Overall environmentally Option 1 is neutral.   | This option is likely to result in more travelling, increasing emissions as people get attracted by the new range of retail offer. The ESG development has the potential to detrimentally affect the character of the historic core. However, developer contributions can create and protect environmental assets and provide funding for sustainable modes of travel which should integrate green corridors which benefit healthy lifestyles and wildlife. Overall Option 2 is environmentally is neutral. |
| <b>General Comments</b>                | The issue is whether larger retail units at ESG could detrimentally affect retail and character of the historic city. Need to ensure wider regeneration of town centres as a whole.   |   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is neutral. This is dependant on appropriately located and few in number of national retailers, the development of a locally distinctive place and harnessing sustainable design and construction techniques to reduce contributions to climate change.  | Overall Option 2 is neutral. It is dependent on a certain amount of balance or control of the type and scale of shops. The independent stores that provide local distinctiveness will need to be protected from new development by appropriate integration, for example of  |

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|                                      |  | the ESG development. |
| <b>Habitat Regulation Assessment</b> | Both options are likely to attract people and thus increase transport emissions affecting air quality. Locally produced food stuffs are likely to increase agricultural practice and associated fertiliser use, nitrogen enrichment and runoff potentially leading to eutrophication issues. |                      |

**What new transport infrastructure is required in Hereford to accommodate growth and how will it be provided?**

| <b>Hereford Transport</b>                | <b>Options</b>   |  |
|--|--|--|
|  | Option 1: Deliver a blended package of transport improvements including the provision of the ODR, and associated public transport improvements, including bus priority and park and ride, in association with the proposals for growth of the City   | Option 2: Develop an enhanced package of public transport measures to enable growth without the provision of an outer distributor road   |
| <b>The Reasonableness Test</b>           | This is reasonable when considered that the additional highway capacity provided by the ODR will offer greater route choice and facilitates the provision for the development of a range of ways to reduce car usage within central Hereford.  | This option is reasonable when it is considered that there is a link between greater network capacity and greater car use without the use of measures to restrict car usage.   |
| <b>The Community Engagement Test</b>     | Residents are likely to consider this a sensible way forward but would probably like to see improvements in place and proven to work prior to further growth being established. They will also need to appreciate the role of the road in supporting sustainable modes of transport and not the use of additional car use. | An ODR would create a lot of debate. Some people will want the ODR because it will be viewed as a way of routing heavy goods vehicles and other traffic away from the centre of town, whilst others will consider the negative environmental consequences. |
| <b>The Sustainability Appraisal Test</b> |  |  |

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|------------------------|---|---|
| <p><b>Economic</b></p> | <p>The ODR (with supporting traffic regulation orders) could potentially facilitate the strategic displacement of traffic from the local network. The potential removal of through traffic and goods vehicles from the city centre bottleneck is likely to provide greater commercial certainty in journey planning and enhance the viability of Hereford as a place to invest within. Similar to strategic trips, the supporting package of sustainable transport improvements is likely to encourage further use for trips within Hereford's urban footprint by providing greater certainty in travel times. The significant construction costs associated with the ODR and its supporting package of sustainable transport improvements is likely to be at the loss of funding being provided elsewhere within the County. Economically the blended package of transport provision through delivery of the ODR under Option 1 is likely to benefit business by reducing congestion in the city centre and the delivery of it would move the City towards sustainability.</p> | <p>Enhanced public transport measures are likely to assist in a culture change of how people get to the city centre. Hereford's competitiveness as an economic centre may be reduced without the additional highway capacity provided by the ODR and the removal of through traffic and goods vehicles from the city centre bottleneck. In the context of the limitations provided by the existing highway network the use of more assertively imposed demand management techniques may need to be considered to further encourage the necessary reduction of unsustainable local trips. This may well prove to be very unpopular without some form of travel incentives or improvements in public transport travel times. This may impact upon the desirability of Hereford as a principal centre. The significant cost of constructing the ODR may also be saved and potentially used elsewhere. Possibly used to further enhance non-motorised transport improvements. Because of the unknown factor of how the public could use such measures the economic benefits are unknown and therefore Option 2 is neutral in terms of sustainability.</p> |
| <p><b>Social</b></p>   | <p>There are potential significant benefits to the redistribution of traffic around Hereford including: the reduction of congestion and the corresponding emissions from the existing A49 Air Quality Management Area; a reduction in the inappropriate highway use of residential areas, improving the quality of life of residents; a reduced risk of severe disruptions to the transport network when key links are blocked; a reduction in the scale of community severance currently caused by the A49 through additional safety improvements for pedestrians, cyclists and public transport users; and the ability to provide sufficient capacity to incorporate priority measures which is likely to impact greatly upon improving the viability of the strategic park and ride sites and travel times for public transport services. These include encouraging more children to walk and cycle to school reducing the school run traffic from local roads and also encouraging more</p>   | <p>Encouraging the use of public transport without highway priority improvements is likely to be challenging and may be more reliant upon the use of financial demand management techniques than improvements in service reliability. An increase in the use of the more sustainable modes of walking and cycling is more realistic and could become more attractive as a travel option for local trips. Social benefits have the potential to be very high here both achieving a reduction in congestion and improving the health and well-being of local residents. The smarter choices programme of travel awareness campaigns and travel behaviour is likely to be crucial in encouraging the use of sustainable modes of transport. Socially the challenge could be huge to get the reductions in traffic needed to improve movement and access to services. Greater walking and cycling are likely to aid health improvements and air quality for residents. And therefore socially, Option 2 is</p>  |

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|  | school bus schemes to cover a wider area of the County. Socially air quality is likely to be improved by any reduction in traffic along the AQMA of the A49 and the health benefits from the increase in safer routes for pedestrians and cyclists means that socially Option 1 is moving towards sustainability.   | dependant on implementation and is therefore neutral.   |
| <b>Environmental</b>                   | Public transport improvements are likely to be enabled by a corresponding reduction in highway capacity from the existing network. The ODR has the potential to aid a reversal of transport modes in the City. Cycling and pedestrian traffic should be priority and this potential significant assistance in improving air quality within the A49 Air Quality Management Area could create a safer more pleasant environment and new green spaces in which people could travel through. A balancing of environmental priorities is required. The improvement in central Hereford is likely to be at the cost of the natural environment in Hereford's hinterland. Environmentally Option 1 is moving towards sustainability as air quality is likely to be improved by the reductions in congestion and increased walking and cycling and these new routes have the potential to be green corridors to encourage biodiversity. | It is widely accepted that more roads leads to more traffic and thus this option to reduce traffic congestion without an ODR is likely to be the most sustainable option on a number of levels, construction materials saved, safeguarded biodiversity, protection of landscape etc. However, there continues to be the risk of the network exceeding its capacity through future demand and causing gridlock. The associated increase in pollutants is likely to impact upon all households in Hereford. A balancing of environmental priorities is required. The preservation of Hereford's high quality hinterland could potentially be at the expense of improving Hereford's urban environment. Environmentally Option 2 is moving towards sustainability. |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. However, this is based on the sustainable delivery of the ODR with its blended package and more information is also required.  | The unknown factors of how successful the public culture change will be are to some extent dependant on implementation. For this reason overall Option 2 is neutral as further information is necessary.  |
| <b>Habitat Regulation Assessment</b>   | The ODR is associated with travel choices and has the potential to contribute to vehicle emissions and impact upon air quality. Although a reduction in congestion hotspots could assist in reducing the requirement for the AQMA and improve localised air quality.  | Similar to Option 1 this option is associated with travel choices however without the development of the ODR. Air quality is a major concern and the AQMA hotspots are less likely to be addressed under this option than Option 1 as a shift culture change is required to gain potential improvements.  |

**If an ODR was to be built, would you favour an east or a west route?**

| ODR                                      | Options   |  |
|--|---|--|
|  | Option 1: West Route  | Option 2: East Route   |
| <b>Reasonable Test</b>                   | It is reasonable when considered with additional highway capacity will offer greater route choice, facilitate public transport improvements and given that housing requirements for Hereford City.  | It is reasonable when considered with additional highway capacity will offer greater route choice, facilitate public transport improvements and given that housing requirements for Hereford City.         |
| <b>Community Engagement Test</b>         | Will create a lot of debate depending on impacts on individuals' circumstances, impact on environment and impact on growth in Hereford.   | Will create a lot of debate depending on impacts on individuals' circumstances, impact on environment and impact on growth in Hereford.  |
| <b>The Sustainability Appraisal Test</b> |   |  |
| <b>Economic</b>                          | The ODR is likely to enhance vitality of city and reduce congestion. Existing employment land is located north and south east. The latter is already served by new road east or westward would support existing employment land. Overall economically Option 1 is moving towards sustainability | The impacts of Option 2 are likely to be the same as for Option 1 and therefore economically Option 2 is also moving towards sustainability.   |
| <b>Social</b>                            | It is unclear what the social implications are likely to be and further information is required. Therefore socially Option 1 is neutral.  | It is unclear what the social implications are likely to be and further information is required. Therefore socially Option 2 is neutral.   |
| <b>Environmental</b>                     | This option is likely to improve the City environment in terms of air quality through sustainable transport. However, loss of landscape, historic assets and biodiversity is likely. Therefore overall environmentally Option 1 is neutral.   | Option 2 is similar to Option 1 however in addition there is potential for negative impacts to occur on the Lugg Meadows. As a result of this Option 2 is environmentally moving away from sustainability. |
| <b>Conclusions and Recommendations</b>   | Overall Option 1 is neutral, as it does not have enough information to assess the impacts fully.  | Overall Option 2 is moving away from sustainability as it is likely to have detrimental effects on environmental assets and the social implications are unknown. Further information is required.          |
| <b>Habitat Regulation Assessment</b>     | The ODR in either direction is associated with travel choices and enrichment through runoff, sedimentation issues and erosion.  | concerns over impacts upon air quality, nitrogen   |

### The Market Towns

What role should the Market Towns have in the future?

| Market Town Roles | Options   |   |   |
|-------------------|---|---|---|
|                   | Option 1: To continue to plan for each town based on maintaining and enhancing their current roles, as providing multi-functional roles for | Option 2: Develop each market town as a place with a specialist function/role, for instance through heritage, tourism, outdoor leisure, | Option 3: Develop better linkages between the market towns and Hereford both in terms of location of services and transport links between |

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|  | their rural hinterlands  | employment or specialist shopping, that is complementary to and doesn't compete with the others or Hereford  | them  |
| <b>The Reasonableness Test</b>           | It is reasonable to continue to plan for the market towns in their established functions.  | It is reasonable to consider developing the market towns in a way that focuses on specific roles, potentially contributing to local distinctiveness.   | It is reasonable to have good linkages with the market towns; however, this option is likely to work best when incorporated with option 1 or 2 as these options will rely on such links for growth and development.               |
| <b>The Community Engagement Test</b>     | Residents are likely to support the market towns continuing to develop the way they are currently, however they would also hope to see services and facilities currently not provided and needed made available. | Residents may have mixed views on this. A focus on a specific role may be seen to result in other services that are needed not being provided. Whilst others may see this as an opportunity to raise the profile of a particular area and grow in a particular direction creating character and local distinctiveness. | Local people will encourage better public transport links between the market towns as this will enable them to have greater flexibility on how and when they decide to travel to work, to see friends and have recreational time. |
| <b>The Sustainability Appraisal Test</b> |  |  |   |

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| <b>Economic</b>      | The economy is likely to continue to grow, in the long term, if facilities and services are maintained and enhanced as all the requirements of local people will be provided at their nearest market town. Economically market town growth is likely to improve under Option 1 and therefore would move towards sustainability.  | A focused approach will not necessarily result in the loss of services and facilities although some economic value may be lost from those with a lower priority. A focused role may encourage more people into an area, e.g. for tourism and increase spending in other sectors. Overall economically Option 2 is neutral as more information is needed on what the focus is likely to be and what other services will be invested in. | Better linkages to the market towns and Hereford will increase ease of movement and potential spending in the market towns as people are able to get to them more easily. Better linkages will also appeal to businesses bringing investment into the area and potentially offering a range of services and shops required and wanted by local residents. Overall economically Option 3 is moving towards sustainability.                              |
| <b>Social</b>        | New people moving into the area or visiting the location may place pressure of change on the market town altering the social structure. However, access to services from the new services provided is likely to benefit all in the community. Therefore, overall Option 1 is socially neutral.   | Socially a better sense of place may be created with a defined role. However, an increase in commuting to other service centre's may result. Socially overall Option 2 is neutral.   | Better public transport and linkages will improve accessibility to facilities and services for locals and visitors. Greater opportunities to reduce the use of the private car will improve air quality and help those with respiratory disorders. New people moving into the area or visiting the location may place pressure of change on the market town altering the social structure. Overall Option 3 is socially moving towards sustainability. |
| <b>Environmental</b> | The multi functional role is likely to maintain a range of services in one location, reducing travel and therefore emissions. Enhancements to town centres making improvements to the local environment could be made, for example the character of the historic core. There are environmental opportunities under Option 1 and overall environmentally the option is moving towards sustainability. | A specialist role may increase commuting and emissions as people have to access services in other locations. Overall Option 2 is moving away sustainability.   | Improvements to a range of public transport, is likely to result in improvements to the local environment, reducing emissions from and reliance on the private car. However, if the improved links mean more roads or widening existing roads, there is the potential for greater environmental impacts as may result in loss of land/hedgerows, more traffic, and increased pollution for example. The environmental impacts are                      |

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|  |  |   | dependant on implementation and location and type of improvements and as such Option 3 is neutral.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is neutral. More information is needed on what the social impacts are likely to be. Economic growth should be maximised and balanced with the enhancements and preservation of the historic core. | Overall Option 2 is neutral as more information on the types of economic focus is needed to be able to predict the impacts for social cohesion and environmental improvement opportunities. | Overall Option 3 is moving towards sustainability as economic and social benefit gained through improved public transport linkages.  |
| <b>Habitat Regulation Assessment</b>   | Encouragement of people into an area may place disturbance pressure on nearby designated sites.  | Encouragement of people into an area may place disturbance pressure on nearby designated sites. An increase air pollution may result from tourism and commuting.                            | Air quality could potentially be stabilised or improved through public transport improvements. These associated outcomes are reliant on appropriate implementation, for example the limiting of new roads or road widening schemes as part of infrastructure improvements. |

### Growth in the Market Towns

Taking into account the spatial options (table 1) where should the remaining homes be built?

**Bromyard**

In which direction should Bromyard grow?

| <b>Bromyard growth</b>         | <b>Options</b>  |  |   |   |
|--------------------------------|---|--|---|---|
|                                | Option 1: Allocate growth to the north  | Option 2: Allocate growth to the south   | Option 3: Disperse the growth to a number of smaller sites in various locations around the town | Option 4: Limit further growth to that falling within the existing built-up parts of the town   |
| <b>The Reasonableness Test</b> | Growth to the north would appear to include an area that is within an area subject to flooding. | It would be reasonable to consider growth of Bromyard to the south, avoiding the south east as | It is reasonable to consider dispersed growth areas around the town as this would address need  | This is reasonable if there is sufficient and appropriate available land within the town. It is |



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|  | However, it is reasonable to consider the option as appropriate development of the area to the north west can be avoided.  | this has been identified as a flood zone.  | across the town and its hinterlands rather than creating a focus in one particular area.  | reasonable to consider growth within the existing built form.   |
| <b>The Community Engagement Test</b>     | Residents will not like this option if it results in development to the north east in an area known to flood. Some residents may however, have concerns on the loss of the town's individual character and community feel. | Residents are likely to approve of growth in this direction, so long as flooding areas to the south east are avoided. Some residents may however, have concerns on the impacts of growth, negatively affecting the town's individual character and community feel. | Residents may prefer this option against the others as the whole town and surrounding areas will benefit from the growth in the areas that are in need. Some residents may however, have concerns that the hinterlands of their place may lose individual character and community feel from the growth. | If the land is available residents are likely to support this option as it will prevent unnecessary growth outside of the built form of the town. |
| <b>The Sustainability Appraisal Test</b> |  |  |   |   |

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| <p><b>Economic</b></p> | <p>Any properties built in the north east would need to be built to high specifications that would mitigate and reduce the risk of flooding, placing a cost on the economy. Growth to the north west of the County in general, has the potential to meet the needs of areas outside of the County as well as within County borders. There are good links to existing employment opportunities in Bromyard supporting prosperity in the job market. Overall economically Option 1 is moving toward sustainability if areas to north east are avoided..</p> | <p>Growth to the south of Bromyard provides opportunities for additional employment areas to the south. There is good access to Hereford for jobs and services and out of County. However the existing employment areas for the town are to the north, this could increase cross-town commuting, economically, Option 2 is neutral.</p>           | <p>Economic growth although spread more thinly by this option will allow the growth to benefit the majority of local residents and businesses. The rural hinterlands of Bromyard may be supported by this option. Commercial businesses such as farm shops, local community shops and rural post offices are more likely to be supported by the potential increase in use from new dispersed growth. Economically Option 3 is moving towards sustainability as it is likely to provide greater economic support for the rural hinterlands improving self sufficiency.</p> | <p>The limited supply of land could adversely impact on the price of land and potentially the range and mix of development achievable on land, increasing the possibility of town cramming. Contributions towards community infrastructure are likely to be less in relation to large developments. Overall economically Option 4 is moving away from sustainability.</p>                             |
| <p><b>Social</b></p>   | <p>Bromyard has a leisure centre and recreational open space areas and with increased growth is likely to require contributions to improve facilities and open space provision due to the extra pressure placed upon them from new development. There is a primary and secondary school and growth may support to falling rolls of these schools to assist in them remaining open. Opportunities to walk and</p>  | <p>The community hospital is located to the south and these services with other facilities such as schools and recreational areas may benefit from an increase in growth of the town. Development in the south may enable walking to school and thus improve our quality of life. Overall Option 2 socially is moving towards sustainability.</p> | <p>Facilities such as health care, education and open space for creating well being in the community are unlikely to be secured through developer contributions because development is more likely to come forward as piecemeal development under this option. Contributions for public transport are also likely to be reduced. Dispersed development is likely to prevent pockets of</p>  | <p>Development would be restricted to that which can be contained within the existing settlement boundary and by doing so will place less pressure on existing services than the other options. However, without growth there is the potential to lead to a detrimental loss of services. Limited development may result in less contributions which could be used to improve services. Therefore</p> |

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|  | cycle to school are greater in this market town as the area is relatively small and easily accessible, improving air quality. Overall socially Option 1 is moving towards sustainability.   |  | deprived areas as development will be integrated with existing market housing. Overall socially Option 3 is moving away from sustainability.   | overall socially Option 4 is moving away from sustainability.  |
| <b>Environmental</b>                   | Building in the flood zone to the north east may be detrimental due to the potential to exacerbate flooding issues. Growth is likely to place pressure on infrastructure and further information is required on such issues as water supply and sewerage to account for impacts upon internationally designated sites, such as the River Wye. The impact of development on the landscape and character of the town and lay of the land may also be adversely affected. Increased car use from growth is likely to increase air pollution and congestion. Overall environmentally Option 1 is moving away from sustainability. | Growth to the south east would be detrimental due to the potential to exacerbate flooding issues. Growth is likely to place pressure on infrastructure and further information is required on such issues as water supply and sewerage to account for impacts upon internationally designated sites, such as the River Wye. The area to the east also has topography issues as it is on higher ground, where growth could cause detrimental impacts upon character and landscape. Environmentally Option 2 is moving away from sustainability. | Development outside the built form is likely to have an adverse visual impact and detract from the landscape quality to the east of the town. It is designated as a flood plain and this area is unsuitable for growth. Growth is also likely to place pressure on water supply and potentially impact upon the River Wye. An increase in the use of the private car is likely to create congestion and increased air pollution, contributing to the detrimental effects of climate change. Overall Option 3 is environmentally moving away from sustainability. | Development within the current built form would reduce negative impacts on the wider environment. However town cramming may result negatively affecting the character of the town. Enhancements to the infrastructure are likely to be less significant. Piecemeal development may result in fewer opportunities for developer contributions, which could be used for enhancement schemes. Overall Options 4 is environmentally neutral. |
| <b>Comments</b>                        | The latest Environment Agency maps should be used when considering areas of land in terms of flood risk.  |  |  |  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is neutral, as more information is required about how the  | Overall Option 2 is neutral, as more information is required regarding how   | Overall Option 3 is neutral, as more information is required on impacts.   | Overall Option 4 is moving away from sustainability. Limitations in the available  |

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|                                      | development may impact on character and natural environment of Bromyard.  | any further development may impact on character and natural environment of Bromyard.  | Developer contributions would be more difficult to secure.   | land for growth pose problems for economical development. Opportunities may exist to harness live work units and should be explored as part of this option if it is to be considered neutral. However the contributions from developers will continue to be issue with this approach. Consideration should be given to whether Bromyard is required to grow, it may be acceptable for Bromyard to maintain its status quo however local services will continue to require investment in ensure they are safeguarded. Any development within the built form should be designed to consider the character of the town to avoid inappropriate town cramming. |
| <b>Habitat Regulation Assessment</b> | Flooding concerns will have an impact on water levels, water quality, water borne pollution, run off, nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. In addition, an increase in the demand for water with development growth. Opportunities for | Flooding concerns will have an impact on water levels, water quality, water borne pollution, run off, nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. In addition, an increase in the demand for water with development growth. | Piecemeal development is likely to result in fewer developer contributions and strategic infrastructure improvements which are likely to increase the use of the private car increasing air pollution. Flooding concerns will have an impact on water levels, water quality, water | Pressures on designated sites are likely to be fewer with limited growth. However, fewer financial contributions are likely to result in less improvement and enhancement initiatives.  |

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|  | walking and cycling are likely to assist in reducing air pollution impacts. |  | borne pollution, run off, nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. In addition, an increase in the demand for water with development growth. |  |
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## Kington

### In which direction should Kington grow?

| Kington growth                           | Options  |   |
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|  | Option 1: Limit any further growth to that falling within the existing built-up parts of the town  | Option 2: Allocate limited employment and housing growth to a number of smaller sites in various locations around the town  |
| <b>The Reasonableness Test</b>           | It is reasonable to consider growth purely within the existing settlement boundary, particularly because the town is showing evidence of constraints to growth, such as topography and limited demand. | It is reasonable to identify a variety of sites around the town that can accommodate employment and housing growth.   |
| <b>The Community Engagement Test</b>     | The community is likely to prefer the town to stay as it currently is and this limited growth would appeal.  | The local residents and businesses are likely to be supportive of allocated sites if consultation and negotiation takes place to ensure any new development addresses their concerns and needs. |
| <b>The Sustainability Appraisal Test</b> |  |   |

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| <b>Economic</b>                        | Limited growth potentially could restrict economic growth and supply of local labour force. Smaller development sites are likely to be less attractive to the larger developer. Businesses located in the town will be supported by smaller growth in the town from potential employees and customers. Overall Option 1 is economically neutral.   | Allocating sites for business and housing will give some certainty to companies interested in investing in the town and to developers for gaining permission to build. Therefore, Option 2 is economically moving towards sustainability.  |
| <b>Social</b>                          | Smaller development sites are unlikely to bring forward significant affordable housing numbers. Open space within the settlement boundary could be under risk of being developed, which may limit access to community facilities, adversely affecting healthy life styles and decreasing well being. The viability of existing services could also be negatively affected with limited growth. Overall, socially Option 1 is moving away from sustainability.  | Allocating sites may give the opportunity to negotiate affordable housing units. Allocated sites create greater certainty for inward and existing business and housing developers. Specific sites will also allow community facilities and open space to be considered in any design scheme. Further information is required with regards to infrastructure needs such as water supply and sewage treatment. Overall socially Option 2 is moving towards sustainability. |
| <b>Environmental</b>                   | Smaller sites can often be designed in a locally distinctive manner fitting in more appropriately with the existing context. Green space and biodiversity is less likely to be negatively affected if development is confined to within the existing settlement boundary. However, Kington has a large conservation area within its boundary and flood risk areas just outside and a special wildlife site that runs through the town, development will be constrained by these features but need not result in negative outcomes. Overall, environmentally Option 1 is neutral as the outcomes are dependant on implementation. | Allocated sites for growth in areas outside the built form is likely to require mitigation against any adverse environmental impacts through the due consultation process. Where green space may be lost to development, financial contributions or other green space, are more likely with larger development sites allowing compensation for loss. Overall environmentally Option 2 is neutral as it is dependant on implementation.                                   |
| <b>General Comments</b>                | A balance of affordable housing is needed in the market town and the rural areas.  |  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is neutral as development is constrained by the settlement boundary and has the potentially to develop open space and is largely dependant on the way in which development implements environmental issues.   | Overall Option 2 is moving towards sustainability. This is dependant upon the implementation of the affordable housing, community facilities and environmental issues being integrated.  |
| <b>Habitat Regulation Assessment</b>   | If greater pressure is placed on open space within the settlement boundary for development pressure is likely to be placed on designated sites for recreational activity   | Further information is required on water supply and sewage treatment and as such pressures from development are likely on water levels, water quality,   |

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|  | increasing disturbance and air pollution from the need to travel to such destinations. | water borne pollution, nitrogen enrichment, point source pollution (STW), sedimentation, erosion and dredging. |
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**Ledbury**

**In which direction should Ledbury grow?**

| Ledbury growth                       | Options   |  |   |   |
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|                                      | Option 1: Allocate growth to the northwest on land currently proposed for employment use  | Option 2: Allocate growth to the west, on the western side of the by-pass  | Option 3: Disperse growth to a number of smaller sites in various locations around the town                     | Option 4: Limit further growth to that falling within the existing built-up parts of the town.  |
| <b>The Reasonableness Test</b>       | Evidence is needed to support any development on existing employment land before housing should be allocated here. If there is new housing there will be a corresponding need for employment opportunities. If it is suggested that alternative employment opportunities will be provided then this option is reasonable. | The western edge of Ledbury is designated as a flood zone and this area would be considered inappropriate to build on. However, it may be reasonable to consider this direction for growth on the basis that any growth was outside of this zone and good links were created to the existing built form. | It is reasonable to consider various locations for growth around the town.                                      | It is reasonable to consider growth within the existing built form.   |
| <b>The Community Engagement Test</b> | Local businesses may not be very supportive of such an option because of loss of employment unless an alternative can be found.   | Local people may consider growth in this area inappropriate due to the risk of flooding. Businesses may like growth here as this area has good links to the by pass that lead to the M50.  | The community is likely to be concerned about flood risk issues and the impacts on the surrounding countryside. | So long as new development is not built in high density and does not cause additional congestion local residents are likely to support development within the settlement boundary. However, there has historically been concern regarding 'infilling' and the loss of local distinctiveness |

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|  |  |  |  | through town cramming. |
| <b>The Sustainability Appraisal Test</b> |  |  |  |                        |



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| <b>Economic</b> | The loss of allocated employment land may give rise to negative outcomes on the local economy. Reduced investment into the town and more households requiring job opportunities may have a combined overall negative effect, if replacement employment land is not found. Therefore overall economically Option 1 is moving away from sustainability.   | Development to the west which avoids the flood risk area does provide good access to the by pass and M50, creating greater economic viability for businesses. The costs associated with such avoidance may be a deterrent for any potential developer or business. Overall economically Option 2 is neutral as it is dependant on implementation.  | Various locations around the town provide businesses across the town an equal opportunity to benefit from new inward investment. Smaller sites may be relatively more expensive to develop and appeal less to the larger developer. Overall economically Option 3 is neutral as it is dependant on the price of land and type of business attracted to the smaller disbursed locations.   | Similarly to Option 3 locations around the town are likely to provide businesses across the town an equal opportunity to benefit from new inward investment. Restricting growth may also adversely affect viability of the economy. Overall economically Option 4 is neutral as it is dependant on the price of land and type of business attracted to the smaller disbursed locations.   |
| <b>Social</b>   | The site may be large enough to provide the required affordable housing for the community and be of sufficient size to gain community facilities and recreational space to aid healthy lifestyles and well being. The site is also near to the railway station providing good access to the rest of the County. However, any increase in people into the area because of the good linkages, will place increased demand for key services. Overall socially Option 1 is moving towards sustainability. | If development is not appropriately safeguarded from the flood risk, property owners are unlikely to be able to obtain insurance on their homes and businesses. Good links to the by pass allow access to job opportunities. However, any increase in people into the area because of the improved linkages, will place increased demand for affordable housing. The amenity value of Special Wildlife Sites has the potential to be negatively affected by inappropriate development. Maintaining this beneficial asset provides residents with | Smaller sites are unlikely to attract the developer contributions to provide the affordable housing numbers or community facilities, including improved public transport that the local area requires. However smaller sites are often more likely to be able to maintain local distinctiveness, contributing to the sense of place and well being for local residents. Overall socially Option 3 is neutral, as a balance between the need for affordable housing and local distinctiveness is needed. | Having a variety of development sites within the built form is likely to spread the community need for recreational activities potentially relieving the pressure for new facilities. Conversely, restricting growth may negatively impact upon access to services and facilities due to a lack of support. It is unlikely that smaller developments will provide affordable housing or the revenue for improvements in public transport in the short term but Ledbury does benefit from having one of the County's few train stations and good access links to the M50. Overall socially |

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|  |  | access to open space and sense of well being. Overall socially Option 2 is moving away from sustainability.   |  | Option 4 is neutral as a balance between need of affordable housing, public facilities transport and local distinctiveness is necessary.   |
| <b>Environmental</b>                   | <p>Environmental quality on the site is likely to be low due to previous uses and previous habitat fragmentation. Development provides opportunities to improve green corridors and creating new open space. The proximity of the railway station gives good opportunities to reduce the need to travel by means of the private car. Disturbance pressure may also be placed on the Area of Outstanding Natural Beauty as increases in population are likely to result in more people accessing the countryside for recreation. Overall environmentally Option 1 is moving towards sustainability.</p> | <p>Building in flood risk areas would cause adverse effects. Inappropriate development in areas of local designation is likely to damage the character of Ledbury. However, sympathetically designed schemes outside of these areas to the west may be acceptable and provide an opportunity to create wildlife sites and manage the flood risk. Integration of development into the character of the town will be important. Disturbance pressure may also be placed on the Area of Outstanding Natural Beauty as increases in population are likely to result in more people accessing the countryside for recreation. Overall environmentally Option 2 is moving away from sustainability.</p> | <p>Spreading the development around the town is likely to result in less significant loss of habitat and create less congestion hotspots as growth is distributed more widely. Ledbury has many development constraints around its settlement, including flood risk areas, an Area of Outstanding Natural Beauty, protected open space, Special Wildlife Sites and conservation areas. Adverse affects on these from growth is highly likely, for example from disturbance pressure from an increase of population accessing the countryside. Overall environmentally Option 3 is neutral.</p> | <p>This option is least likely to impact negatively upon the environmental quality of the surrounding area. However, an increase in population from development within the boundary may increase congestion and town cramming adversely affecting the historic character of the town. Overall environmentally Option 4 is neutral.</p> |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. Optimising the environmental improvements will be   | Overall Option 2 is moving away from sustainability. The implementation of flood risk measures will be required to maintain the   | Overall Option 3 is neutral as it is dependant upon balancing growth and local distinctiveness, provision of affordable housing and  | Overall Option 4 is neutral as it is dependant on balancing affordable housing need with transport provision and   |

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|                                      | important, provision of employment land and monitoring affordable housing units provided will be essential to ensure that Option1 does move towards sustainability.   | economic viability of the town. Impacts upon the local wildlife designations and maintenance of good access routes and monitoring of the provision of affordable housing to ensure supply meets the demand would need to be addressed to make option 2 neutral.   | avoidance of negative impacts on environmental assets from development and as a result of an increase in population.  | community facilities and balancing the avoidance of damage to environmental assets with reductions in pollution and congestion.   |
| <b>Habitat Regulation Assessment</b> | The location of development near to the train station may enable a reduction in the use of the private car improving air quality. Creation of open space in the development area is likely to reduce pressure for access to designated sites, however the train station also enables easy access to protected areas which could cause disturbance issues. | Flooding concerns will have an impact on water levels, water quality, water borne pollution, run off, nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. In addition, an increase in demand for water is likely with growth and potential disturbance pressure from increases in population on designated sites. | Developer contributions are likely to be fewer under this option and as a result improvements to public transport are likely to be limited and thus not reduce the use of the private car to improve air quality as much as other alternatives. Flooding concerns will have an impact on water levels, water quality, water borne pollution, run off, nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. In addition, potential disturbance pressure from increases in population on designated sites. | Any risk of increased pressure for recreational activity may add pressure for people to access designated sites placing disturbance concerns upon them. Although it is accepted that Ledbury has a train station, any increase in development and people is likely to increase car usage and therefore increase air pollution from emissions. |

**Leominster**

**In which direction should Leominster grow?**

| Leominster growth                        | Options   |  |  |
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|  | Option 1: Allocate land to the south or southwest in conjunction with an east-west link road  | Option 2: Disperse growth to a number of smaller sites in various locations around the town  | Option 3: Limit further growth to that falling within the existing built-up parts of the town  |
| <b>The Reasonableness Test</b>           | It is reasonable to allocate land in the south and south west direction of Leominster, as it appears to be the least constrained direction.   | It is debatable that this option is reasonable as some potential directions outside the existing boundary are constrained by particular features. For example the railway line to the east and flooding to the north and east. | If the housing land availability study reveals that land is available for development within the existing built form, this option is reasonable. |
| <b>The Community Engagement Test</b>     | With the promise of improvements to the road links, local residents may be likely to accept growth in this direction. However, those residents close to any proposed development site are likely to perceive proposals as damaging in respect of disturbance, loss of views and concerns of additional traffic. | The community may not object to smaller sites for development but are likely to be concerned about where these locations may be located due to the constraints in the areas around the town, namely the flooding issues.       | The local community will want to safeguard their recreational open space and would be concerned regarding any potential loss.                    |
| <b>The Sustainability Appraisal Test</b> |   |  |  |

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| <b>Economic</b>      | The south and south west direction is the least constrained and therefore the least expensive to develop which is likely to encourage investment into the area. An east-west link road would improve job opportunities, ease of movement into and out of the town and assist in reducing congestion pressures on existing roads. New housing is likely to support the business park and infrastructure linkages. Overall economically Option 1 is moving towards sustainability. | Transport improvements would be less likely to be implemented. A split between the north and south west outside of the constrained areas, would result in similar impacts to Option 1, by supporting economic development and housing growth. Overall economically Option 2 is moving towards sustainability.                       | Smaller development sites are unlikely to appeal to the larger developer, as costs may be higher for smaller parcels of land. Leominster has a relatively new enterprise park provided under the UDP and although additional employment land is likely to be required under the Core Strategy the area may attract new investment. However, restricting this growth within the built form may result in cramming adversely affecting the character of the market town in some areas. Overall economically Option 3 is neutral, as it is dependent on location and implementation. |
| <b>Social</b>        | The scale of development potential in this area is likely to provide sufficient benefits that result in improvements to leisure, recreational and open space, health facilities and educational facilities. The road network would also likely to be improved too. More information would be required regarding water and sewerage capacity. Overall socially Option 1 is moving towards sustainability.   | Growth could bring benefits of supporting existing services and facilities in the town but smaller sites may not bring contributions to provide additional services as Option 1. Road improvements would be less likely and potential impact on air quality management area, thus people quality of life and well being may suffer. | A spread of development may place less pressure for a new community facility, however if existing facilities are already at capacity smaller development sites are unlikely to provide the funding necessary for the development of new community facilities. Smaller sites are also less likely to achieve affordable housing needs and less likely to attract developer contributions. Overall socially Option 3 is moving away from sustainability.  |
| <b>Environmental</b> | There are relatively few environmental constraints in this area. Good opportunities for developer contributions towards green infrastructure, sustainable design/construction and public transport. The east-west link should assist in reducing emissions in the  | Any development of smaller sites would need to be focused around the north west and the south and south west directions where fewer constraints exist. This would provide the best opportunity for growth under this option with the least environmental consequences.  | Development in the existing built form, particularly in the conservation areas, will need to be sympathetic to their surroundings to ensure that the sense of place and character of Leominster is not lost. Areas of the town are liable to flood and an increase in development in any area   |

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|  | town centre but could contribute to increase traffic and pollution. Overall environmentally Option 1 is neutral as it is dependant on the above being appropriately implemented.   | However, the cumulative impacts of the size of developments could potentially adversely affect environmental assets. Increases in town centre congestion are likely with growth as implementation of link road more likely. This could impact on AQMA.. Overall environmentally Option 2 is neutral.  | of the town is likely to cause greater pressure as more hardstanding is created. Less impact is likely with limited growth when compared with larger development in Options 1 and 2 on character and landscape quality. Overall environmentally Option 3 is neutral, an integrated approach to these increasing concerns will be required.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. It should be ensured that with any new road, provisions are made for safe and green cycling and walking routes. Access to the town centre should be easier by these forms of travel rather than the private car to ensure congestion hotspots do not prevail. Provision of recreational and community facilities will be important with any growth in housing and that provisions are made to avoid damage to the environmental assets close to the area. | Overall Option 2 is neutral. Transport improvements would need to be implemented under this option to allow growth. The use of natural resources to safeguard against flooding would be essential. Developing in unconstrained areas vital and consideration of the cumulative impacts of development sizes around the town on environmental assets such as water use and energy consumption. | Overall Option 3 is neutral as there are concerns over the effects of flooding; sufficient community facilities/services and affordable housing remain and require more information. An integrated approach will be necessary to over come these issues.   |
| <b>Habitat Regulation Assessment</b>   | The east-west links whilst recognising may reduce congestion and improve air quality in the town, a new link is also likely to encourage more cars onto the road and overall create at best a neutral air quality issue and therefore increase air pollution. Developer contributions could increase habitat restoration and enable other sites to be utilised for recreational activity avoiding the more sensitive protected sites. Flooding concerns will have an impact on water levels, water quality,  | Flooding concerns will have an impact on water levels, water quality, water borne pollution, run off, nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. Increases in town centre congestion are likely to increase air pollution. Growth is also likely to place pressure upon water supply affecting water levels and water quality.                         | Growth constrained by the development boundary is still likely to place pressure upon water supply affecting water levels and water quality. Additional pressure for recreational activities is likely with an increase in population. With reduced developer contributions this may result in disturbance pressures on protected sites as people access the countryside for leisure activities. Flooding concerns will have an impact on water levels, water quality, water borne pollution, run off, |

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|  | water borne pollution, run off, nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. The use of developer contributions to integrate sustainable urban drainage systems could reduce the risk from runoff, aiding reductions in flash flooding, sedimentation issues and nutrient enrichment. Growth in development is likely to place pressure on water supply affecting water levels and water quality. |  | nitrogen enrichment, acidity, sedimentation, erosion, flood defence and dredging. |
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### Ross-on-Wye

#### In which direction should Ross-on-Wye grow?

| Ross-on-Wye growth                   | Options  |  |  |   |  |
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|                                      | Option 1: Allocate significant growth to the north   | Option 2: Allocate significant growth to the southeast   | Option 3: Allocate significant growth to the southwest   | Option 4: Disperse growth to a number of smaller sites in various locations around the town | Option 5: Limit further growth to that falling within the existing built-up parts of town            |
| <b>The Reasonableness Test</b>       | Although Ross-on-Wye is heavily constrained by many environmental assets it would be reasonable to consider appropriate growth to the north. | The south east of Ross-on-Wye is the least constrained area of the town and is probably the most reasonable option for significant growth. | Growth to the south west would be significantly constrained by environmental assets more so than Option 1. | Smaller dispersed sites are a reasonable option to explore.                                 | Developing sites within the built form is a reasonable option.                                       |
| <b>The Community Engagement Test</b> | Locals may have concerns about the character of the development in such a picturesque  | The least constrained direction to the south east is most likely to be supported by local  | The south west has fewer good access links than options 1 and 2 and more constraints.                      | The community may prefer smaller development sites than one or two larger sites as these    | The community are likely to prefer this option if it is proven that significant growth is not needed |

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|  | setting. However, good links to the road network and employment opportunities are available in the north of the town. | people. | Concerns of any development here would be similar to option 1 in terms of the character of any new development in the Area of Outstanding Natural Beauty and Conservation Area. | may be seen to blend more easily with the existing character of the town. | in the town, as it will not affect the landscape and character of the town as much as a larger extension. |
| <b>The Sustainability Appraisal Test</b> |   |         |   |   |   |



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| <b>Economic</b> | There is employment land to the north of Ross and good road links and the quality of the environmental assets may be a benefit to some companies and a draw to the town for investment purposes. Overall economically Option 1 is moving towards sustainability. | To the south east of Ross, under the UDP, land is safeguarded for employment whilst land to the east is proposed for employment use, the Employment Land Study being conducted for the evidence base of the LDF will identify if these areas and others are still appropriate for future usage. The area has good links to the road network and is likely to be an attractive location for businesses to establish themselves. Overall economically Option 2 is moving towards sustainability. | Growth in this direction is likely to cause significant negative outcomes. However, the rich environmental assets in this area indicate that appropriate growth in this direction may be in responsible tourism. Sensitivity will be needed in any building development due to these environmental assets/constraints. Overall economically Option 3 is neutral as it is dependant on implementation. | Smaller development sites around the town could be located to benefit more effectively from the existing employment land and town centre connections. may also aid the growth of tourism, as they are likely to have less negative impacts on their surroundings. Overall economically Option 4 is moving towards sustainability. | Ross has established employment land and historic town centre therefore and development within the built form will help to support these. The appearance of the area is unique and attracts tourists. However, town cramming is likely in the built up area and potential limited growth may restrict economic development and prosperity of the town centre. Overall economically Option 5 is neutral as it does not support growth but rather maintenance of the existing picture. |
| <b>Social</b>   | Significant growth is more likely to meet the affordable housing needs of the local area and give a mix of housing, employment, shops and community facilities to allow the new development to thrive and integrate with the existing                            | Similarly to Option 1 significant growth is likely to provide the affordable housing numbers required with community facilities and services. A larger development site is likely to bring the financial benefits required to improve  | Issues around affordable housing and community services and facilities and access to good infrastructure are less likely to be addressed by this option. Overall socially Option 3 is neutral as it is  | Dispersed development could preserve the quality of the townscape in Ross. Lower density, mass and scale of development are more likely to be in keeping with the character of the town's environmental   | Affordable housing is less likely to be delivered on smaller sites. Limited growth could also negatively affect the viability of existing services/facilities and potential to provide new access to services. More information is   |

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|  | community successfully. More information is required regarding available water and sewerage capacity. Socially overall Option 1 is moving towards sustainability.  | public transport links including better walking and cycling routes. Overall socially Option 2 is moving towards sustainability.   | dependant on implementation of the infrastructure being provided to access the environmental assets for social well being.   | assets. Significant affordable housing and other community benefits is less likely to be delivered on smaller sites due to lower developer contributions. Overall socially Option 4 is neutral.   | required regarding available water and sewerage capacity. Overall socially Option 5 is neutral as it is dependant on the implementation of development.   |
| <b>Environmental</b>                   | This northern part of Ross is contained within the AONB and therefore significant environmental constraints exist. Consider the evidence base in order to capitalise on sustainable design opportunities, maximising the positive and minimising the negative. Overall environmentally Option 1 is neutral as more information is required to predict the impacts. | As with Option 1 advice from the evidence base will be vital here. Option 2 is least constrained by the Area of Outstanding Natural Beauty than Options 1 and 3. Opportunities exist to enhance environmental assets/habitats. Overall environmentally Option 2 is neutral. | South west area borders the AONB and environmental assets in this area are high. Appropriate development could harness these assets whilst large scale inappropriate development is more likely to have a detrimental affect the character of the area. Advice from the evidence base should be considered. Overall environmentally Option 3 is neutral as more information is needed. | Ross is constrained by a large number of environmental assets. The area to the west and open areas within the existing built form are constrained by international and national designations. Smaller developments could potentially have less of a negative impact on these than one or two larger schemes. However, the cumulative impacts could be detrimental. Overall environmentally Option 4 is moving towards sustainability however this would be dependant upon implementation. | High environmental quality is likely to be safeguarded most in Ross and the surrounding area by this option to develop within the built form. Safeguarding the recreational/open spaces within the built form will be important. Overall environmentally Option 5 is moving towards sustainability, however is dependent on implementation. |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is  | Overall Option 1 is   | Overall Option 3 is  | Overall Option 4 is   | Overall Option 5 is   |

|                                      |   |  |   |  |   |
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|                                      | moving towards sustainability. This outcome is dependent upon the environmental assets being used as a resource.  | moving towards sustainability. This outcome is dependent upon the environmental assets being used as a resource. Option 2 is seen as more preferable than to Option 1.   | neutral because more information is needed from the evidence base and is dependent on implementation.   | moving towards sustainability. This is dependant on appropriate tourism and other economic development on smaller sites, utilisation of the environmental assets and ensuring provision of affordable housing, community facilities and protection / enhancement of the natural environment. | neutral as it is dependant on safeguarding the environmental assets that are used for recreational activities and attract tourists and on implementation to safeguard such assets.  |
| <b>Habitat Regulation Assessment</b> | The environmental assets of the area could attract people to the area placing development pressures upon water supply affecting water levels and water quality; and increase the use of the private car affecting air borne pollution and thus air quality. | Developer contributions are likely to provide walking and cycling routes to assist in reducing levels of vehicle emissions and thus help improve air quality. Contributions are also likely to assist in protecting water levels, water quality through conservation measures. | Growth in development is likely to place pressure on water supply and therefore affect water levels and water quality. Attraction of people to the assets is also likely to increase the use of the private car and affect air quality. | An increase in the numbers of tourists coming to the area is likely to place disturbance pressures on designated sites. The cumulative impacts of development are likely to place pressure on water supply affecting water levels and water quality.   | Development within the built form may place pressure on open space and if lost could place additional disturbance pressures on designated sites. Less development under this option is likely to result in fewer pressures on water supply protecting water levels and water quality. |

**Shops in Market Towns**

**How should we protect shops in the Market Towns?**

| Market Town Shops                        | Options   |   |  |
|--|---|---|--|
|  | Option 1: Continue with the current UDP approach of defining primary and secondary shopping frontages and a criteria based policy to encourage a higher proportion of retail uses within the core of each of the town centres | Option 2: Define primary shopping frontages only  | Option 3: Do nothing and allow market forces to prevail  |
| <b>The Reasonableness Test</b>           | It would be reasonable to continue with both primary and secondary frontages as planning policy statements state that an understanding of the difference between them is appropriate.   | Identifying only primary shopping frontages is reasonable in terms of encouraging a high proportion of retail offer in market towns.  | This may be considered reasonable in terms of creating a mix of uses for local communities.  |
| <b>The Community Engagement Test</b>     | Local people are likely to prefer the status quo with assurances that retail offer would improve in the centres.  | Local businesses may be concerned about the clarity of what uses would be considered acceptable outside of any designated primary frontage. Local people are unlikely to be concerned so long as access to all retail and commercial facilities was easy. | Local people and businesses are likely to have concerns about this option. Will the character of the existing retail town be altered; will businesses close because of higher value uses moving in? How accessible will the facilities and services be if they are located in an adhoc manner? |
| <b>The Sustainability Appraisal Test</b> |   |   |  |

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| <b>Economic</b>      | There is a degree of certainty for the economy if the location of uses is defined. Having all facilities and services located in one defined place makes it easier and encourages consumers to spend more money. However, restrictions on uses of buildings can cause vacant units. Overall economically Option 1 is moving towards sustainability. | Purely identifying where retail offer can be located is likely to encourage and reinforce the quality of retail in towns but potentially neglect other commercial uses which may result in pepper potting around a town as businesses locate to places with cheaper rental costs. However, this could affect the character and retail dynamic of the place. Overall economically Option 2 is moving towards sustainability.   | Leaving market forces to determine where retail and commercial offer will be located has the potential to create the doughnut effect, where town centre vitality and viability die away and pockets of out of town development occur. However, national policy does guard against this. Therefore this effect is more likely to occur at the edge of the centre of the City opposed to edge of town. This has many negative outcomes for both the health of the economy in the town and socially for maintaining and encouraging both a daytime and evening economy. A lively place makes for a prosperous and safer place. Overall economically Option 3 is moving away from sustainability. |
| <b>Social</b>        | Locating shops all in one place creates streets for people for enjoyment as well as being functional adding to the shopping experience. It also allows for greater accessibility. Housing above shops would assist in this vibrancy, street making and place shaping. Overall socially Option 1 is moving towards sustainability.                   | A well defined, legible retail area will strengthen the shopping experience and retail offer for consumers. Other traditional uses in secondary frontages now located elsewhere may be less accessible and create higher travelling costs and congestion in areas previously less affected by traffic flows. Housing above shops would assist in this vibrancy, street making and place shaping. Overall socially Option 2 is neutral as it is dependant on implementation. | Accessibility to out of town may be more difficult for those without a private car. There is likely to be a decreasing feeling of safety as town centres become less viable and possibly run down and an increase in acts of anti social behaviour in the evening. Property prices in these areas could decrease over time. Overall socially Option 3 is moving away from sustainability.   |
| <b>Environmental</b> | A good mix of services and facilities in one locality reduces the travelling time and distance needed reducing pollution. However, congestion in these places is likely. Good public  | Travel times into a centre may be reduced if traditional secondary frontages are not defined and potentially relocated to alternative locations in or around the town. This   | With an increase on the reliance of the private car emissions on certain routes are likely to increase. Parking provision will be needed for out of town, edge of centre sites. These   |

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|  | <p>transport links are essential to access these facilities. Walking and cycling provision should be made attractive and safe to encourage a reduction in car travel. Overall environmentally Option 1 is neutral as it is dependant on the appropriate integration of improved infrastructure networks.</p> | <p>will potentially assist in reducing town centre congestion and pollution however, may result in increases elsewhere. Greater retail offer in the town may also attract more people and unless access by means other than the private car are made easier, more reliable and where ever possible cheaper, any saving made by the secondary frontage businesses moving out will be replaced by increased visitors to the retail centre by car increasing emissions. Overall environmentally Option 2 is neutral as it is dependant on the implementation of the infrastructure network.</p> | <p>surfaces are likely to be impermeable, increasing runoff and contributing to flood risk and the effects of climate change. However, national policy requires a need and impact test and sequential test to ensure development occurs as close to the centre as possible prior to sites being located out of town. Overall environmentally Option 3 is moving away from sustainability.</p> |
| <b>Conclusions and Recommendations</b> | <p>Overall Option 1 is neutral even though economically and socially the option is moving towards sustainability. This is because these are dependant on the environmental requirement for the infrastructure network to be appropriately integrated and improved.</p>                                       | <p>Overall Option 2 is neutral because the outcome of the option is dependant upon appropriate integration of an infrastructure network to assist economically, socially and environmentally.</p>  | <p>Overall Option 3 is moving away from sustainability because it is likely to result in a less vibrant centre, increased use of the private car leading to congestion hotspots, an increase in the feeling of being less safe in the evenings in town centres and potentially increases in anti social behaviour.</p>  |
| <b>Habitat Regulation Assessment</b>   | <p>Location of facilities and services close to one another reduces the need to travel aiding better air quality. However, congestion hotspots are likely and therefore pollution is likely also. Good public transport and walking and cycling are essential to aid better air quality.</p>                 | <p>Traffic dynamics may alter under this option and cause congestion and pollution hotspots in areas previously unaffected, affecting air quality. Sustainable modes of travel will be important to reduce this impact.</p>  | <p>If development out of centre results increases in the need to travel are likely, leading to likely increases in vehicle emissions and thus affecting air quality. Large surfaces for parking are also likely to increase flooding from rapid surface runoff which could affect water quality, nitrogen enrichment, sedimentation, erosion and dredging issues.</p>                         |

**The rural areas**

**Growth in the rural areas, settlement hierarchy**

**How should the rural areas including all the settlements outside of Hereford and the Market Towns grow?**

**The balance of growth between the market towns and rural areas:**

| Rural areas balanced growth          | Options  |  |  |   |
|--------------------------------------|--|--|--|---|
|                                      | Option 1: Focus a significant majority of new growth outside of Hereford, on the market towns, with rural settlements limited to affordable housing to meet local needs only | Option 2: Focus new growth outside Hereford to the market towns, but enable some growth in or around a limited number of sustainable rural settlements, with the remainder of the rural area limited to affordable housing to meet local needs only                    | Option 3: Plan for an equal or similar distribution of growth between the market towns and sustainable rural settlements   | Option 4: Focus the majority of growth, outside of Hereford, to sustainable rural settlements   |
| <b>The Reasonableness Test</b>       | It is reasonable to consider the majority of housing provision to be located in the market towns.  | It is reasonable to consider locating the remaining allocated housing to the market towns with limited amounts to sustainable rural settlements and affordable housing in other rural areas. A definition of a sustainable rural settlement would be required however. | It is reasonable to consider splitting the remaining distribution of growth evenly between the market towns and sustainable rural areas. A definition of a sustainable rural settlement would be required however. | It is reasonable to consider locating the remaining allocated housing outside Hereford in sustainable rural settlements. A definition of a sustainable rural settlement would be required. However, conformity with the RSS needs to be considered. |
| <b>The Community Engagement Test</b> | The market town communities may be concerned that growth will be excessive in their area and more isolated rural areas may feel overlooked on provision of housing           | The community is likely to prefer this option as it would appear to meet local needs.  | Local communities may consider this an appropriate approach to growth. However, more isolated rural areas may feel overlooked on provision of housing and  | The market town communities may feel that their growth needs are not being addressed in this option and the more isolated rural areas may feel the same.  |

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|  | and associated services. |  | associated services. |  |
| <b>The Sustainability Appraisal Test</b> |                          |  |                      |  |



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| <p><b>Economic</b></p> | <p>This option may assist in the strengthening of the market town economy, particularly in key facilities and services and tourism. Overall economically Option 1 is moving towards sustainability.</p>   | <p>This option would allow the strengthening of the economy in all areas, as growth would be focused around the market towns and sustainable rural settlements. These have much of the established allocated employment land and rural economy. However, the more rural settlements are less likely to have rural employment opportunities offered under this option. Overall economically Option 2 is moving towards sustainability.</p> | <p>Economic growth will be supported similarly as to Option 2, perhaps with a stronger support for the rural economy as the distribution of growth is equal between the market towns and sustainable rural settlements. Costs of transportation may be higher for businesses as more reliance on the private car may be expected from the rural setting of some businesses. Overall economically Option 3 is neutral.</p> | <p>Economic growth in sustainable locations is likely to be a draw for some new businesses and support existing rural enterprise. For example, through home working and internet businesses. Areas that employees can get to easily and transportation routes that make distribution for the companies viable will all be beneficial. The market towns however, may not be well supported if the focus of growth, outside of Hereford, is in sustainable rural areas. Overall economically Option 4 is neutral as it is dependant on the transport links being created.</p> |
| <p><b>Social</b></p>   | <p>Growth in the market towns will assist the younger generation gain access to housing and employment and support the local economy as more people potentially have more disposal income to spend. Overall socially Option 1 is moving towards sustainability.</p> | <p>This option allows growth in all areas, enabling vibrancy and vitality. The character of the County is most likely to be maintained in this option as growth appears to be proposed in scale with the size of the existing locations. Supporting and maintaining communities and the feeling of safety whilst providing affordable housing in areas of need. Overall socially Option 2 is moving towards</p>                           | <p>Even distribution of growth is likely to provide a balance of employment opportunity and housing, including affordable housing in areas of social need. Potentially there will be a need to use the private car to reach the rural areas and access employment in the rural and market towns. Overall socially Option 3 is neutral.</p>  | <p>The County's traditional rural culture may be altered if growth is significant in these areas potentially affecting the activities people enjoy doing in the countryside. However, the type of growth offered may be advantageous if it is focused around the rural economy maintaining the cultural heritage of the settlements, for example agriculture/food production, tourism etc.</p>  |

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|  |   | sustainability.   |   | Overall socially Option 4 is neutral.   |
| <b>Environmental</b>                   | Growth in the market towns will place pressure on their historic nature and could detrimentally affect them. Provision of public transport will be important to encourage a reduction in the use of the private car. Overall environmentally Option 1 is moving away from sustainability. | Growth placed in the market towns and sustainable rural settlements alleviates the pressure on less sustainable rural areas for growth, safeguarding habitats and species. Opportunities exist to use these less accessible places for flood alleviation schemes, habitat creation and improvement and rural economic activities. Overall environmentally Option 2 is moving towards sustainability.  | Impacts will be similar to Option 2 with a more even distribution of growth between the market towns and sustainable rural areas. The rural character of these places may be altered detrimentally. Traffic emission issues may be increased, as contributions from development will be required to support and improve accessibility to other areas. Overall environmentally Option 3 is neutral.  | Sustainable rural locations are likely to have available public transport routes reducing the need for private car use. However growth will require these links to be supported and improved similarly to Option 3. The historic and natural environment of these rural settlements may be adversely affected by the scale of growth. Overall environmentally Option 4 is neutral.                                  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. However, the environmental concerns around the local historic environment and the provision of public transport will be important in achieving this.   | Overall Option 2 is moving towards sustainability. The opportunities in the rural economy should be maximised. Market town character should be safeguarded and affordable housing should be secured. In the more rural areas, access to employment areas should be improved, for example public transport routes, walkways, cycle paths. Environmental assets outside these areas should be utilised in a holistic way to reduce flooding concerns and create and | Clarification of what a sustainable rural area is required for Option 3. Overall Option 3 is neutral. Sustainable modes of travel need to be implemented to reduce the use of the private car, which will support the economy. Housing and employment opportunities need to be located such as to provide ease of movement by sustainable modes of travel. The character of place needs to be safeguarded and the natural environmental assets used to reduce | Clarification of what a sustainable rural area is required for Option 4. Overall Option 4 is neutral. Improvements to transport linkages are important, including the provision of sustainable modes of travel. Appropriate rural business types should be attracted to the area in order to safeguard the social cultural and environmental assets of the area, for example agriculture, food production, tourism. |

|                                      |   |   |  |   |
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|                                      |   | protect habitats and enrich specie diversity.   | flooding and create and protect biodiversity.  |   |
| <b>Habitat Regulation Assessment</b> | Growth in development is likely to place pressure on water supply affecting water levels and water quality. Sustainable modes of travel will be essential to reduce travel by the private car and thus aid reductions in air pollution. | Growth in development is likely to place pressure on water supply affecting water levels and water quality. | Increases in travel by means of the private car is likely to increase air pollution. Growth in development is likely to place pressure on water supply affecting water levels and water quality. | The opportunity for home based working may reduce the need to travel however rural enterprise is likely to attract business and users and therefore create more traffic and congestion, affect air quality. Growth in development is likely to place pressure on water supply affecting water levels and water quality. |

Depending on the level of growth distributed to rural areas, development in rural settlements could be:

| Rural area growth, brownfield or greenfield | Options  |   |
|---|--|---|
|   | Option 1: Limited to brownfield land inside the existing built up limits of sustainable rural settlements using a criteria based policy  | Option 2: Enabled to provide sufficient growth, including Greenfield releases, to retain or provide new rural services or facilities in identified rural settlements  |
| <b>The Reasonableness Test</b>              | It is reasonable to limit brownfield land for development within rural settlements, as this ties in with national policy.  | It is reasonable to consider greenfield extensions to rural settlements, where these may support new or existing services and not detrimentally affect appearance and character.  |
| <b>The Community Engagement Test</b>        | The communities are likely to prefer this option to option 2 as the place will be restricted in terms of how big it could grow and thus considered to retain the rural character. However some local communities may be concerned that limiting growth will have an impact on existing services and lead to their decline. | Some local communities may be concerned that the rural identity and local distinctiveness may be lost if growth is achieved by means of a large greenfield rural extension. Others may feel there is an opportunity to protect rural services and provide rural housing, particularly affordable. |
| <b>The Sustainability Appraisal Test</b>    |  |   |

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| <b>Economic</b>                        | In the long term for viability and vitality of settlements utilising brownfield land before greenfield on the outskirts is best. Depending on the final proposed use of the brownfield land development costs could be higher if the site required decontamination. A proposed use with similar previous use is unlikely to incur the same associated costs. Therefore the proposed final use of a site may well alter the economic value and appeal of the site to a developer or occupier. Overall economically Option 1 is neutral.  | Greenfield land could be utilised to provide new rural employment land and housing land and is likely to be easier to develop reducing costs to the developer. Overall Option 2 economically is moving towards sustainability.  |
| <b>Social</b>                          | As this Option could limit growth this could potentially limit the provision of affordable housing and safeguarding or providing services/facilities. employment opportunities and recreation provision. Brownfield land is likely to provide available land for housing and could assist in meeting affordable housing targets. Overall socially Option 1 is neutral as it is dependant on developer contributions and interest in regenerating such brownfield land to create the benefits, which are likely for social well-being.   | Growth in these areas could improve employment opportunities and provide affordable housing, retail services and recreational activities. On larger sites a higher percentage of affordable housing is likely. Overall socially Option 2 is moving towards sustainability.  |
| <b>Environmental</b>                   | A decontaminated site brought back into use will improve the environment as any potential leachate and soil contamination will be removed and remediated. The reuse of brownfield land is also the best use of existing land. However, within many rural settlements, brownfield land is likely to be infilling/garden plots, town cramming may result, potentially affecting the character of place. Environmental richness is likely to be improved with new habitat creation. However, it is acknowledged that some derelict sites can be ecologically rich and development of these sites would result in the loss of biodiversity. Overall environmentally Option 1 is neutral, as it is dependant on a site by site base for ecological richness and developer costs, the results of the evidence base will be useful here. | Although a loss of greenfield land is likely with this option the ecological value of the land may be small and improvements can be made in conjunction with development either on site or provided off site. Flood alleviation schemes on the edge of settlements are likely to be required to alleviate flooding concerns. Overall environmentally Option 2 is neutral, as it is dependant on the greenfield land ecological value. |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is neutral as this Option would enable the best use of land but many have some impact on character of areas.   | Overall Option 2 is moving towards sustainability. Biodiversity value in potential development areas may be unknown and research would be needed later in the   |

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|                                      |   | process from the evidence base as necessary. Developer contributions would need to be achieved to gain the affordable housing and open space requirements for growth.   |
| <b>Habitat Regulation Assessment</b> | If brownfield land is contaminated development will improve soil quality improving the potential for contaminated runoff during rain events, protecting water quality. However, if similar operations continue on a site this risk will continue as decontamination would not be cost effective. Prevention and management methods and techniques would then be required to safeguard water quality. Any development growth is also likely to place pressure on water supply and therefore water levels and water quality in this regard. | Growth in development is likely to place pressure on water supply affecting water levels and water quality. Increased development is also likely to increase traffic and affect air quality from vehicle emissions. |

### Jobs in rural areas

#### How should we encourage the diversification of the rural economy?

| Rural areas economy                  | Options  |   |
|--------------------------------------|--|---|
|                                      | Option 1: Limit employment development in rural areas to proposals which support farm diversification, and the development of small employment sites for businesses which are required to locate in a rural area | Option 2: Devise a criteria based policy to diversify the rural economy within and outside of rural settlements, by enabling the development of new employment opportunities and enterprise such as:<br>a) live-work units;<br>b) environmental technologies, such as the development of biofuels or food production; or<br>c) sustainable rural tourism and leisure businesses |
| <b>The Reasonableness Test</b>       | It is reasonable to limit employment in rural areas to those that require a rural location and to small sites and farm diversification.  | It is reasonable to consider criteria based policy for rural economic growth.   |
| <b>The Community Engagement Test</b> | The community will like this option as it provides direction on what development will be allowed.  | The community will support this approach slightly more than option 1 as the criteria approach gives the specifics of the types of development that will be acceptable in the rural areas.   |

| <b>The Sustainability Appraisal Test</b> |  |   |
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| <b>Economic</b>                          | Diversification will enable the rural economy to continue and strengthen in these areas supplying services, facilities and employment opportunity to the rural community and the County. However, the opportunities are limited as the option may not meet all economic demands. For example, if a new business wants to locate in the countryside, not connected with the rural setting, this option would prevent it. Overall economically Option 1 is moving towards sustainability as it strengthens the diversification for the rural economy.  | This should increase developers' confidence and ensure that facilities, services, job opportunities and economic growth are delivered more quickly. This option is likely to achieve rural renaissance as per the RSS. Overall Option 2 economically is moving towards sustainability as it aims to raise developer expectations and deliver enterprise opportunities to raise diversity in the rural economy.  |
| <b>Social</b>                            | Maintaining the viability of the rural areas is vital to the Herefordshire economy. If this is not maintained and strengthened more people will leave the rural areas and these once thriving communities will diminish. This may have several negative impacts including low housing occupation rates, a reduction in support for local services such as shops, seasonal unemployment and an increase in house prices making housing less affordable for local people. Overall Option 1 is socially moving towards sustainability, as it would prevent the negative impacts highlighted here. | This option will provide more local jobs for rural populations, resulting in less commuting and potential for live work units and providing affordable housing. With the growth the rural character will need to be protected to ensure it is respected and preserved. However, potential increases in commuting from the town to rural areas may result. Overall socially Option 2 is moving towards sustainability.   |
| <b>Environmental</b>                     | Businesses that are required to locate in rural areas may be technologies that could improve the environmental quality of the County. However, there may be a need for controls and quality assurances to prevent environmental contamination in rural areas. Diversification gives the opportunity for environment improvements. Overall Option 1 environmentally is moving towards sustainability.   | Environmental assets are more likely to have been considered from the outset in the writing of the criteria reducing the negative impacts associated with rural development. This outcome is dependant on implementation. However, the rural character may be negatively affected. Overall environmentally Option 2 is neutral as the safeguarding and incorporation of the environmental assets in the criteria based approach is dependant on implementation. |
| <b>Conclusions and Recommendations</b>   | Overall Option 1 is moving towards sustainability. This is because the diversification of the rural economy will strengthen it and create a viable area which will support thriving communities. Provision of affordable housing and support for local services and reductions in seasonal unemployment are likely. The types of   | Overall Option 2 is moving towards sustainability. This is likely as enterprise opportunities are likely to increase, affordable housing is likely to be supplied and local jobs and services maintained reducing commuting traffic and congestion. However, impacts on the character and environmental assets will need to be safeguarded and  |

|                                      |   |  |
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|                                      | businesses attracted could potentially benefit environmental assets. Implementation will be key.  | incorporated at the earliest opportunity to avoid negative impacts.  |
| <b>Habitat Regulation Assessment</b> | It is difficult to identify what the impacts could be for designated sites without knowing the farm diversification activity, different changes are likely to have different outcomes and as such detrimental impacts could affect water and air quality. | Growth in development is likely to place pressure on water supply and therefore water levels and water quality. Traffic increases may also increase air pollution affecting air quality. |

### How should we protect our rural facilities?

| Rural areas facilities                   | Options   |   |   |
|--|---|---|---|
|  | Option 1: Develop more robust criteria based policies to protect and/or increase the provision of small-scale, rural services/facilities, including retail – for example farm shops, in or adjoining settlement | Option 2: Identify particular settlements outside of the market towns and Hereford as Local Service Centres (still within a ranking of settlements), and use criteria based policies to promote/protect facilities/services (similar to the current approach) | Option 3: Do nothing and allow market forces to prevail                                       |
| <b>The Reasonableness Test</b>           | A criteria based approach is reasonable in considering rural facilities and services.   | The identification of local service centres is a reasonable approach to providing services and facilities in rural areas.   | This is reasonable.   |
| <b>The Community Engagement Test</b>     | A criteria based approach will give more certainty to the community and thus they are likely to support this option.  | A mixed response is likely here as those communities that feel that the current approach is working will support this option and those that feel that their community is left out of service provision will not prefer it.                                    | The community may have concerns on how this approach may affect the character of their place. |
| <b>The Sustainability Appraisal Test</b> |   |   |   |

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| <b>Economic</b>                        | Criteria based policies may appeal to developers and businesses in these rural locations supporting the growth in the most appropriate places. Locally produced foods are becoming more sought. Given the high quality of agricultural land in the County, there is an opportunity to expand this market. Overall Option 1 economically is moving towards sustainability due to the certainty created by criteria based policy. | Local service centres will enable businesses to co-locate and support one another. Economic vitality and viability in these areas is likely to increase. Development linked to housing will enable developer contributions towards service provision. Overall Option 2 economically is moving towards sustainability.  | Market forces left to decide where services and facilities will be located may result in a decline in rural services. This has many negative outcomes for both the health of the economy and socially for maintaining and encouraging a safe place, and a place with vitality and viability. This option could result in less coordinated developer contributions. Overall Option 3 economically is moving away from sustainability. |
| <b>Social</b>                          | Enhancement of services and facilities provide local people with job opportunities, housing and reduced travel times to reach the services that they require. Overall Option 1 socially is moving towards sustainability.   | A vibrant rural service centre is likely to increase well-being, improve job opportunity and expectation and support housing provision. Overall Option 2 is socially moving towards sustainability.  | Possible increase in distance to travel to reach services and facilities could increase the use of the private car. Peoples sense of community could also be affected by lack of available services and facilities. Option 3 socially is moving away from sustainability.  |
| <b>Environmental</b>                   | Criteria based policies can incorporate environmental assets to ensure that their unique qualities are not lost and enhancement opportunities are exploited. The positive outcome is dependant upon implementation. Overall Option 1 environmentally is neutral, as it is dependent on implementation.  | Local service centres may create local congestion hotspots. However, an improvement in air quality across the County is likely as people would need to travel less to reach the services that they currently use, which are likely to be in Hereford or the market towns. Overall Option 2 is environmentally moving towards sustainability as countywide improvements on traffic volume and congestion is likely to reduce and assist in the contributions to climate change. | With an increase on the reliance of the private car for accessibility to dispersed locations, emissions are likely to continue to increase, having a detrimental effect upon air quality. Overall environmentally Option 3 is moving away from sustainability.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability as it creates more certainty for developers and local communities for rural economic  | Overall Option 2 is moving towards sustainability. Economic stability should be maximised through the creation of rural jobs and services,   | Overall Option 3 is moving away from sustainability. Concerns for the decreasing vibrancy of the rural villages. Increases in car travel and   |



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|                                      | development and provides for local jobs, affordable housing and associated facilities and services. Environmental assets will need to be protected and enhanced through implementation to ensure that movements towards sustainability are achieved environmentally.   | support for the provision of affordable housing, facilities and well being through developer contributions. Local congestion and pollution should be minimised to reduce the impacts as much as possible and to maximise the countywide benefits for reductions in contributions to climate change. | pollution may also result as more people rely on the private car to reach services and facilities outside of their rural settlement.. |
| <b>Habitat Regulation Assessment</b> | Expanding the agricultural sector is likely to place pressure on the use of fertilisers and nitrogen enrichment (for example from live stock) which could affect water quality through runoff and impact upon erosion and potentially flood defence and dredging. Reducing the need to travel possible through this option is likely to assist in improving air quality. | Development of local service centres may increase congestion hotspots and thus increase air pollution. However, cumulatively the overall air quality of the County is likely to be improved since more people will travel less to access employment, services and facilities.                       | This option is likely to increase the need to travel by the private car and affect air quality.                                       |

## Appendix B3 – Predicting the Effects of the Policy Options

### Policy Options

#### Sustainable Communities

#### Renewable Energy

How can Herefordshire increase its usage of renewable energy sources?

| Herefordshire Renewable Energy           | Options  |  |
|--|--|--|
|  | Option 1: Highlight specific technologies and locations in Herefordshire where renewable energy sources could be promoted – such as wind turbines, individual turbines, solar energy, waste to energy, combined heat and power plants, biomass, geo-thermal or other | Option 2: Set targets and design requirements for the inclusion of energy from renewable sources within new developments of a particular scale |
| <b>The Reasonableness Test</b>           | This has potential as it works in Wales, however it needs investigation and research for sites. There were 2 sites for biomass highlighted in the 1990's. 1 in Hereford and 1 in Leominster. This shows potential interest.  | This is reasonable since it is in line with government legislation such as the Renewable Obligations and the new Planning and Energy Act 2008. |
| <b>The Community Engagement Test</b>     | It is thought that the public would welcome this in theory, but may react differently if the sites were near them due to impacts on views, landscape, property prices etc. The potential initial impacts of this option are likely to be accepted over time.         | The community will accept the theory of the policy.  |
| <b>The Sustainability Appraisal Test</b> |  |  |

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| <b>Economic</b>                        | Renewable energy could be promoted in line with regeneration, for example biomass plants in new development schemes. There is a lack in the specialist skills required in the local construction workers and therefore importing skilled workers would be necessary. Renewable energy could assist in lower energy costs for local businesses. Bigger schemes could potentially be more profitable rather than the smaller ones in Herefordshire. Overall Option 1 economically is moving towards sustainability. | Targets and design requirements provide developers with certainty on economies of scale and are likely to result in financial benefits. Overall economically Option 2 is moving towards sustainability.  |
| <b>Social</b>                          | Impacts are likely to affect the immediate neighbours, but will benefit many others. Overall socially Option 1 is neutral.  | Renewable energy is likely to provide the consumer with a cheaper and greener energy supply. The design requirements are likely to result in minimising the negative impacts upon communities. Overall socially Option 2 is moving towards sustainability.   |
| <b>Environmental</b>                   | There is likely to be a benefit in reducing carbon emissions, but there will also be a potential negative impact on the landscape of the area, depending on the type of renewable scheme. Hedges can be replaced and in the long-term carbon dioxide reductions will help biodiversity and contributions to climate change. Overall Option 1 environmentally is moving towards sustainability.  | The environmental impacts are the same for this Option as for Option 1. The design requirements are likely to result in minimising the negative impacts on landscape quality. Overall environmentally Option 2 is moving towards sustainability.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. However, this outcome is dependant on implementation and individual sites. Cost of various technologies needs to be assessed for the best practical option. Effects on neighbouring communities need to be minimised and technology appropriately located. Reductions in carbon emissions need to be maximised while the impacts on landscape quality need to be minimised.  | Overall Option 2 is moving towards sustainability. Local targets should be set which aim to meet national targets as set out in legislation. Maximising carbon reduction is needed whilst balancing landscape quality and the need for cleaner technologies to reduce contributions to climate change. |

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| <b>Habitat Regulation Assessment</b> | Depending on the location of renewable sources of energy, the impact upon designated sites is likely to vary. Issues for the sites may include water quality if discharges from processes are made to water courses; water temperature could also be an impact in this respect. Overall air quality is likely to improve as coal fired power stations may be less relied upon, however commercial combustion emissions from burning waste for energy is likely. The transportation of waste may also increase air pollution depleting air quality. | Targets and design are unlikely to impact upon designated sites however, renewable energy sources are likely to improve air quality. |
|--------------------------------------|--|--|

## Waste Management

How should Herefordshire manage the waste it produces?

| Herefordshire Waste Management           | Options   |  |  |
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|  | Option 1: Identify locations where specific waste management facilities will be required, for example these could be, a. close to urban centres, b. as part of new urban extensions, c. within areas with good transport links, d. existing/proposed employment sites | Option 2: Provide a set of generic criteria in a policy for new waste management facilities which would be used to judge planning applications against | Option 3: Devise a policy whereby all new developments of a certain size will need to be accompanied by a new local waste facility being built or contributed to |
| <b>The Reasonableness Test</b>           | This would depend on what the term waste facilities actually means. Clarification is needed.  | Similar approach to the UDP, a reactive policy for waste would be appropriate because often need to react to needs identified by the private sector.   | Yes it is reasonable to devise a policy to incorporate small scale neighbourhood recycling centres.  |
| <b>The Community Engagement Test</b>     | The community would welcome the theory, but not the site.   | The community would welcome the theory.  | The community would welcome the theory, but not the site.  |
| <b>The Sustainability Appraisal Test</b> |   |  |  |

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| <b>Economic</b>      | Waste facilities offer generally low skilled jobs, however there is economic value in some waste streams. This option is expensive in the short term, but should balance out over time. Overall economically Option 1 is neutral.   | Waste facilities offer generally low skilled jobs, however there is economic value in some waste streams. Transportation costs may increase with this option as it is not based on a strategic policy. There is less certainty for developers prior to entering into the planning process on location and appropriateness of technology type, which is likely to increase costs. Overall Option 2 economically is moving away from sustainability. | Outcomes are similar as for the other options. This option places greater costs on developers to incorporate waste facilities within new development of a certain size. Depending on type of technology and facility, transportation costs may also result in transporting waste to disposal centres. Costs would remain for existing development and therefore waste management would likely become disjointed. Overall economically Option 3 is moving away from sustainability. |
| <b>Social</b>        | Community engagement with recycling is easily achievable and local communities gain the feeling that they are helping the environment. The location of facilities, depending on their type may cause odour, noise or dust nuisance to local residents. As such different types of facilities will have different location requirements to avoid such impacts. Overall Option 1 socially is neutral. | The criteria will give greater certainty to the community on issues such as environmental quality and pollution to reduce the impact on local residents. As such, overall Option 2 socially is moving towards sustainability.  | New facilities in new development would result in similar outcomes as for the other options. It would not however address the ease of recycling and sense of well-being for existing development. Option 3 overall is creating waste neutral new development and therefore is socially moving towards sustainability.  |
| <b>Environmental</b> | In the short term this would have a negative impact due to transport and carbon footprint, however over the longer term impacts are likely to be more positive. The recycling process is not always carbon neutral. Proposals will have to be appropriately located facilities are likely to impact less upon the visual  | The criteria based policy should reduce negative effects of proposals. Environmentally, a generic policy would incorporate specific criteria to protect aspects of landscape quality etc, and therefore is moving towards sustainability.  | This Option could result in a plethora of local facilities which may detrimentally affect the environment.   |

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|  | amenity of an. Overall environmentally Option 1 is neutral.  |  |   |
| <b>General comments</b>                | <ul style="list-style-type: none"> <li>• Consideration needs to be given to the needs of the industry, it is difficult because waste management is mainly in the private sector.</li> <li>• The options should be dependent on the evidence base to ensure that sites are appropriate.</li> </ul>  |  |   |
| <b>Conclusions and Recommendations</b> | Clarification on what waste facilities means is required. Investment will be expensive in the short term and therefore proper utilisation of the type of facilities required will be essential to ensure the investment is economically viable and fit for purpose. Overall Option 1 is neutral as it is dependant on implementation and individual sites..          | Option 2 is reactive and therefore although the conclusions are the same as for Option 1 it is potentially less sustainable as there is no certainty for the developer and waste is less likely to be planned for efficiently. Overall Option 2 is neutral as it is dependant on implementation and individual sites approval. | Option 3 is a reactive option to waste issues. It also does not address the wider energy and climate change issues from other existing development and as such is the least sustainable of the options. Overall Option 3 is neutral.  |
| <b>Habitat Regulation Assessment</b>   | Depending on the location of facilities impacts upon designated sites may vary. Increased travel requirements for waste facilities will increase air pollution. Different facilities may impact negatively upon soil structures through acidity, nitrogen enrichment, cooling waters, affect sedimentation and therefore erosion, flood defence and dredging issues. | The impacts are the same as highlighted in Option 1. Criteria based policies that incorporate measures to avoid first and then mitigate later impacts associated with waste facilities; are likely to address the potential for detrimental impacts upon designated sites.   | The impacts are the same as highlighted in Option 1. Facilities incorporated into all new development would be place and waste type specific and as such could have a variety issues for the designated sites over a wider area. The cumulative impacts of all the facilities also need to be considered. |

## Minerals

How should Herefordshire address any additional mineral reserves requirement?

| Herefordshire Minerals                   | Options   |   |   |
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|  | Option 1: Identify the current and required land bank of permitted mineral reserves to meet the needs of Herefordshire up until 2026  | Option 2: Identify preferred areas of mineral extraction, to enable greater flexibility and safeguard potential mineral reserves  | Option 3: Provide a set of generic criteria, which would be used to judge planning applications for new minerals extraction |
| <b>The Reasonableness Test</b>           | It is reasonable to identify sites where land banks and reserves are located. It gives greater certainty to the industry and greater community consultation opportunities. The Entec study will be vital here.  | It is reasonable to take the area approach. The RSS and Entec study should provide the necessary information for the Core Strategy on strategic areas for extraction.   | This approach is similar to that with the current UDP and would be appropriate to consider it for the Core Strategy.        |
| <b>The Community Engagement Test</b>     | Communities who live near mineral sites are aware of operations and those outside of these areas are possibly less aware of minerals and are likely to have limited views. The industry however will likely support this option as it tells them where reserves are and what the opportunities for extraction are based on. | The communities affected by allocated areas may have concerns with regards to lorry traffic, noise, dust etc. Consultation would be very important with this option, as it is likely it would be more general than Option 1's approach. | A status quo approach is likely to be supported by the community, as it will involve little change.                         |
| <b>The Sustainability Appraisal Test</b> |   |   |   |

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| <b>Economic</b>      | Economic stability would be likely with this option as higher levels of certainty are possible with identified sites for extraction. The mineral industry will be attracted to the area if a robust reserve and land bank is available, creating job security. Overall economically Option 1 is moving towards sustainability.  | This would give greater certainty for the industry, as they would know in advance general areas were they could gain planning approval to extract reserves and what the conditions and restrictions are likely to be to aid safeguarding other areas to avoid sterilisation. Overall economically Option 2 is moving towards sustainability.  | This is the least economically beneficial as the certainty to the developer is lower. Overall economically Option 3 is neutral.  |
| <b>Social</b>        | Identified sites are likely to have greater community involvement. This should lead to their concerns being addressed appropriately and giving a sense of well-being to the community most affected. Greater job security and end of the life restoration works will create recreational areas for fishing, walking, cycling improving quality of life. Overall socially Option 1 is moving towards sustainability.   | Similarly to Option 1 and identified sites, areas of potential mineral exploration may also enable community engagement and provide job security. Restoration works will also create an environment in which residents/visitors can enjoy wetlands and other habitat areas for recreational activities improving well being, health and reducing obesity. Overall Option 2 socially is moving towards sustainability. | A criteria based policy will continue the current situation with planning applications and appeals tending to create opposition in the community in which the operation is being proposed. Restoration works will continue through this process. Overall socially Option 3 is neutral. |
| <b>Environmental</b> | During the life of the sites operation emissions are likely from lorry traffic and dust potentially affecting local communities. However, at the end of the various phases which will be probable the extraction sites will be restored into areas of relative high biodiversity offering in the most part, wetland sites which have the potential to act as water attenuation areas assisting in reducing flood risk. Overall environmentally Option 1 is neutral as there are short to medium | Similarly to Option 1 during the extraction phase emissions are likely to be higher from lorry movements and dust may affect a very localised area. However, the restoration works following extraction is likely to enhance the area to a better state than prior to extraction. Overall environmentally Option 2 is neutral as there are short to medium term negative impacts and long term positive outcomes.     | Outcomes from this option are likely to be similar to Options 1 and 2, as the application process would still engage the key players such as the Council's Conservation team and highways. Option 3 is therefore environmentally overall neutral.                                      |



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|  | term negative impacts and long term positive outcomes.   |   |  |
| <b>Conclusions and Recommendations</b> | Greater clarity with regards to reference to identified sites may be necessary for this option. Overall Option 1 is moving towards sustainability, and is considered to be the most sustainable of the three options due to the identification of sites for mineral extraction. Transport journeys should be minimised and alternatives to lorry movements, such as rail freight, should be explored for feasibility and efficiency. | Overall Option 2 is moving towards sustainability. Discussion with the mineral industry should be maximised to ensure that the economic benefits of job security and mineral supply for the construction industry is exploited to the fullest. Transport journeys should be minimised and alternatives to lorry movements, such as rail freight, should be explored for feasibility and efficiency. | Overall Option 3 is neutral. The uncertainty to the industry may encourage the industry to explore minerals in other areas outside the County increasing costs of minerals to the construction industry in the medium to long term. These uncertainties need to be minimised and community engagement needs to be at the earliest opportunity including discussion with council departments to maximise the benefits through restoration projects. Option 3 is the least sustainable of the options. |
| <b>Habitat Regulation Assessment</b>   | Impacts upon designated sites are likely to be water level, water quality transport emissions, clean gravel, sedimentation, disturbance, erosion, aggregate extraction, flood defence and dredging. However, impacts are likely to be localised, except for transport emissions, which is more likely to impact upon air quality on a wider scale.   | Impacts are likely to be the same as for Option 1. Designated areas for mineral extraction will enable research into the impacts of the area to be identified early and mitigation measures implemented more appropriately.   | Impacts are likely to be the same as for Option 1. However, generic policies that incorporate measures to avoid first and then mitigate later the impacts associated with mineral extraction, are likely to address the potential for detrimental impacts upon designated sites.   |

## Flooding

How should the flooding issues in Herefordshire be addressed with the increasing needs for future development?

### A) Development in flood risk areas

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| Herefordshire Flood Risk | Options |
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|  | Option 1: Devise a policy based on the PPS25 sequential test approach using the data from the SFRA. This is similar to the current UDP approach   | Option 2: Adopt a stricter policy, only allowing development in areas with no known flood risk  |
| <b>The Reasonableness Test</b>           | This is considered reasonable and realistic   | Potentially areas not known to flood may flood and therefore although this policy is reasonable as it aims to safeguard development, it is difficult to implement such a strict policy. No settlement or settlement expansion should be in flood risk areas.              |
| <b>The Community Engagement Test</b>     | This would be critical due to recent press coverage, everyone will be affected. People are not very trusting of flooding data.  | This is a sensible option for householders, however developers are unlikely to consider this an appropriate option.   |
| <b>The Sustainability Appraisal Test</b> |   |   |
| <b>Economic</b>                          | Option 1 allows for flood risk to be managed positively for economic development requirements. Overall economically Option 1 is moving towards sustainability.  | Option 2 safeguards new development to the highest standard, above and beyond government guidelines. However, it restricts the locations for development, which may affect the economy. Overall economically Option 2 is neutral.   |
| <b>Social</b>                            | Option 1 allows flood risk to be positively managed safeguarding properties, businesses and social well-being. Overall socially Option 1 is moving towards sustainability.  | The risk of loss of life or damage to property is further reduced due to this stricter approach on the location of development. However, restricted locations may prevent sufficient new housing and other development being built. Overall socially Option 2 is neutral. |
| <b>Environmental</b>                     | Option 1 is a pragmatic approach, which will manage positively for the environment. Overall environmentally Option 1 is moving towards sustainability.  | Option 2 goes further in protecting, enhancing and creating an environment that will focus development in those areas that are not known to flood, emphasising the use of the natural system. Overall environmentally Option 2 is moving towards sustainability.          |
| <b>Conclusions and Recommendations</b>   | Overall Option 1 is working towards sustainability. An appropriate management technique is required to ensure that infrastructure is safeguarded from the flood events so protecting the economy, safety for people, homes and businesses and environmental assets. | Although Option 2 offers the highest protection to people, homes and businesses, developing solely in areas outside of the flood risk areas but is considered to be problematic and possibly unrealistic, therefore overall Option 2 is neutral.                          |

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| <b>Habitat Regulation Assessment</b> | The sequential approach is likely to enable the issues associated with flooding such as water levels, water quality, runoff, nitrogen enrichment, sedimentation, erosion, dredging and ditch construction to be managed effectively in order to safeguard designated sites. | Impacts are likely to be the same as for Option 1. Development in no known flood risk areas is the ideal. However, increased development is still likely to place pressure on water resources and could still create pockets of flooding, negatively affecting designated sites if mitigation is not implemented. |
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**B) Design of developments**

| <b>Herefordshire Flood Risk</b>          | <b>Options</b>  |   |  |
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|  | Option 1: Introduce built or natural design approaches to tolerate or adapt to flooding               | Option 2: Ensure all new development includes methods to collect, store and reuse rainwater, including sustainable urban drainage systems where appropriate to reduce possible non-fluvial flooding | Option 3: Work with developers to determine the most appropriate design solutions with regards to reducing flooding risks at the application stage |
| <b>The Reasonableness Test</b>           | Yes because need to mitigate  | Yes this would continue and strengthen current negotiations.  | Yes this continues current negotiations at planning application stage.   |
| <b>The Community Engagement Test</b>     | Yes the community would support this option as helps to reduce impact of flooding on homes and lives. | Yes the community would support this option as helps to reduce impact of flooding on homes and lives.   | Yes the community would support this option as helps to reduce impact of flooding on homes and lives.  |
| <b>The Sustainability Appraisal Test</b> |   |   |  |

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| <b>Economic</b>                        | Flood management is good for the economy as roads; communication lines etc can remain open. Businesses and homes have reduced risk of being affected by flooding. Overall economically Option 1 is moving towards sustainability.  | Comments are similar as for Option 1. Option 2 is more prescriptive and could potentially give developers greater certainty. Existing areas susceptible to flooding are unlikely to be resolved under this option, however the situation is less likely to be exacerbated by new development if safeguarding measures are put into place as described. | Comments are similar as for Option 1. Although Option 3 is dealing with the flooding concerns at point of application it has the greatest flexibility in being able to integrate a range of techniques that could benefit both non fluvial and fluvial flooding and help existing and new development. Strong criteria are likely to be needed to ensure the maximum benefit of this option could be attained. Overall Option 3 is economically moving towards sustainability. |
| <b>Social</b>                          | This will have a positive impact due to the reduction in flooding in people's homes and will reduce levels of stress and disruption caused. Overall socially Option 1 is moving towards sustainability.  | Option 2 is moving towards sustainability as is similar to Option 1.   | Overall socially Option 3 is moving towards sustainability.  |
| <b>Environmental</b>                   | Environmentally it would be best not to develop in flood areas. This approach would meet Option 1 most effectively, as the natural systems would be utilised to the maximum to reduce the risk of flooding. However, built adaptation to flood risk may negatively affect visual amenity. Overall environmentally Option 1 is moving towards sustainability. | Option 2 would mean that no additional flooding pressures would be likely from non fluvial sources from new development. However, existing environmental assets are unlikely to be utilised effectively to reduce flooding concerns for existing development or to deal with fluvial flooding. Overall Option 2 is neutral                             | Comments are similar as to the above. This option has greater flexibility of techniques and as such could be utilised to maximised the natural environment to safeguard development from flooding and create areas for biodiversity interest. Overall Option 3 is environmentally moving towards sustainability.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability because it would enable development to cope with   | Overall Option 2 is moving towards sustainability because it ensures water use savings.  | Overall Option 3 is moving towards sustainability. However, it is vital to obtain the earliest engagement with   |

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|                                      | and adapt to changing climatic conditions sustaining the economy. Social cohesion is likely to be maintained as stress and disruption is minimised and by using the natural environment in the best way to safeguard new development from increased risk of flooding.  |  | developers to discuss the most effective and efficient techniques that will benefit new business and homes from fluvial and non fluvial flood risk, however it is difficult to ensure consistency in approach in that policy guidance |
| <b>Habitat Regulation Assessment</b> | Issues of flooding for designated sites include water levels, water quality, runoff, nitrogen enrichment, sedimentation, erosion, dredging and ditch construction. Option 1 is likely to incorporate a natural approach to flood defence and therefore be the most effective at safeguarding the designated sites. | Although new development will incorporate measures to mitigate non fluvial impacts the option does not address fluvial flooding and existing issues. The option is therefore likely to continue to place pressure on the issues highlighted in Option 1. | Impacts are similar as for Option 1. Issues would have to be addressed at the application stage which is late in the process and therefore avoidance issues could be compromised.   |

## Water Use

### How can we balance the growing needs for water and the European status of the Rivers Wye and Lugg?

| Herefordshire water use        | Options   |  |  |  |
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|                                | Option 1: Ensure that all new development incorporates water saving and efficiency measures linked to the code for sustainable homes requirements | Option 2: Incorporate phasing proposals to enable necessary new infrastructure to be put in place prior to the commencement of new development | Option 3: Require developments over a particular threshold to contribute to incorporating water saving and efficiency measures into existing properties, using SUDS or other efficiency techniques | Option 4: A combination of elements of 1, 2, and 3 |
| <b>The Reasonableness Test</b> | Some new development  | This is reasonable   | Thresholds for   | This is reasonable but                             |

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|  | have to do this already   |  | development require clarification. This will be difficult to implement and should have regard for viability.  | thresholds would need to be clarified and implementation considered.   |
| <b>The Community Engagement Test</b>     | The community would welcome measures which assist in reducing household and business utility bills and supportive of proposals which are more water efficient | The local community will be supportive of such work that continues the current situation | The community will want to be aware of the threshold to determine whether they would be affected but would welcome measures that were clear and aim to improve water efficiency helping to reduce household and business utility bills. | A sustainable approach, fit for the purpose and scale of development, would be considered an appropriate way forward and likely to be supported by the majority. |
| <b>The Sustainability Appraisal Test</b> |   |  |   |  |

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| <b>Economic</b>      | Move to sustainable homes will mean this is cost neutral. Possible increase in build costs however, savings at point of use are likely to be lower. Overall Option 1 economically is neutral.   | Imposing an extra cost due to phasing of infrastructure development. Overall Option 2 economically is moving away from sustainability.   | This option effectively asks new developers to pay for existing problems. This retro fitting will be difficult to implement. Overall economically Option 3 is moving away from sustainability. | A combination of the assessments from Options 1 to 3 is likely for Option 4. Overall economically Option 4 is neutral as its dependant on implementation and cost viability.       |
| <b>Social</b>        | The need for water will include social factors and feeling of well-being. There is a potential for water supplies to be limited without such measures proposed under Option 1. Overall Options socially is moving towards sustainability. | New infrastructure will improve the capability of water supplies to be delivered however without water saving measures and pressures for greater supply there may be a limited supply in the County. Option 2 socially is neutral as it is dependent on supplies being secured.      | Comments are similar as for Option 1. Option 3 socially is moving towards sustainability.  | A combination of the assessment outcomes from Options 1 to 3 is likely for Option 4. Overall Option 4 socially is moving towards sustainability.                                   |
| <b>Environmental</b> | This will be positive if management works. Reductions in water usage will improve water flow in rivers and streams protecting biodiversity and designated sites. Overall Option 1 environmentally is moving towards sustainability.       | Greater delivery capability is likely to aid an increase in usage. This could have a detrimental effect on water course flows and thus negatively impact upon biodiversity and protected sites. Overall environmentally Option 2 is environmentally moving away from sustainability. | The environmental benefits of schemes such as SUDs have great potential if implemented and maintained appropriately. Overall Option 3 environmentally is moving towards sustainability.        | A combination of the assessments from Options 1 to 3 is likely for Option 4. Overall environmentally Option 4 is neutral as it is dependant on implementation and good management. |

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| <p><b>Conclusions<br/>Recommendations</b></p> | <p><b>and</b></p> <p>Overall Option 1 is moving towards sustainability. It is dependant on the code for sustainable homes being maintained through building control regulations and is also dependant on the appropriate management of the internationally important sites to ensure that the designated features are maintained in favourable condition. This option does not address existing and retrofitting of water saving technology. The results of the water cycle study and HRA will also be important here in assessing and choosing options for the next stage.</p> | <p>Overall Option 2 is moving away from sustainability. A neutral outcome is dependant on developer costs of purchase; phased infrastructure works to ensure development is implemented to best effect. It is also dependant on the code for sustainable homes being maintained and the designated features of protected sites being managed appropriately. Option 2 does not consider retro fitting in existing development. The results of the water cycle study and HRA will also be important here in assessing and choosing options for the next stage.</p> | <p>Overall Option 3 is neutral as it is dependant on a resolving what the threshold limit is set to be and how the retro fitting of schemes can be done in a viable way. Developer contributions could be used to create SUDs schemes in areas of existing development with existing or predicted flooding issues as a result of climate change or increased development. The results of the water cycle study and HRA will also be important here in assessing and choosing options for the next stage.</p> | <p>Overall Option 4 is neutral however is the most sustainable of the 4 Options. The conclusions and recommendations for the previous Options apply to this option and should be noted. A balanced approach to water usage and conservation in development is vital to ensure that the European designated site features are maintained or reach favourable condition. The results of the water cycle study and HRA will also be important here in assessing and choosing options for the next stage.</p> |
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| <b>Habitat Regulation Assessment</b> | <p>The results of the water studies and the review of the RSS HRA are important to ensure that the options do not determinately impact upon water levels and water quality. Option 1 will allow new development to reduce the impact it has upon water levels and water quality for designated sites.</p> | <p>The results of the water studies and the review of the RSS HRA are important to ensure that the options do not determinately impact upon water levels and water quality. Water resources are finite and Option 2 is likely to result in supply and demand becoming unbalanced, placing greater pressure upon water levels and water quality that designated sites depend upon.</p> | <p>The results of the water studies and the review of the RSS HRA are important to ensure that the options do not determinately impact upon water levels and water quality. Option 3 would seek financial contributions from developers to retrofit water saving technology into existing development and this would benefit the ecosystems based on water level and water quality issues.</p> | <p>The results of the water studies and the review of the RSS HRA are important to ensure that the options do not determinately impact upon water levels and water quality. Option 4 is considered to be the most favourable for designated sites. New developments should meet the highest practical standards, new infrastructure will be required to deal with the levels of growth expected for the County and awareness raising to implement retrofitting of water saving technology in the reuse of existing buildings would be an ideal scenario.</p> |
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## Design and Sustainable Construction

### How can we make Herefordshire distinctive in terms of design?

| Herefordshire design | Options  |   |  |
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|                      | Option 1: Devise a locally distinctive design policy incorporating all aspects of design and sustainable | Option 2: Integrate design elements into the place shaping policies and general core policies such as | Option 3: Rely on the sustainable design and construction policy as set out in the regional plan |

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|  | construction  | renewable energy, flooding, housing provision       |  |
| <b>The Reasonableness Test</b>           | Yes   | Yes   | This is reasonable regionally however, it is considered this would not reflect Herefordshire's locally distinctive character sufficiently. |
| <b>The Community Engagement Test</b>     | Yes the community is likely to support this option. | Yes the community is likely to support this option. | The community are likely to feel that this option needs to be more local   |
| <b>The Sustainability Appraisal Test</b> |   |   |  |

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| <b>Economic</b>                        | Good as it is distinctive. It will improve people's wishes to live and work in the County, with desirable homes and businesses. Option 1 economically is moving towards sustainability.  | Comments are similar as for Option 1. Overall economically Option 2 is moving towards sustainability.                                   | Option 3 is likely to negatively affect tourism due to the loss of distinctiveness. This is likely to cause negative impacts on the character of place and thus reduce economic investment. Overall Option 3 is economically moving away from sustainability. |
| <b>Social</b>                          | There will be an improvement in the quality of life and sense of well-being in well designed areas. Option 1 socially is moving towards sustainability.  | Comments are similar as for Option 1. Overall socially Option 2 is moving towards sustainability.                                       | Option 3 is likely to reduce the sense of place, as it would result in a loss of local distinctiveness. Overall Option 3 is socially moving away from sustainability.   |
| <b>Environmental</b>                   | Sustainable construction techniques will improve and become more main stream over time. Option 1 environmentally is moving towards sustainability.   | Comments are similar as for Option 1. Overall environmentally Option 2 is moving towards sustainability.                                | Option 3 is likely to result in a change in the character of place adversely affecting environmental assets. Overall Option 3 is environmentally moving away from sustainability.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. Local businesses should be encouraged to maximise the potential that good design could have for their business. Schools and other community services and facilities should be the anchor for good design awareness raising in the community and as people adapt and adjust to a more sustainable way of living aspirations will raise, health and well being will improve. Engagement with developers will be vital in delivering schemes to the highest standards that should be | Overall Option 2 is moving towards sustainability. Conclusions and recommendations for Option 1 should be accounted for under Option 2. | Overall Option 3 is moving away from sustainability. The regional approach is not sufficient to safeguard the local distinctiveness that the County depends upon for investment, tourism, character and sense of place.                                       |

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|                                      | striving for higher than regional or national requirements to ensure that the future continues to be moving the County in a sustainable direction.   |  |   |
| <b>Habitat Regulation Assessment</b> | Policies to ensure well-designed places that incorporate measures to avoid first and if not mitigate against issues affecting designated sites would be beneficial. Issues include air pollution, water levels, water quality, runoff, nitrogen enrichment, sedimentation, erosion, disturbance and flood defence. | Integrating design into policy is likely to have similar outcomes as for Option 1. | Regional policy reliance may not take account of some designated sites that affect Herefordshire and could therefore place pressure on these sites. |

### Diversifying and Strengthening the Local Economy

#### Provision of Employment Sites

What type of employment sites should we be providing?

| Herefordshire employment sites | Options |   |   |   |  |
|--------------------------------|---------|---|---|---|--|
|                                |         | Option 1: Locate significant employment growth on larger purpose built estates similar to Rotherwas or Leominster Enterprise park, providing a mix of employment uses | Option 2: Locate new employment growth on a number of smaller sites to meet local needs and start up businesses | Option 3: Expand existing employment areas to accommodate new employment growth | Option 4: Encourage the integration of new employment opportunities in mixed use developments such as live-work schemes or opportunities to work from home |

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| <b>The Reasonableness Test</b>           | It is reasonable to consider future employment land being provided on larger sites  | It is reasonable to consider smaller sites as new employment may be required to be located in areas where a large site, such as that proposed under Option 1, would be inappropriate   | It is reasonable to consider extensions to existing employment land as much of the infrastructure required for such sites would already be in place   | Mixed use developments that incorporate employment are sustainable solutions particularly for a rural County like Herefordshire   | Depending on the scale of the urban extension incorporating employment land into housing development is a reasonable solution to any increased demand for employment. |
| <b>The Community Engagement Test</b>     | Some members of the community may consider that Herefordshire has enough large employment areas and that the County does not need any more industry and business. | Local people may consider that local businesses offering employment opportunities will reduce the distance they have to find work and reduce associated costs. However, depending on the type of industry or business relocating or setting up in these places they may equally be concerned about noise, pollution, dust and heavy traffic. | Extensions to existing employment sites may be the most favourable to the community unless areas already have issues as a result of existing employment sites. For example traffic congestion, heavy lorry movements or pollution emissions, which would potentially be exacerbated with any extension. | The community may consider this to be the best option. By providing employment as part of a mixed development local people would view this as supplying all the essential things for a sustainable lifestyle. | The community would consider this to be very similar to option 4 incorporating employment into urban extensions will be considered appropriate.                       |
| <b>The Sustainability Appraisal Test</b> |   |  |   |   |   |

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| <b>Economic</b> | This option would be beneficial. Similar sites in the County have proven success rates. If demand shows a need the economic benefits could be significant for attracting new employers. However, costs of infrastructure would be higher than that associated with Option 3. Overall economically Option 1 is moving towards sustainability. | Smaller sites are likely to support the local business enterprise encouraging small business start-ups and growing businesses. Local sites will also provide local employment opportunities to enable people to work closer to home. However, it will not necessarily improve higher waged employment. Overall economically Option 2 is moving towards sustainability. | This option is beneficial as established business centres could attract new business and industry to the site more easily. As the infrastructure is already in place the costs involved for new or smaller existing sites would be lower. In terms of deliverability this would be quicker allowing the outcome of business to start sooner, aiding the local economy. Option 3 economically is moving towards sustainability. | There is some merit in expanding the opportunities for people to work from home or having home based businesses. A significant element of the local employment sector are self employed and having the means of properties being built to accommodate this would encourage a diversity and expansion in the local economy. Overall economically Option 4 is moving towards sustainability. | These outcomes would be similar to Option 2 for smaller sites and Option 4 for home working. Infrastructure requirements are largely likely to be in place avoiding the costs to businesses and developers. The location is likely to be well linked with transport networks, as housing should be located in more sustainable places. The employment base for new employers is also likely to be in ready supply. Overall economically Option 5 is moving towards sustainability. |
| <b>Social</b>   | New employment areas offer greater opportunities for employment creating personal wealth and   | Smaller sites that provide local employment opportunities will reduce the distance   | Readily available employment areas will aid more people back into work or supply new people attracted to the   | The ability for people to be able to work from home and create a good work life balance will improve well-being.   | Developing employment provision in proximity to housing other  |

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|  | <p>stability and providing a sense of well-being. However, the location of sites may result in an increase in the need to travel. Overall socially Option 1 is moving towards sustainability.</p> | <p>and associated transport costs for local people. They would have potential for providing a sustainable life style that would increase the sense of well-being. Overall socially Option 2 is moving towards sustainability.</p> | <p>area with job opportunities, due to new housing, raising aspirations and well being. However, existing areas that could be expanded under this option may not necessarily be located near housing development, potentially increasing the need to travel. Overall socially Option 3 is moving towards sustainability.</p> | <p>For some however, working in isolation may not be good for their mental well-being. Integrating such development into a mixed scheme of housing, employment, shops etc as well as live work units may overcome this issue. Overall socially Option 4 is moving towards sustainability.</p> | <p>facilities should save on transport costs and assist in access to community facilities such as childcare provision and education. These improvements are likely to assist in a better work life balance and thus improve well-being. Overall socially Option 5 is moving towards sustainability.</p> |
|--|---|---|--|---|---|

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| <p><b>Environmental</b></p>   | <p>Developing new sites has the potential to harm environmentally rich areas. Infrastructure provision will also be required and this may not be restricted to the site boundary adding to any negative impacts. Increased emissions are also likely from the increased need to travel if new homes are not existing employment. Overall environmentally Option 1 is moving away from sustainability.</p> | <p>Smaller employment sites are likely to be more easily catered for within existing built up areas reducing the impacts on the wider environment. Reductions in vehicles will reduce emissions aiding better air quality and improvements for those that suffer from respiratory problems. Overall environmentally Option 2 is moving towards sustainability.</p> | <p>Extensions to existing sites are likely to be less environmentally damaging, as infrastructure links will largely be in place and potentially only require minor improvements. Loss of environmental assets will be reduced with extensions and if located and designed appropriately can and should incorporate good transport links with cycle routes and pathways and public transport to ensure that sustainable modes of travel are available. However, increases in emissions are likely from the possible increase in the need to travel if new homes are not built close by. Overall environmentally Option 3 is moving towards sustainability.</p> | <p>Working from home may reduce energy costs to businesses. However, these individuals will still require energy in the home/work environment. Fuel savings are likely if commuters change to a live work unit or choose to work closer to home. Overall environmentally Option 4 is neutral.</p> | <p>Increased opportunities from developer contributions could potentially aid environmental enhancement and habitat creation schemes and best performance of new development sites. However, overall impacts of development upon visual character could adversely affect environmental assets. Overall environmentally Option 5 is moving neutral.</p> |
| <p><b>Conclusions and</b></p> | <p>Overall Option 1 is</p>  | <p>Overall Option 2 is</p>   | <p>Overall Option 3 is</p>   | <p>Overall Option 4 is</p>  | <p>Overall Option 5 is</p>   |



|                                      |   |  |   |   |   |
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| <b>Recommendations</b>               | moving towards sustainability. Consideration is needed on the location of employment sites to ensure that the social aspects can be maximised and the requirement for new or improved infrastructure firstly enables more, safe walking and cycling routes and also minimises loss of environmental assets. | moving towards sustainability. The type of business attracted to a particular location will need to be considered. The opportunities for small businesses should be maximised. | moving towards sustainability. Existing infrastructure routes should be improved where necessary to maximise sustainable modes of travel. | moving towards sustainability. Consideration for the type of business attracted to live work units is important to ensure that they can sustain and contribute to the local economy and provide sufficient employment opportunities for existing and new residents. Units created should be energy efficient. | moving towards sustainability. The conclusions and recommendations for Option 2 and Option 4 need to be considered for Option 5. In addition the opportunity to maximise upon habitat creation and low energy usage will be vital in order to make Option 5 as sustainable as possible. |
| <b>Habitat Regulation Assessment</b> | Employment land has the potential to increase commercial combustion and institutional emissions and associated transport emissions impacting upon air quality. Growth is also likely to increase the demand for water affecting water levels and water quality.   |  |   | Commercial and institutional emissions are likely to be much lower under this option. The need to travel is likely to reduce and overall the impacts on air quality are likely to be improved. Demand for water is however still likely affecting water levels and water quality.                             | Depending on the type of employment land uses emissions could adversely affect air quality. Growth is also likely to place pressure on water levels and water quality.  |

**Protection of Employment Land**

**Should we protect existing employment land?**

| Herefordshire employment land protection | Options   |  |   |
|--|---|--|---|
|  | Option 1: Protect all employment land from development for other uses   | Option 2: Protect no employment land and allow market forces to prevail  | Option 3: Develop a criteria based policy to protect employment sites on their merit at the time of an application, based on sustainable locations, best employment land, quality of site and a rolling 5 year supply                   |
| <b>The Reasonableness Test</b>           | This is reasonable to explore this option more as it continues the current UDP approach.  | It is reasonable to consider this approach however, it must be recognised that this option would mean the policy on protection of employment land would no longer be required in the Core Strategy.  | It is reasonable to consider a policy approach, as it is more flexible with a changing economy. Clarification is needed on what a sustainable location is and the identification of the best employment land would also be appropriate. |
| <b>The Community Engagement Test</b>     | Local business owners are likely to support this option if they have business premises on one of these allocated employment sites. May be unpopular if employment land is left vacant and unable to use for alternative uses. | The residential and business community are likely to be uncomfortable with this option. However, housing developers are likely to be in favour of such an approach. Concerns will be on the grounds of character of places potentially being altered; businesses closing down because other supporting businesses are no longer located near by; accessibility of facilities and services being located in an adhoc arrangement etc. | The current economic climate may make local business owners be open to the idea of a criteria based policy to control employment uses as flexibility will be important.   |

**The Sustainability Appraisal Test**

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| <p><b>Economic</b></p> | <p>This is likely to have a positive outcome on the economy, as business will know where the land for such development is located. Companies will be located with other business uses and they may have mutual benefits. However, if some employment land is of poor quality due to access or appropriateness of the site for various uses then safeguarded sites are likely to be under utilised and prevent inward investment or growth of existing companies. The Employment Land Review will consider the quality of employment sites and may recommend which could be used for other land uses. Overall economically Option 1 is neutral as further information is required.</p> | <p>This option provides no protection for employment land and is likely to lead to higher value uses such as housing. Overall economically Option 2 is moving away from sustainability.</p>                 | <p>The flexibility created by this option is likely to attract local businesses and companies to the County to meet the needs of economic growth. The requirement for a 5 year rolling supply of employment land, set by the RSS, will allow the adaptability for the employment sector to weather the current economic climate and meet future demands. This option appears to be most sustainable in economic terms. Overall Option 3 is neutral, as more information from the employment land study is needed on available and appropriate land for employment use to meet the 5-year supply.</p> |
| <p><b>Social</b></p>   | <p>Protection of employment land will potentially aid retention of employees for local companies, as there is a supply of employment in the area. Having opportunities to work increases well-being. However, the reverse could result if current sites are inappropriate and land becomes derelict or underused. Opportunities would then become available for appropriate alternative uses. For example sites could be utilised for housing, improved aesthetically for recreational use or for improvements to biodiversity.</p>   | <p>A lack of employment land is likely to lead to migration out of County for employment opportunities. Increasing travel time and costs. Overall socially Option 2 is moving away from sustainability.</p> | <p>Planning applications determined on criteria based policies only enable community involvement at the implementation stage of the planning policy. Good practice would be to have the community engaged in such issues from the outset, aiding front loaded decisions. However, the identification of appropriate land for employment use from the employment land study will enable community engagement, provide a 5 year supply to maintain and identify currently safeguarded land of poor quality, that could be used for other</p>   |

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|  | Overall Option 1 socially is neutral as it is dependant upon implementation.  |  | uses. Overall socially Option 3 is moving towards sustainability.   |
| <b>Environmental</b>                   | Employers bring some wealth opportunities into an area and can contribute to environmental improvements in the wider community. However if sites are inappropriately safeguarded an opportunity may be lost for key environmental improvements such as creation of habitats for biodiversity or open space creation. Overall environmentally Option 1 is moving towards sustainability. | Increases in emissions are likely from resulting out migration and reliance on the private car to access employment opportunities. However derelict land or under used land is likely to reduce. Overall environmentally Option 2 is neutral.  | Employers bring some wealth opportunities into an area and can contribute to environmental improvements in the wider community. However if sites are inappropriately safeguarded an opportunity may be lost for key environmental improvements such as creation of habitats for biodiversity or open space creation. Overall environmentally Option 3 is moving towards sustainability. |
| <b>Conclusions and Recommendations</b> | Option 1 is overall neutral as it is dependant on further employment land studies following which the appropriate use of land can be considered and implemented.  | Option 2 is overall moving away from sustainability. Alternative uses may prevail resulting in a lack of land for employment land. The resulting increases in the reliance of the private car to access employment opportunities is likely to increase congestion hotspots and emissions, adversely affecting respiratory disorders in the community and air quality concerns. | Option 3 overall is neutral as further information is required based on the employment land study.  |
| <b>Habitat Regulation Assessment</b>   | Impacts are similar to the table above on employment land uses however in regards to safeguarding there are no known impacts upon designated sites.   |  |   |

### Improving the County's Skills Base

#### How can we improve the skills base in the County?

|                             |                |
|-----------------------------|----------------|
| <b>Herefordshire skills</b> | <b>Options</b> |
|-----------------------------|----------------|

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|  | Option 1: Create a university style campus in Herefordshire to improve skills, retain young people in the area and help to attract new types of development | Option 2: Support the development of new and extended school/college facilities – improving skills, learning and performance  | Option 3: Allow market forces and demand to prevail and judge any applications at the appropriate stage  |
| <b>The Reasonableness Test</b>           | It is reasonable to consider a university in the County   | It is reasonable to consider the community response to improvements in education requirements   | It is reasonable to consider a market forces approach.   |
| <b>The Community Engagement Test</b>     | Some members of the community are likely to agree with a university in the area. Currently many people utilise facilities elsewhere.                        | The community may prefer Option 2 to Option 1 as it may be more easily accessible, especially for those members of the community who are retraining, in the third sector (the volunteering sector) or for life long learning. | The community who are in need of such facilities may consider that if it is not planned for strategically that the facilities required will not be provided or existing facilities will decline. |
| <b>The Sustainability Appraisal Test</b> |   |   |  |

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| <b>Economic</b>      | Local businesses are likely to support this option so long as the training and education packages on offer meet their needs for local improvements in skills. A university could also increase the likelihood of a wider range of businesses locating nearby to take advantage of research and development opportunities. Opportunities exist for environment courses to be run which may benefit existing and future industry in the County. Overall economically Option 1 is moving towards sustainability. | Local smaller establishments may create greater flexibility for local companies to allow employees to attend a local education establishment, as it will take less time and resources to train their staff. Costs will potentially be kept down, as provisions are more local. The infrastructure will also already be in place keeping development costs down. This approach will also favour those in the third sector, the volunteering sector and those looking to retrain to gain employment or change career path. Overall economically Option 2 is moving towards sustainability. | Funding for an education facility is more likely if strategically planned for. However, a private investor may be able to provide a facility on an individual basis. The economy as a whole is likely to benefit from such an establishment, as local people will increase their range of skills. Potentially younger generations will be encouraged to stay within the County helping to address any skills shortage. Overall Option 3 economically is moving towards sustainability. |
| <b>Social</b>        | Improvements in skills are likely to improve the aspirations and well being of residents. In current economic conditions improvements in diversifying the skills of the County will be important to overcome unemployment. School leavers' choosing to go to university will have greater choice of where they study if a university was on offer in the County. Overall socially Option 1 is moving towards sustainability.  | Local accessible training opportunities for all will be good for raising aspirations in the community, getting people back into work, particularly those who may have been long term unemployed, or those returning to the work force. These improvements will increase social cohesion and well-being. Overall Option 2 socially is moving towards sustainability.  | An education establishment will raise aspirations for life-long learning, students and those in unemployment that need to be retrained to gain other employment, raising well being and opportunities to be part of an active society. Arrangements for deliverability may be uncertain under this option, if the market is left unchecked. Overall Option 3 socially is neutral as it is dependant on implementation.   |
| <b>Environmental</b> | Would need to consider issues of character and appearance with reference to any new buildings. Also promote public transport from emissions associated walking and cycling to reduce impacts with new   | Environmental opportunities are likely to be the same as for Option 1, although to a lesser extent. Overall environmentally Option 2 is neutral.   | Environmental opportunities are likely to be the same as for Option 1. Overall Option 3 environmentally is neutral.  |

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|  | development. Overall environmentally Option 1 is neutral.   |   |   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. Engagement with education authorities and local businesses will be essential to maximise the benefits for local skills and local employees. Impacts upon character of place from any new campus should be given careful consideration. | Overall Option 2 is moving towards sustainability. The conclusions and recommendations given for Option 1 apply here and in addition consideration is needed for the potential new locations for education facilities, which suit both potential businesses, future students and reduce the impacts on character of place and reduce emissions. | Overall Option 3 is neutral. The conclusions and recommendations given for Option 1 apply here and in addition deliverability and character of place are likely to cause concern. |
| <b>Habitat Regulation Assessment</b>   | A university style campus is likely to place pressure on water resources affecting water levels and water quality. Mode of travel may also impact upon air quality.   | Extending existing facilities is likely to result in similar impacts upon travel demand as Option 1 impacting on air quality. Demand for water may still continue to be an issue affecting water levels and water quality.  | Any development is likely to place pressure upon water and air quality potentially impacting upon water levels, water quality and air pollution.                                  |

## Tourism and Culture

### How can Herefordshire's tourism and culture sector grow?

| Herefordshire tourism and culture |   | Options   |  |  |  |
|-----------------------------------|---|---|--|--|--|
|                                   | Option 1: Devise a policy to limit the growth of tourism in Herefordshire in order to protect existing environmental assets | Option 2: Devise a policy to strongly promote the growth of tourism across Herefordshire to help create a vibrant local economy | Option 3: Focus tourism development on key assets within Herefordshire for example Hereford, the Black and White villages or Symonds | Option 4: Focus tourism development only to those areas accessible by public transport | Option 5: Concentrate on promoting Herefordshire as a centre for green tourism |



|  |   |   |   |  |  |
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|  |   |   | Yat; to maximise the growth of tourism and attract more visitors  |  |  |
| <b>The Reasonableness Test</b>           | It is reasonable to consider the limitation of tourism for environmental preservation   | It is reasonable to promote tourism in Herefordshire  | It is reasonable to promote growth in tourism towards focussed areas in the County.   | It is reasonable to consider this option on the basis that it meets the need for sustainable modes of travel and the requirement to reduce the need to travel. | This option is reasonable. Clarification on what is meant by “green tourism” is required.  |
| <b>The Community Engagement Test</b>     | The community are likely to support this option. However, those in the tourism sector will argue that the tourism trade is based on the environmental assets that Herefordshire has and that restricting growth is not the way to deal with protecting the environment. | Businesses involved in tourism will welcome this option. Local people looking for affordable homes may consider that the option will increase the potential for holiday homes, which may increase house prices. | The Community are likely to support this option more than Option 2 as issues surrounding holiday homes, for example low housing occupation rates, reduction in support for local services seasonal unemployment, increases in house prices out pricing local people, may be better controlled and their local economy will benefit. Local shops will welcome the investment to continue to support their business and aid growth. | The community are likely to support this option as it appears to reduce the additional traffic that would be created with tourism growth                       | The community may not be sure what green tourism is and ask whether there is such a thing. |
| <b>The Sustainability Appraisal Test</b> |   |   |   |  |  |

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|------------------------|--|---|---|--|--|
| <p><b>Economic</b></p> | <p>Limiting tourism and culture growth in an area which has a large proportion of its economy based on tourism has the potential to adversely affect economic growth in this sector, placing small businesses and their suppliers at risk. Overall economically Option 1 is moving away from sustainability.</p> | <p>A vibrant economy based on tourism will benefit the County in many ways. New and local businesses will be supported as well as the independent shops that Hereford and the Market towns are renowned for. Overall Option 2 economically is moving towards sustainability.</p>  | <p>A focussed growth will have the same impacts as for Option 2 although may well be more positive due to impacts being less dispersed. Overall Option 3 economically is moving towards sustainability.</p>   | <p>The best public transport provision is generally located in areas with the most facilities and services. Focussing tourism growth in these areas is likely to support these facilities. Overall economically Option 4 is moving towards sustainability.</p>   | <p>A focus on a green tourism agenda will attract new companies and business to the County. This could still support the existing economy whilst allowing a sustainable growth in the green industry. Option 5 is economically moving towards sustainability.</p>                      |
| <p><b>Social</b></p>   | <p>Limiting tourism growth is likely to restrict new employment opportunities and potentially place jobs at risk, raising unemployment and weakening social well-being. Overall Option 1 socially is moving away from sustainability.</p>  | <p>Economic prosperity raises employment levels; increases spend and assists in making a place feel safe and vibrant. However tourism growth may result in higher numbers of second homes reducing support for local services, seasonal unemployment, and increases in house prices out pricing local people. Overall Option 2 socially is neutral.</p> | <p>A focussed growth will have the same outcomes as for Option 2 but are likely to be more area-specific. The reuse of buildings for tourism purposes may encourage sustainable growth. Shops and services are likely to be less affected by seasonal variations and be supported by the economic investment. Overall Option 3 socially is moving towards sustainability.</p> | <p>Reductions in seasonal tourism traffic on local roads will reduce congestion and improve air quality, which will help those with respiratory disorders. Fewer vehicles will make streets safer places. As businesses will be supported in well-connected places jobs will be safeguarded aiding employment levels and well-being. Overall Option 4 socially is moving towards sustainability.</p> | <p>The concept that the County would be a destination for green tourism would provide the community with a feeling that they were doing their bit for the environment, creating a sense of well being and achievement. Overall Option 5 is socially moving towards sustainability.</p> |

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| <p><b>Environmental</b></p>                   | <p>Reducing access to some environmentally sensitive areas will benefit habitats and species by reducing disturbance from people, cars and some tourism related development. Although, could lose out on developer contributions towards enhancing environmental assets. Overall Option 1 environmentally is moving towards sustainability.</p> | <p>Tourism may increase activities in areas of environmental sensitivity. However, if it is increased appropriately, the areas that tourists are attracted too can be controlled so that the most sensitive places are given the protection that they require. Any increase in the numbers of people attracted to an area is likely to increase congestion and pollution and will raise requirements for water, energy usage and produce waste. Overall Option 2 environmentally is neutral as positive outcomes are dependant upon implementation.</p> | <p>The focus on Hereford and the Market Towns and specific tourism areas will reduce the associated risk raised in Option 2. The most vulnerable places will be avoided in this option whilst still allowing appropriate growth. Other issues of resource use and waste production would still be an issue however. Overall environmentally Option 3 is moving towards sustainability.</p> | <p>Sustainable modes of travel and the use of public transport will reduce congestion and air pollution. Sensitive eco systems will be best protected, as interest will be diverted to other less environmentally important sites of interest. Overall Option 4 environmentally is moving towards sustainability.</p> | <p>Short-term negative impacts as a result of some development in sensitive areas to allow green tourism may be detrimental. However, the medium and long-term benefits for green tourism has real opportunities to overcome some of the negative issues raised in the other options environmental assessments. Overall environmentally Option 5 is moving towards sustainability.</p> |
| <p><b>Conclusions and Recommendations</b></p> | <p>Overall Option 1 is considered to be neutral. A balance between appropriate growth in the economy through tourism and the needs of preserving the environment is necessary. A greater</p>  | <p>Overall Option 2 is neutral as it is dependant on implementation. In order to prevent adverse impacts affecting social cohesion and the environment.</p>   | <p>Overall Option 3 is moving towards sustainability. The natural environment is always going to be an attraction for tourism in the County and measures to maximise the benefits of such</p>  | <p>Overall Option 4 is moving towards sustainability. The maintenance of and improvement to the public transport network will be important for this Option in order to maximise the benefits</p>  | <p>Clarification is needed on what is meant by green tourism. Overall Option 5 is moving towards sustainability. The economic benefits from green tourism needs to be maximised by ensuring that the</p>   |

|                                      |  |  |  |   |   |
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|                                      | importance upon the environment under this option is considered appropriate and hence the neutral outcome.                                     | Consultation is needed with businesses, developers and biodiversity and landscape conservationists to ensure provision of affordable housing for local people and not an influx of second homes and that development is appropriate and minimises the highlighted negative impacts upon the environment. | growth are needed whilst balancing the potential impacts upon the environmental assets, through appropriate development and mitigation where necessary.      | for services and facilities through tourism.  | most appropriate businesses are attracted that limit the negative effects of tourism growth such as seasonal unemployment and low housing occupation. |
| <b>Habitat Regulation Assessment</b> | Limiting tourism growth will place less disturbance pressure on designated sites and reduce associated air pollution from transport emissions. | Strong tourism growth is likely to increase disturbance pressure and increase modes of travel, which could impact upon air quality.  | Focussed growth may enable avoidance to some of the designated sites improving disturbance issues. Localised air quality may be an issue in focussed places. | A public transport focus will improve air quality associated with tourism traffic. However, disturbance pressures are likely to continue. | Green tourism is likely to enable reductions in polluting modes of travel and reduce disturbance to the most sensitive places.                        |

### Housing Provision

#### Affordable Housing

How should we address the need for affordable housing in the County?

|  | Options   |  |                                    |   |
|--|---|--|------------------------------------|---|
|  | Option 1: Increase the percentage of affordable | Option 2: Lower the site size thresholds for | Option 3: A combination of 1 and 2 | Option 4: Identify settlements or areas |

|  |  |   |   |   |
|--|--|---|---|---|
|  | housing required on housing sites (currently 35%)  | affordable housing particularly in rural areas where most housing is completed on sites smaller than existing thresholds  |   | where new housing development is limited only to affordable housing; this could mean that rural exceptions sites for affordable housing are the subject of specific allocations |
| <b>The Reasonableness Test</b>           | The demand for affordable housing may justify this. The percentage of affordable housing would need to be balanced with developer viability. | Difficult to achieve affordable housing at lower levels due to the viability concerns of developers, resulting in an overall negative impact on housing supply. | This approach is similar to that taken for the UDP and is therefore reasonable to consider. | Yes this reasonable as it meets the RSS targets.  |
| <b>The Community Engagement Test</b>     | The community will welcome any increase in the availability of more affordable homes.  | The community will welcome any increase in the availability of more affordable homes.   | The community will welcome any increase in the availability of more affordable homes.       | The community will welcome any increase in the availability of more affordable homes.   |
| <b>The Sustainability Appraisal Test</b> |  |   |   |   |

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| <b>Economic</b>      | Difficult to achieve in current economic market due to downturn in larger housing sites and the fact that the majority of applications in the County are smaller scale. Overall Option 1 economically is moving towards sustainability.  | Comments are similar to those expressed for Option 1, however the concerns regarding viability on lowering thresholds are more pronounced than for Option 1. Overall Option 2 is economically neutral because it may affect supply of new housing coming forward. | Comments are similar to those expressed for Options 1 and 2. Overall Option 3 economically is neutral.                   | Whilst this option will provide for identified local need, funding issues will be paramount. Overall Option 4 is economically neutral.  |
| <b>Social</b>        | This will potentially provide more affordable homes for the community and will therefore improve quality of life. Overall Option 1 socially is moving towards sustainability.  | Comments are similar to those expressed for Option 1. Overall Option 2 is socially moving towards sustainability.   | Comments are similar to those expressed for Options 1 and 2. Overall Option 3 socially is moving towards sustainability. | Comments are similar to those expressed for Option 1. Concern exists that could be creating exception estates where all affordable housing is together which is contrary to current guidance. Overall Option 4 is socially moving towards sustainability. |
| <b>Environmental</b> | Development could potentially be on greenfield land, potentially resulting in the loss of good agricultural land or areas of landscape or habitat value. Whether housing is affordable or market it will not make any significant difference to the environmental assets. Developer contributions could be used to improve | Comments are similar to those expressed for Option 1. Overall Option 2 is neutral.  | Comments are similar to those expressed for Options 1 and 2. Overall Option 3 is environmentally neutral.                | Comments are similar to those expressed for Option 1. Overall environmentally Option 4 is neutral.  |

|  |  |  |  |  |
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|  | the environment. Overall Option 1 environmentally is neutral.  |  |  |  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. However, it is important for both economic value and social cohesion that new estates are of mixed market and affordable homes. Land should not be released for development, which is of good agricultural or landscape quality to safeguard the environmental assets. There is a need to tackle thresholds as well as percentages because of the plethora of small scale applications in the County. | Overall Option 2 is neutral as it is dependant on the economic value being safeguarded to enable developers to be interested. The conclusions and recommendations given for Option 1 also apply for this option. | Overall Option 3 is neutral. The conclusions and recommendations given for Options 1 and 2 are applicable for this option. A policy, which combines Options 3 and 4 would be most sustainable. | Overall Option 4 is moving towards sustainability. However, a combination of Options 3 and 4 appears to be the most sustainable, as there is a need to tackle thresholds as well as percentages because of the plethora of small scale applications in the County. |
| <b>Habitat Regulation Assessment</b>   | Affordable housing numbers are unlikely to have an impact upon designated sites. Housing in general however, will place pressure on water supply impacting upon water levels and water quality.  |  |  |  |

### Settlement Boundaries

Should we continue with settlement boundaries?

|  | Options  |  |
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|  | Option 1: Devise a criteria based policy for sustainable settlements to judge future development proposals | Option 2: Continue to define settlement boundaries for sustainable settlements within a future DPD |

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|  | against  |   |
| <b>The Reasonableness Test</b>           | This is reasonable however, the current UDP policy H6, which covers housing in smaller settlements, could be argued to be subjective and prescriptive and open to interpretation. Could lead to cramming within settlements. Could affect appeal workload as policy would be subjective but could lead to uncertainty regarding potential of land.   | It is reasonable as it defines development limits and gives certainty. However continues the current policy tool that is understood.  |
| <b>The Community Engagement Test</b>     | This would depend on the circumstances but generally the community are likely to support this option.  | This would depend on the circumstances. However, it does give people certainty and has historically been accepted in the County.  |
| <b>The Sustainability Appraisal Test</b> |  |   |
| <b>Economic</b>                          | This option may need to protect employment land on edge of settlements from housing pressure, however less pressure on brownfield land within boundary. There is a need for employment land protection. Overall economically Option 1 is neutral.  | Settlement boundaries allow for certainty if the development of housing is constrained. More pressure for housing on land within the development boundary rather than other uses. Need to protect employment land. Overall economically Option 2 is neutral.  |
| <b>Social</b>                            | Evidence is needed to account for any high-density development and a criteria based policy is also needed to prevent densities from going too high. Criterion would need to include control of density, provision of open space and reference to local facilities. If inappropriately developed with lack of living space within buildings, poor layout and insufficient green space and associated shops, services and facilities, negative impacts are likely. Overall socially Option 1 is neutral. | Comments are similar as for Option 1. This option allows new homes within settlement boundaries, providing local need with some certainty to developers on deliverability. However, this additional growth may result in cramming, which could result in pressure for reuse of open spaces. Settlement boundaries only affect landowners not the public directly. Overall Option 2 socially is neutral. |
| <b>Environmental</b>                     | The character could be affected, but a policy could be created to account for this. There is potential for urban sprawl, loss of landscape and development of open countryside, due to uncertainty of policy interpretation. Overall environmentally Option 1 is neutral.  | Settlement boundaries add certainty but need character protecting criteria in policy to prevent town cramming. Overall Option 2 environmentally is neutral as it is dependent on implementation.  |
| <b>Conclusions and Recommendations</b>   | Overall Option 1 is neutral as it is dependent on other appropriate criteria being developed on densities,   | Overall Option 2 is neutral as it is dependent on implementation of a character safeguarding policy,  |



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|                                      | character of place being safeguarded and adverse impacts on environmental assets being minimised.  | engagement with developers on deliverability of land for viability and criteria to prevent or mitigate against cramming of developments. |
| <b>Habitat Regulation Assessment</b> | Settlement boundaries are unlikely to have an impact upon designated sites. However, growth in general will place pressure on water supply and air quality impacting upon water levels, water quality and air pollution. |  |

## Density

### What level of density targets should Herefordshire set?

|  | Options  |   |   |
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|  | Option 1: Apply a single standard density to all housing provision across the County | Option 2: Apply different standard densities to different parts of the County to reflect accessibility, highest densities in central Hereford, towns and adjacent areas, densities in other parts of urban areas, and the lowest densities in rural areas | Option 3: Densities either set or determined for each site on the basis of an assessment of the character of the surrounding area |
| <b>The Reasonableness Test</b>           | This is reasonable.  | This could result in complex set of policies to cover different standards for every place in the County.  | This would enable protection of areas at an early stage.  |
| <b>The Community Engagement Test</b>     | The community would understand this.   | The community may have difficulty understanding this option.  | The community may have difficulty understanding this option.  |
| <b>The Sustainability Appraisal Test</b> |  |   |   |

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| <b>Economic</b>                        | This option gives developers certainty and ease of understanding of the approach. Overall economically Option 1 is moving towards sustainability.  | Helps to make best use of available land. Concern needs to be addressed regarding not only putting too much on a site but also too little. Overall Option 2 is economically moving towards sustainability.  | Comments are similar as for Option 2. Overall Option 3 is economically moving towards sustainability.  |
| <b>Social</b>                          | This option is not locally distinctive and therefore could affect sense of place. Overall socially Option 1 is moving away from sustainability.  | Achieving optimum density, supports social facilities and improves well-being. Overall Option 2 is socially moving towards sustainability.  | Comments are similar as for Option 2. Overall Option 3 is socially moving towards sustainability.  |
| <b>Environmental</b>                   | This option may result in inappropriate densities out of character with the locality and is not necessarily the best use of land. Overall Option 1 is environmentally moving away from sustainability.   | Optimum use of land provided the densities are set at a local level, safeguarding environmental assets. Overall Option 2 is environmentally moving towards sustainability.  | Comments are similar as for Option 2. Although this option, is more likely to develop an area with the existing character. Overall Option 3 environmentally is moving towards sustainability.  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving away from sustainability. Although greater certainty and understanding is likely for developers under this option the negative impacts upon the communities' sense of place, character and inappropriate use of land do not make it a sustainable option. | Overall Option 2 is moving towards sustainability. An option should be considered which combines Options 2 and 3. Consideration is needed on what density is appropriate and this may vary from site to site and area to area. Maximising space for services and facilities and open space, for the benefit of social cohesion, will be important in making the place safe and vibrant. | Overall Option 3 is moving towards sustainability. An option should be developed which combines Options 2 and 3. The conclusions and recommendations given for Option 2 are applicable here. In addition consultation with landscape conservationists is necessary to protect the character of each place. |
| <b>Habitat Regulation Assessment</b>   | The impacts of disturbance and air quality upon designated sites associated with density of development are likely to be dependant on location. However cumulative impacts of water supply could impact upon water levels and  | Impacts are the same as for Option 1. Higher densities in certain locations could place additional disturbance and air quality pressure on designated sites. Appropriate densities according to location are needed to minimise these pressures   | Impacts are the same as for Option 1. Density determined by character of place is still likely to impact upon air and water resources.   |

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|  | water quality regardless of location. | on designated features. However cumulative impacts of water supply could impact upon water levels and water quality regardless of location. |  |
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## Housing Mix

### What type and mix of housing does Herefordshire need?

|  | Options   |  |  |
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|  | Option 1: Allow a market-led approach to the mix of new house types in new developments | Option 2: Ensure all schemes have a mix of house types in accordance with up to date housing needs information                           | Option 3: Devise a policy, which gives priority to specific housing types; for example, homes for families, single persons and for retirement – in order to balance the types of housing across the County |
| <b>The Reasonableness Test</b>           | This is reasonable.   | This is potentially unworkable, however the Housing Market Assessment (HMA) may provide this information                                 | This is reasonable based on the information emerging from housing studies.   |
| <b>The Community Engagement Test</b>     | The community may not understand what a market led approach will mean for them.         | The community are likely to support a diverse range of housing as more people will be able to access the type of housing that they need. | Various sections of the community are likely to feel differently about this option, as it will benefit some and not others.  |
| <b>The Sustainability Appraisal Test</b> |   |  |  |

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| <b>Economic</b>                        | The mix of housing type is already a market led approach, and the market generally dictates the economy. Overall Option 1 is economically neutral because it does not always provide for local needs.   | Developers will be aware of what is required and be more likely to obtain land values appropriate for the sale price after development and supply at the time of need as a result. Overall Option 2 is economically neutral as it is dependent on implementation.  | This could give certainty to developers and support the economy if an area based approach is taken. Overall economically Option 3 is moving towards sustainability.  |
| <b>Social</b>                          | If economically a mix is already developed and responds to what the public are buying, a choice of housing type across an estate is generally made available, including affordable units. This usually only relates to larger schemes. Overall Option 1 is socially moving towards sustainability.  | With homes being supplied, as they are needed socially, people are going to have greater opportunities of accessing affordable and market priced properties. Overall Option 2 is socially moving towards sustainability.   | This could result in the right housing being provided at the right time and in the right place in accordance with government guidance. Overall socially Option 3 is moving towards sustainability.   |
| <b>Environmental</b>                   | Other areas of the plan deal with the location of housing and control of design and sustainability. Overall Option 1 environmentally is neutral, as it is dependent on the appropriate implementation of the other policies.  | Comments are similar s for Option 1. Overall Option 2 environmentally is neutral.  | Comments are similar as for Option 1. Overall environmentally Option 3 is neutral.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. Existing trends of mixed housing type will need to be considered further in light of the current economic climate and changing needs of society. The potential for more single units or units for the elderly are likely to increase over the plan period. Linkages with other policies need to be robust to ensure that detrimental | Overall Option 2 is neutral. Discussions with developers is important to ensure that land can be acquired at a price that will allow the delivery of affordable housing at the right time. The environmental benefits should be maximised and considered prior to development to minimise any development that does potentially affect any environmental assets or require improvements to | Overall Option 3 is moving towards sustainability. Certainty to the developer needs to be maximised in order to support the economy. Housing provision in the right places and at the right time need to be considered in conjunction with the appropriate housing departments and supported by the necessary studies. |

|                                      |   |                 |  |
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|                                      | environmental affects are minimised.  | infrastructure. |  |
| <b>Habitat Regulation Assessment</b> | Housing type is unlikely to have an impact upon designated sites. However, growth in general will place pressure on water supply and air quality. |                 |  |

## Gypsies and Travellers

How should we make provision for the needs of gypsies and travellers?

|  | Options   |   |   |
|--|---|---|---|
|  | Option 1: Develop a County-wide criteria based policy for location of different types of gypsy and travellers sites (residential, transit and temporary)                | Option 2: Identify areas or locations where gypsy and traveller sites would be unacceptable due to environmental constraints  | Option 3: Provide an indication of specific areas (but not sites) where gypsy and travellers sites are needed and sites will be directed                                |
| <b>The Reasonableness Test</b>           | This is reasonable.   | This is reasonable.   | This is reasonable.   |
| <b>The Community Engagement Test</b>     | The community are likely to have mixed feelings about this option, potentially derived from a lack of knowledge and awareness of the traditions of the community group. | The community are likely to have mixed feelings about this option, potentially derived from a lack of knowledge and awareness of the traditions of the community group. | The community are likely to have mixed feelings about this option, potentially derived from a lack of knowledge and awareness of the traditions of the community group. |
| <b>The Sustainability Appraisal Test</b> |   |   |   |

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| <b>Economic</b>                        | The group contribute to the local economy in traditional ways selling items and offering services. Overall economically Option 1 is moving towards sustainability.   | Outcomes are similar as for Option 1. Overall Option 2 is economically moving towards sustainability.  | Outcomes are similar as for Option 1. Overall economically Option 3 is moving towards sustainability.  |
| <b>Social</b>                          | European law states that gypsies and travellers are exceptions in the planning system and should be dealt with on a case by case basis. A criteria based policy would enable the European law to be fulfilled in respect to Herefordshire's capacity in accommodating this group in society. Overall Option 1 is socially moving towards sustainability. | Identifying areas that have the most environmental constraints are also likely to be in areas where access to services is least efficient. Although the option constrains movement in these most sensitive areas it will assist in locating the community in safe places away from areas which may potentially flood or have high environmental or landscape quality, such as the Areas of Outstanding Natural Beauty. Overall Option 2 is socially moving towards sustainability. | Identified sites for this group will give greater certainty to meeting housing needs, however provision will not be as much as if sites were identified. Proximity to services will be necessary. Overall Option 3 is socially moving towards sustainability.  |
| <b>Environmental</b>                   | A criteria based approach will support development management officers in dealing with a variety of applications regarding gypsy and travellers. Overall Option 1 is environmentally moving towards sustainability.  | This option doesn't help define sites that are acceptable. Overall Option 2 is environmentally neutral as areas are ruled out under this option.   | Comments are similar as for Options 1 and 2. However, this option is more positive since specific areas will be identified, which will ensure a holistic approach to the location of development. Safeguarding both environmental assets and providing access to recreational and open space for the community group. Overall Option 3 is environmentally moving towards sustainability. |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. Traditional trades should be considered and maximised when deciding upon  | Overall Option 2 is moving towards sustainability. Conclusions and recommendations are similar as for Option 1. In addition the maximising   | Overall Option 3 is moving towards sustainability. Conclusions and recommendations are similar as for Options 1 and 2. A combination of  |

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|                                      | location. A strong criteria based policy, which supports European Law and development management officers, is required. A combination of Options 1 and 3 should be considered to create a more appropriate option. | of locating gypsies and travellers near to services and facilities for social inclusion is important. A combination of Options 1 and 3 should be considered to create a more appropriate option. | Options 1 and 3 should be considered to create a more appropriate option. |
| <b>Habitat Regulation Assessment</b> | Location choice under any of the options will potentially assist in reducing disturbance pressure on designated sites.   |  |   |

### Ensuring Better Health and Wellbeing

#### Health Care Provision

How can new developments help to make provisions for new improved health care facilities?

|  | Options   |   |
|--|---|---|
|  | Option 1: Provide new facilities in areas which are a focus for growth or urban extensions in partnership with Herefordshire Primary Care Trust and other health care providers | Option 2: Increase the capacity of existing facilities in partnership with social/health care organisations   |
| <b>The Reasonableness Test</b>           | It is reasonable to consider new facilities to deal with increases in population and development  | It is reasonable to consider extending existing facilities.   |
| <b>The Community Engagement Test</b>     | The community are likely to welcome new facilities, particularly if they are part of a consultation group that considers themselves to be lacking in access to services.        | The community will consider this an improvement. Those without services in their area may consider that they are no better off as they may still have to travel some distance to access the improved service. |
| <b>The Sustainability Appraisal Test</b> |   |   |

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| <b>Economic</b>                        | New facilities place financial commitments on local authorities and Primary Care Trusts and ultimately upon the taxpayer. However, if they were incorporated in new developments of focussed growth developer contributions would reduce this burden. Overall Option 1 economically is neutral as it is dependent upon securing financial contributions.   | Extending an existing facility may be more cost effective. Overall Option 2 economically is neutral as it is dependant on financial contributions.  |
| <b>Social</b>                          | New facilities will support existing communities so aiding health and well-being. Overall Option 1 is socially moving towards sustainability.  | Similar impacts are likely for this option as for Option 1. However, those locations that are lacking in services are more likely to continue with a deficit under this option. Overall Option 2 is socially neutral as some communities are unlikely to benefit. |
| <b>Environmental</b>                   | Will involve reducing need to travel and therefore reduce emissions but may have a negative impact on environmental assets such as character. Overall Option 1 is environmentally neutral.   | There is the potential for impacts on character from extensions and the option won't impact on reducing the need to travel and thus emissions are likely to increase. Overall Option 2 is neutral.  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is neutral. The implementation of the facilities needs consideration with regards to where the funding will come from in order to secure the finances prior to need arising. Opportunities to maximise the connection of facilities with healthy lifestyles is recommended to prevent extra pressure on services long term. In addition, the design of facilities could integrate green spaces with added biodiversity value and assist in areas, which may be liable to flood. | Overall Option 2 is neutral as it is unlikely to support those communities that are currently already lacking in services.  |
| <b>Habitat Regulation Assessment</b>   | New facilities are likely to have a lower demand for water and place less pressure on air quality than say housing and therefore impact marginally upon designated sites.  |   |



## Open Space Provision

What is the best way to provide the required open space and recreation facilities throughout the County?

|  | Options   |   |
|--|---|---|
|  | Option 1: Develop a Countywide standard for the provision of open space and recreation facilities within all new developments, similar to the current UDP | Option 2: Develop area specific standards and needs for the provision of open spaces and recreation facilities based on assessments from the PPG17 study and the green infrastructure study |
| <b>The Reasonableness Test</b>           | It is reasonable to consider a Countywide approach  | It is reasonable to consider an area specific approach  |
| <b>The Community Engagement Test</b>     | The community will like this option as it aims to provide recreational open space   | The community will like this option as it may address deficiencies in specific areas.   |
| <b>The Sustainability Appraisal Test</b> |   |   |

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| <b>Economic</b>                        | A set standard for open space will be more easily planned, financed and predictable for developers to add into development costs from the beginning. Negotiations will be quicker and thus save the developer money in the process. The health benefits experienced by users of the space will place fewer burdens on the NHS and thus public spending. Overall Option 1 is economically moving towards sustainability.  | The impacts for this option are similar to that for Option 1. However, with specific requirements for the open space to be area specific, costs may be higher and the time taken to agree schemes may be longer. Overall Option 2 is economically neutral due to the added time likely in providing and securing open space standards.   |
| <b>Social</b>                          | The greater provision of open space will encourage participation in activities, which should increase fitness and well-being. Overall Option 1 is socially moving towards sustainability.  | The impacts are the same for this option as for Option 1. However, if the open space is more locally specific it is likely to be more accessible to those in need providing greater sense of place and well-being for residents and users. In addition, it will be locally targeted to potentially provide the type of facilities and open space lacking in an area, for example providing gardens, a park, arboretum or play areas football pitches or skate parks. Overall Option 2 is socially moving towards sustainability. |
| <b>Environmental</b>                   | Open space provides areas for habitats and species to be present and can detract attention of walkers and recreational activities away from more sensitive environmental assets of the County. Areas developed for open space can also be developed as areas that take floodwater, improving the quality of places that people live and work in. Green areas also provide habitats for biodiversity and increase people's sense of enjoyment of being in touch with nature. However, incorporating open space into every development, regardless of whether the area already has sufficient open space, may result in land take for this use, which could be better used for other facilities or services to benefit the community. Overall Option 1 is environmentally moving towards sustainability. | The impacts are similar as for Option 1. Overall Option 2 environmentally is moving towards sustainability.  |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability.   | Overall Option 2 is moving towards sustainability.   |

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|                                      | <p>Consideration needs to be given to need for access to open space as some areas may already be well serviced and land could be better used for other uses. The area required could be supplied off site more effectively; benefiting an area, which has not necessarily seen new development, but would benefit more from access to open space. Maximising the environmental improvements will be vital to ensure habitats are linked for specie migration and reducing habitat fragmentation. The advice of biodiversity experts is recommended.</p> | <p>Discussions with developers should be taken at the earliest opportunity to ensure that delivery times and costs are kept to a minimum. The habitats created should be native to the locality to support local species and add value to the place. And the type of open space created should be based on local need in order to maximise the usage of facilities and be developed with flexibility in mind to allow adaptability in the future with changing trends. The results from the open space study should be considered here. Overall this option is more sustainable than Option 1.</p> |
| <b>Habitat Regulation Assessment</b> | <p>Depending on the location of the new facilities designated sites may be affected by disturbance pressures. Provision of open space and recreational facilities, appropriately located, may assist in attracting people to newly created open space and recreational facilities helping to reduce disturbance on designated sites.</p>  |  |

### Conserving and Enhancing the Natural and Built Environment

#### Green Infrastructure

#### How should Herefordshire protect and enhance its green spaces?

|                                      | Options   |   |  |
|--------------------------------------|---|---|--|
|                                      | <p>Option 1: Ensure that new developments are designed in a way which enhances Herefordshire's green infrastructure, for example through linking into existing networks</p> | <p>Option 2: Seek developer contributions for identified green infrastructure proposals, particularly in areas where there is an identified need.</p> | <p>Option 3: Make the most of the benefits of green infrastructure for a number of purposes including flood storage, biodiversity and recreation</p> |
| <b>The Reasonableness Test</b>       | <p>It is reasonable to design development around Herefordshire's green infrastructure.</p>  | <p>It is reasonable to expect developers to contribute to green infrastructure requirements.</p>  | <p>It is reasonable to consider using existing green infrastructure for additional benefits.</p>   |
| <b>The Community Engagement Test</b> | <p>The community may not understand what this approach means and how</p>  | <p>The community will be pleased with this approach, however they will be</p>   | <p>The community are likely to be supportive of this option; however</p>   |

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|  | it will affect them. | concerned about how the policy would be implemented, particularly in the current economic climate. | they may not be certain how it can be achieved in practice. |
| <b>The Sustainability Appraisal Test</b> |                      |  |   |

|                      |   |   |  |
|----------------------|---|---|--|
| <b>Economic</b>      | This option may be expensive to implement and environmental restrictions may prevent a lot of development or types of development in a range of areas, which may not allow the local economy to be supported. However there may be some benefits in creating pleasant working environments that attract higher waged industries. Overall Option 1 economically is neutral as it is dependent upon place and implementation. | The impacts are likely to be similar as for Option 1. Overall Option 2 is economically neutral as it is dependant on financial contributions.                           | The impacts on the economy from adapting such green infrastructure for these uses, is likely to improve and protect economic viability. Of the 3 options this option may be the least costly to a developer. Overall Option 3 is economically moving towards sustainability.   |
| <b>Social</b>        | Developing with green infrastructure may improve the way people live and work for the benefit of their work life balance so increasing well-being. Overall Option 1 is socially moving towards sustainability.  | Outcomes are likely to be similar as for Option 1 but more so because it is based on need and deficiencies. Overall Option 2 is socially moving towards sustainability. | Socially the impacts are likely to be positive from the adaptation of green infrastructure. It will provide a pleasant environment in which people can live, work, enjoy and be active. Overall socially Option 3 is moving towards sustainability, but less so than the other two options.  |
| <b>Environmental</b> | This is the most environmentally beneficial of the options, as it allows development to be built in harmony with nature. The use of nature to develop sustainably makes developments ever lasting for generations to come. It may also support improvements to biodiversity addressing negative trends of species decline. Overall Option 1 is environmentally moving towards sustainability.                               | The outcomes for the environment are likely to be similar as for Option 1. Overall Option 2 is environmentally moving towards sustainability.                           | The environmental enhancements likely with this option are likely to improve green infrastructure for the benefit of habitats and species. However, as new space is not being created the maximisation of environmental improvement potentially achievable through Options 1 and 2 are less so under this option. Overall Option 3 environmentally is moving towards sustainability. |

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| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. The impacts upon the economy by such an approach will need to be considered and implementation effects minimised. The benefits for the environment in terms of mitigating and adapting to climate change through flood defence schemes and species planted etc should be maximised. | Overall Option 2 is moving towards sustainability. The conclusions and recommendations given for Option 1 apply here. This option is more likely to be delivered and provide area specific benefits. | Option 3 is moving towards sustainability. However, it does not create new infrastructure or maximise developer contributions for improvements. It is recommended that a new option be considered, which combines Options 2 and 3, creating an option that uses existing infrastructure to enhance and improve, whilst contributions can be used in areas of need for additional infrastructure to strive to achieve the positive aspects of Option 1. |
| <b>Habitat Regulation Assessment</b>   | The design, funding and maximising of use of green infrastructure is likely to improve the quantity and quality of biodiversity, linkages, water storage and the like, which could assist in improving water levels, water quality, air quality, runoff, nitrogen enrichment, sedimentation, erosion, flood defence and dredging.      |  |  |

### Locally Distinctive Feature / Assets

How should we protect, conserve and enhance our locally distinctive features and assets?

|                                | <b>Options</b>   |  |  |
|--------------------------------|--|--|--|
|                                | Option 1: Rely on the national and regional policies only, to protect Herefordshire's environmental assets | Option 2: Develop specific policies to provide an appropriate level of protection, conservation and enhancement for those locally distinctive and locally designated or recognised features and areas which are important for their biodiversity, landscape and or the historic, built environment | Option 3: Ensure that relevant policies of the plan include criteria, which provide an appropriate level of protection, promotion and enhancement for all elements of the natural or historic environment. |
| <b>The Reasonableness Test</b> | This option would mean that a policy   | It is reasonable to consider a policy  | Clarity is required here. Does this  |

|  |   |   |  |
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|  | would not be required in the Core Strategy. It is reasonable to explore this option.  | for these sites/areas, strengthening the local environmental habitats that are not offered the same protection under higher-level legislation such as national or international designations. | policy mean that all policies in the core strategy should have criteria based on environmental assets? Or should a criteria policy be developed in the core strategy for development to have to comply with? It is reasonable to explore the criteria approach in either case. |
| <b>The Community Engagement Test</b>     | The community may not be familiar with regional or national policy or may consider that policies are not locally distinctive enough to protect local features and assets. | The community are likely to be pleased that the assets of the County are being safeguarded.   | The community are likely to be pleased that the assets of the County are being safeguarded.  |
| <b>The Sustainability Appraisal Test</b> |   |   |  |

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| <b>Economic</b>                        | Protecting assets has a positive impact with respect to promoting tourism in the County for example Areas of Outstanding Natural Beauty. Overall Option 1 is economically moving towards sustainability.   | Outcomes are similar as for Option 1. Overall economically Option 2 is moving towards sustainability.  | Outcomes are similar as for Option 1. Overall Option 3 is economically moving towards sustainability.   |
| <b>Social</b>                          | So long as the protection for these assets are in place the effect on the social aspects are likely to be positive for promoting health and well-being. Overall Option 1 socially is moving towards sustainability   | Option 2's policy approach will be more likely to control development for the local benefit than Option 1 and will be easier to safeguard and uphold appeals and make requirements of developers. Socially the safeguarding of assets is likely to be positive for access to the countryside and key assets. Overall Option 2 socially is moving towards sustainability. | Impacts are similar as for Options 1 and 2. Overall Option 3 is socially moving towards sustainability.   |
| <b>Environmental</b>                   | Protection and enhancement of local features is less certain and is important for local distinctiveness. Overall Option 1 environmentally is neutral.  | Locally safeguarding policy will be more protective than relying on national and regional policy and thus more positive on sustainability than Option 1. Overall Option 2 is environmentally moving towards sustainability.  | Impacts are similar as for Option 2. Overall Option 3 is environmentally moving towards sustainability.   |
| <b>Conclusions and Recommendations</b> | Overall Option 1 is moving towards sustainability. Further information is needed on what a national or regional approach would mean for the economy, assurances from the appropriate bodies would need to be obtained with regards to the enhancement and protection of assets to maximise the areas | Overall Option 2 is moving towards sustainability. Economic benefits need to be sought and maximised by using the environmental assets as a positive aspect to an area. Developer contributions could be minimised through early discussions on what is required for a site so that costs can be integrated at point of  | Overall Option 3 is moving towards sustainability. Clarity is required on what the Option is seeking to achieve as set out in the reasonableness test. The conclusions and recommendations given for Option 2 apply here. |



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|   | <p>potential for society's well-being, and in addition, consideration needs to be given to how local features, not safeguarded by national or regional policy, can be protected to ensure local distinctiveness.</p> | <p>land purchase. Access to assets should be maximised wherever possible to improve activity levels and well-being. The local features of sites should be maximised for the benefit of the environment and secondary economic and social impacts.</p>                         |  |
| <p><b>Habitat Regulation Assessment</b></p> | <p>Relying on national and regional policies is likely to support improvements on general water supply and transport emissions that could impact upon water levels, water and air quality.</p>                       | <p>Local policies (Option 2) and criteria based policies (Option 3) are likely to be more effective at delivering improvements on air and water issues than Option 1, assisting in safeguarding designated sites from water level, water quality and air quality impacts.</p> |  |