

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.
These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

PLEASE SEE ACCOMPANYING REPRESENTATION.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

PLEASE SEE ACCOMPANYING REPRESENTATION

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

PLEASE SEE ACCOMPANYING REPRESENTATION.

(Please use additional box at the back of questionnaire if you need more space to comment)

About you: MICHELLE SIMPSON - GALLEGU, PEGASUS GROUP,
Name: ON BEHALF OF LIONCOURT STRATEGIC LAND
Address: 5 THE PRIORY, OLD LONDON ROAD, CANWELL,
SUTTON COLDFIELD, B75 5 SH
Email: michelle.simpson-gallego@pegasusgroup.co.uk

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

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Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:

Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

HEREFORD AREA PLAN (HAP)

HOUSING AND EMPLOYMENT SITE OPTIONS
CONSULTATION

HOME FARM, HEREFORD

ON BEHALF OF LIONCOURT STRATEGIC LAND



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Pegasus Group

5 The Priory | Old London Road | Canwell | Sutton Coldfield | B75 5SH

T 0121 308 9570 | F 0121 323 2215 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
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1. INTRODUCTION

1.1 Pegasus Group is instructed by Lioncourt Strategic Land (**'Lioncourt'**) to make representations to the Hereford Area Plan (**'the HAP'**); Housing and Employment Site Options Consultation. The purpose of the HAP is to set out detailed proposals to ensure the delivery of the targets for the city as set out within the adopted Herefordshire Local Plan **Core Strategy ('the Core Strategy')**, which itself sets out an overall framework for the scale and location of new development across the county.

1.2 These representations relate to land at Home Farm, Hereford, identified as parcel reference **'Bel 15'** within the HAP Consultation documents. It is submitted that land at Home Farm represents a sustainable, suitable and deliverable site for residential development, capable of delivering residential development. A number of documents are appended to this representation to support which further support the delivery of land at Home Farm, including:

- Landscape and Visual Note, prepared by Pegasus Group (see Appendix 1 of this representation)
- Ecological Technical Briefing Note, prepared by Aspect Ecology (see Appendix 2 of this representation)
- Site Location Plan, prepared by Pegasus Group (see Appendix 3 of this representation)

1.3 A call for sites exercise is running for the duration of the Housing and Employment Sites Options Consultation period. For completeness, a Call for Sites Form has been completed and submitted in respect of land at Home Farm and is included at Appendix 4 to this representation.

2. PLANNING POLICY BACKGROUND

Hereford Local Plan Core Strategy 2011-2031, Adopted October 2015

- 2.1 The adopted Core Strategy sets out provision under Policy SS2 for the delivery of a minimum of 16,500 homes in Herefordshire between the period 2011 to 2031. Hereford is the main focus for new housing development to support its role as the main centre. Outside of Hereford development is directed to the market towns of Bromyard, Kington, Ledbury, Leominster and Ross on Wye, on existing and new allocations to enhance their roles as multi-functional centres for the surrounding areas. In the rural areas new housing will be acceptable where it meets local needs and requirements and supports the rural economy, local services and facilities. The broad distribution of new dwellings in the county is set out in Policy SS2 as being a minimum of: 6,500 to Hereford; 4,700 to the Market Towns and 5,300 to the Rural settlements as listed in the Core Strategy.
- 2.2 Policy SS3 relates to ensuring a sufficient supply of housing land to ensure the delivery of the Core Strategy target set out in Policy SS2 over the plan period. This policy sets out the mechanisms which will be used if monitoring demonstrates that completions fall below the cumulative target set out in the housing trajectory over a 12-month monitoring period. The mechanisms that the Council will use will include: A partial review of the Local Plan - Core Strategy; the preparation of new Development Plan Documents or the preparation of an interim position statement and utilising evidence from the Strategic Housing Land Availability Assessment to identify additional housing land.
- 2.3 Policy SS4 relates to movement and transportation and sets out the major transport schemes that will be brought forward which include the Hereford Relief Road; Connect 2 Cycleway in Hereford; Park and Choose schemes and other schemes identified in the Local Transport Plan.
- 2.4 Section 4 of the Core Strategy sets out the proposals for Hereford, the Market Towns and the Rural Areas. The key policies of note in relation to Hereford are summarised below.
- 2.5 Policy HD1 states that a minimum of 6,500 dwellings will be provided in the plan period and a minimum of 15ha of employment land. Of the minimum requirement of 6,500 dwellings, 3,300 are identified at four locations: 800 to be provided in Hereford City Centre (HD2), 500 dwellings at the Northern Urban Expansion Areas (HD4); 1,000 dwellings at the Western Urban Expansion Area (HD5) and 1,000

dwellings at the Southern Urban Expansion Area (HD6). The remaining minimum requirement of 3,200 dwellings are to be provided through existing commitments, windfall development and the development of non-strategic sites allocated through the production of the Hereford Area Plan or Neighbourhood Development Plans.

2.6 Policy HD3 relates to the proposed improvements to the highway network to accommodate the scale of the proposed development for Hereford. One of the measures is the proposed Relief Road to the west of Hereford to reduce the volume of traffic from the city centre and enable walking, cycling and bus improvements on the existing highway network. The road is to be designed and developed to avoid and mitigate adverse impacts or physical damage to or loss of habitats, noise pollution and vibration, light pollution, air pollution, flood risk and water quality on the River Wye SAC, as well as residential amenity and business interests. Consideration is to be given on the impact of the road on heritage assets, their significance and setting, as well as the historic character of the wider landscape. It is set out that further assessment will be undertaken as part of the Hereford Area Plan and subsequent planning application(s). Policy HD3 also sets out that the pace of delivery of transport and movement infrastructure will be aligned with that of housing provision in accordance with Policy SS3.

2.7 The adopted Core Strategy proposes three expansion areas around the edge of Hereford and associated infrastructure, services and facilities as part of this strategy. The Hereford Relief Road is a key component that will assist in the delivery of the Western Urban Expansion (Three Elms).

Belmont Neighbourhood Development Plan 2011-2031, made October 2017

2.8 The NDP was adopted in 2017 and forms part of the Development Plan for Herefordshire. Home Farm falls within the Belmont NDP as well as the Golf Course, Belmont House and Belmont Abbey. There are a number of objectives and policies of relevance to Home Farm which are set out below.

2.9 Objective 2 – **to protect 'Home Farm'**. This sets out that Home Farm is a key area of open land in the western half of the parish to the north east of Belmont Abbey. The land is set out as being within close proximity to the proposals for the Western Relief Road as detailed within Policy HD3 of the adopted Core Strategy. Paragraph 5.5 sets out that the site is unregistered parkland.

2.10 Objective 3 – to support the long terms development proposals for the former Belmont Golf Club. This objective refers to Belmont House, a Grade II* Listed Building and Belmont Lodge (hotel) which have been decommissioned. The golf course is set out as being leased for agricultural use. Paragraph 5.7 notes that future decisions on the route of any Western Relief Road could impact future development of this area.

2.11 Part 2 of the NDP provides the detailed policies. Policy 2 is titled 'Protecting Home Farm and the Land adjacent to Ruckhall Lane'. The policy contains 3 criteria. Criteria (a) sets out that any development on land at Home Farm and land adjacent to Ruckhall Lane as identified in Figure 10 must have regard to the character and appearance of the area and conserve or enhance the character or appearance of heritage assets. Figure 10 is inserted below. Criteria (b) seeks to promote opportunities to enhance the ecological networks and habitats and support a walking and cycling link between Abbey View West and Belmont Abbey. Part (c) sets out that any proposals must have regard to policies SS4 and HD3 of the adopted Core Strategy and any other strategic policy or proposal concerning the proposed Hereford Relief Road. Part (c) sets out that the policy is not intended to prejudice the implementation of the Hereford Relief Road. The importance of the ecological and heritage assets, namely Belmont Abbey, Home Farm Stables, Belmont House former Golf Club site, The Almshouses and Chapel.

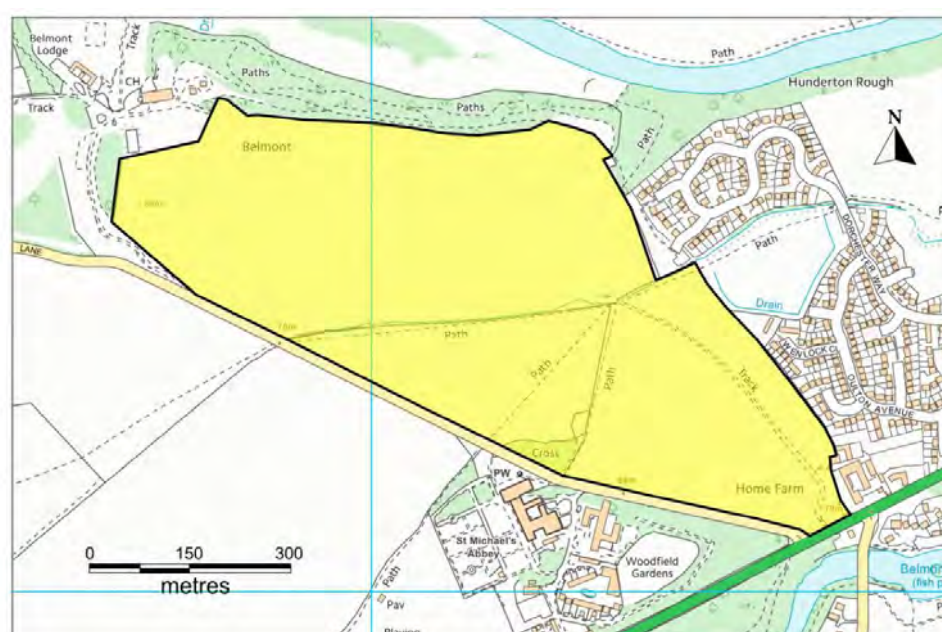


Figure 10 - Home Farm/ The Land Adjacent to Ruckhall Lane (page 31 Belmont NDP)

2.12 Policy 3 relates to future development for Belmont House which is supported in order to secure the future of Belmont House and other heritage assets. A range of uses including housing, B1 employment and leisure uses will be supported in principle subject to a number of criteria being satisfied.

Hereford Relief Road (Western Relief Road)

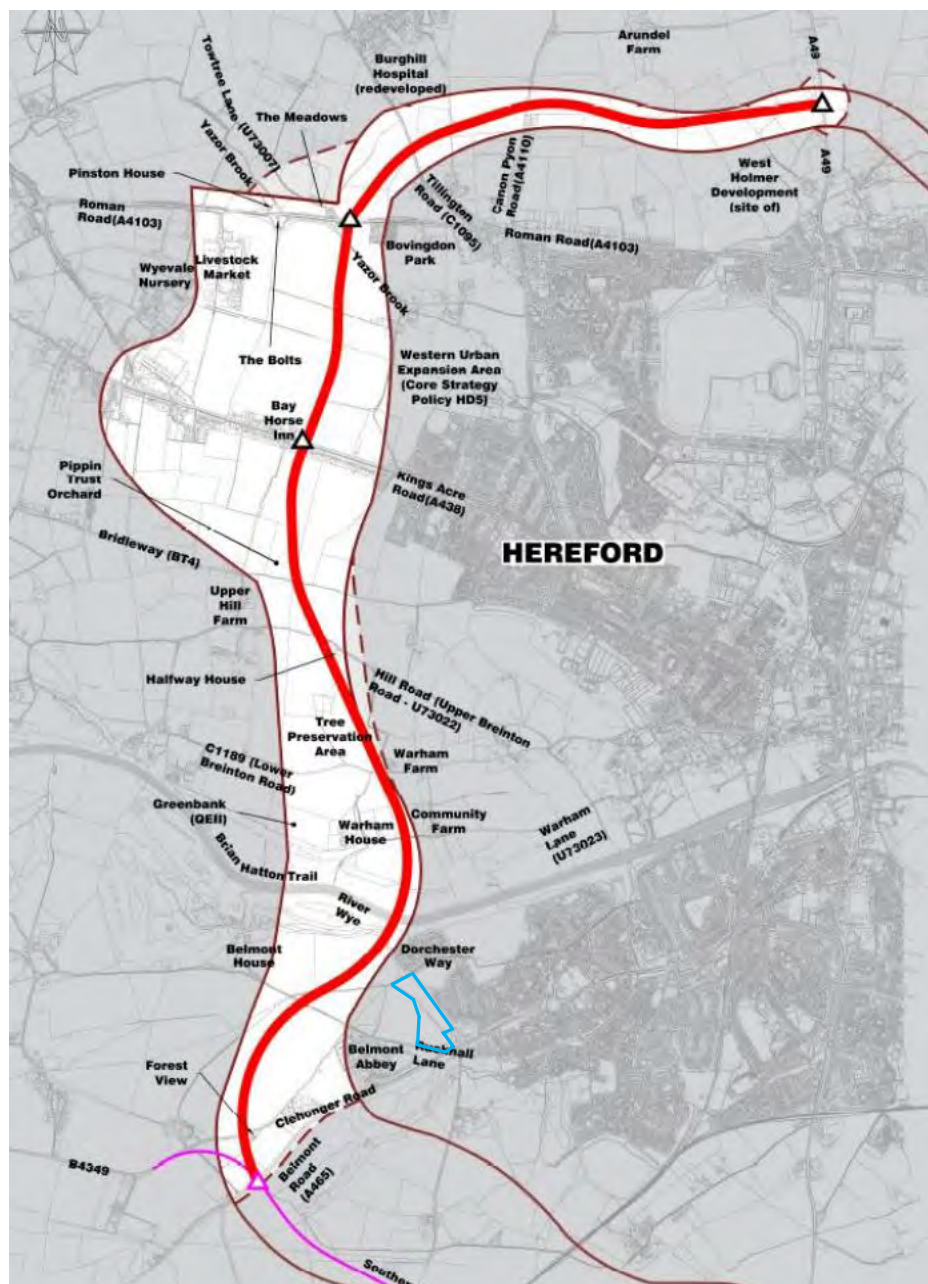
2.13 In **January 2018, Herefordshire Council's Cabinet approved a short-list** of route corridors for the bypass and a public consultation on these and proposals for the other elements of a Hereford Transport Package was undertaken during February and March 2018.

2.14 Based on the technical work and the public consultation feedback, more detailed reports were produced which recommend a preferred route. Based on this **assessment the recommendation has been made to opt for the 'red route'**.

2.15 The council's Cabinet considered these reports at a meeting on Friday 27 July 2018 and was able to support the proposed red route based on the evidence presented.

2.16 The identification of a final route for the Hereford bypass has enabled the progression of the HAP.

2.17 An extract of the preferred red route is included overleaf.



Selected Red Route of Hereford Western Bypass, with the approximate extent of land at Home Farm shown blue

Herefordshire Council 5 Year Housing Land Supply Position Statement

2.18 The most up to date Position Statement on housing land supply statement as at 1st April 2017. This sets out that the Council have a 4.54-year supply and cannot demonstrate a 5-year supply at this time. Recent appeal decisions¹ within the Authority confirm that the Council is still unable to demonstrate a 5-year supply.

¹ APP/W1850/W/18/3198134 dated 6th September 2018

3. HAP QUESTIONNAIRE

- 3.1 The Herefordshire Local Plan Core Strategy sets out an overall framework for the scale and location of new development across the county. The purpose of the HAP is to set out detailed proposals to ensure the delivery of the minimum targets for the city in the adopted Core Strategy. It will include policies and proposals for growth in the historic city of Hereford including specific proposals for housing, employment and urban regeneration. The HAP will be a statutory element of the **county's Local Plan and will be one of a number of development plan documents** (DPDs) currently being prepared which will provide detailed planning policies for specific locations or issues.
- 3.2 Identifying and delivering new housing and employment land is a key policy area that the HAP must deliver. The Core Strategy identifies four strategic sites for housing and employment land at Three Elms, Holmer West, Lower Bullingham and the city centre area. These strategic sites will account for a significant proportion **of the city's** minimum housing growth target for the plan period. It is the task of the HAP to identify further deliverable site allocations to aid the delivery of the remainder of the housing target (a minimum of 3,200 dwellings minus windfall sites, existing commitments and completions granted within the plan period 2011-2031).
- 3.3 This site options paper sets out to identify a range of sites to be considered as potential allocations for housing and employment uses within the HAP. The consultation documents include Technical Assessments and Site Summaries for sites previously submitted to the Council. Land at Home Farm is identified as site reference BEL15 and is included within the 'South West Hereford' **assessment** documents.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

- 3.4 The consultation document summary indicates that, of the 57 housing sites assessed, 20 have been considered unsuitable for housing and therefore identified **as having '0' capacity**. The housing capacity of the remaining 37 sites with potential amounts to 3647 dwellings. However, a deduction on this capacity must be made

for the Urban Village strategic site, due to existing commitments and completions, which amount to 448 dwellings. The 37 sites therefore have a collective capacity of approximately 3199 dwellings.

- 3.5 Lioncourt submits that it is wholly inappropriate to identify sites with an approximate collective capacity of less than the identified minimum housing requirement of 3,200 dwellings. This is particularly so when Herefordshire Council is unable to demonstrate a five-year housing land supply (and has been unable to do so since approximately 2014), combined with the fact that the housing figures contained within the Core Strategy constitute minimum figures. It is submitted that additional sites should be identified through the HAP over and above the 3,200-dwelling minimum requirement, in order to provide flexibility in the market, **competition and to remedy the Council's five-year housing land supply deficit.**
- 3.6 Apart from the delivery of the Northern Urban Expansion Area, there has been limited progress with the Western and Southern Urban Expansion Areas. It is appreciated that both sites are dependent on further highway infrastructure, but the lack of planning application approvals or even planning submissions is somewhat concerning and confirms that the Urban Extension Areas are not contributing to the housing supply as the Core Strategy had anticipated. It is therefore essential that the HAP provides sufficient land to deliver the housing requirements of the Core Strategy, given the significant delay to the Urban Expansion Areas.
- 3.7 Lioncourt submits that land at Home Farm (site ref: BEL15) has erroneously been identified as having no capacity for development due to landscape sensitivity. The Landscape and Visual Note appended to this representation demonstrates that, in the context of the recently approved route of the Western Relief Road, previous judgements on landscape sensitivity are not considered to be up to date or robust **and the subsequent decisions that rely on the 'high sensitivity' are flawed and should be reconsidered.**
- 3.8 It also follows from this, that the decisions upon which the outline planning application (reference S122747/O) was refused, and the subsequent appeal dismissed (reference APP/W1850/A/13/2192461) were made in the context of a completely different baseline situation.
- 3.9 The site is considered to have capacity for a sensitively designed residential masterplan, based on its own merit. When considered against the reduced

sensitivity of the baseline landscape (i.e. in the context of the modern settlement edge and introduction of major highways infrastructure) the site is considered suitable for development in landscape and visual terms.

3.10 In respect of other technical matters, there are no obstacles to prevent the site coming forward for development within the short-term i.e within five-years (see Chapter 4 of this representation).

3.11 Regarding alternative sites within the County, Lioncourt has concerns in respect of the transparency of the overall site selection process. This is particularly the case in respect of the former Belmont Golf Course (site reference: BEL08) which is located approximately 700m from Home Farm (site reference: BEL15) and is identified within the Council's Technical Assessment as being suitable for development. This is despite the Assessment identifying a number of '*significant constraints*' with site, including:

- A lack of nearby bus services and facilities
- Shape and nature of the site '*may make housing and access difficult*'
- The HRR may cut off Ruckhall Lane and require access to BEL08 by all modes to be from the west, which would be less desirable. Highways do not support the site '*at this time for the overall due to HRR uncertainty*'
- Landscape sensitivity identified as being '*high*'
- '*Not likely to be suitable*' in terms of archaeology

3.12 The Council's Technical Assessment concludes that '*there is minimal desire to introduce additional development on the sites because of its highly sensitive and historic setting*'. As such, Lioncourt is concerned that, despite the fundamental issues identified above, the site is identified as being suitable for development. This is particularly concerning when other sites with minimal constraints, such as Home Farm, are excluded.

Question 3: Do you think any particular sites should be developed in the short, medium or long term? The Site Allocations Plan may need to also control the phasing of housing delivery/development. The phases are:

- *Short term, 0-5 years*

- *Medium term, 5-10 years*
- *Long term, 10 + years*

3.13 The Core Strategy is heavily reliant on the delivery of several strategic urban extensions as identified in Section 2 of this representation, including at Three Elms (Western Urban Expansion Area) and Lower Bullingham (Southern Urban Expansion Area).

3.14 Lioncourt submits that there has been limited progress with the delivery of homes at these urban extensions, which has resulted in the persistent lack of five-year housing land supply within Herefordshire. It is recognised that progress has been made on several of the smaller urban extensions, albeit it is unlikely that they will deliver in accordance with the trajectory which is reported in the August 2017 Five Year Supply update.

3.15 As such, as set out above, it is submitted that additional sites should be included in the HAP to ensure that there is choice and competition in the short-medium term, in the absence of the delivery of the urban extensions, which are anticipated to deliver in the long-term.

3.16 It is submitted that land at Home Farm represents a suitable site, that is available and deliverable in the short term i.e the next five years. Further information in respect of the deliverability of the site is included at Chapter 4 of this representation.

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

3.17 The HAP consultation document indicates that the approach taken to identify and assess potential sites is based on an iterative site assessment process, resulting in colour coding sites either red (not considered suitable for allocation for housing) or green (potential to be allocated for housing but there may be issues which need to be resolved).

3.18 The methodology states that considerable emphasis has been placed on examining the potential for impacts to be mitigated where necessary. Mitigation can either reduce to acceptable levels any impacts or remove them entirely. Mitigation can be achieved in a number of ways depending on the impact type, for example by

providing new or enhanced spaces or habitats where existing areas are impacted or by using design and landscaping to mitigate visual impact.

3.19 The methodology goes on to state that:

"Landscape assessments of site options have been undertaken on external city sites. Landscape and visual sensitivity were determined based on a scoring of High, Moderate and Low. The assessments helped to guide conclusions on the extent of area capable of accommodating new development. With this in mind, this process helped to inform potential capacity of the site to accommodate more development and where possible mitigation measures were included."

3.20 Based on the above, Lioncourt has a number of objections in respect of the methodology used, particularly in respect of landscape and mitigation.

3.21 **Despite stating that 'considerable emphasis has been placed on examining the potential for impacts to be mitigated where necessary',** there has been no consideration of mitigation in respect of Home Farm **within the Council's Technical Assessment.** Regarding landscape, the Technical Assessment is wholly reliant upon the Urban Fringe Sensitivity Analysis (2010), which identifies the site as being in **an area of "high sensitivity"**.

3.22 As set out within the submitted Landscape and Visual Note at Appendix 1 of this representation, the recently approved route of the Hereford Western Relief Road runs approximately 500m from the north-western site boundary. This results in a fundamental change to both the landscape and its sensitivity, which has not been **considered through the Council's Assessment methodology.**

3.23 Furthermore, in respect of mitigation, no mitigation has been considered in respect of the landscape impact of the site. As set out later within this representation, significant woodland planting is proposed to support the reinstatement of the unregistered parkland to the west of the site, which will result in net ecological gains, as well as serving to mitigate the landscape and visual impact of the development.

4. LAND AT HOME FARM, HEREFORD

4.1 This Chapter contains an assessment of relevant technical matters in respect of land at Home Farm, Hereford. This includes references to supporting documentation, included as appendices to this representation.

Landscape

4.2 Pegasus Group has prepared a Supplementary Note on Landscape and Visual Matters, included at Appendix 1 to this representation. The Note sets out how the existing HAP evidence base includes several reference documents which date back as far as 2004. Together these address landscape and visual matters for a range of different purposes, including baseline characterisation, sensitivity and capacity and high-level considerations of suitability for development.

4.3 At this stage, none of the evidence base documents have been updated to reflect the proposals for the major highways infrastructure proposed on the western edge of Hereford, notably the proposed Hereford Bypass, or Western Relief Road (WRR). The preferred route of the WRR (the red route) passes around the western edge of the town, cutting across several landscape types, including the valley of the River Wye.

4.4 In relation to the site, the WRR passes through the Wooded Parklands landscape type, cutting across the Belmont Parkland, which is a recognised (unregistered) park and garden. Notwithstanding judgements in the previous evidence base **documents that the landscape in this area is of 'high sensitivity', the WRR would, by virtue of its scale, its fundamental nature, and the preferred route, have a substantial influence on the landscape and its sensitivity.**

4.5 As such, in the context of the WRR, judgements on landscape sensitivity are not considered to be up to date or robust and the subsequent decisions that rely on the **'high sensitivity' are flawed and should be reconsidered.**

4.6 It also follows from this, that the decisions upon which the outline planning application (reference S122747/O) was refused, and the subsequent appeal dismissed (reference APP/W1850/A/13/2192461) were made in the context of a completely different baseline situation.

4.7 The site is considered to have capacity for a sensitively designed residential masterplan, based on its own merit. When considered against the reduced

sensitivity of the baseline landscape (i.e. in the context of the modern settlement edge and introduction of major highways infrastructure) the site is considered suitable for development in landscape and visual terms.

Ecology

- 4.8 **The Council's Technical Site Assessment identifies the potential for the site to impact upon the River Wye SAC/SSSI. To this end, the Assessment states that:**

"All foul water should be managed through connection to main sewer network. Confirmation that this is possible and also acceptable to Welsh Water is necessary. No direct discharge of any foul water outfall from any onsite treatment system in to any watercourse or culvert will be considered acceptable. All surface water will need to be managed on site through a Sustainable Drainage system (SuDS)."

- 4.9 Lioncourt submits that the above requirements are not onerous, and the site is capable of achieving a suitable drainage solution. This has been demonstrated in previous planning submissions, which the Council did not dispute when determining the planning application.
- 4.10 Regarding protected species, the Assessment goes on to states that any development involving demolition of an existing building or structure will require an Ecological Survey.
- 4.11 A Technical Briefing Note has been prepared by Aspect Ecology in support of the promotion of land at Home Farm. This Note is included at Appendix 2 to this representation. The Note assesses the ecological deliverability of any new development at the site and provide an overview of any likely ecological constraints and opportunities. This includes utilising historical and updated survey work, including an on-site Phase 1 Habitat Survey, which satisfies the requirements of **the Council's Technical Assessment** as set out above.
- 4.12 The Note sets out how the site may be developed so as to conserve the River Wye SAC/SSSI, through maintaining **the site's current green field run off rates post** development, whilst any surface water leaving the site should also be at ambient temperature and carry no pollutants. Mitigation protocols for the protection of sensitive designated sites in respect of hydrological impacts are well established, and centre on the provision of a Sustainable Drainage System (SuDS) that incorporate a three-stage 'treatment train' to ensure that surface water runoff is

carefully controlled. As such, mitigation measures for the nearby River Wye SAC can readily be implemented.

- 4.13 Regarding habitat, the Note sets out how the site comprises wood pasture and parkland, although The Priority Habitat within the site is currently degraded in relation to the standard definition for this habitat type, owing to the nutrient input and trampling from intensive sheep grazing over time. The proposals therefore offer an opportunity to enhance and extend Parkland habitat in the area. Indeed, a large area to the west of the site comprises former parkland where trees have been removed, and as such a significant opportunity is available to enhance and restore this area, either to facilitate any mitigation requirements, or as an ecological enhancement in its own right. As such under the proposals there is the opportunity to bring forward a net gain in Parkland.
- 4.14 Similarly, there are mature and veteran trees present within the site, which are considered to be of high ecological value. As such, it is recommended that all mature and veteran trees should be retained under the proposals within an appropriate landscape buffer, and appropriate management should be implemented to ensure that these features are safeguarded into the future.

Highways

- 4.15 It is proposed to access the site from Ruckhall Lane to the south-west. In order to establish the required visibility splays for the site access, a speed survey was undertaken on Ruckhall Lane by Phil Jones Associates in September 2018. The survey recorded an eastbound 85th percentile speed of 38.4mph (towards the access).
- 4.16 Based upon the formulae set out in DRMB TD 9/93 and Manual for Streets 1 & 2, a desirable minimum stopping sight distance of 97m would be required to allow drivers on the major road to slow down and stop safely if necessary. On this basis, it is appropriate to provide a visibility splay of 97m from the minor arm, measured from a distance of 2.4m back from give-way line to the edge of the eastbound carriageway. The visibility splay can be achieved within either the adopted highway, or land within the site.
- 4.17 The traffic impact of the site would be minimal; however, it should be noted that the compulsory purchase order for the Southern Link Road is likely to commence in October 2018, with construction due to start early in 2019. The Southern Link

Road would benefit the site as it would provide additional highway capacity and allow active travel measures to come forward in the South Wye Area.

- 4.18 In addition, as set out earlier within this representation, the preferred route for the remainder of the Hereford Relief Road has been **approved by Hereford Council's** Cabinet. Further detailed information is currently being drawn up, with further consultation due early in 2019. It should be noted that the preferred route includes the provision of a new highway structure to carry Ruckhall Lane over the relief road.
- 4.19 The Technical Site Assessment for Home Farm produced by Herefordshire Council states that:

"It is estimated that development of the site (based on 100 dwellings) would result in 35 additional trips per hour into Hereford city centre on the A465 in the morning peak hour, and similar outbound in the evening peak. This only equates to 3% of the corresponding total one way flow arriving at the A49/A465 junction. It is likely that the addition of a further 30 vehicles spread over the peak hour would only have a marginal impact on the existing slow moving traffic that occurs on the A465.

There are regular bus services available on the A465 and adjacent existing residential areas. Cycle routes are also available on and off road in the adjacent residential area.

It is considered overall that development would have minimal impact and would be acceptable. This information is based on 2012 application and will require updating with regard to network capacity and HTP."

- 4.20 It is clear from the above that the development is acceptable in terms of its access and overall impact upon the highway.

Built Conservation and Archaeology

- 4.21 **Herefordshire Council's Technical Site Assessment identifies that** the site has the potential to include heritage assets with archaeological interest. Any application submitted will accordingly include a field assessment to explore this further.

- 4.22 In respect of the unregistered parkland, this representation has already set out measures for improving the ecological and visual character of the parkland, in particular through additional planting.

Open Space

- 4.23 The development of this site will incorporate open space which will be an integral part of the development. Important views into and from the site will be incorporated into the design of the development with pedestrian routes and natural play dispersed throughout the site. A more formal area of play (neighbourhood equipped area of play) will be delivered on site which will be accessible to the wider community. Footpath links to adjacent existing development, including to the north-east, north-west, south-east and south-west will be incorporated into the layout and reinstated tree planting to the west of the site would enhance the landscape character and ecological value of the site.

Drainage and Flood Risk

- 4.24 The site is located wholly in Flood Zone 1; the area at least risk from flooding (land having less than 1 in 1,000 annual probability of flooding).
- 4.25 Surface water will be managed by a potential drainage attenuation basin. SuDS will be utilised throughout the development. As set out earlier within this representation, SuDS will incorporate a three-stage system to ensure that surface water runoff is carefully controlled, in order to preserve the nearby River Wye SAC.

Agricultural Land Classification

- 4.26 **The land is identified as Grade 2 ‘very good’ agricultural land.** However, it is recognised within the Council’s consultation document that *‘the majority of the land around Hereford is Grade 2 agricultural land which is very good quality’*. It is therefore submitted that, regardless of the sites selected for development through the HAP, it is likely that this will involve developing Grade 2 agricultural land.
- 4.27 The agricultural land classification of the site is therefore not a barrier to development.

Site Capacity, Phasing and Delivery

- 4.28 It is submitted that the site has capacity for up to 70 dwellings. The site is available for development now and is deliverable as a single phase within the short-term i.e within five years.
- 4.29 It is therefore submitted that the development has significant potential to provide for much-needed housing within the short-term, particularly in the context of a lack of five-year housing land supply.
- 4.30 As set out earlier within this representation, it is submitted that it is inappropriate to identify sites with an approximate collective capacity of less than the identified minimum housing requirement of 3,200 dwellings. This is particularly so in the absence of a five-year housing land supply combined with the fact that the housing figures contained within the Core Strategy constitute minimum figures. The allocation of the site for residential development will support the delivery over and above the 3,200-dwelling minimum requirement, in order to provide flexibility in **the market, competition and to remedy the Council's five-year housing land supply deficit.**

APPENDIX 1

LANDSCAPE AND VISUAL NOTE

HEREFORD AREA PLAN (HAP)

HOUSING AND EMPLOYMENT SITE OPTIONS CONSULTATION

HOME FARM, HEREFORD:

SUPPLEMENTARY NOTE ON LANDSCAPE AND VISUAL MATTERS

ON BEHALF OF LIONCOURT STRATEGIC LAND



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Pegasus Group

5 The Priory | Old London Road | Canwell | Sutton Coldfield | B75 5SH

T 0121 308 9570 | F 0121 323 2215 | W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
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1. INTRODUCTION

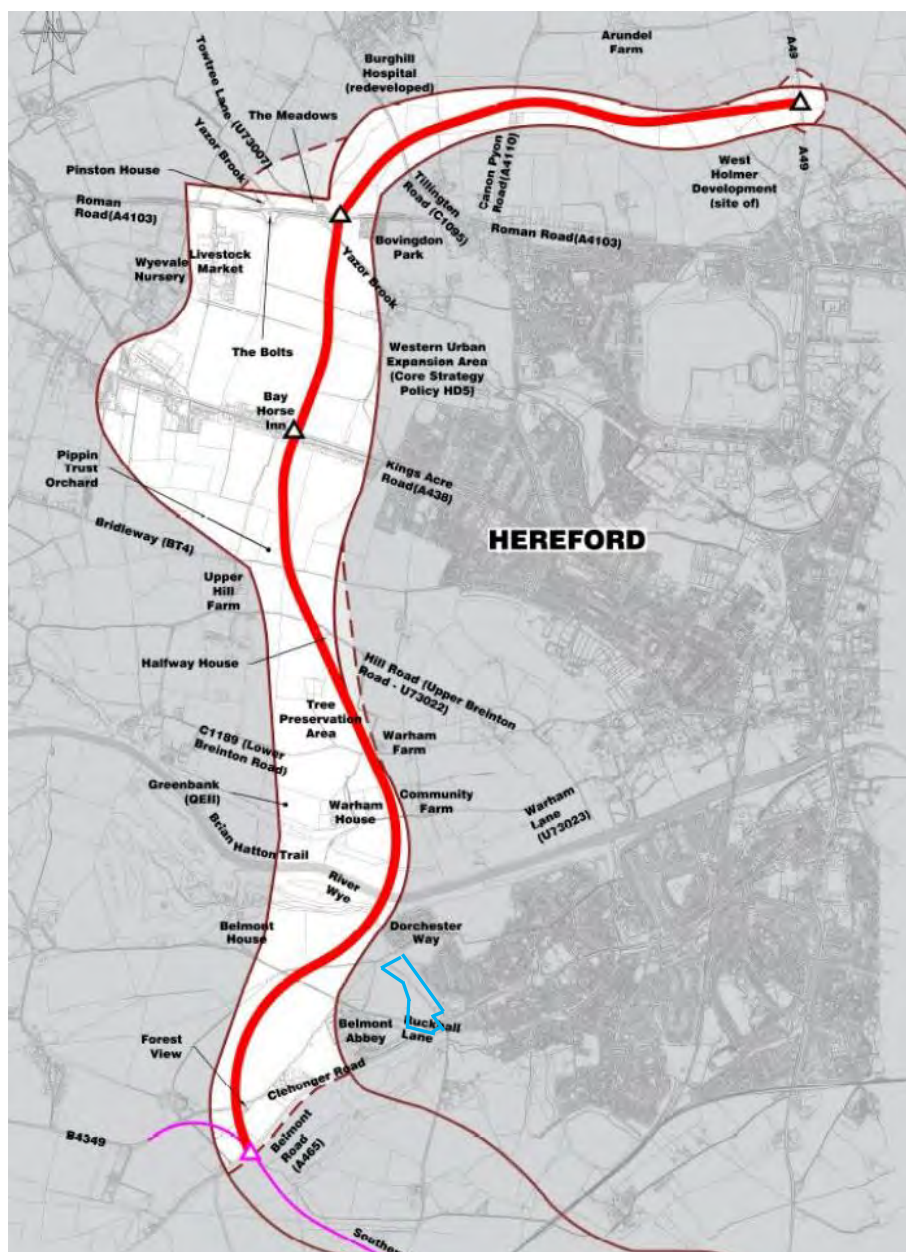
- 1.1 Pegasus Group is instructed by Lioncourt Strategic Land (**'Lioncourt'**) to make representations to the Hereford Area Plan (**'the HAP'**); Housing and Employment Site Options Consultation.
- 1.2 The representations relate to land at Home Farm, Hereford, identified as parcel **reference 'Bel 15' within the HAP Consultation documents** (referred to as the site). It is submitted that land at Home Farm represents a sustainable, suitable and deliverable site for residential development, capable of delivering up to 70 homes.
- 1.3 The site has some planning history with several issues related to landscape and visual matters being considered at as part of an outline application (2012) and subsequent appeal (2013/14). The site is also the subject of several strategic documents addressing its suitability for residential development. However, in all instances the baseline context of the site has significantly altered since those matters were initially considered.
- 1.4 This supplementary note has been prepared with reference to the following documents:
- Landscape Character Assessment, SPG (2004);
 - Urban Fringe Sensitivity Analysis: Hereford and the Market Towns, Local Development Framework (January 2010);
 - **Herefordshire's Strategic Housing Land Availability Assessment**, Hereford City Site Schedules (SHLAA) (March 2012);
 - Housing and Employment Site Options Consultation Technical Site Assessments - South West Hereford (August 2018); and
 - Hereford Transport Package – Hereford Bypass (Stage 2 Scheme Assessment Report June 2018; Preferred Route Report June 2018; Rote Selection Report July 2018).
- 1.5 This supplementary note sets out the main changes to the baseline of the site and its surrounding landscape context and the implications of such changes in respect of the suitability of the site from delivering residential development.

2. CONSIDERATION OF LANDSCAPE AND VISUAL MATTERS

Hereford Transport Package – Hereford Bypass (Western Relief Road)

- 2.1 **In January 2018, Herefordshire Council’s Cabinet approved a short-list** of route corridors for the bypass, and a public consultation on both these, and proposals for the other elements of a Hereford Transport Package was undertaken during February and March 2018.
- 2.2 Through the route selection process, the corridor options were divided into a series of **‘elements’**. Those relevant to the site and its immediate context are situated towards the southern end of the Western Relief Road (WRR) and include Elements 1.1 and 1.2.
- 2.3 The consideration of the routes through these areas acknowledge landscape and visual impacts with the narrative seeking to minimise (and mitigate for these), rather than avoid them entirely.
- 2.4 Based on the technical work and the public consultation feedback, the assessment recommended **to opt for the ‘red route’**; this route being subsequently supported by the council's Cabinet (on Friday 27 July 2018).
- 2.5 **The preferred ‘red route’** of the WRR is shown in Plate 1, below, and illustrates how this cuts through the estatelands to the north of Ruckhall Lane (and Belmont Abbey).

Plate 1: Selected Red Route of Hereford Western Bypass, with the approximate extent of land at Home Farm shown blue



Landscape Character Assessment, SPG (2004)

- 2.6 Located to the south of the River Wye, the site and this section of the WRR route are located in an area of landscape character defined as the Wooded Estatelands landscape type.
- 2.7 Noting that the Landscape Character Assessment was prepared in 2004, the guidance describes this landscape type as a 'wooded agricultural landscape of isolated farmsteads, clusters of wayside dwellings and occasional small estate

villages’. Although the landscape type is situated directly adjacent to Hereford’s settlement edge, little or no reference is made in respect of the influence of the settlement on the landscape character. Ornamental grounds and parkland are noted as noticeable features.

- 2.8 Should the LCA be updated, it would no doubt need to address the influence of this the major road infrastructure which the WRR represents.
- 2.9 The consequences are likely to be, either a subdivision of the landscape types into smaller landscape units (those to the east of the WRR being closely associated with the urban edge of Hereford); or accounting for the route of the WRR within the landscape type, which would undoubtedly represent a major feature in the landscape and one that would influence (i.e. reduce) the overall sensitivity of the landscape.

Urban Fringe Sensitivity Analysis: Hereford and the Market Towns, Local Development Framework (January 2010)

- 2.10 The Urban Fringe Sensitivity Analysis is a technical paper prepared in support of the Strategic Housing Land Availability Assessment. The study classifies the sensitivity of the urban fringe landscapes of Hereford, noting a limitation that it is **a ‘broad scale’ study and not a ‘capacity study’ (i.e. a capacity study would be prepared at a more detailed level, and in relation to a specific type of development – para 1.3.4 of the study).**
- 2.11 The study classifies sensitivity on a **five point scale, with 5 (high) representing ‘no potential for housing’, whilst 4 (medium to high) represents ‘potential housing sites with significant constraints’.**
- 2.12 **The ‘landscape zone’ carried forward for the analysis is defined by the study as ‘Belmont’** and the extent of this is broadly aligned with the area of the unregistered park and garden of the same name (noting that the landscape zone extends further, across a parcel to the north-east that includes existing development on the edge of Hereford).
- 2.13 **The study determines that the ‘Belmont’ landscape zone is of high sensitivity (forming 1 of 9 sites in this highest tier).**
- 2.14 Spatially, the landscape sensitivity around Hereford as a whole is illustrated on Map 3.1 of the study; this shows that almost the entire fringe of the settlement is of

'medium to high', or 'high' sensitivity, with only limited small scale pockets on the north and north-west **of judged to be 'medium to low' sensitivity (along with a single small pocket on the southern edge).**

2.15 The summary **of the sensitivity analysis in respect of the 'Belmont' landscape zone** refers to the maintained integrity of the unregistered Belmont House parkland; the maintenance of the parkland character; the designed views of the Wye valley; and the maintenance of tranquillity (particularly in the western part of the parkland).

2.16 **On the basis that these are the key issues driving the judgement of 'high sensitivity', the introduction of the WRR will clearly alter the baseline landscape context and reduce the overall sensitivity of the parcel.** For example, considering:

- integrity of the unregistered Belmont House parkland – the WRR would cut across the parkland, creating physical and visual severance of the parkland area to the north of Ruckhall Lane and undermining its overall integrity;
- the maintenance of the parkland character – the WRR would introduce a substantial piece of highways infrastructure to the area, including associated mitigation (likely to comprise linear tree and woodland planting) which together would not be in keeping with the parkland character;
- the designed views of the Wye valley – in both views from and to the parkland area, the WRR would result in considerable visual impacts (and also visual separation); and
- maintenance of tranquillity (particularly in the western part of the parkland) – highways infrastructure and associated traffic would substantially reduce the tranquillity of the area, however there remains scope for the western areas of the parkland to remain relatively more tranquil, away from the WRR and away from the settlement edge.

2.17 Overall, in the context of the WRR, the judgements on sensitivity presented in the Urban Fringe Sensitivity Analysis (UFSA) are no longer robust as they are based on an outdated baseline context. The emerging changes to the baseline are very likely **to reduce the landscape sensitivity from 'high'.**

2.18 With reference to the UFSA methodology, any reduction in sensitivity would consequently result in some capacity for development within the landscape zone; something that should be considered further at a more detailed level.

Herefordshire SHLAA

- 2.19 The site is included in the SHLAA, referenced as HLAA/310/001a. The SHLAA **suggests that the site is 'not suitable', going on to refer to 'high' landscape sensitivity.** The degree of landscape sensitivity has been addressed in the previous **section, whereby the level of sensitivity is likely to be reduced from 'high' due to the WRR.**
- 2.20 The SHLAA reference to sensitivity also refers (briefly) to matters of the value as a **landscape resource and that the site comprises 'unregistered parkland'.**
- 2.21 The summary of the SHLAA then goes on to contradict this, stating that the **parkland is 'designated'; and that it forms an attractive setting to the urban edge** of Belmont which should be protected from further development.
- 2.22 The judgements of the SHLAA were been made prior to confirmation of the route **of the WRR. The 'red route' would effectively sever the parkland area which is** referred to, impacting upon the integrity and character of this part of the landscape. The area to the east of the WRR, adjacent to the settlement edge would be compartmentalised and effectively severed from the wider countryside; such severance would arise not just from the engineered infrastructure but also any associated linear tree and woodland planting used to mitigate the impacts of the route. Furthermore, there would be considerable visual effects arising from the WRR in terms of its vertical alignment as it passes north toward a potentially elevated crossing across the River Wye.
- 2.23 Consequently, in the context of the WRR, judgements on landscape sensitivity in relation to this site would be reduced and, based on a lower sensitivity, it is likely that the site would be considered suitable for development in landscape and visual terms.

Housing and Employment Site Options Consultation Technical Site Assessments

- 2.24 The Technical Site Assessments document was produced in August 2018 and is likely to have been prepared concurrently with the Hereford Transport Package reports (dated June/July 2018). In this respect it is reasonable to assume a degree of transparency between the projects and early conclusions.

-
- 2.25 Notwithstanding the proposals for the WRR, the Technical Site Assessment (TSA) for the site (site reference Bel15) makes no reference to this major piece of infrastructure, instead reverting to the existing baseline information (which is considered to be out of date) and judgements on sensitivity therein.
- 2.26 **Citing 'high' landscape sensitivity the TSA for the site suggests** that it is not suitable to take forward in the site options.
- 2.27 Having considered the future scenario of the WRR and its consequences, including the severance of the parkland; the adverse impacts on the parkland landscape character; the loss of tranquillity and the impact on views of the Wye Valley, the former judgements on sensitivity are no longer robust and sensitivity of this part of the landscape would no longer be high. In turn this would suggest the site has some capacity for development and that the site should be taken forward to the Site Options in order to consider this in greater detail.

3. SUMMARY

- 3.1 This supplementary note addresses landscape and visual matters in respect of land **at Home Farm, Hereford, identified as parcel reference 'Bel 15' within the HAP Consultation documents** (referred to as the site).
- 3.2 It is submitted that land at Home Farm represents a sustainable, suitable and deliverable site for residential development, capable of delivering up to 70 homes.
- 3.3 In respect of landscape and visual matters, the existing evidence base includes several reference documents which date back as far as 2004. Together these address landscape and visual matters for a range of different purposes, including baseline characterisation, sensitivity and capacity and high level considerations of suitability for development.
- 3.4 At this stage, none of the evidence base documents have been updated to reflect the proposals for the major highways infrastructure proposed on the western edge of Hereford, notably the proposed Hereford Bypass, or Western Relief Road (WRR). The preferred route of the WRR (the red route) passes around the western edge of the town, cutting across several landscape types, including the valley of the River Wye.
- 3.5 In relation to the site, the WRR passes through the Wooded Parklands landscape type, cutting across the Belmont Parkland, which is a recognised (unregistered) park and garden. Notwithstanding judgements in the previous evidence base **documents that the landscape in this area is of 'high sensitivity', the WRR would, by virtue of its scale, its fundamental nature, and the preferred route, have a substantial influence on the landscape and its sensitivity.**
- 3.6 As such, in the context of the WRR, judgements on landscape sensitivity are not considered to be up to date or robust and the subsequent decisions that rely on the **'high sensitivity' are flawed and should be reconsidered.**
- 3.7 It also follows from this, that the decisions upon which the outline planning application (reference S122747/O) was refused, and the subsequent appeal dismissed (reference APP/W1850/A/13/2192461) were made in the context of a completely different baseline situation.
- 3.8 The site is considered to have capacity for a sensitively designed residential masterplan, based on its own merit. When considered against the reduced

sensitivity of the baseline landscape (i.e. in the context of the modern settlement edge and introduction of major highways infrastructure) the site is considered suitable for development in landscape and visual terms.

APPENDIX 2

ECOLOGICAL TECHNICAL BRIEFING NOTE

Technical Briefing Note

Project: Home Farm, Hereford

TN01: Review of Ecological Constraints and Opportunities

September 2018

1 Introduction

- 1.1 Aspect Ecology is advising Lioncourt Strategic Land in respect of the area of land known as Home Farm, Belmont, Hereford (see the enclosed Plan 2753/BN1), hereafter referred to as 'the site'. Herefordshire Council is currently consulting on an updated Hereford Area Plan and has previously discounted the site from the Plan on the basis of ecology. As such, Aspect Ecology has been commissioned to conduct a review of the current ecological conditions at the site, to make information available to the Council to inform future decisions regarding land allocation under the Hereford Area Plan.
- 1.2 With this understanding, Aspect Ecology has been commissioned to assess the ecological deliverability of any new development at the site and provide an overview of any likely ecological constraints and opportunities. Aspect Ecology has good historical data for the site, having previously conducted a full ecological assessment of the site in 2013. The results of this previous survey work have been used alongside updated survey work to inform this briefing note.
- 1.3 An overview of the deliverability of the site is provided within this technical briefing note, and on the basis of this discussion, recommendations are made to guide the location of any future development within the site, in order to minimise any potential impacts on ecology. Where future development may adversely affect habitats or species of value, mitigation is outlined in order to demonstrate where suitable measures can be put in place to safeguard features/species and avoid detrimental effects.

2 Methodology

- 2.1 This assessment comprises two stages, namely a desktop review of existing ecological data for the local area and a rapid Phase 1 survey of the site.

Desktop Study

- 2.2 In order to compile background information on the site and its immediate surroundings, freely available information has been utilised to identify the presence of any statutory designations within the site and/or the local area. Such information has been principally obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC) database, which utilises data provided by Natural England.

- 2.3 The Hereford Biological Records Centre has also been contacted, to obtain information regarding locally-designated ecological sites, and the presence of rare, notable, and invasive species in the local area.

Rapid Phase 1 Survey

- 2.4 A rapid, high level Phase 1 habitat survey was undertaken in September 2018, based on standard Phase 1 Habitat Survey methodology¹, whereby habitat types within the site are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey (any such areas identified can then be examined in more detail through Phase 2 surveys). Particular attention was paid to the presence / absence and condition of mature and veteran trees present within the site.

3 Discussion of the ecological status of the site

- 3.1 In order to frame an understanding of the potential suitability of the site to receive development, the current ecological value of the site is first discussed, as set out below under the headings 'Ecological Designations', 'Habitats' and 'Fauna'.

Statutory Ecological Designations	
Notes	<p>The site itself is not subject to any statutory nature conservation designation, nor are there any such designations located immediately adjacent to the site. The nearest statutory nature conservation designation to the site is River Wye Special Area of Conservation (SAC) / Site of Special Scientific Interest (SSSI) the closest point of which is located approximately 0.3 km north of the site, from which it is separated by open fields, along with an area of woodland. The River Wye is designated as a SAC due its aquatic faunal interest and the presence of Annex I habitats.</p> <p>The closest non-statutory ecological designation to the site, Hayleaseow Wood, Newton Coppice and Spring Grove Special Wildlife Site SWS, is located approximately 20m to the south of the site and is separated from the site by Ruckhall Lane.</p>

Habitats	
Notes	<p>The site is situated at Home Farm, at the south-western edge of Hereford. The site is bound to the southeast by the A465 Belmont Road, and to the southwest by Ruckhall Lane, beyond which lies Belmont Abbey. The site is largely bound to the east by the curtilage of existing residential properties.</p> <p>The site is dominated by closely grazed semi-improved sheep pasture and contains a number of mature/veteran trees, a number of hedgerows and a single small area of hardstanding associated with offsite farm buildings to the east.</p> <p>The habitats of elevated ecological value within the site are described in more detail below.</p> <p>Wood Pasture and Parkland (Priority Habitat):</p> <p>Information obtained from the MAGIC database and the Herefordshire Biological Records Centre shows the site is situated within an area identified as the UKBAP priority habitat 'Wood-Pasture and Parkland'. Indeed, nine trees (a key component of parkland habitat) are present within the centre of the site, which include a number of likely veterans. Veteran trees are considered 'irreplaceable' habitats under the NPPF and are</p>

¹ Joint Nature Conservation Committee (2010) 'Handbook for Phase 1 habitat survey: A technique for environmental audit.'

	<p>of high ecological value at the local level, potentially providing opportunities for lower plants, lichens, specialist invertebrates and other wildlife.</p> <p>However, a review of the Parkland finds it is degraded in nature. Since the conversion of the land from traditional Parkland (formerly associated with the nearby Belmont Abbey) to intensively sheep-grazed grassland, much of the ecological value of the Parkland habitat has been lost, such that the existing veteran trees represent a remnant feature. The intensive use of the Parkland for sheep grazing, and subsequent high nutrient input into the site, may also have reduced the potential of the trees to support other species. Previous specialist survey work, conducted in 2013, found only a limited diversity of lower plant species (Lichens and Bryophytes) and fungi to be present on the trees within the site, and did not record any species considered rare or threatened at a national or local level. These findings were likely explained due to moderate nutrient inputs and trampling, owing to management of the land for sheep production. As such, given that the land use at the site appears to have remained consistent from 2013 to the present, it is considered unlikely that the status of lower plants and fungi on mature and veteran trees within the site will have changed significantly in the interim such that the Parkland remains degraded in nature.</p> <p>Hedgerows (Priority Habitat): Three hedgerows are present within the site, of which two are likely to qualify as UKBAP priority habitat 'Hedgerows'.</p> <p>Hedgerow H1 is likely to qualify as a UKBAP priority habitat, albeit this hedgerow is species poor, short in extent and isolated in nature such that it is likely to restrict its ecological value to a low level. Hedgerow H3 is relatively more diverse and comprises a number of woody species, such that it is considered to be of some moderate ecological value and potentially likely to qualify as important under the wildlife and landscape criteria of the Hedgerows Regulations 1997 and as a UKBAP priority habitat.</p>
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Fauna	
Notes	<p>The habitats on site (dominated by sheep-grazed grassland and individual mature trees) offer some limited potential for protected faunal species. Where such opportunities exist, these are discussed below:</p> <p>Bats. The mature trees present within the site offer opportunities for roosting bats, particularly those trees which are of veteran status. The desktop study returned records of Common Pipistrelle <i>Pipistrellus pipistrellus</i> foraging within the site, while additional records of other bat species including Lesser Horseshoe <i>Rhinolophus hipposideros</i> were returned from areas adjacent to the site. However, survey work carried out in 2013 recorded no roosting bats within any of the mature trees within the site.</p> <p>Reptiles. The desktop study returned only a single record for Slow Worm <i>Anguis fragilis</i> from within the wider search area, whilst survey work undertaken in 2013 recorded this species at the periphery of the site. In any case, the site is dominated by short sward grassland which offers limited opportunities for this species group, albeit longer-sward grassland and ruderal vegetation at the site perimeters may offer some limited opportunities for sheltering and foraging reptiles. However, suitable habitats are limited in extent and temporary in nature, and similar opportunities are plentiful in the surrounding area. As such, it is considered that any use of the site by reptiles is likely opportunistic and short-term.</p> <p>Nesting Birds. The trees and hedgerows present within the site are likely to offer opportunities for nesting birds. However, given that abundant nesting opportunities, in the form of woodland, are present to the south and north of the site, together with opportunities in neighbouring residential gardens, the site is not considered of elevated</p>

	<p>value for nesting birds in the context of the local area.</p> <p>Invertebrates. No records of protected invertebrate species were returned from within or adjacent to the site during the desktop study. Furthermore, a specialist invertebrate survey, conducted in 2013, did not record any species of elevated conservation concern within the site, or specifically associated with the mature and veteran trees within the site. The site is in close proximity to Moccas Park National Nature Reserve (NNR), which is designated on the basis of its outstanding assemblage of invertebrates associated with veteran trees, and it has been noted that invertebrate ecology within the NNR is likely to function at the wider landscape scale in similar habitats². The veteran trees within the site may therefore present a future opportunity to act as a stepping stone habitat which may be secured and enhanced under any sensitive planning proposal.</p>
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4 Discussion of the ecological deliverability of the site

Ecological Designations

- 4.1 The site is located in the vicinity of the River Wye SAC/SSSI. To ensure that any development proposals do not pose a risk to the SAC through possible hydrological effects, mitigation measures will be likely required. These would potentially include a requirement to maintain the site's current green field run off rates post development, whilst any surface water leaving the site should also be at ambient temperature and carry no pollutants.
- 4.2 Mitigation protocols for the protection of sensitive designated sites in respect of hydrological impacts are well established, and centre on the provision of a Sustainable Drainage System (SuDS) that incorporate a three-stage 'treatment train' to ensure that surface water runoff is carefully controlled. As such, mitigation measures for the nearby River Wye SAC can readily be implemented.
- 4.3 In terms of local designations, these have the potential to receive new recreational pressure from the proposed development. However, the 2013 survey work recorded the nearby SWS's to be dominated by woodland and include a number of well-defined compacted gravel aggregate paths comprising way marked circular walking routes. Areas beyond the paths were noted to be largely dense in nature and/or on sloping ground such that the majority of the SWS away from the main paths is somewhat relatively difficult to access. Accordingly, as the SWS is well set up to receive visitors, it is therefore considered that indirect adverse effects on the SWS as a result of the proposed development are unlikely to arise.
- 4.4 Accordingly, it is considered that nature conservation designations should not form an overriding constraint to any future development.

Priority and Irreplaceable Habitats

- 4.5 **Wood Pasture and Parkland.** The Priority Habitat within the site is currently degraded in relation to the standard definition for this habitat type, owing to the nutrient input and trampling from intensive sheep grazing over time. The proposals therefore offer an opportunity to enhance and extend Parkland habitat in the area. Indeed, a large area to the west of the site comprises former parkland where trees have been removed, and as such a significant opportunity is available to enhance and restore this area, either to facilitate any mitigation requirements, or as an ecological enhancement in its own right. As such under the proposals there is the opportunity to bring forward a net gain in Parkland.

² Harding & Wall (2000) Moccas: An English Deer Park. History, wildlife and Reserve. English Nature (Veteran Trees Initiative).

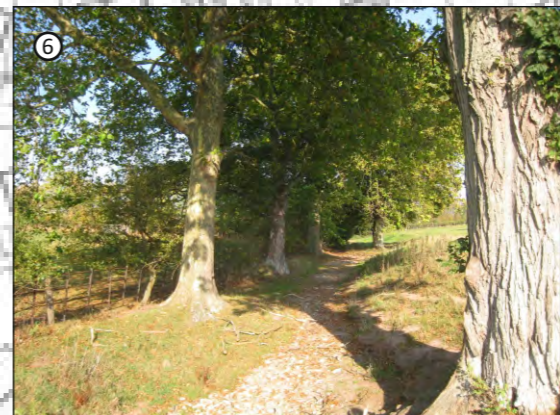
- 4.6 **Mature and Veteran Trees** The mature and veteran trees present within the site are considered to be of high ecological value. Additionally, trees considered to be of veteran status are considered 'irreplaceable' under the NPPF. As such, it is recommended that all mature and veteran trees should be retained under the proposals within an appropriate landscape buffer, and appropriate management should be implemented to ensure that these features are safeguarded into the future. In the case of veteran trees, the recommended buffer under Natural England's standing advice is 15x the diameter of the main trunk, or 5m from the widest extent of the canopy, whichever is greater.
- 4.7 Moreover, under the proposals there is an opportunity to ensure the future of the mature and veteran trees is fully safeguarded through the implementation of an appropriate management plan. In the absence of appropriate management, veteran trees can fall into decline and may be prematurely removed due to safety concerns such that they would be lost from the landscape.
- 4.8 **Hedgerows.** Two hedgerows within the site are considered to qualify as Priority Habitat, while one hedgerow (H3) may also qualify as Important under the Hedgerows Regulations. The retention and enhancement of these boundary features, using native planting to close gaps for example, could therefore provide enhancements for biodiversity, increasing connectivity between off-site habitats as well as within the site. Where removal of hedgerows may be required in order to facilitate access or sightlines, it is recommended that an equivalent length be replanted along the site boundaries.

Protected Faunal Species

- 4.9 The majority of the site, dominated by sheep-grazed grassland, offers only limited potential for protected faunal species. Prior survey work has recorded that while opportunities are present for other species e.g. bats, reptiles and invertebrates, the intensive nature of the current land use does not provide significant opportunities.
- 4.10 By contrast, under any sensitively delivered proposals, opportunities for faunal groups are anticipated to increase. The creation of an increased area of Parkland to be managed at a low intensity will provide much increased opportunities for invertebrates through the sensitive management of grassland habitats and introduction of further trees. Likewise, these conditions will benefit reptiles and bats such that populations of these species will have the opportunity to expand.
- 4.11 Accordingly, it is considered that protected faunal species do not present an overriding constraint to future development.

5 Conclusion

- 5.1 In conclusion, a number of potential constraints are present at the site. However, it is considered that with careful design of the proposed development to enable the retention of the mature and veteran trees (the habitats of greatest ecological value), and the implementation of suitable safeguarding measures, the delivery of the site is readily achievable in terms of ecology. Indeed, under the proposed allocation there is the opportunity to deliver a significant net gain in biodiversity, through the delivery of new areas of high value Parkland habitat.



Key:

- Site Boundary
 - Tree (High Bat Potential)
 - Tree (Moderate Bat Potential)
 - Tree (Low Bat Potential)
 - Tree
 - Semi-improved Pasture
 - Hardstanding
 - Hedgerow
 - Coniferous Hedgerow
 - Tree Stump
 - Watercourse
 - Pond
 - Photograph Location
- Off-site Habitats
- Watercourse
 - Pond



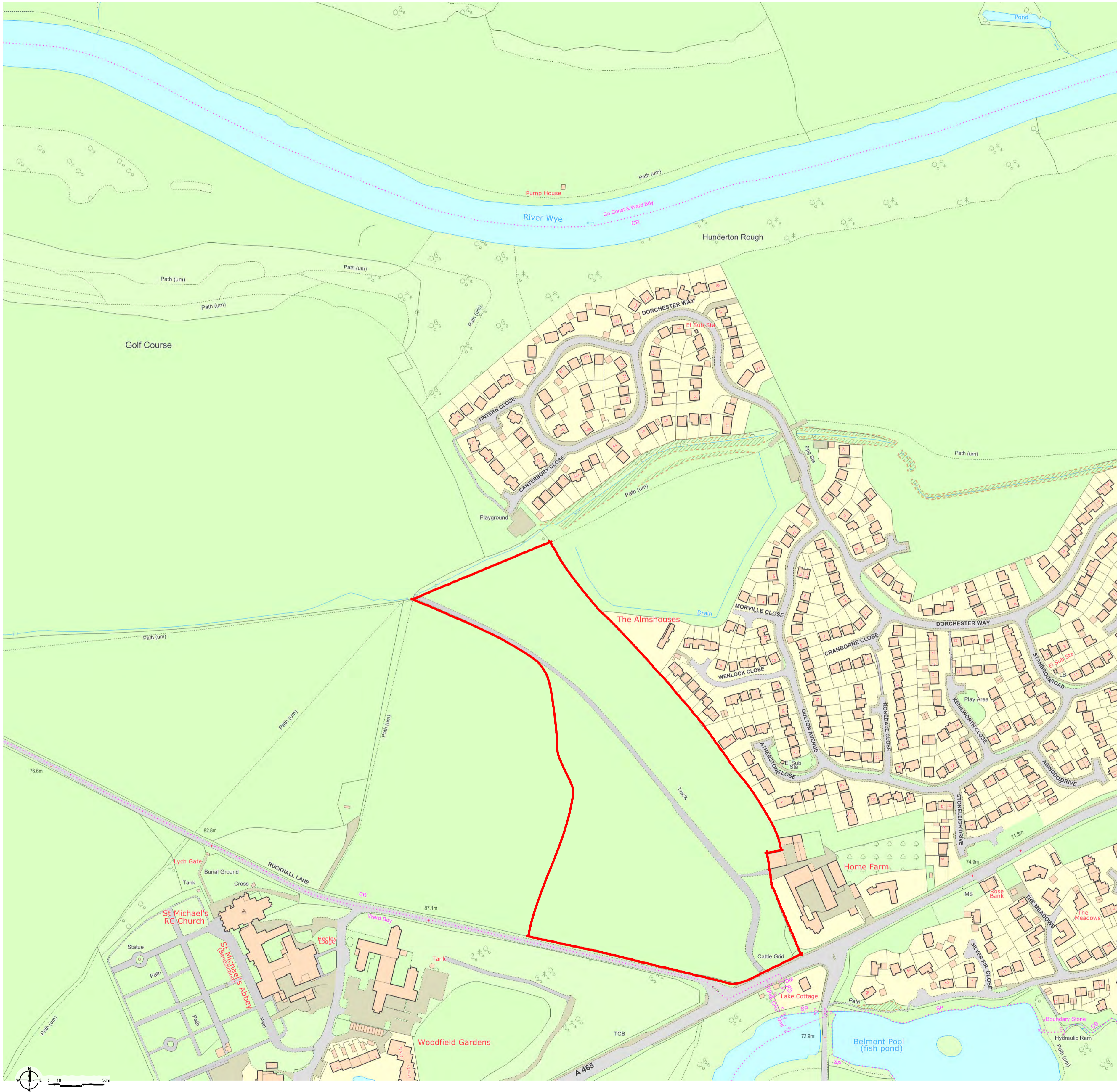
Aspect Ecology Limited - West Court - Hardwick Business Park
 Noral Way - Banbury - Oxfordshire - OX16 2AF
 01295 276066 - info@aspect-ecology.com - www.aspect-ecology.com

Home Farm, Hereford	PROJECT
Habitats and Ecological Features (Updated)	TITLE
2753/ECO3	DRAWING NO.
September 2018	REV.
	DATE

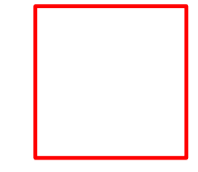


APPENDIX 3

SITE LOCATION PLAN



Key:



Site boundary

HOME FARM, HEREFORD - SITE LOCATION PLAN

APPENDIX 4
CALL FOR SITES FORM

Land in Hereford area with development potential	
Your contact details	
Name	BEN COOK
Address	PEGASUS GROUP, 5 THE PRIORY, OLD LONDON ROAD, CANWELL, SUTTON COLDFIELD, BIRMINGHAM, B75 5SH
Telephone no.	0121 308 9570
Email	ben.cook@pegasusgroup.co.uk
Representing (if applicable) LIONCOURT STRATEGIC LAND	
Site details	
Site Address	LAND AT HOME FARM, BELMONT, HEREFORD
Post Code	HR2 9RX
Grid reference (if known)	EASTING: 348537 NORTHING: 238250
Site area in hectares	5.43
What is your interest in the land (eg. Landowner/ Developer)?	LIONCOURT STRATEGIC LAND IS A LAND PROMOTOR WITH AN OPTION ON THE SITE.
Previous use	AGRICULTURE / PASTURE LAND
Current use	AGRICULTURE / PASTURE LAND
Proposed use	RESIDENTIAL

<p>Is the site level?</p>	<p>GENTLY UNDULATING</p>
<p>Are there any other relevant issues? E.g. restrictions or covenants</p>	<p>NONE KNOWN</p>
<p>Is the site being submitted with a view to undertaking a self or custom build project?*</p>	<p>Please circle as appropriate:</p> <p>Yes</p> <p><input checked="" type="radio"/> No</p> <p>*Self build: Where an individual or group of people directly organise and commission the design and construction of their new homes. Custom build: When an individual or group of people work closely with a developer to build new homes. This could include fully commissioned homes or fitting out a previously constructed shell.</p>

Thank you

Ref-68.



9th Oct 2018

Re:- Planning for
Foley Street

To The Planning Officer

We are writing to oppose the building
of anything on the green space at the top
of Foley Street.

In a street that has cars parked on
the pavement for its entire length, our
small green oasis is of great importance
to us all.

To see it built on would be a
great shame.

Yours hopefully

MR & MRS RJ and P Perks.

Entered 17/9/18.
Ref-05.



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

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Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

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Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

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**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain: THREE ELMS AND
~~AGHER~~ / HUNTINGTON WANE AREA
THIS IS PRIME AGRICULTURAL LAND AND IS SUCH
A BEAUTIFUL AREA AND ENTRANCE TO THE CITY,
HEREFORD IS LOSING ITS ATTRACTION AS IT IS
EXPANDING INTO A LARGE CITY LIKE WORCESTER
IT USED TO BE A LOVELY MARKET TOWN

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

OLD SUN VALLEY SITE
SPORTSMAN PUB SITE
SMALL DEVELOPMENTS INCLUDING
VILLAGES THAT WOULD BENEFIT AS IT
WOULD KEEP SERVICES, LIKE STOPS, PUBS,
SCHOOLS ETC GOING

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

NOT SURE, SUN VALLEY OLD SITE IS AN
EYESORE AND NEEDS SOMETHING DOING.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

ROTHERWAS AND MORETON ON WUGE HAVE MORE CAPACITY, POSSIBLY SUN VALLEY SITE. THREE ELMS TRADING ESTATE WHICH IS HALF EMPTY, COULD BE FOR INDUSTRY OR HOUSING.

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

AS ABOVE

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

OLD BOYS HIGH SCHOOL IS
NOW EMPTY

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

OLD BOYS HIGH SCHOOL
ACCOMMODATION ABOVE SHOPS IN CITY CENTRE

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name: MR & MRS PITT

Address: [REDACTED]

..... [REDACTED]

Email:..... [REDACTED]

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

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Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

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**Complete the questions for as many sites as you would like to comment on.
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Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

Cen21 – Edgar Street Grid Area – Parcels Cen21f and Cen21g

This representation is made on behalf of Hereford & Worcester Fire and Rescue Service (HWFRS) and West Mercia Police (WMP) in relation to parcels Cen21f and Cen21g.

HWFRS and WMP object to their inclusion as they constitute the land offered by Herefordshire Council to HWFRS and WMP for the construction of the new Emergency Services Hub for Hereford.

HWFRS and WMP are perplexed as to why Herefordshire Council have offered the land whilst at the same time proposing its allocation for Class C3 residential development. If the allocations are carried through to the adopted Hereford Area Plan (HAP), a planning application for the Emergency Service Hub would in turn represent a departure from the

adopted development plan. This would significantly increase the risk of permission being refused and in turn delay the delivery of a public facility that would be of major benefit to the people of Hereford and the wider County.

Further discussions are requested with Herefordshire Council in relation to this matter.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

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The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name: Andrew Morgan MRTPI, Strategic Planning Manager

Address: Place Partnership Limited, 2 Kings Court, Charles Hastings Way, Worcester, WR5 1JR

Email: andrew.morgan@placepartnership.co.uk

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

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Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

Cen27 – West Mercia Police Station, Bath Street, Hereford, HR1 2HT

This representation is made on behalf of West Mercia Police (WMP) concerning their Bath Street Police Station. The site is sustainably located in the centre of the city and considered to have a potential capacity of 25 Class C3 dwellings by Cen27.

However, whilst supporting the principle of the allocation, WMP consider that the estimate of 25 Class C3 dwellings to be overly cautious. There are two reasons for this:

Firstly, the figure proposed appears to have been on the basis that all existing buildings will be demolished at the site and replaced with high density houses. This is despite the Technical Site Assessment stating that conversion of the existing Police Station into apartments may be the most viable and sustainable solution. WMP have undertaken their

own initial architectural feasibility study in this respect, which determined that 42 apartments with the same number of parking spaces could be provided. WMP would be happy to develop this work further in partnership with Herefordshire Council.

Secondly, the Technical Site Assessment for Cen27 also confirms that the estimate of 25 units is on the basis that significant new development at the site would negatively affect archaeological remains, particularly those associated with the City Walls.

There is doubt over the extent of any remains though. The Conservation Gazetteer for Hereford is the starting point in this respect. This states in Section 12 that the segment of City Wall along the front elevation of the Police Station is likely to have been constructed circa 1845; i.e. it is not an original wall from the medieval period.

The Gazetteer subsequently states the following in relation to archaeological investigations that have taken place at the Police Station site:

'An investigation behind the Police Station in 1997 (event 38206), although impinging on the back of the rampart, found only 19th Century features and deposits. Archaeological monitoring of a CCTV cable trench running north-south past the south end of the Police Station (event 32276) saw no trace of the city wall or its associated archaeology within the 0.6m depth of the trench.'

The above suggests that the remains are therefore concentrated where the existing line of the City Walls is maintained at the front of the Police Station. In this respect, the next set of archaeological investigations took place in relation to the following planning applications for Bath Street Police Station:

DCC072130/F – Extension to building to form new front desk, vehicle dock to front/side and detainee cells in rear yard. Amended parking layout – Approved - 28 August 2007

DCC062074/F – Extension to building to form new front desk, vehicle dock to front/side and detainee cells in rear yard. Alterations to car park layout – Approved - 16 August 2006

It was found that the existing buildings at the site were constructed with large pad foundations to a depth of 2.4m below ground level, meaning that any City Wall archaeological remains within the existing footprint would have been destroyed at the time of construction (early 1970s). Logically, this means any remaining archaeology is to the front of the existing line of the City Wall. This would put any remains below the existing garden area to the front of the station.

Resolving the above uncertainty and enabling an evidence-led approach to development will require further archaeological investigations on-site. WMP accordingly propose to undertake this work in partnership with Herefordshire Council and Historic England. Further discussions are therefore requested.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

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The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Cen27 – West Mercia Police Station, Bath Street, Hereford, HR1 2HT

WMP are of the view that Cen27 will be available for development in the medium term (5-10 years). This is when it is scheduled to become surplus to operational requirements. However, this will be dependent on successful delivery of the new Emergency Services Hub, for which the proactive support of Herefordshire Council and other stakeholders will be required.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

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Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

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Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name: Andrew Morgan MRTPI, Strategic Planning Manager

Address: Place Partnership Limited, 2 Kings Court, Charles Hastings Way, Worcester, WR5 1JR

Email: andrew.morgan@placepartnership.co.uk

Do you wish to be kept informed of future planning policy consultations?

Yes

No

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Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

Cen28 – Fire Station, 101-107 St Owen’s Street, Hereford, HR1 2JW

This representation is made on behalf of Hereford & Worcester Fire and Rescue Service (HWFRS), in respect of their landholding on St Owen’s Street, which serves as the fire station for Hereford. The site is sustainably located in the centre of the city and is considered to have a potential capacity of 15 Class C3 dwellings by Cen28.

HWFRS support this estimate as it will ensure this brownfield site is successfully regenerated through a comprehensive redevelopment. This in turn will enable the release of a significant capital receipt to help support the delivery of a new Emergency Services Hub for Hereford, which will replace the existing fire and police stations.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

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- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Cen28 – Fire Station, 101-107 St Owen’s Street, Hereford, HR1 2JW

HWFRS are of the view that Cen28 will be available for development in the medium term (5-10 years). This is when it is scheduled to become surplus to operational requirements. However, this will be dependent on successful delivery of the new Emergency Services Hub, for which the proactive support of Herefordshire Council and other stakeholders will be required.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

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Yes:

No:

Question 6 continued...

If yes, please supply site details:

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Yes:

No:

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Thank you for taking time to share your views with us.

Entered 3/10.
Ref-17

20.9.2018

Dear Herefordshire Council/Balfour Beatty,

I have obtained a consultation document/Questionnaire from Hereford Library.

Having seen the proposed areas for housing and employment, which appears larger than the ones proposed a few years ago, I had hoped your documents would give more in-depth information; it doesn't!

I had thought that all departments should work together to produce a community housing and employment plan?

The 'Site Options Consultation Questionnaire' does not have the questions / *would ask:*

1. How many proposed housing: Houses, Flats, Bungalows, Sheltered Accommodation are expected on the sites you have marked? (saying per hector space isn't saying the numbers').
2. How many will be Social Housing?
3. How many will be Affordable?
4. What do you mean by Affordable?
5. Will it be within the budget of the local communities?
6. Will there be a moratorium for those who already live in the communities and Herefordshire??
7. Especially the children and grandchildren of Residents?
- 8. Will you be obtaining monies from the Governments offer of a Billion plus for Social Housing?**
9. ***As important:*** How many extra hospital beds will be created in the Acute and community sector?
10. Will another 'Acute' hospital be built?
11. Will there be more 'community Hospitals and 'Recovery' facilities?
12. Where will they be situated?
13. Will there be increased 'Nursing Home/Residential' places and who will be responsible ie The Council or private run organisations?
14. How many more GP 'Hubs' will be built, in Hereford and other areas?
15. And will the 'patients' be able to get to them?

16. How many more schools will be built, pre school, Primary, Junior and Senior Schools?
17. How and where will the Collage facilities expand?
18. With so much 'housing', what type of Transport infrastructures will there be?
19. And where?
20. With housing comes cars and the need for roads, with so much housing the 'new bypass' will need a 'New Bypass', otherwise we will be back to traffic jams, which pollute the city.

21. Who will pay for the additional Community Transport, as some services are already in short supply and finish in the early evening?
22. Who will pay for the additional cost of 'Community Care', be it the young, physical and mental disabilities or the elderly?

23. What will happen to 'The Green Spaces' we already have?
24. If creating 'new' open spaces, will there be a restriction on where cycles can go?
25. At present they go on pavements that are NOT designated cycle paths and are not wide enough for both pedestrians and cyclist: The Cyclist expect the right of way! And many have no means of warning those in front!
26. Walkers would like to walk in peace and not fear of being 'run down'!

27. All the above will add to the drainage and sewage problems, especially on the 'flood plains' and those areas which have 'hidden springs'. As are the areas you plan to build on!

These are a few important areas that many Residents and Communities want answered!

Yours Truly

A.Plummer.



"up , -
/ and 0 orth 1 est of ' ueens\$ ood 2 rive HR((A"
Ob3ection from local residents



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Please include the site reference for any you are making a specific comment on!

Housing

Question (##) Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes!

No!

If no* please explain#

"up, - . / and 0 orth 1 est of ' ueens\$ ood 2 rive HR((A"

This is a community area and has been for many years since development of the estate back in the ' () * -s. %is an important space for the residents and by definition is for the local community. , ocal knowledge suggests it was part of the agreement and -gifted+when the surrounding land was sold for housing.

. or such a small piece of important community land to be considered for housing is staggering. The council should focus their time / resource elsewhere0identifying larger sites, such as the new -Point+development on 1 oman 1 oad.

The report states there is an oversupply of green space in the city, then contradicts itself by stating the loss would need to be compensated. What does this mean\$ %s obvious this small area is not a suitable site option and should be removed from the list.

Also, road access is limited and will lead to further local congestion.

Also, the land is prone to flooding.

2 n a personal note, this community area was one of the reasons we purchased our house, and this has been further enhanced since having our daughter. %is a beautiful location, a place which offers calm and serenity to all. 3uilding houses on such a small area would create total disruption to the local community and cause distress, upset and anger to all affected.

Question 4: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes

No

If yes, please supply site details to identify the site!

We are currently running a call for sites. Please refer to www.herefordshire.gov.uk/HAPcallforsites

The Housing Allocations Plan may need to also control the phasing of housing delivery/development. Please refer to the report, para 9.1.8

The phases are!

- Short term, 0-5 years
- Medium term, 6-10 years
- Long term, 11+ years

Question 5: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer!

Employment

Question 5: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes!

No!

If no, please explain!

Question 6: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes!

No!

If yes, please supply site details to identify the site!

We are currently running a call for sites. Please refer to www.herefordshire.gov.uk/HAPcallforsites

Question 7: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes!

No!

> uestion ? continued@

%yes, please supply site details!

' uestion **7##** o you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in uestion ? above\$

Yes! ✓

&o!

%yes, please supply site details to identify the site!

4We are currently running a 5 all for 6ites 7 Please refer to www.herefordshire.gov.uk"HAPcallforsites8

' uestion **8##** o you have any comments on the document and the approach used to identify potential sites\$

Yes! ✓

&o!

%yes, please e=plain!

%cannot comment about how the sites have been identified. However, %would like e=press concern on how the information is distributed " shared. The first %heard about this was via a hand:written note tied to a binA

4Please use additional bo= at the back of uestionnaire if you need more space to comment8

Question 8 continued



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.
These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

PLEASE NOTE:
QUESTION 1 CONTINUED ON
SEPARATE SHEET.

If no, please explain:

SITE THR29 IS IN AN AREA THAT FLOODS AFTER A PERIOD OF HEAVY RAIN PARTICULARLY FROM AYLESBROOK. THR29 IS ALSO NEEDED FOR COMMUNITY EVENTS AS WELL AS CAR PARKING FOR THE RACECOURSE. IT IS ALSO USED BY YOUNG FAMILIES AND DOG OWNERS. THIS USE WILL INCREASE MUCH MORE WHEN THE HOLMER WEST SITE IS FULLY DEVELOPED (460 NEW HOUSES). THE SITE IS CURRENTLY USED FOR CIRCUITS, HOPKINS, STEAM RAILIES ETC AS WELL AS FOR RACE MEETINGS.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

LAND TO THE WEST OF
PLOUGH LANE TRADING ESTATE BEHIND TO THE EAST OF
SHERRINGTON DRIVE IS CURRENTLY SCRUB LAND. IT
COULD PROVIDE SOME HOUSING CLOSE TO PLOUGH LANE. THERE
IS A LOT OF FREE UP LAND AROUND THE NEW EDGARS STREET
CONNECTING ROAD WHICH WOULD BE IDEAL FOR FLATS.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes: (PART)

No:

If no, please explain:

THE TYPE OF EMPLOYMENT FOR DEVELOPMENT TO SOME EXTENT DETERMINES THE SITE. ROTHERHAM AREA NOW HAS RURAL ROAD ACCESS AND NEEDS TO BE FULLY DEVELOPED ESPECIALLY IF BYPASS ROAD IS COMPLETED. ROTHERHAM ALSO HAS GOOD INTERNET INFRASTRUCTURE WHICH WILL BE MORE CRITICAL IN THE FUTURE.

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

THE BT TELEPHONE EXCHANGE LOOKS UNDERUTILISED. NEW DIGITAL TECHNOLOGY MEANS MUCH LESS SPACE IS REQUIRED. THE BUILDING^{WHICH} IS IN A PLEASANT LOCATION AND WOULD BE GOOD FOR SOFTWARE DEVELOPMENT JOBS. THE BEST CYLWAY IN HEREFORD IS NEXT TO IT. IT WAS USED FOR
(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

A CALL CENTRE FOR A NUMBER OF YEARS. INTERNET SHOULD BE FANTASTIC THERE.

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

FORMER ROCKWELL SITE NOW PUBLIC CAR
PARK, NEAR RAILWAY STATION FOR UNIVERSITY BUILDING (PART OF)
LAND EAST OF OLD COUNTY HOSPITAL, END OF GREEN STREET
IS UNDEVELOPED AND USEFUL FOR STUDENT ACCOMMODATION
5 MINS WALK INTO CITY CENTRE ALSO CLOSE TO CYCLEWAYS.

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(1) LAND TO THE WEST OF
PLOUGH LANE TRADING ESTATE SOME OF THIS IS JUST SCRUB LAND
AT PRESENT - IT IS JUST 15 MINS WALK INTO CITY CENTRE (2) LAND
BETWEEN COBEAR STREET AND HEREFORD RAILWAY STATION, GREAT FOR
ACCESS TO PUBLIC AMENITIES, BROWN FIELD AND 5 MINS WALK INTO
CITY CENTRE.

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(1) RESIDENTIAL SITE DEVELOPMENTS
SHOULD START IN THE CENTRE OF HEREFORD AND WORK
OUTWARDS TO AVOID CAR USE (CONSTANT). BROWN SITES SHOULD
BE USED BEFORE GREEN SITES. DEVELOPMENTS SHOULD BE EVENLY
AROUND THE CITY FOR EXAMPLE SIMILAR DEVELOPMENT IN NEAST SECTOR
AS NORTH WEST. AT PRESENT IT IS ALL IN WEST!

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:..... STEVEN RAMSDALE

Address:..... 

.....

Email:..... 

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (FoI) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

4
Q1 (CONTD.) THR29

HIGHMORE STREET ENTRANCE IS USEFUL TO THE RACECOURSE AND TAKES PRESSURE OFF ROMAN ROAD ENTRANCE WHICH IS VERY BUSY ON RACE DAYS.

NEW HOLMER WEST (HEREFORD POINT) WILL CREATE MORE SURFACE WATER FLOWING INTO AYLESBROOK AND COULD INCREASE PRESSURE ON AYLESBROOK STREAM AND RISK OF FLOODING, TO PART OF PROPOSED THR29 SITE.

FALLEN ~~DRIVE~~ ^{HAM} DRIVE IS DESIGNED FOR A LOW TRAFFIC FLOW AND ITS JUNCTION IS ON A BEND WITH KEMPTON AVENUE WHICH WOULD BE A HAZARD FOR TRAFFIC (INCREASED).

THIS PART OF THE RACECOURSE IS A USEFUL PIECE OF RECREATIONAL GREENARY. MOST OF THE RACECOURSE IS FENCED OFF AND NOT ACCESSIBLE TO THE GENERAL PUBLIC.

~~SOME~~ PART OF THE SITE CONTAINS ATTRACTIVE MATURE TREES THAT HELP THE DRAINAGE OF THE SITE. IT WOULD BE IMPORTANT TO PRESERVE THEM.

SITE BURD9 - A LARGE DEVELOPMENT ON THIS SITE WOULD CREATE MORE TRAFFIC ON ROMAN ROAD PARTICULAR AT THE BEEF EATER A49 ROUNDABOUT WHICH CAN'T cope with current traffic at PEAK TIMES. TRAFFIC WILL ALSO INCREASE

IN THE NEXT 3 YEARS FROM HOLMER WEST
DEVELOPMENT

A DEVELOPMENT A BURDQ WILL ADD TO HOLMER
WEST A CREATE AN ESTATE OF AROUND 1000
PROPERTIES ON THE NORTH WEST EDGE OF
HEREFORD ALL OVER 2 MILES FROM THE
CITY CENTRE I.E. BEYOND NORMAL
WORKING DISTANCE. SO INCREASING CAR USAGE
WITH ITS PARKING PROBLEMS IN CENTRAL
HEREFORD AND INCREASED POLLUTION.

THE BURDQ AND THR29 SITE ARE NOT
CLOSE TO LOCAL SCHOOLS HOLMER PRIMARY
AND WHITECROSS SECONDARY AND SO
ENCOURAGE SCHOOL CAR RUNS BY RESIDENTS TO
SCHOOLS A MILE AWAY
WHERE NOW SURFACE WATER FLOW TO FROM THE
BURDQ SITE. AT PRESENT IT FLOWS TO AYLESBROOK
STREAM, WHICH COULD NOT COPE.

Latham, James

From: rlidb
Sent: 11 September 2018 10:10
To: Gilson, Susannah
Subject: FW: Hereford Area Plan Housing and Employment Site Options - Don't miss the opportunity to give us your views

Follow Up Flag: Follow up
Flag Status: Completed

Susannah

Please see below

If you have any queries please do let me know

Many thanks
Adrienne

From: Les Harrison
Sent: 10 September 2018 15:39
To: rlidb <rlidb@hoopleltd.co.uk>
Subject: Re: Hereford Area Plan Housing and Employment Site Options - Don't miss the opportunity to give us your views

Adrienne,

None of the proposed development sites will have any impact on the Board's interests.

Les.

From: rlidb <rlidb@hoopleltd.co.uk>
Sent: 10 September 2018 11:30:12
To:
Subject: FW: Hereford Area Plan Housing and Employment Site Options - Don't miss the opportunity to give us your views

Many Thanks

Adrienne

From: Gilson, Susannah
Sent: 10 September 2018 11:03
To: rlidb <rlidb@hoopleltd.co.uk>
Subject: Hereford Area Plan Housing and Employment Site Options - Don't miss the opportunity to give us your views

Hereford Area Plan – Housing and Employment Site Options Consultation

The Hereford Area Plan (HAP) will set out detailed proposals to ensure the delivery of the targets for the city in the adopted Core Strategy. It will include policies and proposals for growth in the city of Hereford including specific proposals for housing, employment and urban regeneration. In doing so, the plan must also protect and enhance its attractive built and natural environment, providing for its current and future community needs.

A key policy area that the HAP needs to ensure delivery of is new housing and employment land. The Core Strategy identifies four strategic sites for housing and employment land at Three Elms, Holmer West, Lower Bullingham and the city centre area. These sites will account for a significant proportion of the city's housing growth target for the plan period. It is the task of the HAP to identify further site allocations to aid the delivery of the remainder of the target.

Work has been carried out to prepare potential site options for the delivery of housing and employment growth for Hereford City and to help inform the preparation of the HAP.

For more details about the consultation and how to give your views on potential sites, please go to the website: www.herefordshire.gov.uk/herefordareaplan

Displays and information are available to view at Hereford Library until Friday 5th October.

Consultation on the housing and employment site options will run until Monday 8 October 2018.

A call for sites is also running for the duration of the consultation period. The council is specifically looking for previously developed/brownfield land within the HAP area. If there are sites that have not been assessed before and you consider that they should be, please submit a site map plus a completed form by downloading it at: www.herefordshire.gov.uk/herefordareaplan. Please fill out the form to the best of your knowledge and return it to ldf@herefordshire.gov.uk. These instructions for submission can also be found on the council's webpage.

The council encourages electronic submission but the form can also be posted to:

Forward Planning
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

On the webpage, please note there is a map of the area to be covered by the HAP boundary, you may wish to check whether your land falls within the boundaries.

Please note that some Parishes within the HAP area will be producing Neighbourhood Development Plans (NDPs). This will mean that the information you submit therefore may be passed to the relevant Parish Council for their consideration.

All responses should be received no later than Midnight on Monday 8 October 2018.

Herefordshire Council is the Data Controller under data protection law and will use the information you provide for matters relating to planning policy. The legal basis for processing this data is your consent to do so. You can withdraw your consent at any time by notifying us.

To contact us about this, or for any other queries, please email ldf@herefordshire.gov.uk or telephone 01432 383357.

Yours sincerely

Siobhan Riddle

Siobhan Riddle

**Senior Planning Officer
Herefordshire Council**

“Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council, Herefordshire Clinical Commissioning Group (HCCG), Wye Valley NHS Trust or 2gether NHS Foundation Trust. You should be aware that Herefordshire Council, Herefordshire Clinical Commissioning Group (HCCG), Wye Valley NHS Trust & 2gether NHS Foundation Trust monitors its email service. This e-mail and any attached files are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error please contact the sender immediately and destroy all copies of it.”



7th September 2018

Forward Planning
Hereford County Offices
Plough Lane
Hereford
HR4 0LE

Dear Sir,

**Hereford Area Plan: Housing Site Options
Site Summary Assessment – South East Hereford
Land at The Paddocks, Hampton Dene Road, Ref:Tup27, page 14**

It is appreciated that the Hereford Area Plan has been developed as a comprehensive document for the City and that therefore all the possible sites within its curtilage with the potential for development have been identified.

It is further appreciated that the production of such a major plan will have required significant resources both in terms of officer time and finance. Therefore it is crucial that the information contained within the plan is comprehensive, accurate and robust.

It is with some regret that it is necessary to state that the paragraphs relating to Tup 27 are not robust and contain inferences that could be misleading to the reader who is unfamiliar with the locality.

As this document would be a long term reference point for future plans and developments it is essential that it is both comprehensive and accurate in every respect and not open to objections on the grounds of clarity and objectivity.

The appended comments are offered as a means of achieving that comprehensiveness and accuracy with clarity and objectivity. It is in no way a criticism of the officers who prepared the Tup 27 assessment.

It is hoped that these comments may assist in refining the document. An initial acknowledgement and subsequent response would be appreciated.

Yours sincerely,



Malcolm & Vicki Robertson

Copies: CC Cllr TLV Kenyon & City Cllr Kath Hey

Commentary

Item 1: Para 1, Line 4 *“informal recreation”* & *“minimal”*

We were unsure as to the precise meaning of this term. We inferred it was used in the context of any non-organized recreation and any ad hoc recreation. In this respect the usage is far from minimal. During the school holidays it has been used on a regular basis by families with young children and it is used on a daily basis for dog walking and exercising by numbers well into double figures. Speaking with a neighbour the number suggested was in excess of 20. It would seem logical that a detailed survey, including a questionnaire for residents abutting the amenity greenspace, be conducted to ascertain recreational usage before any further action is taken.

Item 2: Para 1, Line 6 *“could be of value”*

We welcome the recognition that the flora within the amenity greenspace provides *“an oasis for wildlife”*. We were concerned, however, by the wording that this *“could be of value”* to the local residents. It most certainly is of major value and residents obtain pleasure in watching the wildlife. This aspect should form part of the residents' survey indicated in Item 1.

Item 3: Para 1, Line 7 *“Ecological survey work may be required.”*

An ecological survey would most certainly be required to ascertain what flora and fauna would be irretrievably lost should a building development take place.

Item 4: Para 2, Lines 3&4 *“Highways have no major concerns with regard to access but this is a considerably busy road at school travel time.”*

The phrase *“no major concerns”* is dependent upon what constitutes a *“concern”* within the Highways Department terminology. The report acknowledges Hampton Dene is *“a considerably busy road”* during school time with two large primary & one large secondary school (3 schools in total) within a short distance. This is especially critical at the start and end of the school day. The report identifies the need for *“an overall assessment”*. This assessment should include a traffic survey on Hampton Dene Road 8.15am to 8.50am on three consecutive school days (additionally at 2.50pm to 3.20pm if possible).

Item 5: Para 2, Lines 6&7 *“potential for wildlife and biodiversity”*

This statement regarding the wildlife and biodiversity is warmly welcomed and underlines the need for a robust ecological survey as called for in the report. Such a survey should consider the extent to which this semi-natural greenspace provides route ways for wildlife within Hereford North and the City as a whole. See also Item 3 above.

Item 6: Para 2, Lines 9, 10 & 11 *“under-supply of semi-natural greenspace in Hereford North”*

The assessment recognizes that there is an *“under-supply of semi-natural greenspace in Hereford North”* and therefore the loss of this habitat would be highly detrimental to the locality and have a negative impact on the whole area.

Item 7: Para 2, Lines 12 & 13 *“consultation with the local community would establish whether or not they value it either for informal recreation or as a semi natural open space.”*

The report calls for a consultation with the local community regarding the value which they place on the habitat for recreation purposes and as a semi natural open space. It is important that the local community should be closely involved in the planning of the consultation exercise as well as its execution. With reference to the wildlife it should be noted that birds seen within the past twelve months include a green woodpecker, a sparrow hawk and jays.

Item 8: Para 2, Line 15 *“The site does have potential and is considered a suitable Option Site.”*

Whilst the narrative of the assessment as presently presented may suggest that the site is **marginally** suitable as an ‘Option Site’, the information contained above when confirmed by future consultations, surveys and questionnaires will clearly indicate that the site is **not** suitable as an ‘Option Site’.

Recommendations

Recommendation 1

That a detailed consultation be carried out to ascertain recreational usage of the semi-natural green space.

Recommendation 2

That a detailed consultation be carried out to ascertain the value which the community places on maintaining the semi-natural green space.

Recommendation 3

That a detailed ecological survey be carried out to ascertain biodiversity of the flora & fauna of the semi-natural green space and its importance to locality.

Recommendation 4

That an overall traffic assessment be carried out, as recommended in the Hereford Area Plan and that it includes a three day traffic census 8.15am to 8.50 (and additionally 2.50pm to 3.20pm if possible) during term time.

Recommendation 5

That in the light of the evidence obtained this site should be removed from the suitable Option Sites cited within the Hereford Area Plan.

September 2018

Ref-47.



2nd October 2018

Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE



Dear Sir or Madam,

Ref: Hereford Area Plan (HAP)
Site ID: TUP27
Land at the Paddock, Hampton Dene Road, HR1 1XH

I tried e-mailing you to register my concerns and opposition to the proposal of designating the green space, referred to as the Paddock, as an area for potential development for building twenty houses, but it was returned with message saying e-mail address could not be found. Therefore I have resorted to sending my concerns by the old fashioned method, by post.

I have lived in the Tupsley area for thirty three years and have witnessed the development of green spaces in the area with growing concern. Green spaces are essential for the wellbeing of residents of the area and it is essential to have green spaces within easy walking distance, especially for more elderly residents.

With regard to the Paddock, I believe the area is an asset for the area and is of significant importance to the area, especially since the development of Bishop's Field (which is not shown on the map of the area). Also the development of the land off Gorsty Lane, that has been lying dormant for as long as I can remember, will inevitably have a range of resident wildlife which will be displaced once the building begins, the Paddock will be an area they will be able to migrate to (we had rats and rabbits coming into our gardens when work started on the Bishop Field's development).

The assessment that there is an oversupply of amenity green spaces seems to be a bit skewed as some of the green spaces in the area are not open to the public. Alternative green spaces to the Paddock are quite a distance from our end of Hampton Dene Road, especially for older residents.

I cannot understand the statement that Highways have no major concerns with regard to access, I constantly have problems with traffic to such an extent I am continuously having problems getting into and out of my property, the road is constantly congested in the mornings and afternoons.

The Paddock is also an area where residents can exercise their dogs, I foresee there will be an increase in dog fouling on the pavements and areas adjacent to the pavements if the Paddock is built on. I believe this will be a potential hazard for school children and their parents in the mornings and afternoons. At the moment there is very little dog mess on the pavements and grassy areas. The Paddock is an ideal area for more elderly residents to take their dogs for exercising. For others I can see them exercising their dogs in the Bishop's School playing fields raising the risk of contaminating the playing surfaces.

Yours faithfully,



George Russell CEngMIMechE,

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes: – partially agree

No:

Table 1 of the Hereford Area Plan ('HAP') Site Options Consultation Main Report (SOCMR (August 2018) sets out that the Core Strategy housing requirement is 6,500 dwellings and the remaining residual requirement is 3,200 dwellings. Appendix 3 of the SOCMR sets out that a total of 3,647 dwellings have been identified as 'HAP Potential Sites'. Therefore the HAP currently identifies approximately 13% more dwellings than required in the Core Strategy. As Herefordshire County Council ('HCC') have a record of persistent under delivery of housing (as evidenced by the 20% buffer in the Five Year Housing Land Supply Statement 2017), we consider that a buffer of 15% to 20% should be added to the remaining residual requirement of 3,200 dwellings to provide flexibility and ensure that the required number of houses are delivered to meet the County's need. In addition to this, with the introduction of the standardised methodology, HCC's annual housing need may increase from 771 – 812 dwellings per annum to 895 dwellings per annum. Therefore we consider that HCC should be seeking to allocate enough dwellings to meet this increased annual

need with the majority of housing growth being directed to within and around Hereford City as the County's most sustainable settlement.

Paragraph 16 of the National Planning Policy Framework ('NPPF') (July 2018) states that Local Plans should "*be prepared positively, in a way that is aspirational but deliverable*". We do not consider that in its current form the HAP is aspirational enough. In order to be aspirational, the HAP should be seeking to optimise the sustainable development opportunities that the proposed western relief road ('relief road') will bring to the western edge of Hereford City. This would also be in accordance with Paragraph 102 of NPPF which states that "*transport issues should be considered from the earliest stages of plan-making and development proposals, so that.....opportunities from existing or proposed transport infrastructure...are realised – for example in relation to the scale, location or density of development that can be accommodated*". The relief road is an example of a 'proposed transport infrastructure' opportunity and we do not consider that HCC are currently making the most out of this opportunity.

Paragraph 103 of the NPPF goes on to state that "*the planning system should actively manage patterns of growth in support of these objectives*" and that "*significant development should be focused on locations which are or can be made sustainable*". Hereford City is the most sustainable settlement within the County and the relief road should ensure that the western edge of the City is made more sustainable. In light of this, we consider that our client's (Golf Inns Limited) land at the Former Belmont Golf Course offers a sustainable location for residential development as it is immediately adjacent to Hereford City and the relief road will pass through it.

Paragraph 130 of the NPPF states that planning policies "*need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability*". In selecting sites around Hereford City, HCC have utilised their Housing and Employment Land Availability Assessment ('HELAA') which was produced in 2015. The housing market and site availability are constantly changing and evolving, therefore we do not consider that the HELAA is an up to date evidence document as it does not include sites which have been promoted to HCC since 2015.

Part of our client's land at the Former Belmont Golf Course was assessed in the HELAA 2015, site reference Bel06 (see attached plan 'HELAA Plan – Annotated with Golf Inns Limited Ownership' which highlights our client's land ownership within site Bel06 on figure 18 of 21). The assessment dismissed the site due to "*availability unknown. Relief road corridor. Also a community asset in use. Adjacent site bel06 dismissed on appeal*". To address the assessment of Bel06, the site has been promoted to HCC through the HAP consultation and Call for Sites process therefore we can confirm that it is available. Our client's land is partially located within the relief road corridor but other sites to the north east of Hereford that are also within the relief road corridor have been identified as 'HAP Potential Sites' (sites referenced Thr35, Cre25, Thr19 and Thr26) therefore we do not consider that this a significant constraint against development. The relief road is expected to be completed by 2022 which still leaves 9 years until the end of the plan period for dwellings to be built adjacent to the relief road. Therefore we object to the HELAA assessment and Bullet Point 6 of Paragraph 6.6 of the SOCMR which states that when considering sites for inclusion in the HAP, sites along the preferred road route should be avoided. Additionally, the site is not a community asset as it is not publically accessible and the adjacent site which was dismissed on appeal are sites referenced Bel04 and Bel05 not Bel06.

The area of land which is identified as a 'HAP Potential Site', reference Bel08, was not assessed as part of site Bel06 in the HELAA but it was submitted by our client as part of a wider site through the 2017 Call for Sites process. We support the proposed allocation of Bel08 however we consider that all of the land that we submitted for our client should be

included in the HAP even if it is identified as a 'HAP Discounted Site'. We have attached a Site Location Plan of Golf Inns Limited's land ownership which was promoted through the 2017 HAP and Rural Areas Sites Allocations Development Plan Document Call for Sites processes.

Appendix 3 of SOCMR states that the 'HAP Potential Site', reference Bel08, will have a capacity of 50 dwellings at 70dph and be a conversion only. As we have already mentioned, we support the allocation of this site but we object to this assessment. As part of our representations to the Examiner of the Belmont Rural Neighbourhood Plan ('NP'), we submitted a letter from Heritage England which states that substantial works would be required to repair the Grade II* Listed Belmont House and bring it back into use. The Heritage England Inspector concluded that the solution to the problem was enabling development and he also alluded to the fact that the financial scale of the problem could be several million pounds back in 2008. 10 years later, we consider that these costs will have increased further. I have attached the Heritage England letter. In addition to submitting the letter to the NP Examiner, we also submitted three plans to demonstrate that due to environmental and heritage constraints the net developable area ('NDA') left within site Bel08 was 0.43 hectares (1 acre). We do not consider that this is a sufficient enough developable area to enable the redevelopment of Belmont House. We have submitted Plan 1 'Belmont Rural Neighbourhood Plan Policy Proposed Site – Constraints Plan' with this response to show the key constraints and the NDA.

We have identified two small parcels of additional land to Bel08 within our client's ownership which could accommodate housing development and enable the redevelopment of Belmont House. We discuss these sites in more detail in our response to Question 2 below.

In relation to 'HAP Potential Site' Bel08, the 'Site Summary Assessments – South West Hereford' consultation document (August 2018) states that "there is minimum desire to introduce additional development on the sites because of its highly sensitive and historic setting". This may be the current situation however once the proposed relief road is constructed, it will cut across this site which we consider will change the landscape sensitivity of the area. Therefore, housing development in this area could have a lesser impact on the landscape than HCC has indicated because the introduction of a major new road will result in a significant change to the landscape.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

We support the proposed allocation of 'HAP Potential Site' Bel08, however we also consider that additional land either side of the proposed relief road owned by Golf Inns Limited should also be allocated for development. We have attached a Site Location Plan which shows Golf Inns Limited's land ownership and two parcels of land that we consider should be allocated in the HAP in addition to Bel08 'HAP Potential Site'.

One parcel (Site 1) is located to the east of the proposed red route relief road, adjacent to the existing Hereford City settlement boundary and measures approximately 1 hectare (2.5 acres). The second parcel (Site 2) is located to the west of the relief road and is adjacent to the Bel08 'HAP Potential Site'. This parcel measures approximately 5 hectares (12 acres). Site 1 could yield approximately 27 dwellings (30 dwellings per hectare at 90% gross to net

ratio) and Site 2 could yield approximately 112 dwellings (30 dwellings per hectare at 75% gross to net ratio). In relation to Site 1, our client has rights of access through the residential estate to the east therefore the site is accessible and will be a logical extension to the existing settlement edge. Both Site 1 and Site 2 are outside of the relief road corridor. Following the completion of the relief road, which is currently expected in 2022, we have shown an area of land of approximately 11 hectares (28 acres) between Site 2 and the preferred red route which could be developed to meet future housing needs. This site could yield approximately 165 dwellings (30 dwellings per hectare at 50% gross to net ratio).

Site	Size	Potential Yield
Site 1	1 ha (2.5 ac)	27 dwellings
Site 2	5 ha (12 ac)	112 dwellings
Future Development Land	11 ha (28 ac)	165 dwellings
Total	17 ha (42.5)	304

By allocating Site 1 and / or Site 2 in addition to Bel07 'HAP Potential Site', it should ensure that there is sufficient enabling development to support the redevelopment of the Grade II* Listed Belmont House and ensure that the Council make the most out of the sustainability opportunities that the relief road will provide along the western edge of Hereford City.

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Land at the Former Belmont Golf Course could be brought forward for residential development in the next 3 – 7 years.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

N / A

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

N/A

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

N/A

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

N / A

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

N / A

About you:

Name: Michael Davies (Savills UK Limited) on behalf of Golf Inns Limited

Address: 55 Colmore Row, Birmingham, B3 2AA

Email: mpdavies@savills.com

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

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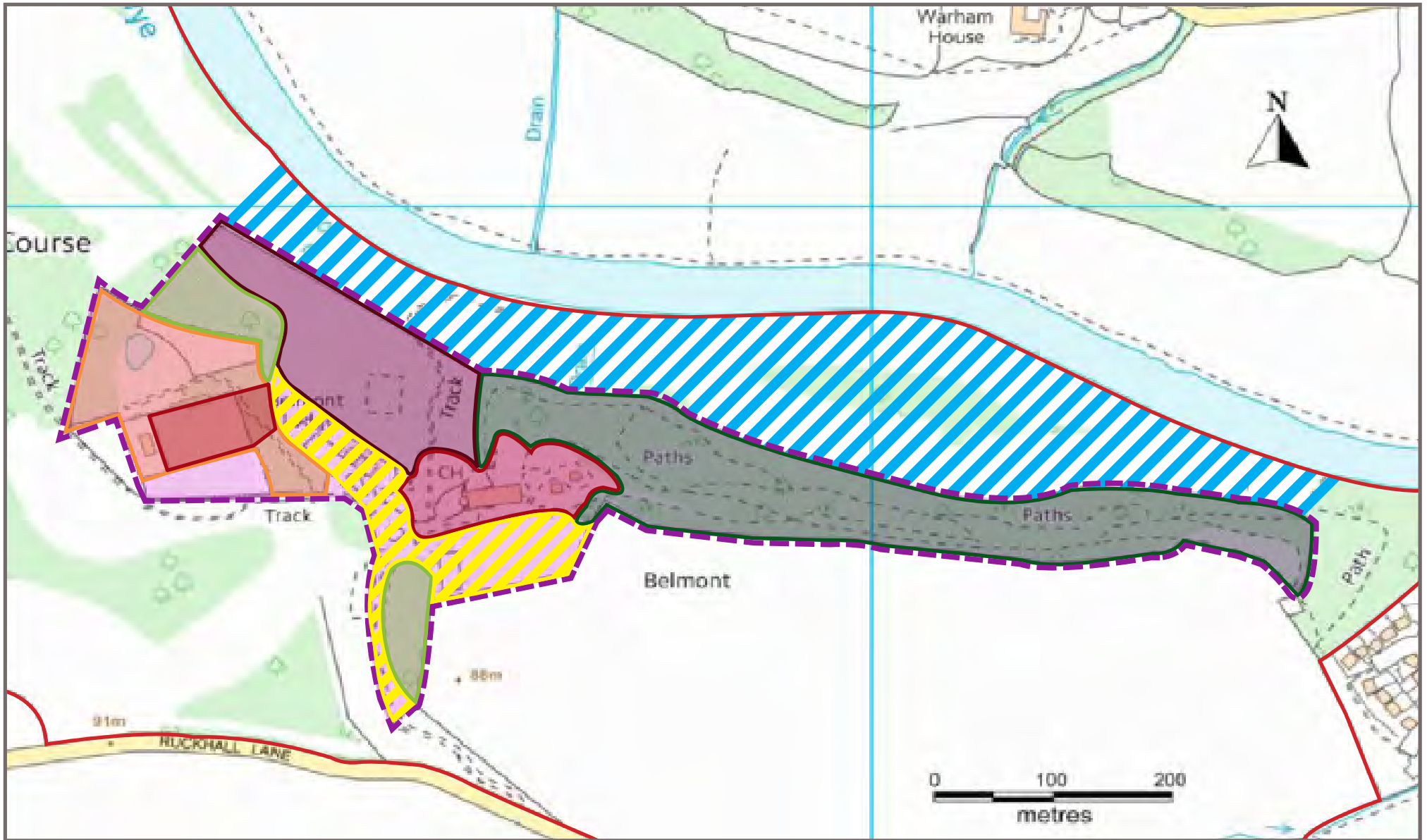
Or by email to ldf@herefordshire.gov.uk










Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

PLAN 1

Belmont Rural Neighbourhood Plan Policy 3 Proposed Site - Constraints Plan



- | | | |
|---|---|---|
|  Golf Inns Ltd (Client) Land Ownership |  Woodland |  Belmont House & Setting, Walled Garden & Stone and Plaque |
|  Potential Development Area (approx 1.6ha / 4 acres) |  Woodland / Site of Importance for Nature Conservation |  Belmont House Significant Views & Steep Topography |
|  Land Reg / Other Ownership / Existing Dwelling |  Flood Zone 3 |  Belmont Rural NDP Policy 3 Proposed Site Boundary |

Base plan extracted from Fig.11 Belmont Rural Neighbourhood Plan (Submission Version).
 Copyright Savills (UK) Ltd. No dimensions are to be scaled from this drawing. All dimensions to be checked on site. Area measurements for indicative purposes only.





ENGLISH HERITAGE

WEST MIDLANDS REGION

David Milton
Managing Director, Golf Inns Ltd
Belmont Lodge & Golf
Belmont
Hereford
HR2 9SA

Direct line: 0121 625 6857

24 September 2008

Dear David Milton

Belmont House, Hereford

I write concerning the discussions we had earlier in the year concerning the future of this building and the adjoining parkland, following on from discussions you have had with my colleagues and Herefordshire District Council. You showed me the proposals which Harkstave Leisure & Care have put together in outline form.

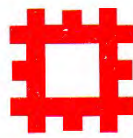
The view of English Heritage remains that the main building is definitely at risk. It is not on our Buildings at Risk register lightly. Having looked over the building, apart from the use of the basement by the golf club, the building is in a poor state of repair. The basic repairs to the building have been kept under control, including eradication of outbreaks of rot. But when we looked at the state of the windows and of the decorative external stonework it was obvious that the problems are more fundamental and will require substantial works..

Thus, the conclusion is that grant aid and/or enabling development will be needed to resolve the problems of the house. The financial scale of the problem (several millions) is such that it is unlikely that we could offer a grant of the size required to resolve the case. Thus the solution would seem to lie in enabling development, which would include dividing the house into a number of large apartments, and building a small development in the grounds. The latter should be possible subject to the scale of it, its location and the details of the design.

It would seem to me that there is a now need to re-engage with the planners and the conservation staff at Herefordshire Council in order to progress the matter further. We, of course, would be more than happy to engage in those further discussions.

We have just published (in the last few days) a new version of Enabling Development Policy document, which I enclose for your information. This does not materially change the policy we had before, but refines the advice on the basis of experience since the previous version was produced.





ENGLISH HERITAGE

WEST MIDLANDS REGION

I should also add that my colleague John Yates is now back in taking this case back into his work load.

Yours sincerely



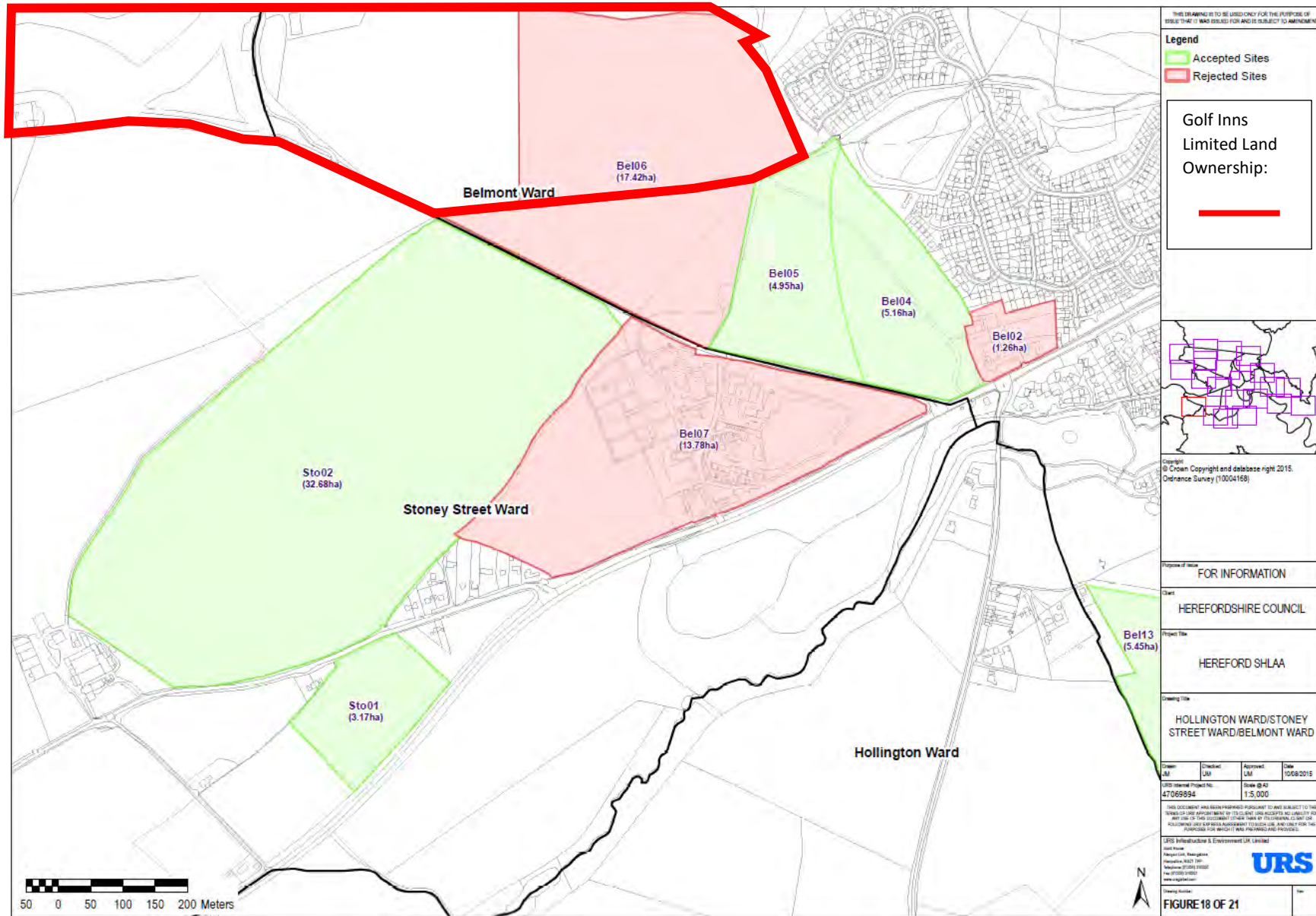
Nicholas A D Hoyleux

Team Leader and Inspector of Historic Buildings

cc John Yates

John Stagg, Senior Conservation Officer, Hereford Council

Golf Inns Limited Land Ownership in HELAA 2015



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSES OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

Legend

- Accepted Sites
- Rejected Sites

Golf Inns Limited Land Ownership:

Inset Map: [Map showing the location of the study area within a larger region]

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FOR INFORMATION

Client: **HEREFORDSHIRE COUNCIL**

Project Title: **HEREFORD SHLAA**

Drawing Title: **HOLLINGTON WARD/STONEY STREET WARD/BELMONT WARD**

Drawn: JM	Checked: UK	Approved: DM	Date: 10/08/2015
URS Internal Project No: 47069894		Scale @ A2: 1:5,000	

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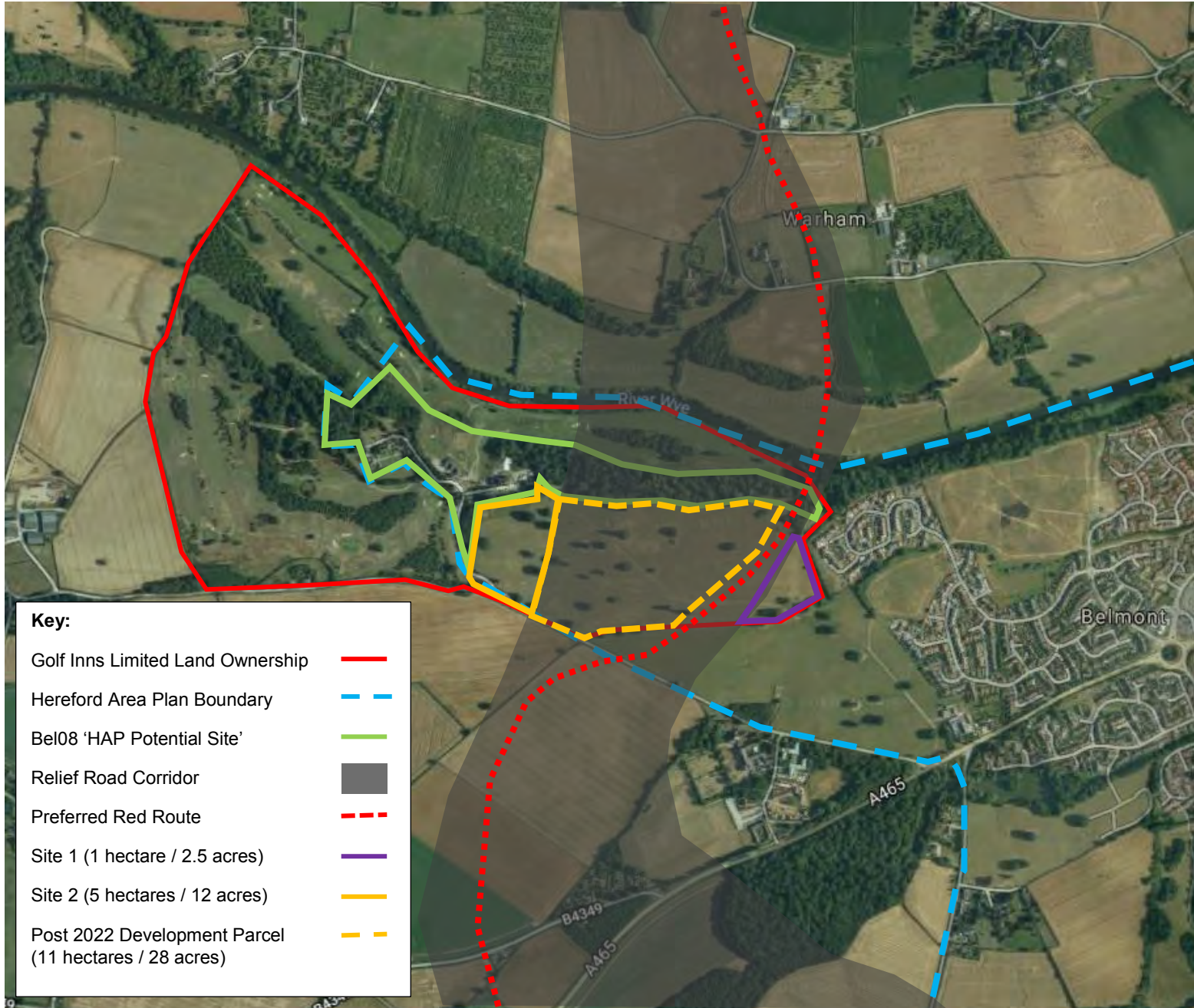
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Drawing Number: **FIGURE 18 OF 21**

Site Location Plan

Former Belmont Golf Course



Ref_69.



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response

Yes:

No:



If no, please explain:

Site TUP 25 is a field at the top of our street was originally left ~~for~~ as a childrens play area and and all the years I've been here children have played there. Also the many trees & birds and wildlife of the field are of utmost importance and would be a huge loss to us local people

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Site # TOP 25 not suitable.

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:



Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:..... Mrs. J. SPENCER

Address:..... [REDACTED]

Email:.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

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Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.



Question 8 continued...

Ref-71.



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

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All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

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Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.
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Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:



If no, please explain:

TUP 25 To the best of my knowledge and belief, the field in question was left, by the owner, to the children of Foley St as a play area.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

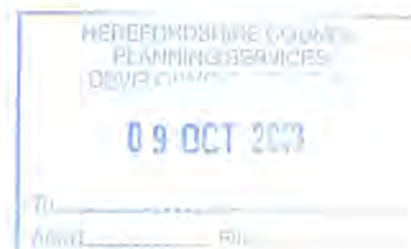
If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:



Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:..... *M. F. Spence*

Address:..... [REDACTED]

Email:.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

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Question 8 continued...

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**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

The following sites would appear to result in the loss of existing playing fields/sports facilities, or important ancillary facilities, such that Sport England would object to their allocation for development unless it was demonstrated that the proposals accord with paragraph 97 of the NPPF and Sport England's policy. Where the playing field is to be re-provided this will need to be equivalent or better in quality and quantity in a suitable location, and would need to be re-provided prior to the site being developed to ensure continuity of use for sport.

Cen 21 f, Cen 21 g and Cen 21 I – Edgar Street – loss of car parking that serves Hereford FC ground.

Cen 21h – Loss of tennis and basketball courts

Cen 21i – loss of (disused) playing field

Thr34 – Faraday Road – Site has potential to provide pitches to develop the sports hub site at Widemarsh Common if there was a demonstrable need. Proximity to existing cricket pitch to the east means that there would be a need to adequately demonstrate that there would not be an adverse impact of ball strike.

Tup25 – Land adj Foley Trading Estate - recreation area noted to be used for football, note that compensatory provision would be required if this site is taken forward.

Bel08 – Rucknall Lane – Loss of part of former golf course

Sport England agree that Ayl14 Aylestone Park should not be taken forward to protect the existing playing field in accordance with Sport England policy.

The following housing sites are supported and have potential to make significant contributions to the provision of new/improved sports facilities to meet the needs of the proposed development:

Bur09 (land at Cot Barn Farm), Hol12a/Hol12b/Stm1 (Bullingham Lane/Redhill Cottages), Cre25/Thr19,thr26a (Wyevale/Huntingdon), Hol13/Hol14/Stm17/Stm05 (Grafton/Leys Farm), Thr23 (Lower Hill Farm)

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

No comments

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

No comments

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

No comments

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

No comments

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

No comments

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

No comments

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain: Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the Hereford Area Plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97 and is consistent with the adopted Core Strategy (particularly policies OS1-OS3). It is also important to be aware of Sport England’s statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Planning Policy Statement: ‘A Sporting Future for the Playing Fields of England’.

<http://www.sportengland.org/playingfieldspolicy>

Any **new housing developments** will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

Hereford’s playing pitch strategy is now out of date, however the outdoor pitch sports group has regularly met to discuss and update local priorities for investment and so should therefore inform the provision of new playing pitches to meet local needs.

The major housing sites that come forward should therefore include appropriate provision for sport, whether that be in the form of on-site provision, or in the form of off-site contributions to deliver investment elsewhere in accordance with the above evidence base, and in accordance with policies OS1-OS3 of the adopted Core Strategy.

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:.....Stuart Morgans, Planning Manager, Sport England

.....

Address:.....21 Bloomsbury Street, London WC1B 3HF

.....

.....

**Email:.....stuart.morgans@sportengland.org and
planning.south@sportengland.org.....**

.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

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If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

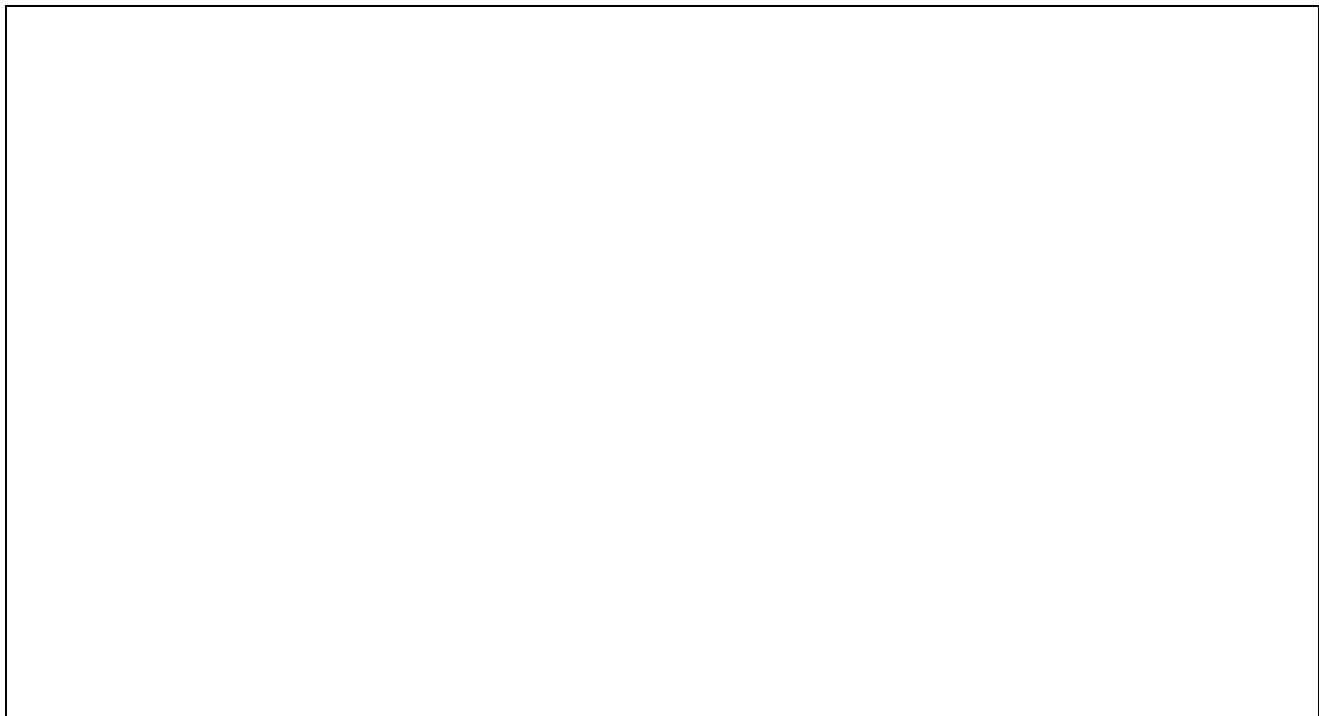
Paper questionnaires can be returned by post to:
Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...



Latham, James

From: ldf
Sent: 08 October 2018 08:47
To: Gilson, Susannah
Subject: FW: Stop the build

I think we need to treat as a rep.

Kev

From: emma talboys
Sent: 06 October 2018 16:02
To: ldf <ldf@herefordshire.gov.uk>
Subject: Stop the build

Stop the build! is an awareness campaign set up by the children of foley street. They organised themselves when they were made aware of your plans to build on their field.

This field is the only safe space for the children to play in without crossing a main road or without any other dangerous factors. The benefits of outside, green space are a huge asset to our city centre community.

Bringing together all ages. Teaching children to respect green space, share community areas as well as combating loneliness with the older community. There are also other contributing traffic factors. Foley street is already a congested road with heavy parking from residents and hospital staff and a thorough fare to foley trading estate making it impossible for children to play out in the street without considerable risk of harm.

I think this space needs to be saved for community and I urge you to reconsider your plans.

Your sincerely

Emma Talboys

Get Outlook for iOS

Get [Outlook for iOS](#)

Entered 17/9/18.
Ref-06



Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

I am only answering question 1.

If no, please explain:

Before any extensive building programme increased hospital facilities should be in place, also increased school places. Plans are mid blowing and don't believe the "New road" will address

traffic problems. SORT THE BYPASS FIRST PLEASE!

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:..... GWYNETH THOMAS

Address: [REDACTED]

.....

Email:..... [REDACTED]

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

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Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Latham, James

From: Idf
Sent: 10 October 2018 13:02
To: Gilson, Susannah
Subject: FW: Forward Planning Review - South East Hereford - Tup 26

Another rep attached

-----Original Message-----

From: Caroline Walden
Sent: 10 October 2018 12:37
To: Idf <ldf@herefordshire.gov.uk>
Subject: Forward Planning Review - South East Hereford - Tup 26

Sirs,

I live in Copsewood Drive, adjacent to Tup 26, and having just returned from holiday, found details of the above consultation review had been sent to me (the first I have known about it). Concerned that I have missed the closure date of midnight 8 October, I telephoned your office and spoke to Kevin Singleton who kindly advised me that I may still send my viewpoint through to you and this will be accepted despite the late date.

My principle concerns are:-

1. Queenswood Drive is already extremely busy facilitating not only the 26 dwellings in Copsewood Drive, but the other cul-de-sacs and the full length of Queenswood. Many households have two vehicles using Queenswood as well as providing access for the continuous trade/delivery vehicles utilising the road throughout the day. It is not a road which has been built to cater for even further proposed housing and the extra traffic flow that will occur.
2. Both the designated recreational area, identified as Tup 26, and the adjacent playing fields and childrens park are widely used and very valued by not only the local dwellings but the extended community as well. Queenswood Drive is already stretched to the limit when there are the youth/adult football matches on the adjoining playing field with cars parking right down the road and even into Copsewood on occasions. With parking understandably taking place on both sides of Queenswood, both by residents and those using the recreational areas, we respect, accept and negotiate this as we acknowledge we are living alongside this much needed facility. However, adding a further 20 dwellings onto the designated recreational area identified as Tup 26 would badly make Queenswood Drive not fit for purpose.

I would be most grateful if you would consider my comments regarding your Forward Planning Review.

Yours faithfully

Caroline Walden (Mrs)

Sent from my iPad

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

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www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

I have serious concerns about Tup 26 and Tup 27 - see attached pages.

Also Tup 25 - how can you state "it's the only kick about area in the vicinity and seems to be well used" and then claim it's OK to build

on it - where are the children supposed to go? increased crime is linked to children being boxed and not having anywhere to go Children's mental health

is far more important than building 10
houses.

Housing- question 1

The impact of the loss of the only nearby informal recreational space If the land **Tup 26** and **Tup 27** is used for housing then the only green space left for residents of the area to use for leisure time and dog walking will be the Bishops school playing field and the community sports playing field. This will mean that there will be increased dog excrement and rubbish in designated sports areas (worth noting there has recently been incidents of drugs related litter being found in the green area) This will have significant impact on the health and well being of the people (mostly children) playing sports in the area)

Road network not able to support the increase in traffic / Estate road not of sufficient width to accommodate the traffic arising from the development-

a/ **TUP 26** -Queenswood drive is a narrow mostly single lane road, cars are often parked on the side of the road opposite the green area so traffic at the moment has to wait to get passed if there is any incoming traffic. This is particularly the case when the sports field adjacent to TUP 26 is used for football matches (Sat, Sun, Tues, Thurs) on these occasions cars are parked the whole length of Queenswood Drive, Increased housing **Tup 26** off this narrow road will cause traffic congestion that will be difficult to ease.

b/ **TUP 27- NO** it is inaccurate to state that there are no major concerns with regard to access of this site- Hampton dene road is clogged with traffic from **8.20-9am and 2.45-3.30pm EVERY SCHOOL DAY**- there is significant risk to the safety and well being of school children already. When Highways make their assessment of this road they have not been at the peak traffic flow times- their view on this road is inaccurate and based on meaningless data
120 houses at Bishops field have recently been built all using Hampton Dene road as the access point and **NO ADDITIONAL SAFETY CROSSINGS HAVE BEEN PUT IN PLACE.**

Estate road not of sufficient width to accommodate the construction traffic building the development- Works traffic building the development will block the residents access to their homes, hinder safe access for pedestrians and children going to school

Over populating of the area with lack of green space to make it amenable There has already been 120 houses built to the right of the Bishops playing field (Bishop Field estate) This is less than 150 metres from the proposed development area means there are

potentially 400 people using the green space **Tup 26 and Tup 27** and the amenities in the area. This is already having an impact on the sports fields in terms of the amount of litter that is left lying around- adding more housing/people to the area and reducing the green leisure space means residents on top of each other with no outdoor space to enjoy. The current trees and vegetation enables wildlife to exist within housing areas and this **IS** of great importance to local residents and biodiversity

Suitability of the land- there is a stream (marked collects) on the border of **Tup 26** and the playing field. This frequently floods and overflows significantly onto the Tup 26 land- has the council considered the viability of building on land which floods?

Visual pollution- cutting down the trees on TUP 26 and building houses causes significant visual impact/pollution to all the houses overlooking the green area and will block out natural daylight to these homes

Noise pollution- the area has already had 2 years of noise pollution due to building 120 homes on Bishops fields, noticeable particularly due to the construction work starting early morning and working on Saturdays. If the proposal is allowed to go through then the area will have constant and prolonged noise pollution over an unacceptable number of years which will have an even bigger impact on residents as it will be in front of their homes (less than 10 metres away) In addition the noise of the construction will be unbearable and will cause suffering to residents if it were to start at the same time in the morning and on Saturdays as the Bishops Field construction is starting.

Local knowledge suggests that when the Tupsley infectious diseases hospital was disbanded the local green land **TUP 26** was gifted to the community as recreational land and not to be used for building on- has the council properly researched this when they state “there are no significant issues with regard to heritage assets”? Stating that the city has an oversupply of green space is not a reason to take away local areas green space- how are residents expected to make use of city green space if they have to travel to it? “its loss would need to be compensated by improving existing open space “ is not viable as the only existing open space nearby is used for sports by the school

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

Any brown field sites throughout the city and surrounding areas -

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Any brown field sites should be used first NO recreational sites should ever ~~be~~ be used for building on

The people of Hereford's mental health wellbeing is far more important. Getting rid of green recreational sites will significantly impact on people's mental health as they won't be able to enjoy the outdoors.

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

no recreational green field sites should ever be considered for building on

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

any braunfield sites in the area

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

consider outdoor gym for Tup 25
Tup 26 Tup 27 - Tupsley hasn't got
one on any of its recreational spaces -
other areas in Hereford have.
Also consider outdoor gym / park equipment
in the park off Holywell gutter lane.

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

The information has been poorly circulated.
Residents in each of the identified areas
should have been notified ^{directly} about the
consultation period. It is disgraceful that
recreational ground has been targetted - the council
(Please use additional box at the back of questionnaire if you need more space to comment)

are obviously more interested in money than
the health and well being of Hereford
citizens - this is not acceptable and we will
be taking legal action if this plan goes ahead.

About you:

Name: Joyce Warburton

Address: 

.....

Email:....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

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HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

6th October 2018

To Whom it may concern,

RE: Herefordshire Area Plan Tup25. Eign Hill Ward

I am writing to you as I live on Foley street with my family. I strongly object to the planned proposal to build 10 houses on the field next to to Foley trading estate.

I don't feel the surrounding infrastructure can support a development of this size. There might be an additional 20 + vehicles travelling to these houses and requiring parking in a street which already struggles with parking.

Secondly this proposed development would be taking away an essential green space which is important to our local community. Many locals use this open space on a regular basis. Personally, I use it daily to walk my dog and often use it with my children to play football etc.

The development would be removing an crucial green space within the city and remove trees which are valuable.

I am hugely disappointed as a local resident at the distinct lack of communication with regards to this proposal and the lack of forward thinking.

Yours,

Mr Paul Wilkinson

Latham, James

From: ldf
Sent: 01 October 2018 10:28
To: Gilson, Susannah
Subject: FW: Hereford Area Plan - Queenswood Drive Objection

Follow Up Flag: Follow up
Flag Status: Completed

Another rep

-----Original Message-----

From: Lee Belle Williams
Sent: 29 September 2018 06:59
To: ldf <ldf@herefordshire.gov.uk>
Subject: Hereford Area Plan - Queenswood Drive Objection

Dear Sir/Madam

We would like to strongly object to the proposed development of 20 houses of the grass land on Queenswood drive, Hampton Dene for the following reasons:

1. Queenswood Drive is already a busy road, especially now Tupsley football team play games and regularly train on the land adjoining the grassland. On the weekends, cars are already parked all the way down Queenswood drive making it difficult for residents to get their cars off the drive and also making it a "one way" road. This is already an accident waiting to happen without introducing potentially 40 more cars.
2. The community use the grassland constantly to walk their dogs. If you developed the land, you would lose the community spirit and find dog owners would probably use the park area making it unsafe for children to play.
3. There have already been 2 developments in this area including the houses built on Bishops Fields and the houses just off Guerny Avenue. These houses also included many social housing and included the placement of a paedophile in the houses next to the park. This is a potential safeguarding issue, as the grassland overlooks the park and Bishops School playing fields. In addition, St Paul's road is already very dangerous with the number of cars using it during school drop off time.
4. The grassland has many trees and is full of birds and wildlife.
5. The visual impact on residents will also be affected as well as the privacy as all the houses on Queenswood Drive will be overlooked. We only bought our house 18 months ago and I don't believe this potential development was on the searches.
6. This will affect the character of the neighbourhood as it currently has a community feel but you would lose this if dog walkers can't use the grassland.
7. There will also be noise disturbance from all the extra houses. At the moment, I sit outside my house listening to the birds.

We only found out about this potential development by chance- surely The Council have an obligation to inform residents?

We look forward to hearing from you.

Regards

Annabel & Lee Williams

Sent from my iPad

From: Lee Belle Williams
Sent: 30 September 2018 10:35
To: ldf <ldf@herefordshire.gov.uk>
Subject: Objection to houses being built on Queenswood drive

Dear sir/madam

Please find attached evidence in support of my objection to the houses being built on Queenswood drive. These photos were taken on 30 September 2018.







Mr & Mrs Wright



Hereford Housing

**HEREFORD AREA PLAN: HOUSING SITE OPTIONS
SITE SUMMARY ASSESSMENT – SOUTH EAST HEREFORD
LAND at the PADDOCKS – HAMPTON DENE ROAD: REF Tup27**

Dear Sir/Madam

I am writing to you regarding the Hereford Area Plan and the area of the Paddocks referred to as Tup27 in the heading to this letter and the attached map.

It is appreciated that the Hereford Area Plan has been produced after significant effort and resources have been expended, but I believe the inclusion of Tup27 as a potential area for development is incorrect for the following reasons:

1. The housing map relating to Tup27 is not correct. I have marked in red the most recent housing developments in the vicinity to Tup27 that are:
 - A. The development known as Bishop Fields North of the track known as Hollywell Gutter Lane.
 - B. The housing development south of the track known as Hollywell Gutter Lane adjacent to the Bishop's School playing field referred to on the map as Playing Field

Notes (1): These are significant developments and it is remiss that these developments are not included in the potential development area map.

Notes (2): The Bishop's School playing fields have also been the subject of a development plan that did not go ahead because of the financial crisis. If this development had gone ahead Tup27 would have been surrounded by housing developments.

Note (3): It must be an ongoing assumption that the Bishop's School playing fields could be developed in the future.

2. Tup27 abuts onto Hampton Dene Road and is directly opposite St Pauls School Junior School, 100 metres along Hampton Dene Road is the Bishop's Secondary School and 50 metres away is Hampton Dene Junior School. Between 8:15 and 9:15 am and 2:30 to 4 pm in term time the area can best be described as traffic havoc. The development of more housing accessing directly onto Hampton Dene road will seriously exacerbate the already difficult traffic flow and parking situation.

Note (4): It is stated that Highways have no major concerns with access, I would suggest that Highways visit Hampton Dene Road during the hours I have stated in Paragraph 2 during term time for a prolonged period. They would then appreciate the traffic problems in this area.

3. Tup27 is a site of biodiversity and wildlife, in fact for number of years the council did not carry out mowing in this area as it was considered an important bio-diverse site.

4. Tup27 contains an abundance of trees, 2 copses and is a nesting area for birdlife.

5. It is a haven for wildlife ranging in diversity from amphibians to foxes.

6. It is a well utilised dog walking area and is very popular with residents.

Note (5): As already pointed out in Paragraph 1 there have already been large developments in the close vicinity of Tup27 that has necessitated the removal of trees and the loss of wildlife habitation. This loss only adds to the importance of Tup27 remaining as a Bio-diverse green space.

Summary

In summary, Tup27 is an important area of green space within the Hampton Dene area. It is a haven for wild life, bio-diversity and contains in the region of 100 trees.

The area around Tup27 has already seen significant development, that as I have pointed out, has not been included in the attached map that was issued by Hereford Council.

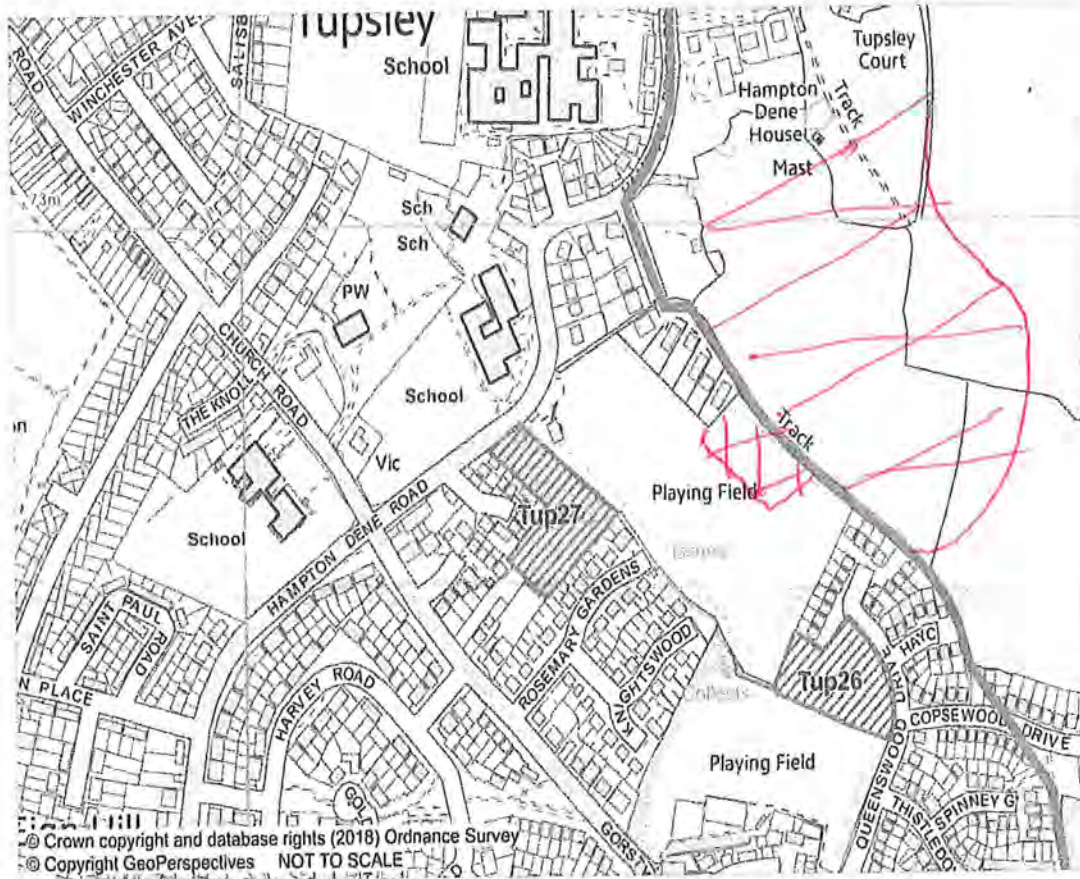
The Bishop's Playing Fields cannot be excluded as a future development and this should be considered when assessing Tup27 as a potential development site.

In addition, during term time the area is swamped with traffic and contemplating a further housing site that will have access onto the Hampton Dene Road directly opposite St Pauls Junior school can at best be described as less than ideal.

I look forward to further correspondence.

Yours sincerely





Site ID	Tup27	Site Address	Land at the Paddock, Hampton Dene Road, Hampton Dene Herefordshire, HR1 1XH		
Ward	Tupsley	Site Area ha	0.66	Potential Capacity	20

The site is existing amenity greenspace which is generally flat land surrounded by residential, additional park land with St Paul's School opposite. It is a small area, not overlooked as housing backs onto it and the only access is off Hampton Dene Road or through school playing fields therefore its use for informal recreation would potentially be minimal. The area does however have a lot of trees and vegetation providing an oasis for wildlife within the housing areas and this could be of value to both local residents and biodiversity. Ecological survey work may be required.

There are no significant issues in relation to heritage assets which preclude development of the site but there are listed buildings and unregistered parkland in the vicinity which should be considered. Highways have no major concerns with regard to access but this is a considerably busy road at school travel time. An overall assessment of the acceptability with regard to highway network capacity will need to be carried out to assess the cumulative impacts for the network. As the site is quite overgrown there may be the potential for wildlife and biodiversity, therefore ecological surveys would be necessary to establish its value in this regard. The evidence for both amenity greenspace and semi-natural green space is still considered to be robust as little has changed. This assessment concluded that there is an over-supply of amenity greenspace but an under-supply of semi-natural greenspace in Hereford North. Although the evidence would support its loss as amenity greenspace, consultation with the local community would establish whether or not they value it either for informal recreation or as a semi natural open space. Its loss would need compensation and this could be an improvement to the existing open space. The site does have potential and is considered a suitable Option Site. ✓



Ref: A110584/ZJ

Date: 28 September 2018

Planning Policy
Herefordshire Council
Plough Lane
Hereford
HR4 0LE

Submission via Email

Dear Sirs

**WYEVALE GARDEN CENTRES
HEREFORD WYEVALE GARDEN CENTRE, KINGS ACRE ROAD, HEREFORD, HR4 0SE
HEREFORD AREA PLAN – HOUSING AND EMPLOYMENT SITE OPTIONS CONSULTATION**

Introduction

On behalf of our client Wyevale Garden Centres, we wish to make the following comments on the Hereford Area Plan (HAP) – Housing and Employment Site Options consultation document in respect of Hereford Wyevale Garden Centre at Kings Acre Road.

The Site and Surroundings

The site comprises the Hereford, Wyevale Garden Centre situated on Kings Acre Road and is located approximately 2.5 miles to the west of Hereford town centre. The site extends to around 3.1ha and is accessed directly off the A438 Kings Acre Road. The site is currently located outside, yet opposite, the settlement boundary of Kings Acre (as identified in Breinton Neighbourhood Plan) but the surrounding area contains a mix of commercial and residential development forming part of the Kings Acre area. It is not allocated for any purpose within the adopted Core Strategy Policies Map.

The Garden Centre is situated adjacent to the A438 road network to the south, with residential uses beyond, to the north is a small parcel of vacant rectangular land with Wyevale Nurseries growing area beyond to the north. To the east are existing residential uses and commercial uses including car showroom to the west beyond the A480. In proximity to the site, to its east lies the Three Elms Urban Extension, identified in the Core Strategy (Policy HD5) for a minimum of 1,000 new homes, 10ha of employment land and land/infrastructure to facilitate the adjoining phase of the Hereford Relief Road.

90 Victoria Street, Bristol, United Kingdom, BS1 6DP
Tel: +44 (0)117 925 4393 Fax: +44 (0)117 925 4239
Email: bristol.planning@wyg.com Website: www.wyg.com

Registered Office: Arndale Court, Otley Road, Headingley, Leeds, LS6 2UJ





The site is currently in active use as a garden centre under the operation of Wyevale Garden Centres. The primary activity is retail sales with ancillary customer café, there are also a number of retail concessions at the site including Leeks Conservatories, Maidenhead Aquatics and Edinburgh Woollen Mill. The site comprises retail buildings, glasshouses, canopy area, plant display, storage areas and hardstanding customer car parking. As such, the site is 'previously developed land' given its current use.

Background

The Core Strategy identifies that the HAP will allocate sites and set out the detailed proposals to ensure the full delivery of development identified for Hereford in the adopted Core Strategy. Policy HD1 sets out the Hereford will accommodate a minimum of 6,500 new homes and 15ha of new employment land within the plan period. Major residential development is identified in the City Centre (800 dwellings) alongside Northern, Western and Southern Urban Expansion Areas. The remaining housing requirement of around 3,200 dwellings will be provided through existing commitments, windfalls and non-strategic site allocations within the HAP. The Western Urban Extension, Three Elms is located in proximity to the site and seeks to deliver a minimum of 1,000 new homes.

The garden centre site has previously been promoted through the Housing and Employment Land Availability Assessment (HELAA) and the HAP process. The site was identified within the Issues and Options HAP consultation which identified the site as suitable for residential development but was considered unviable. There are no present factors which would indicate that residential redevelopment of the site is not viable.

Proposed Housing Site

The current HAP consultation document proposes to allocate the garden centre site for housing development (site reference. Thr35). The site is identified as having potential capacity for 80 dwellings. In addition, the growing area to the north of the garden centre, is also identified as a potential housing option (site reference. Cre25) for around 200 dwellings and land to the west (site references. Thr19 and Thr26a) to the east for 260 dwellings and 520 dwellings respectively.

The Technical Summary document published identifies that the site is a brownfield site, with no listed buildings, contaminated land, public rights of way or flood matters which could impact on redevelopment of the site. The Landscape comments on the site note that the landscape and visual sensitivity of the site is low, and limited mitigation would be required providing a green perimeter buffer is maintained. No archaeological or ecological matters were raised as a barrier to development.

Turning to highways, the Technical Summary report notes that the site benefits from road frontage and bus services are available on Kings Acre Road. A suitable access is considered could be achieved through combination with an adjoining site, such as the site to the north (Cre25) and combine with a modified business park access from A480. However, it notes that capacity issues have been identified on the network in carrying out the transport assessment work for the Three Elms SUE which has resulted in a proposed cap on development until such time as the river crossing section of the relief road is in place. As such, the report states the strategic sites are proposed to take preference and no further sites can



be considered at present which would breach the cap. It states an overall assessment of the highway network capacity will need to be carried out, once all sites are reviewed and shortlisted to assess the cumulative impact and at which stage of the Hereford Transport Package developments can be brought forward.

Housing Requirement

In promoting the Wyevale Garden Centre site (ref. Thr35) for residential development through the HAP process and ahead of the Three Elms SUE, it is necessary to consider the Council's current housing requirement. The Core Strategy Policy SS2 identifies the housing requirement of a minimum of 16,500 new homes in Herefordshire between 2011 and 2031. Of this requirement, Policy SS2 directs 6,500 new homes to the main centre of Hereford and Policy HD1 identifies around 3,200 new homes are to be delivered through the HAP.

The Core Strategy sets an indicative trajectory which increases throughout the plan period with 600 homes anticipated to be delivered per annum between 2011-16, increasing to 850 from 2016-21 and onwards. Appendix B of the Annual Monitoring Report (AMR) sets out the Council's Five Year Housing Land Supply Position for 2017-2022. This identifies that the Council have generally undelivered on the housing requirement within the Core Strategy for the first 6 years by some 1,471 dwellings. Following this under delivery, the Council are required to adopt a 20% buffer bringing the total five-year requirement to 6,925 dwellings between 2017 to 2022. This equates to an annual requirement of 1,385 which is substantially higher than the delivery rates of around 300-400 dwellings over recent years. The paper identifies that the Council can currently demonstrate a supply of 6,299 dwellings resulting in a 4.54 years' supply. Furthermore, the recent under delivery highlights the Council's inability to deliver sustainable housing in the short term.

The NPPF identifies that Local Plans should be prepared based on an OAN for housing and identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement with an additional buffer of 5/20% as necessary. The paper outlining the current Five Year Housing Land Supply identifies that in order to increase the delivery of new housing in the county, Herefordshire Council "*positively encouraged developers to come forward with proposals for suitable and sustainable housing developments to meet the county's needs.*" On this basis and given that the Council is unable to effectively demonstrate a five-year housing supply, we wish to support the proposed allocation of Wyevale Hereford Garden Centre (site Thr35) for residential redevelopment in the short term ahead of the Three Elms SUE.

Site Promotion

In terms of availability, Wyevale Garden Centre lease the site and it is considered the existing use could be discontinued and the development of the site for residential development could be achieved within the short term. As identified above, the site is currently considered suitable and available for development by the Council with no significant constraints identified in terms of landscape, ecology or archaeology and a green buffer can easily be retained at the site. The only identified reasons for the site not being considered able to be developed in the short term is the proposed cap on future development in the vicinity, with the exception of strategic sites, until the river crossing section of the relief road is in place. Whilst we understand the Council's position and desirability for the river crossing



section of the relief road to be delivered in advance of additional development, the present housing need position indicates that the Council should reconsider this approach to deliver urgently required housing on otherwise suitable and deliverable sites.

The Three Elms SUE is currently subject to a live outline application (ref. P162920/F), submitted in September 2016. However, this remains undetermined to date, with the latest agreed target date being 18 August 2018. Given the substantial size of the proposal and the nature of a SUE, it is likely to take a number of years to come forward and start delivering housing. Similarly, whilst we note the route for the relief road has recently been agreed (July 2018) and construction of the southern section of the relief road is due to commence early 2019, delivery and subsequent utilisation of the river crossing section is also likely to take a number of years. Given that the process has started, the Council can be assured that any negative effects of the additional houses will only be short term. That short term effect does not carry sufficient weight to prevent the timely delivery of new homes.

As evidenced by the latest AMR, the Council is in need of identifying additional sites for housing in the short term given they are unable to effectively demonstrate a five-year housing land supply. The need for housing in the interim period, in advance of the Three Elms SUE being delivered, should take priority. Smaller sites, such as the subject site can be delivered quickly and help to make a meaningful contribution to the housing supply. Paragraph 68 of the NPPF recognises the importance small and medium sized sites can make and are often able to be built out relatively quickly. On this basis, we wish to promote the existing brownfield Wyevale Garden Centre site (Thr35) at Kings Acre Road for residential development in the short term and request that the Council allocate it for residential development in the forthcoming HAP.

As identified, the growing area to the north of the garden centre, is also identified as a potential housing option (site reference. CRE25) for around 200 dwellings alongside two further sites (Thr19 and Thr26a) adjoining site Cre25. The garden centre site could therefore be delivered in the short term and link up with these sites if developed in the future following the completion of the river crossing section of the relief road.

Summary

In summary, Wyevale Garden Centres support the proposed site allocation Thr35 and wish to confirm that the site is available, suitable and viable for redevelopment in the short term. The above analysis demonstrates that the site is suitable for residential purposes and could provide an important contribution of around 80 dwellings in a sustainable location. The site has been identified as able to be developed with no landscape implications with retention of a green buffer and whilst located outside of the development boundary, comprises previously developed land given its existing use and can therefore be sustainably redeveloped for residential uses.

The above identifies the importance of allocating the site for residential development and enabling it to come forward in the short term to contribute to the Council's five-year housing land supply.



Conclusions

We trust you will find the above comments and accompanying questionnaire helpful to assess the site as part of the HAP process and find the site suitable for residential redevelopment in the short term ahead of the Three Elms SUE and river crossing section of the relief road.

We look forward to receiving confirmation of receipt of this representation in due course. In the meantime, please do not hesitate to contact us should you have any queries or require any further information.

Yours faithfully

Gary Morris
Director - Planner

Hereford Area Plan (HAP) Housing and Employment Site Options Consultation

We would like to know your views on the sites that are being considered for housing and employment as part of the preparation of the Hereford Area Plan.

All the sites have been assessed, and are either deemed to have potential or be unsuitable for housing or employment development. Please refer to the individual site summaries for more information on each.

Your feedback on whether you agree with the assessments for the sites will contribute towards shaping the preferred options for the Hereford Area Plan, which will help guide growth and development for the city and surrounding areas.

This questionnaire is also available to complete online at the following web address:
www.herefordshire.gov.uk/herfordareaplan

Please read the Hereford Area Plan Site Options Report and relevant site summaries before completing the questionnaire.

These can be found at: www.herefordshire.gov.uk/herfordareaplan as well as at libraries and information centres across the county.

**Complete the questions for as many sites as you would like to comment on.
Please include the site reference for any you are making a specific comment on.**

Housing

Question 1: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future housing development? If there is a specific site you have concerns about please identify the site in your response.

Yes:

No:

If no, please explain:

Site reference Thr35 should be allocated for housing in the short term. Please see our enclosed letter for our full response.

Question 2: Do you think there are other more suitable sites not shown on the plan that could be considered as future housing allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

The Site Allocations Plan may need to also control the phasing of housing delivery/development. (Please refer to the report, para 5.18).

The phases are:

- Short term, 0-5 years
- Medium term, 5-10 years
- Long term, 10 + years

Question 3: Do you think any particular sites should be developed in the short, medium or long term?

Yes

No

Please explain your answer:

Yes, site reference Thr35 should be allocated for housing in the short term. Please see our enclosed letter for our full response

Employment

Question 4: Do you agree that the sites that have been identified as having potential are the most suitable sites to consider for future employment land development?

Yes:

No:

If no, please explain:

Question 5: Do you think there are other more suitable sites not shown on the plan that could be considered as future employment allocations?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 6: Are there any sites being considered in the site options that could be suitable for use solely or in part for other uses such as university educational buildings, student accommodation, community and leisure uses or other commercial activities?

Yes:

No:

Question 6 continued...

If yes, please supply site details:

Question 7: Do you think there are other more suitable sites not shown on the plan that could be considered for other uses as set out in question 6 above?

Yes:

No:

If yes, please supply site details to identify the site:

(We are currently running a Call for Sites – Please refer to www.herefordshire.gov.uk/HAPcallforsites)

Question 8: Do you have any comments on the document and the approach used to identify potential sites?

Yes:

No:

If yes, please explain:

(Please use additional box at the back of questionnaire if you need more space to comment)

About you:

Name:...Gary Morris – Planning Director on behalf of Wyevale Garden Centres Ltd

Address:...WYG, 90 Victoria Street, Bristol, BS1 6DP.....

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Email:...Bristol.planning@wyg.com.....

Do you wish to be kept informed of future planning policy consultations?

Yes

No

(You have the right to withdraw your consent at any time by notifying us.)

Access to Information

All personal data will be treated in line with our obligations under the Data Protection Act 2018, which includes the provisions of GDPR. This means your personal data will not be shared. The data collected will not be used for any other purpose. We do publish representations but email addresses, telephone numbers and signatures will be removed beforehand.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information but private information would be redacted.

Details of our privacy notice can be found at www.herefordshire.gov.uk/privacynotices

If you would like any further assistance, please contact us in one of the following ways:
Email: ldf@herefordshire.gov.uk or telephone 01432 383357

Paper questionnaires can be returned by post to:

Forward Planning
Herefordshire Council Offices
Plough Lane
Hereford
HR4 0LE

Or by email to ldf@herefordshire.gov.uk

Please return this questionnaire by midnight on 8th October 2018

Thank you for taking time to share your views with us.

Question 8 continued...

Please find enclosed a covering letter setting out our full response to the HAP Consultation document and housing and employment site options.