

6<sup>th</sup> October 2018

To Whom it may concern,

RE: Herefordshire Area Plan Tup25. Eign Hill Ward

I am writing as a local resident to object strongly to the planned proposal to build 10 houses on the field adjacent to Foley trading estate.

1. This proposed development would be removing a vital green space which is integral to our local community. It is much used by many local residents young and old for recreation purposes. In particular my objection is because my own and neighbours' children regularly use this as a place to play. It is a safe place for them to walk to, if removed, their nearest piece of green land could only be accessed by crossing a busy main road.
2. The surrounding infrastructure can't support a development even of this size. Potentially there could be 20+ additional vehicles travelling to these houses and seeking parking.

The development would destroy an essential green space within the city and remove trees which are valuable to our environment to reduce global warming and help cool the city as well as being a habitat for nature. My suggestion would be to develop further on the outskirts of the city with improved transport links.

As a local resident I am hugely disappointed at the absence of forward thinking and lack of communication with regards to this proposal of MY local council.

Yours,

Mrs Kahlia Laws

## **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](http://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](http://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 find enclosed two Vision Documents which support the promotion of various sites in the ownership of The Church Commissioners for England for residential development. Each site has been identified as suitable for development by the Council in the Hereford Area Plan Housing and Employment Site Options Consultation Document. The Vision Documents cover the following sites:

### **Vision Document 1**

Land north of Lower Hill Farm, Lower Hill Farm, Breinton, Hereford, HR4 7PB (ref. **Thr23**)  
Land at Huntington, Kings Acre Road, Hereford, HR4 0SD (ref. **Thr26a**)

### **Vision Document 2**

Land north of Redhill Cottages, Ross Road, Hereford, HR2 8EA (ref. **Stm01**)

**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](http://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:

Stm01 – site could be delivered in the short to medium term

Thr23 – site could be delivered following the delivery of the Hereford Bypass - medium term

Thr26a – site could be delivered following the delivery of the Hereford Bypass - medium term

### **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](http://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](http://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: Beth Evans (Lichfields) on behalf of The Church Commissioners for England**

**Address: 14 Regent's Wharf, All Saints Street, London, N1 9RL**

**Email: beth.evans@lichfields.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.

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](http://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](mailto: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](mailto:ldf@herefordshire.gov.uk)

**Please return this questionnaire by midnight on 8<sup>th</sup> October 2018**

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

**Question 8 continued...**

# Hereford

Vision Document

Land North of  
Redhill Cottages

October 2018

jtp





View across Land North of Redhill Cottages



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**THE CHURCH  
COMMISSIONERS FOR  
ENGLAND**  
Land Owner



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Masterplanners



**WYG**  
Drainage Consultants



**LICHFIELDS**  
Planning Consultants



**EDP**  
Environmental Consultants



**COTSWOLD  
ARCHAEOLOGY**  
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**PELL FRISCHMANN**  
Highways Engineers

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# Introduction

# 1\_Introduction

## Planning Context

### INTRODUCTION

This document has been prepared on behalf of The Church Commissioners for England, who own significant land holdings around Hereford, in Herefordshire.

The document reviews site STM01 (Land North of Redhill Cottages) identified within the Hereford Area Plan Housing and Employment Site Options consultation document.

The Hereford Area Plan (HAP) will set out detailed proposals to ensure the delivery of the housing 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 purpose of this Vision Document is to demonstrate that the site is suitable, available and deliverable and can make a significant contribution to helping Herefordshire Council meet its housing requirements over the plan period. It presents a concept masterplan for the site, informed by various technical evidence documents to demonstrate how sustainable development can be delivered in this location. The opportunity to deliver residential development on this land will be opened up by the proposed bypass and can either be delivered as a standalone site, or together with the adjacent site as an expansion to the area south of Hereford.

The following sections include analysis of the site and surrounding context, including identification of constraints and opportunities. It sets out a vision for a new neighbourhood in this location illustrated by a concept masterplan.

The analysis set out within this document has been informed by baseline technical reports prepared by the consultant team:

1. Lichfields: planning consultants
2. Pell Frischmann: highways engineers
3. WYG: flood risk and drainage, geo-environmental
4. Cotswolds Archaeology: heritage appraisal
4. EDP: landscape & visual appraisal, ecology

### PLANNING CONTEXT

The statutory development plan for Herefordshire comprises the Herefordshire Local Plan Core Strategy (adopted 2015) and the Minerals and Waste policies of the Unitary Development Plan (adopted 2007, saved in 2010).

Herefordshire Core Strategy Policy HD1 sets a minimum housing target of 6,500 within Hereford between 2011 and 2031. Taking into account the strategic site allocations, there is a remaining residual requirement for 3,200 homes to be provided through the implementation of existing commitments, windfall development and non-strategic sites to be allocated within the Hereford Area Plan.

The site STM01 is subject to a Safeguarding Mineral Reserves designation in the statutory development plan.

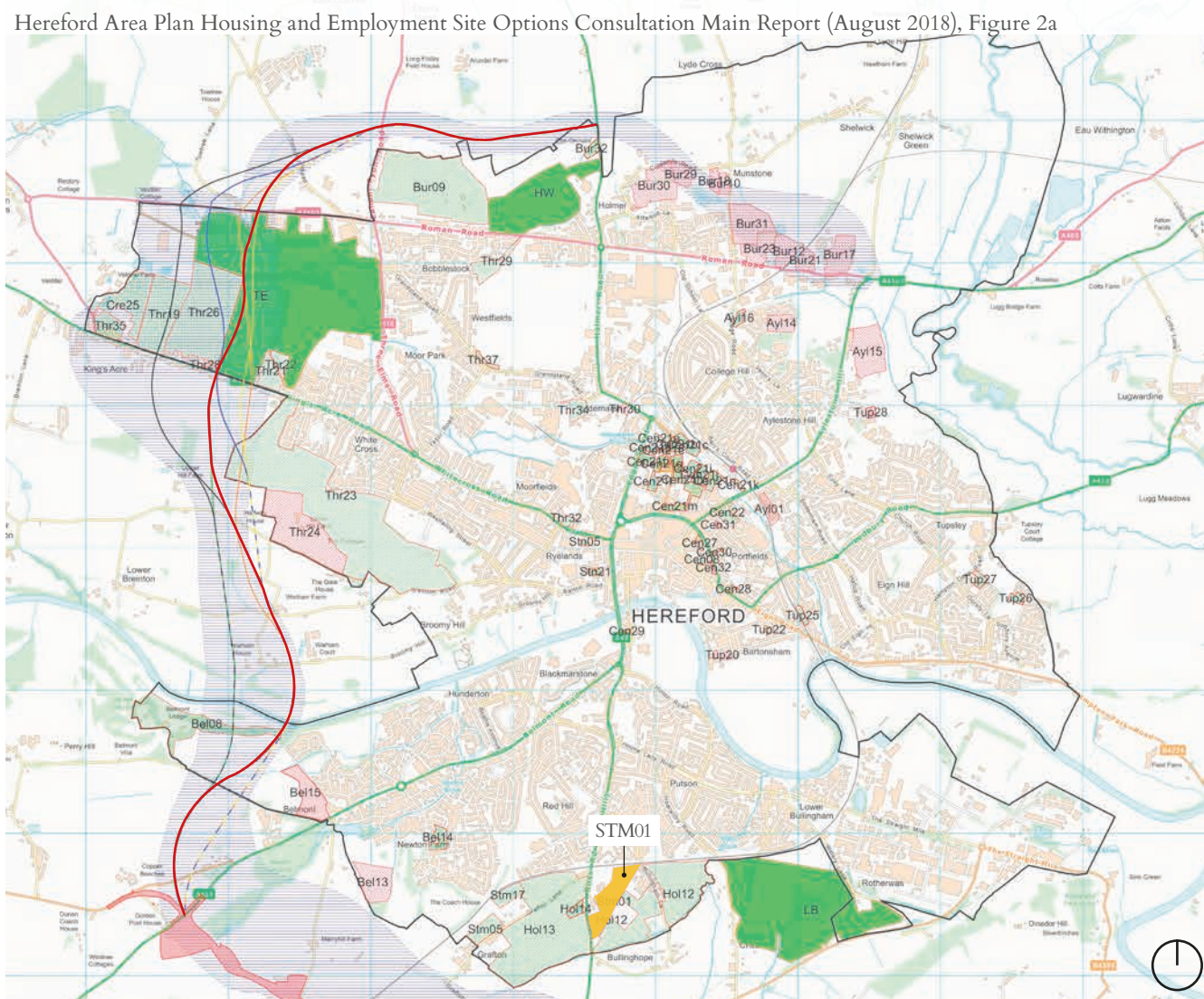
The revised National Planning Policy Framework (NPPF) was published in July 2018 and sets out the Government's planning

policies for England. Chapter 5 focuses on delivering a sufficient supply of homes and paragraph 59 recognises that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. In addition, paragraph 72 recognises the importance of larger scale development in delivering the supply of a large number of homes and states that strategic policy-making authorities should identify suitable locations for such development where it can help to meet identified needs in a sustainable way. In rural areas, planning policies should support housing development that reflect local needs (paragraph 77).

There is no relevant planning history on the site.

# 1\_Introduction Planning Context

Hereford Area Plan Housing and Employment Site Options Consultation Main Report (August 2018), Figure 2a

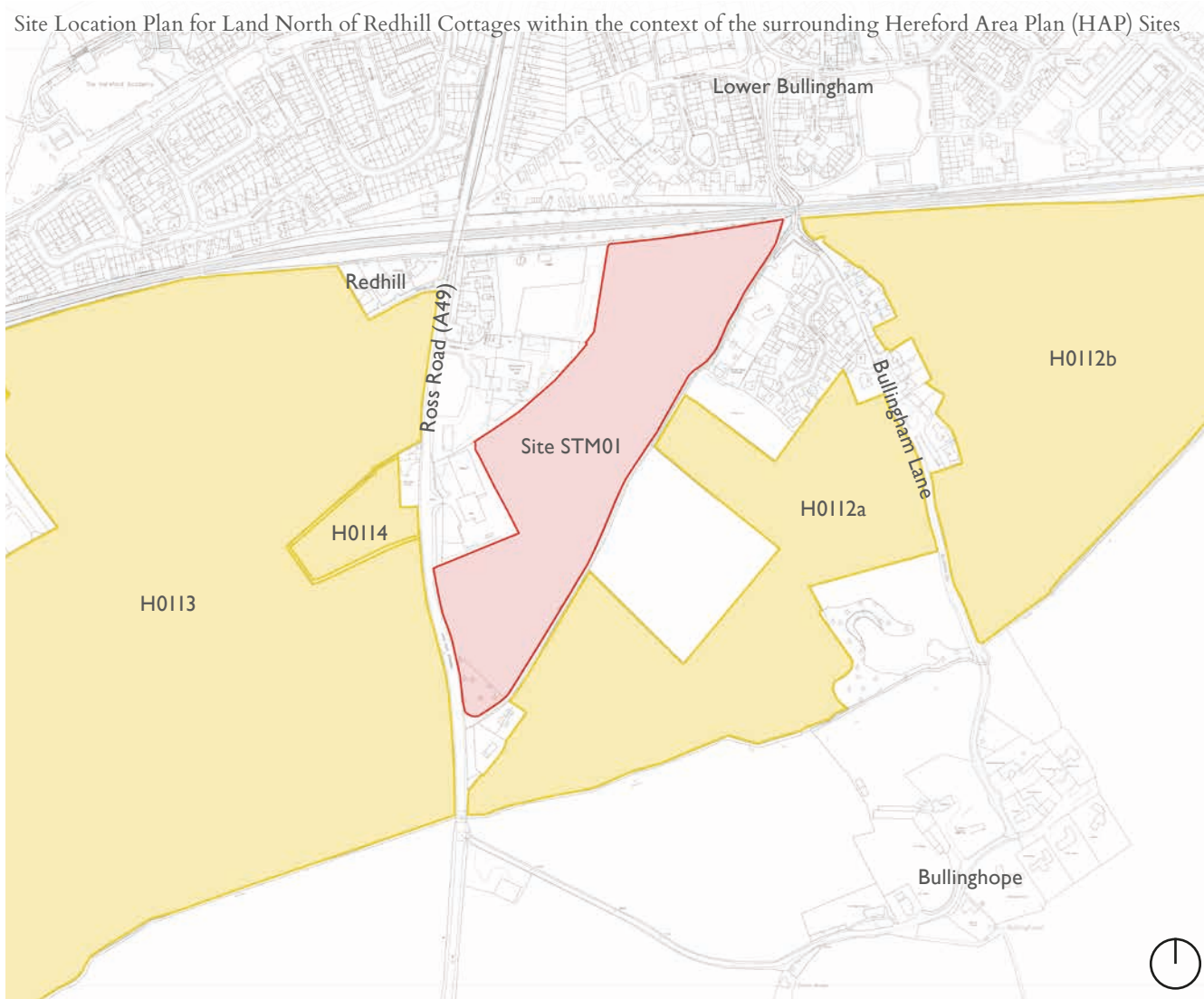


### Key

- HAP Boundary
- HAP Potential Site
- HAP Discounted Site
- Road Corridor
- Southern Link Road
- Preferred Bypass Route
- Site STM01

# Site Location

Site Location Plan for Land North of Redhill Cottages within the context of the surrounding Hereford Area Plan (HAP) Sites



## SITE STM01 - LAND NORTH OF REDHILL COTTAGES

The site is located east of Ross Road (A49) in Redhill, 2km south of Hereford city centre.

The site comprises an area of undeveloped agricultural land. The site is bounded by hedgerows on all sides, with trees along the northern and western boundary. The site is approximately 6.48 hectares.

Land to the south, east and west is largely agricultural with small numbers of residential and commercial developments. To the north of the site is a two-track rail line with residential housing extending along Bullingham Lane at the southern extent of Hereford.

### Key

- Site STM01 (Land North of Redhill Cottages)
- Other HAP Sites

View Looking South West Across Land North of Redhill Cottages Site







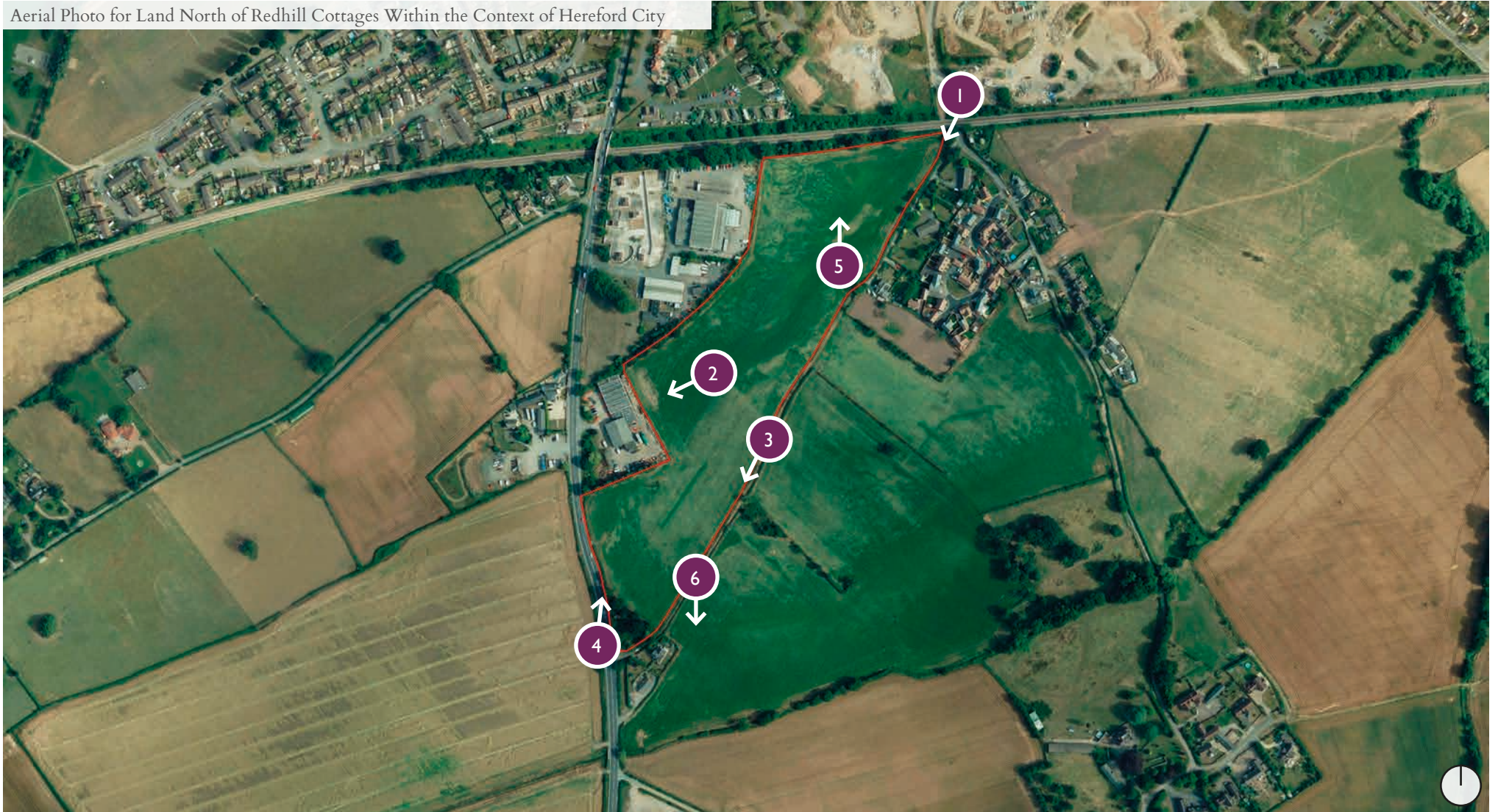
2.



Land North of  
Redhill Cottages

## 2\_Land North of Redhill Cottages Aerial Photo

Aerial Photo for Land North of Redhill Cottages Within the Context of Hereford City



## 2\_Land North of Redhill Cottages Site Photos

Access point under the railway bridge at the north of the site



Warehouses to the west of the site on Ross Road



View to the south west to Ross Road



View across the southern edge of the site



View north on Ross Road along western site boundary



View north across the site



## 2\_Land North of Redhill Cottages

# Landscape Analysis of Site

### Site Description

The site consists of a single arable field bound by a railway line to the north (with residential development beyond), existing development in part to the east and west with housing, a haulage yard and ambulance services headquarters to the north west. There is open countryside to the south.

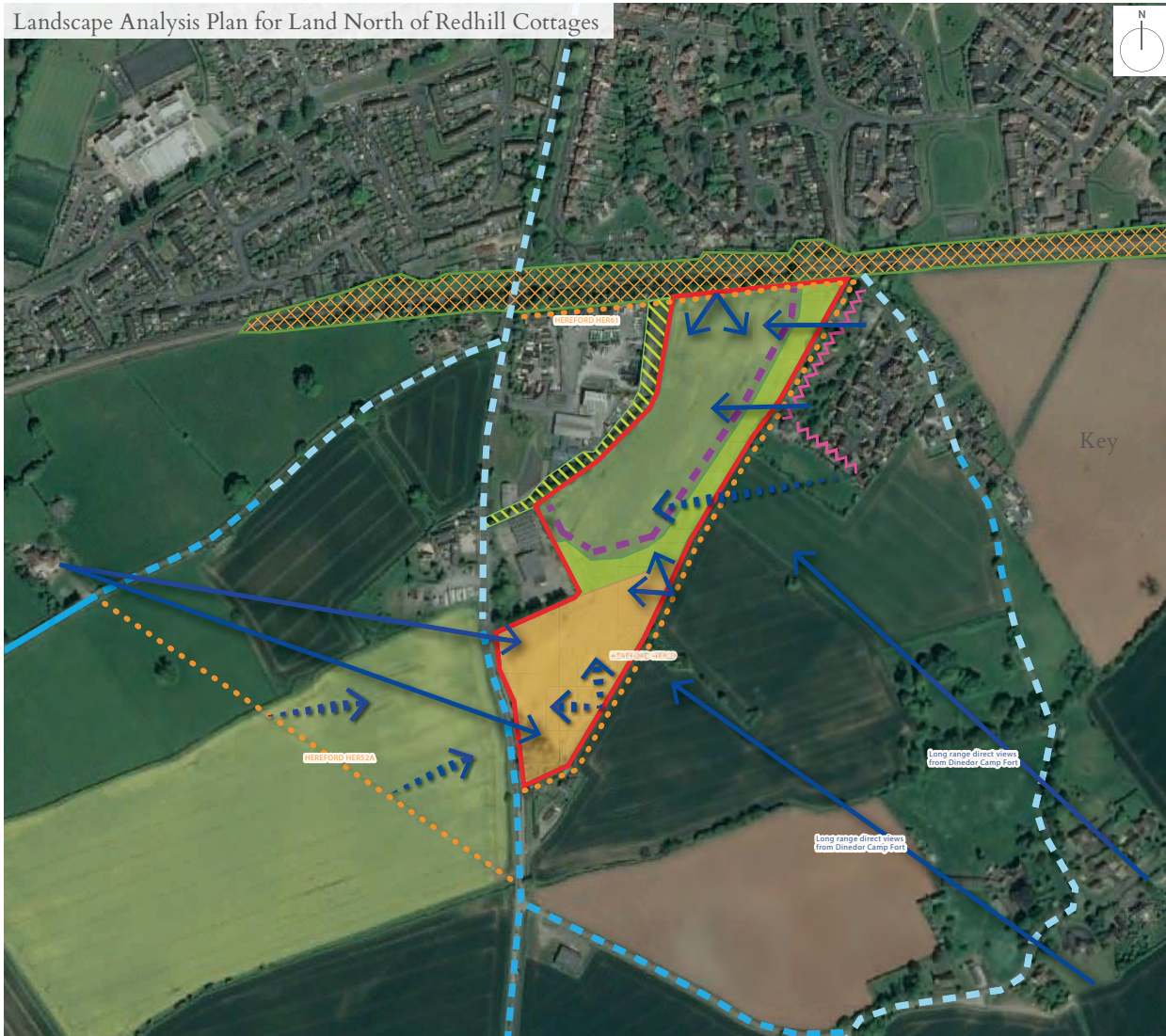
There are close range direct views from adjoining and close residences to the northeast of the site at Thoresby Drive and Billingham Lane; close range direct views are also gained from the adjoining public bridleway to the southeastern edge of the site (where the existing vegetated hedgerow permits); medium range direct views are captured of the south-western extent of the site from Grafton Lane (including residences) and users of the public right of way which links Grafton Lane with the A49 (approximately 0.5km west of the site); and lastly long range direct views are captured on the south-western extent of the site from the higher landform to the southeast including Dinedor Camp Fort (approximately 1.8km southeast of the site at its closest point).

View of Land North of Redhill Cottages



## 2\_Land North of Redhill Cottages Landscape Analysis of Site

Landscape Analysis Plan for Land North of Redhill Cottages



In relation to this site (Site Ref. Stm01) it is considered that development would be acceptable in principle from a landscape perspective. The site is not considered to afford any special landscape value and is not deemed a valued landscape. There are no in principle constraints to the development of the site.

Key characteristics of the site are identified as:

- Tree cover largely restricted to thinly scattered hedgrows
- The composition of hedgerow tree cover in its lower density
- Landscape of notably domestic character, defined by the scale of its field pattern, the nature and density of its settlement.

It is feasible to bring development forward across the whole site area, however, there would need to be careful consideration of the lower south and south-western extent of the site are considered sensitive due to the discernibility of the site from close range and wider views of the site and will be subject to a sensitive design strategy. Careful masterplanning and effective landscape mitigation would be recommended to integrate the development proposal whilst offsetting and reducing any impact.

The provision of the landscape buffer to screen views would contribute to the landscape management and mitigation guidelines prescribed by Herefordshire Council in their Landscape Character Assessment (supplementary planning guidance), published 2004. This prescription 'seeks to strengthen patterns of tree cover associated with settlements.'

Key

Site Boundary	Roadway with filtered views of the site
Direct views of the site	Roadway with direct views of the site
Filtered views of the site	Views of the site are screened by adjoining mature landscape features along railway route
Filtered views of the site from local landmark (site is seen against the wider urban context of Hereford)	Views of the site screened by adjoining boundary vegetation
Sensitive residential edge	Landscape buffer required to filter and screen views of the site
Public Right of Way	Sensitive site area
Roadway with no direct view of the site	Potential zone of development (based on landscape and visual constraints)

## 2\_Land North of Redhill Cottages Constraints & Opportunities

The technical team has reviewed the proposed site allocation to shape the masterplan. This section provides an overview of the key technical studies and the opportunities and constraints that are present in this location.

### TRANSPORT

The site is located to the east of Ross Road (A49) where bus stops are served by routes 33, 36, 411, and 412 which provide access to destinations including Hereford, Gloucester, Monmouth, Lea, Ross on Wye, Kings Thorn, and Much Dewchurch.

The north eastern corner of the site fronts Bullingham Lane near to an existing bridge where the railway crosses above the road. There is a height restriction on the bridge which prevents vehicles taller than 12 feet passing beneath the railway. An unnamed track extends at the southern boundary of the site.

Public rights of way extend along the northern boundary of the site adjacent to the railway line and along the southern boundary along the unnamed track.

The site has the capacity to provide a quantum of new homes that could be served from a single point of access from Ross Road (A49) and a pedestrian/cycle access (also providing emergency access) to Bullingham Lane. The A49 currently has a speed limit of 60mph and so with the introduction of residential development in this area, there is an opportunity to explore reducing the speed limit along this stretch which would assist in facilitating access.

### ECOLOGY

There are no statutory ecological designations within the site or within its immediate vicinity. Non-statutory Local Wildlife Sites are located adjacent to the site on the northern boundary

along the existing railway line (SINC\_54) and towards the south along Withy Brook (SINC\_55 and SINC\_56). which are characterised by areas of scrub (LWS SINC\_54), shrub (LWS SINC\_55), and grazed land with patches of bramble and several tree stumps indicating it may have been woodland in the past (LWS SINC\_56). Overall, it's highly unlikely that a residential scheme would adversely affect LWS SINC\_56 and measures are proposed to ensure impacts on LWS 54 and LWS\_55 are mitigated.

In terms of habitat, the site is, in part bounded by mature hedgerows with occasional associated standard trees; typically, oak. In the southern corner of the site is a small copse of mature oak trees. The remainder of the arable habitat is of negligible ecological note. The site has limited potential to support notable or protected species, which is limited to the boundary hedgerows and mature trees. In summary, there is limited potential to support roosting bats and nesting barn owls, foraging and commuting bats, breeding birds, a small assemblage of common widespread but legally protected reptile species such as slow worm and common lizard, badgers (although no sets were noted based on a provisional walkover).

Overall, the development of the site is considered to be acceptable from an ecological perspective and can be made achievable by appropriate mitigation and design measures, including the following recommendations:

- The site should be subject to a Habitat Regulations Assessment Screening given its proximity to the River Wye SAC;
- A greenspace buffer along the northern boundary to compliment LWS SINC\_54 and consolidation and enhancement of the hedgerows where they connect to the LWS;
- A surface water drainage strategy that will avoid adversely impacting the water quality and flow of LWS SINC\_55
- Retain, consolidate and enhance the peripheral hedgerows

and associated mature trees;

- Retain, consolidate and enhance the woodland copse in the southern end of the site;
- Buffer the railway corridor to the north through the provision of natural greenspace which can also have other functions as necessary with respect to public open space and/or drainage;
- Deliver biodiversity gain where possible consistent with the published NPPF; and
- Species specific enhancement measures should be incorporated into schemes based on detailed surveys.

The River Wye Special Area of Conservation (SAC), also designated as a Site of Special Scientific Interest (SSSI), is located north of the site within a 5km distance. The closest point of the SAC is approximately 1km away from the site but is spatially separated by existing residential development.

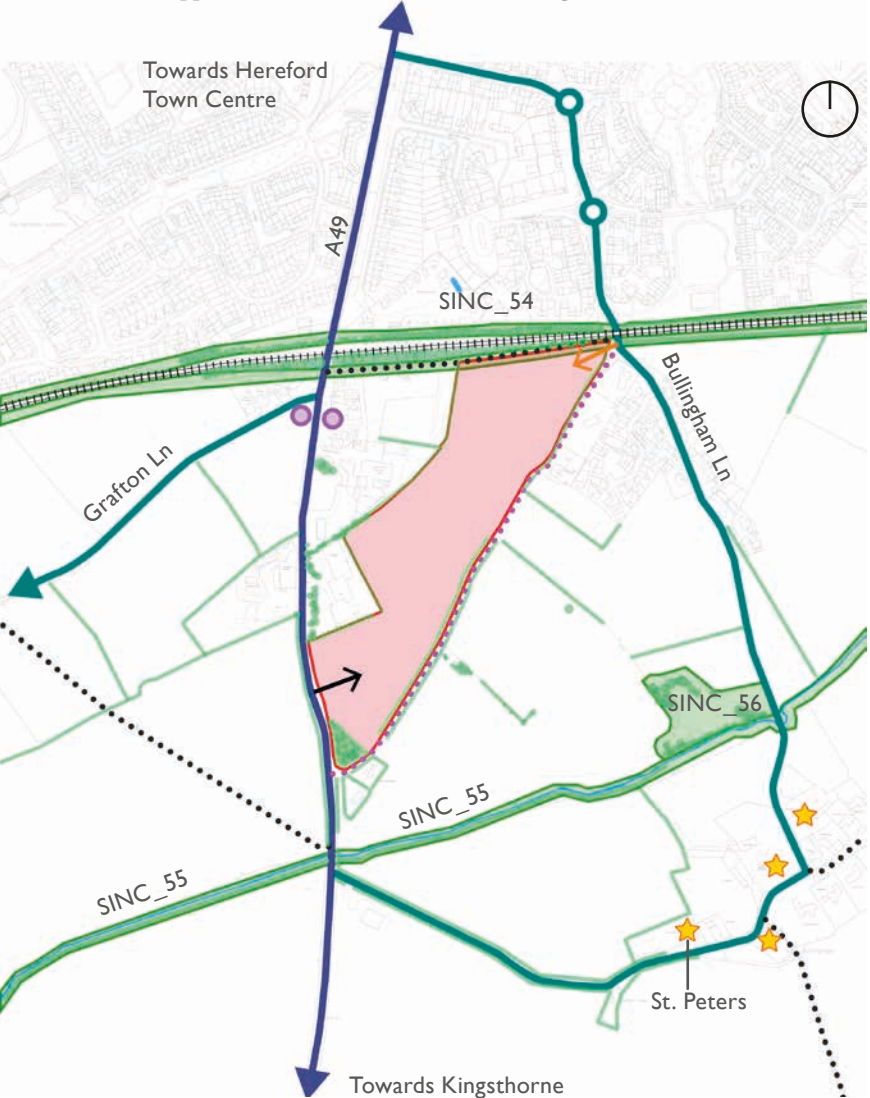
### HERITAGE

There are no designated heritage assets within the site or within the immediate vicinity.

St Peter's Church at Bullinghope is located approximately 450m southeast of the site. The setting of this Grade II listed building will be carefully considered as part of the extensive design process informing any future planning application to ensure that the scheme is acceptable from a heritage perspective.

# 2\_Land North of Redhill Cottages Constraints & Opportunities

Constraints & Opportunities Plan for Land at Huntington



Key

- Site boundary
- Primary roads
- Secondary roads
- Existing railine
- Existing bus stops
- Public right of way
- Bridleways
- Potential vehicular access points
- Potential pedestrian / cycle access points
- Watercourses
- Hedgerows / trees
- Listed Buildings
- Local Wildlife Sites



## 2\_Land North of Redhill Cottages

# Constraints & Opportunities

### GEO-ENVIRONMENTAL

A preliminary geo-environmental data review has been completed which assesses the geology, hydrogeology, hydrology and radon of the site. The opportunities and constraints of the site have been considered, including:

#### Opportunities:

- A review of historical mapping indicates that the site is likely to have been agricultural land from the late 19th century and limited made ground is therefore anticipated. As a result, any potential contamination is likely to be localised.
- The site is also not located within a groundwater Source Protection Zone.
- The site is located outside of the Yazor Gravel Aquifer Catchment.
- A review of available water well data indicates there are no abstraction wells in the vicinity of the site.
- Site conditions are likely to be suitable for low rise residential development with traditional foundations.
- Based on nearby historical boreholes, anticipated groundwater levels are likely to be approximately 5-6m below ground level and should not impact shallow excavations associated with future development.

#### Constraints:

- The railway line immediately north of the site represents a potential source of Made Ground of unknown composition. This poses a potential contamination risk to shallow soils and groundwater underlying the site. Any impact is, however, anticipated to be localised and low risk in nature.
- The Depot immediately west of the site poses an additional potential source of contamination to shallow soils and groundwater underlying the site, again, the impacts are likely to be localised.

- The bedrock and superficial deposits underlying the site are shown to be classified as Secondary A Aquifers which may be vulnerable to potential contamination.
- The River Terrace sand and gravel deposits where present are classified as a mineral resource. Any future development is likely to require a Mineral Safeguarding Assessment to satisfy policy M5 of the Unitary Development Plan.

It is recommended that any future planning application is supported by a Desk Top Study including a CIRIA 552 Compliant Risk Assessment and to inform an Intrusive Ground Investigation in due course.

### FLOODING AND DRAINAGE

The site is entirely in Flood Zone 1 and at low risk of flooding from surface water, overland flows, sewers, groundwater and reservoir failure. Therefore, it is considered that there are no constraints for the residential development of the site from a flood risk perspective and no specific flood risk mitigations works will be required.

In terms of surface water discharge, the site is not within a groundwater source protection zone, however nearby borehole records indicate the presence of stiff clays and therefore infiltration is unlikely to be feasible in this location. Nevertheless, infiltration testing may be required. An appropriate drainage strategy is therefore considered to comprise discharge to a nearby watercourse. Due to the site topography, a new surface water in the A49 discharging to the unnamed watercourse would be required to drain the southern third of the site. The rest of the site could be drained via a new surface water sewer alongside the railway discharging to Wither Brook.

An initial attenuation requirement of approximately 860 m<sup>3</sup>

per hectare of impermeable land has been estimated, based on the pre-development greenfield Q<sub>bar</sub> rate (mean annual maximum flow rate) of 1.70 l/s per hectare. The site falls in all directions from a high point within the south eastern part of the site. Despite the site's topography, a number of Sustainable Drainage System (SuDS) elements could be implemented within this site in order to provide the required attenuation volumes and an element of water quality treatment.

Consideration has also been given to foul drainage. The area to the north of the site is urbanised and therefore there will be public foul sewers near the site boundary. It is considered that foul drainage connection can be achieved to serve the proposed development and an engagement with Welsh Water is required to inform the next stage of the scheme.

It is recommended that a Flood Risk & Drainage Assessment will be required to support any future planning application and infiltration testing should be undertaken to confirm the viability of infiltration systems within the site. SuDS elements should be incorporated into the site masterplan and to any surface water drainage proposals. During the course of the design process engagement with Welsh Water and the Lead Local Flood Authority is recommended.

## 2\_Land North of Redhill Cottages Constraints & Opportunities

View of Land North of Redhill Cottages



# 2\_Land North of Redhill Cottages Concept Masterplan

The concept masterplan illustrates the potential for residential development to the south of Lower Bullingham. Indicative access is shown off Ross Road (A49) with a primary route through the site, a potential pedestrian/cycle/emergency access is shown onto Bullingham Lane.

An existing public right of way is retained along the edge of the railway line on the northern site boundary, providing a link from Bullingham Lane to Ross Road.









The copse of trees on the south western corner of the site has been retained and a landscape buffer comprising tree planting is proposed along the southern site boundary to screen views from Bullinghope.

Residential parcels set within a network of green spaces have the potential to deliver circa 95 new homes.

## CONCLUSION

Land North of Redhill Cottages provides an excellent opportunity to provide residential development and make a significant contribution to helping Herefordshire Council meet its housing requirements over the plan period. The Vision Document demonstrates that the site is suitable, available and deliverable. It presents a concept masterplan for the site, informed by various technical evidence documents to demonstrate how sustainable development can be delivered in this location. In conjunction with the adjacent site allocation the site would form a natural extension to the south of Hereford and would contribute to meeting housing needs.

## Key

-  Existing roads
-  Proposed primary route
-  Potential pedestrian/cycle/emergency access
-  Public right of way/footpath
-  Proposed residential development
-  Proposed public open space
-  Trees and hedgerow
-  Green corridors

## LAND BUDGET

Site Area 6.48 ha

Residential 3.17 ha

Open Space 2.54 ha

Infrastructure 0.77 ha

New Homes: 95 (at ave. 30 dph)



# Our Success Awards

Our unique approach to placemaking has received high praise. JTP is the only architectural practice in the UK to have won eight Building for Life Awards, the national standard for well-designed homes and neighbourhoods.

In the last twenty years, our work has achieved recognition at international, European and national levels and we have been the recipient of more than 200 awards. These include:

JTP Sunday Times 100 Best Small Companies to Work For 2018 • JTP Best Companies Three Star Status Accreditation • JTP Building Awards Architectural Practice of the Year 2017 • **Battersea Power Station: Phase 2** Winner Best Regeneration Planning Awards 2017 • **Southall Waterside** Highly Commended Best Use of Brownfield Land Placemaking Planning Awards 2017 • **Kew Bridge** Highly Commended Best Housing Scheme (fewer than 500 homes) Planning Awards 2017 • JTP The AJ100 (Architects' Journal) Practice of the Year Shortlisted 2017 • JTP Best Companies Two Star Status Accreditation • JTP BD Awards - Masterplanning & Public Realm Architect of the Year Award 2017- Shortlisted • **A Home for All Seasons**, Sunday Times British Homes Award for Resilient Home of the Future • **Park Street & Lombard Close**, Nottingham, Local Authority Building Control (Labc) East Midlands Region Winners 2016, Best Social Or Affordable New Housing Development • JTP The AJ100 (Architects' Journal) Practice of the Year Shortlisted • **Bow River Village**, First Time Buyer Readers' Awards 2016, Best Large Development • JTP BD Awards - Masterplanning & Public Realm Architect of the Year Award 2016 • **Wimbledon Hill Park** London Sunday Times British Homes Awards Development of the Year – Scheme of up to 25 homes • **Changzhi Island**, China Successful Design Awards - Award for Social Innovation • JTP Best Companies Two Star Status Accreditation • **The Oaks**, Prague AJ120 Awards - Architectural Collaboration of the Year - Shortlisted • **St Clements Hospital**, Bow Placemaking Awards - Community-led Placemaking – Highly Commended • **Water Colour** Placemaking Awards - Best Housing Scheme – Highly Commended • **St Clements Hospital**, Bow National Housing Awards - Overall Winner, Urban Design Group Award • **The Hamptons** Evening Standard New Homes Awards - Best New Large Development • JTP Best Companies One Star Status (Accreditation) • **Graylingwell Park**, Chichester Royal Town Planning Institute Planning Awards (South East) Community Engagement Award • **Kip Village**, Inverkip What House? Awards Best Development - Gold • **Water Colour**, Surrey Building for Life Silver Standard • **The Hamptons** What House? Awards Best Development - Bronze, What House? Awards Best Exterior Design - Silver • **Graylingwell Park** Sustainable Housing Awards -Sustainable Larger Social Housing Project of the Year; The Housebuilder Awards - Best Low or Carbon Zero Initiative • **JTPs' London Studio** City of London Sustainable City Awards Sustainable Building of the Year; The AJ100 (Architects' Journal) Sustainable Practice of the Year Shortlisted, Retrofit Awards - Commercial Building Category, Highly Commended, Green Business Awards, Giant Green Business Awards, Islington Council Sustainable Transport (Medium/Large Business), Sustainability and Innovation Award, CoreNet Global UK Chapter Awards • **Water Colour** What House? Awards Best Brownfield Development Silver Award • **Royal Clarence Yard**, Gosport RTPI Regional Award Heritage Category Commended • **Scarborough Renaissance** International Association for Public Participation's (IAP2) Core Values Awards Project of the Year • JTP Best Companies One Star Status (accreditation), The AJ100 (Architects' Journal) Practice of the Year Shortlisted • **Scarborough Renaissance** European Enterprise Awards Grand Jury Prize, Enterprising Britain Award Winner • **Royal Clarence Yard** The International Green Apple Awards for the Built Environment and Architectural Heritage Gold Award • **Gunwharf Quays**, Portsmouth Building for Life Silver Standard Award • **Royal Clarence Yard** RICS South East Awards Regeneration Category Runner up • **Water Colour** The Evening Standard New Homes Awards Best New Family Home (4 bed) Burchfield, Best New Family Home (3 bed) Sommer, Best New Starter Home (2 bed) Keller • **Manse Road**, Dirlerton, East Lothian Homes for Scotland Quality Awards Rural Small Project Award • **Briery Meadow** (Rowanlea House Type) East Lothian Scottish Home Awards Business Stream House of the Year • **Briery Meadow** Homes for Scotland Quality Awards Rural Large Project Award • **Water Colour** The Daily Telegraph Your New Home Awards Waterside Category: Highly Commended, What House? Award (Property Week/Builder Magazine Group) Joint Gold Winner for Best Brownfield Development • **Urridaholt**, Gardabaer, Iceland BSA/Build Boston Citation for Urban Design, International LivCom Award for Built Projects Silver Award • **Putney Wharf** The Waterways Renaissance Awards Winner of the Design and Construction Category • **The Manor**, Lower Earley Building for Life Silver Standard Award • **Hoebridge Works** Evening Standard Home of the Year • **Briery Meadow** (Rowanlea House Type) What House? Award (Property Week/Builder Magazine Group) Silver winner for Best House • **The Belvedere**, Cambridge The Daily Mail 4 Star Award for Best Development (Regionally), The Daily Mail 5 Star Award for Best Apartment (Regionally), The Daily Mail Award for Best UK Apartment • **The Village at Caterham** Building Awards Major Housing Project of the Year • **The Hamptons** What House? Award Silver Winner for Best Exterior Design • **Nordica**, London What House? Award Bronze Winner for Best Brownfield Development • **Hoebridge Works** What House? Award Gold Winner for Best Starter Home • **Cassio Metro** What House? Award Silver Winner for Best Brownfield Development • **The Village at Caterham** Building for Life Gold Standard Award • **Putney Wharf** Building for Life Silver Standard Award • **French Quarter** Housing Design Awards Exhibition of Excellence • **Royal Clarence Yard** Regeneration Awards (Property Week/Builder Magazine Group) Best Housing-led Regeneration Project • **Queen Elizabeth Park**, Guildford Building for Life Gold Standard Award, Your New Home Awards Best Development for Family Living • **Putney Wharf** Planning for London Awards (Mayor's Office) Best Planning Built Project Contributing to London's Future • **Peter Scott Centre** The Waterways Renaissance Awards BURA and The Waterways Trust Heritage and Conservation Award Winner • **Makins Court** The National HomeBuilder Design Awards Commendation for Best Retirement Development • **Lawfords Wharf**, London The National HomeBuilder Design Awards Commendation for Best Small Housing Development • JTP Architect of the Year Awards Runner up • **Charter Quay**, Kingston Upon Thames Building for Life Gold Standard Award • **Gunwharf Quays** The National HomeBuilder Design Awards Best Mixed-use Development Commendation for Best Use of a Brownfield Site • **The Village at Caterham** The Deputy Prime Minister's Award for Sustainable Communities Finalist • **Queen Elizabeth Park** The Evening Standard Awards 2003 Best Three Bedroom House & Best Home of the Year • **Makins Court**, Winchester Alresford Society Rosebowl Winner • **Kew Riverside** Bentley International Property Awards Best UK Development Best Architecture (5 star rating) • **Kew Riverside** What House? Award Gold Winner for Best Development • **Charter Quay** The Waterways Renaissance Awards Commendation for Riverside Regeneration Project, The National HomeBuilder Design Awards Best Mixed-Use Development • **The Village at Caterham** The European Urban and Regional Planning Awards 2002 Conversion (Joint Winner) • **Charter Quay** Association of Town Centre Management Annual Awards Best Town Centre Mixed-use Development • **The Village at Caterham** BURA Community Award Caterham Barracks Community Trust • **The Village at Caterham** The RTPI National Awards for Planning Achievement Award for Planning for the Whole Community • **Peter Scott Centre** RICS Award for Regeneration, Silver Unicorn Award from the British Guild of Travel Writers for UK Best New Tourist Attraction, Tourism for Tomorrow Global Winner for Sustainable Tourism • **Freiman Frankfurter** Allgemeine Zeitung Award for Planning Innovation • **Berlinerplatz**, Essen, Germany Robert Jung Prize • **Barnes Waterside** What House? Award Best Luxury Housing Development

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We continue to ensure that our accreditations, memberships, awards and affiliations reflect the importance we place on our people, our clients, and our collaborators in the delivery of great places.



JTP Chartered Practice Registration Number 2249624P



JTP Royal Institute of Architects Scotland Chartered Practice Services Number 2363



JTP is a member of the NLA. The organisation is a focus for the debate and discussion of issues facing architecture, planning, development and construction in the capital.

[www.newlondonarchitecture.org](http://www.newlondonarchitecture.org)



JTP is a supporter in kind of The Academy of Urbanism which brings together a group of thinkers and practitioners involved in the social, cultural, economic, political and physical development of our villages, towns and cities.

[www.academyofurbanism.org](http://www.academyofurbanism.org)



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[www.thefirstmile.co.uk](http://www.thefirstmile.co.uk)

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[www.changeworksrecycling.co.uk](http://www.changeworksrecycling.co.uk)



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JTP was named in the Sunday Times 100 Best Small Companies to Work For 2018, placed at number 73 in our inaugural entry to the prestigious list. The top 100 employers are determined by employee feedback collected via an anonymous survey, against eight factors of workplace engagement and satisfaction.



JTP was awarded Employer of the Year at the 2012 AJ100 Awards.

The award recognises staff satisfaction, workplace culture, benefits and staff turnover.



JTP was awarded Masterplanning and Public Realm Architect of the Year Awards 2016.

The awards reward the practices responsible for the best overall body of work in 13 different categories.



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JTP is a member of the Green Register of Construction Professionals.

Joining a list of practitioners working towards addressing key issues relating to sustainability in the built environment.

jtp

## Latham, James

---

**From:** Riddle, Siobhan  
**Sent:** 16 October 2018 09:31  
**To:** Gilson, Susannah  
**Subject:** FW: Email 2 of 2: Hereford Area Plan - Consultation response on behalf of Church Commissioners for England [NLP-DMS.FID337958]  
**Attachments:** Hereford Site Promotion 1\_181015\_M.PDF

Hi Sooz

Could save the email with this rep so we know to look at the correct plan.

Regards

Siobhan

---

**From:** ldf  
**Sent:** 15 October 2018 15:37  
**To:** Gilson, Susannah <Susannah.Gilson@herefordshire.gov.uk>  
**Cc:** Riddle, Siobhan <Siobhan.Riddle@herefordshire.gov.uk>  
**Subject:** FW: Email 2 of 2: Hereford Area Plan - Consultation response on behalf of Church Commissioners for England [NLP-DMS.FID337958]

See attached email

Regards

Kev

---

**From:** Beth Evans [<mailto:beth.evans@lichfields.uk>]  
**Sent:** 15 October 2018 15:24  
**To:** ldf <[ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)>  
**Cc:** Pauline Roberts <[pauline.roberts@lichfields.uk](mailto:pauline.roberts@lichfields.uk)>; Victoria Barrett <[victoria.barrett@lichfields.uk](mailto:victoria.barrett@lichfields.uk)>  
**Subject:** RE: Email 2 of 2: Hereford Area Plan - Consultation response on behalf of Church Commissioners for England [NLP-DMS.FID337958]

Dear Sir/Madam

Further to the below, please find attached a slightly tweaked version of the Land at Huntington and Land North of Lower Hill Farm Vision Document. This has been updated to reflect that Cotts Farm (included in the Land north of Lower Hill Farm (Thr23) site) is not in the Church Commissioners for England's ownership.

Please could you substitute the version we sent on Friday with this one attached?

Many thanks,

Kind regards  
Beth

**Beth Evans**  
**Senior Planner**  
Lichfields, 14 Regent's Wharf, All Saints Street, London N1 9RL  
T 020 7837 4477 / M 07557392800 / E [beth.evans@lichfields.uk](mailto:beth.evans@lichfields.uk)



# Hereford

Vision Document  
Land at Huntington and Land  
North of Lower Hill Farm

October 2018



View from north of Lower Hill Farm site looking north towards Hereford



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**THE CHURCH  
COMMISSIONERS FOR  
ENGLAND**  
Land Owner



**JTP**  
Masterplanners



**WYG**  
Drainage Consultants



**LICHFIELDS**  
Planning Consultants



**EDP**  
Environmental Consultants



**COTSWOLD  
ARCHAEOLOGY**  
Heritage and Archaeology



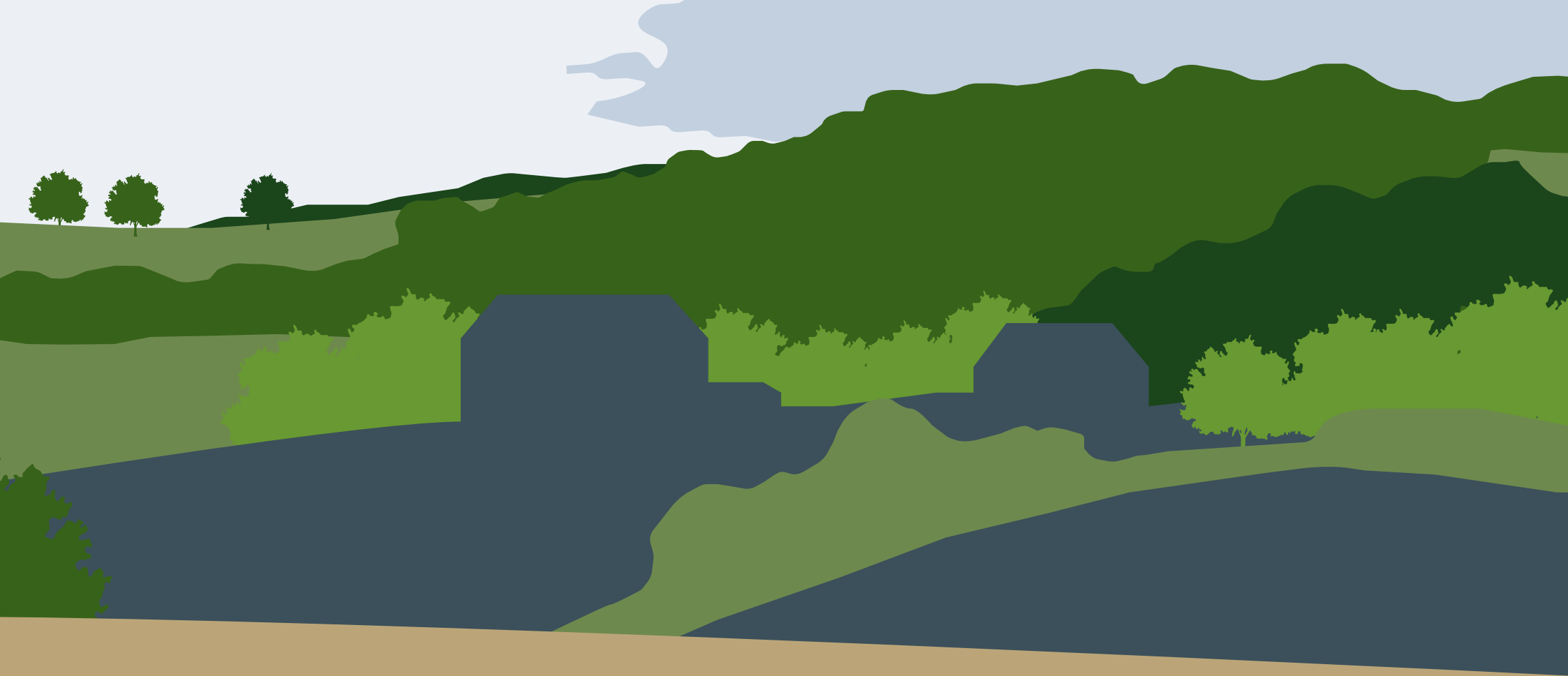
**PELL FRISCHMANN**  
Transport Planning

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1.



# Introduction

# 1\_Introduction

## Planning Context

### INTRODUCTION

This document has been prepared on behalf of The Church Commissioners for England, who own significant land holdings around Hereford, in Herefordshire.

The document reviews the following sites proposed as part of the Hereford Area Plan Housing and Employment Site Options consultation document which is being consulted on until 8 October 2018. Both sites are located wholly within CCE's ownership:

1. Site THR26a – Land at Huntington
2. Site THR23 – Land north of Lower Hill Farm

The Hereford Area Plan (HAP) will set out detailed proposals to ensure the delivery of the housing 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 purpose of this Vision Document is to demonstrate that the site is suitable, available and developable and can make a significant contribution to helping Herefordshire Council meet its housing requirements over the plan period. It presents a concept masterplan for the site, informed by various technical evidence documents to demonstrate how sustainable development can be delivered in this location. The opportunity to deliver residential development on this land will be opened up by the proposed bypass and can either be delivered as a standalone site, or together with the adjacent site if this were to come forward. The sites are available to come forward subject to sufficient capacity on the road network following the delivery of the river crossing as part of the bypass.

The following sections include analysis of the two sites and surrounding context, including identification of constraints and opportunities. It sets out a vision for new neighbourhoods

in these locations illustrated by the concept masterplans.

The analysis set out within this document has been informed by baseline technical reports prepared by the consultant team:

1. Lichfields: planning consultants
2. Pell Frischmann: highways engineers
2. WYG: flood risk and drainage, geo-environmental
3. Cotswolds Archaeology: heritage appraisal
4. EDP: Landscape & visual appraisal, ecology

### PLANNING CONTEXT

The statutory development plan for Herefordshire comprises the Herefordshire Local Plan Core Strategy (adopted 2015) and the Minerals and Waste policies of the Unitary Development Plan (adopted 2007, saved in 2010).

Herefordshire Core Strategy Policy HD1 sets a minimum housing target of 6,500 within Hereford between 2011 and 2031. Taking into account the strategic site allocations, there is a remaining residual requirement for 3,200 homes to be provided through the implementation of existing commitments, windfall development and non-strategic sites to be allocated within the Hereford Area Plan.

The site is subject to the following designations in the Statutory Development Plan:

1. Site THR26a – Land at Huntington  
Safeguarding Mineral Reserves
2. Site THR23 – Land north of Lower Hill Farm  
Safeguarding Mineral Reserves  
Local Wildlife Sites of Importance for Nature Conservation

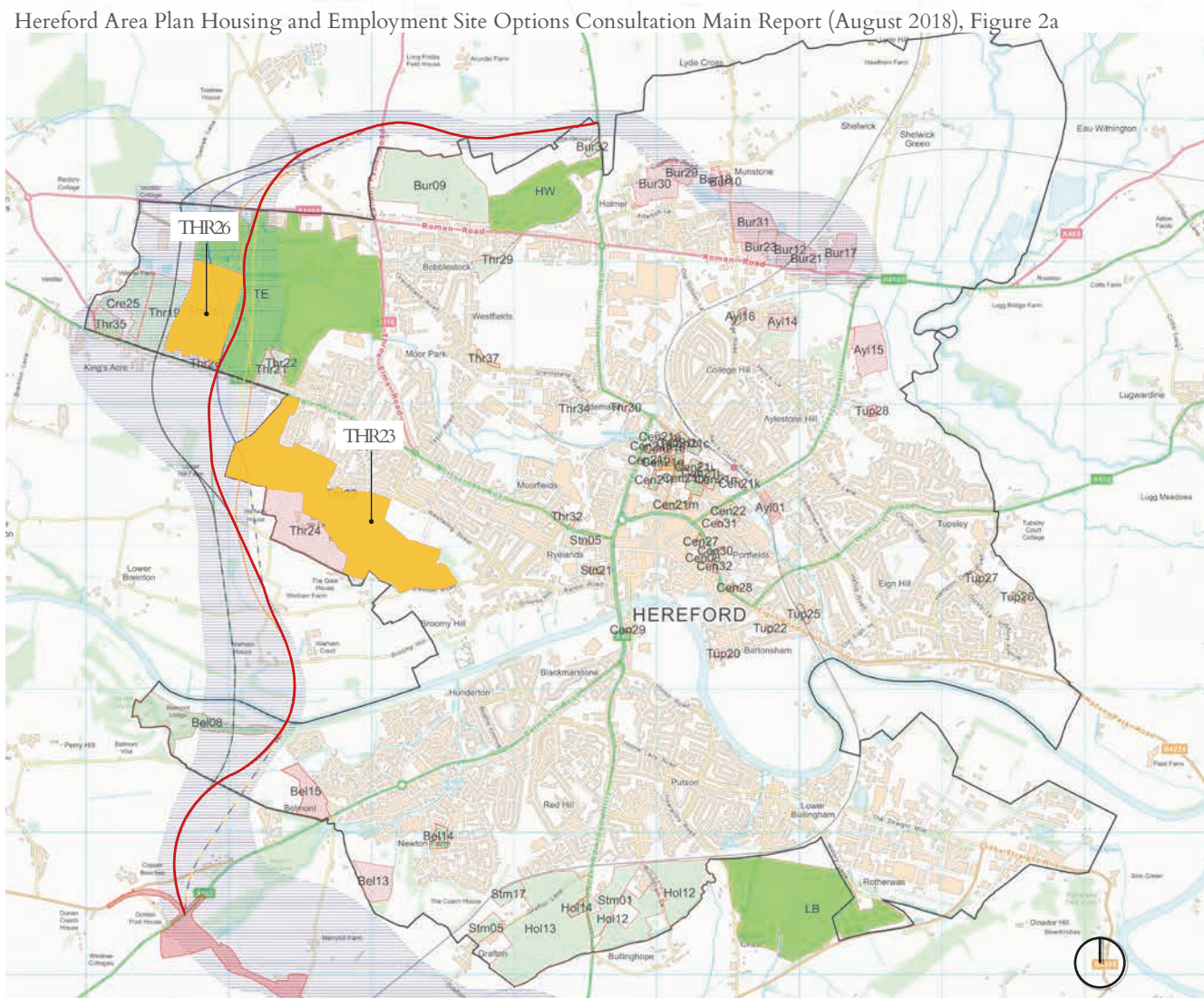
The revised National Planning Policy Framework (NPPF) was published in July 2018 and sets out the Government's planning policies for England. Chapter 5 focuses on delivering a sufficient supply of homes and paragraph 59 recognises that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. In addition, paragraph 72 recognises the importance of larger scale development in delivering the supply of a large number of homes and states that strategic policy-making authorities should identify suitable locations for such development where it can help to meet identified needs in a sustainable way. In rural areas, planning policies should support housing development that reflect local needs (paragraph 77).

There is no relevant planning history on either site.








With regards to site Thr26a, the emerging Three Elms development provides important context. This comprises the Western Urban Expansion allocated by Core Strategy Policy HD5 (planning application reference 162920) and is located immediately to the north and east of the site. An outline planning application is currently pending for 1,200 new homes, 10ha employment land and a neighbourhood community hub (ref. 162920). 580 dwellings are proposed as phase 1 to be delivered prior to the delivery of the bypass with the remaining 620 dwellings to be delivered as a later phase in July 2018, the Councils preferred route for the western part of the bypass was published and is located at the western edge of the Three Elms development.

# 1\_Introduction Planning Context

Hereford Area Plan Housing and Employment Site Options Consultation Main Report (August 2018), Figure 2a

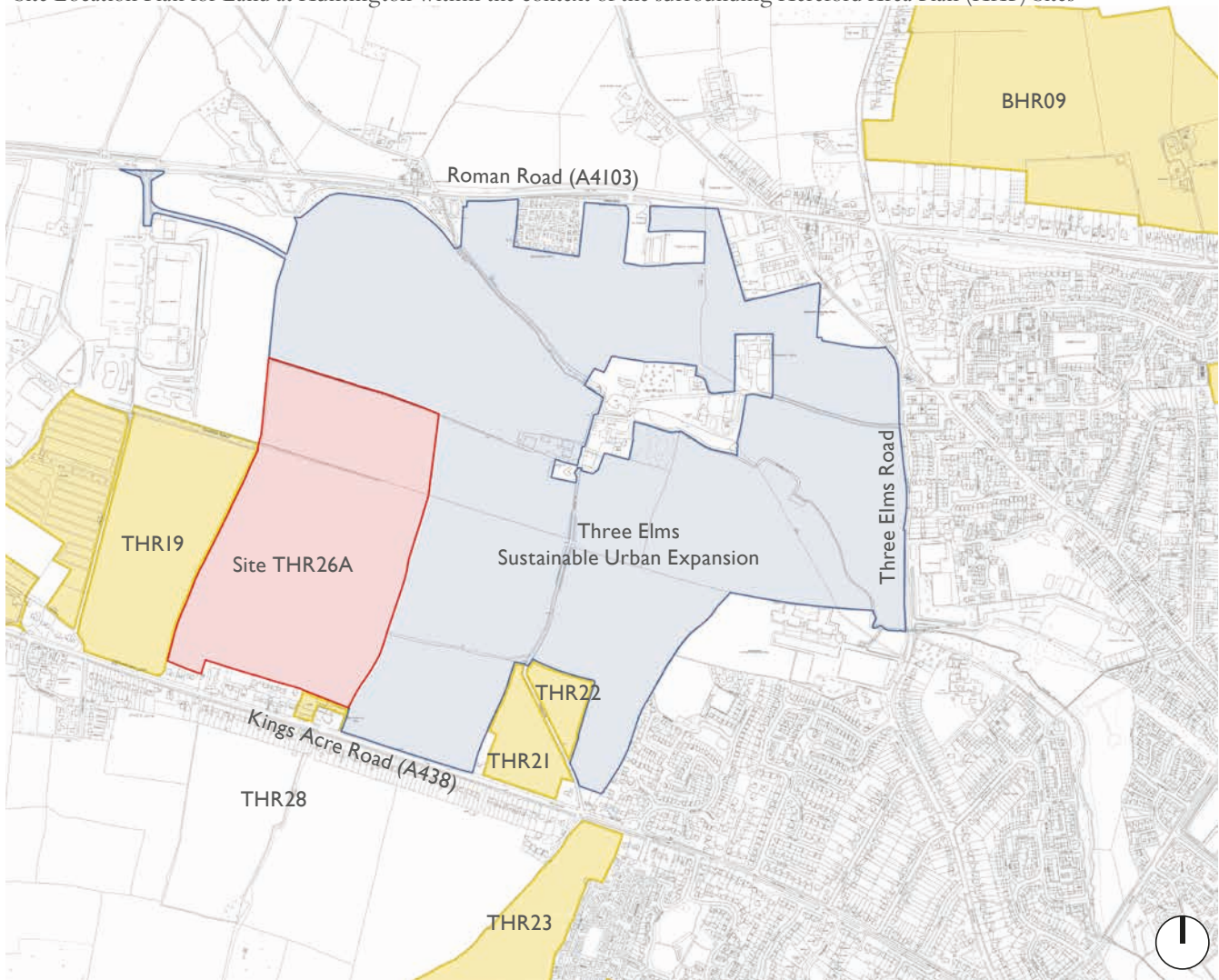


## Key

-  HAP Boundary
-  HAP Potential Site
-  HAP Discounted Site
-  Road Corridor
-  Southern Link Road
-  Preferred bypass route
-  Site THR26a and THR23

# Site Location

Site Location Plan for Land at Huntington within the context of the surrounding Hereford Area Plan (HAP) Sites



## SITE THR26A - LAND AT HUNTINGTON

The site is located north of the Kings Acre Road (A438), 3km north west of Hereford city centre.

The site comprises 2 agricultural fields and is bounded by hedgerows on all sides. The site is approximately 24.98 hectares.

The site is located within a predominantly agricultural area. Residential housing and commercial land lie immediately south of the site with the residential area at Three Elms Road and proposed Three Elms Sustainable Urban Expansion located to the east of the site. An outline planning application for the Three Elms scheme has been submitted to Herefordshire Council for 1,200 homes, employment use, a neighbourhood centre and a primary school (ref.162920).

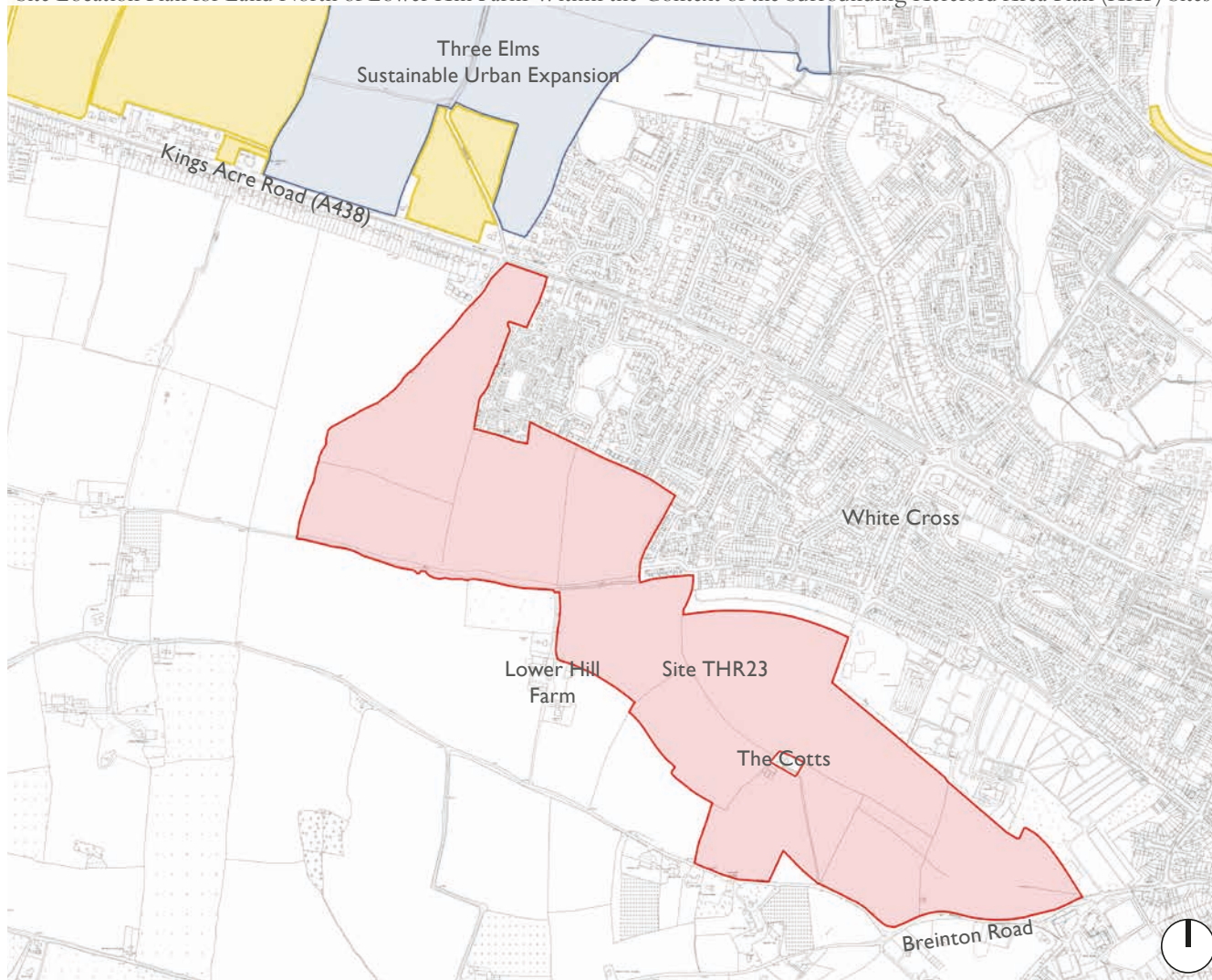
### Key

- Site THR26A (Land at Huntington)
- Other HAP Sites
- Three Elms Sustainable Urban Expansion



# Site Location

Site Location Plan for Land North of Lower Hill Farm Within the Context of the Surrounding Hereford Area Plan (HAP) Sites



## SITE THR23 - LAND NORTH OF LOWER HILL FARM

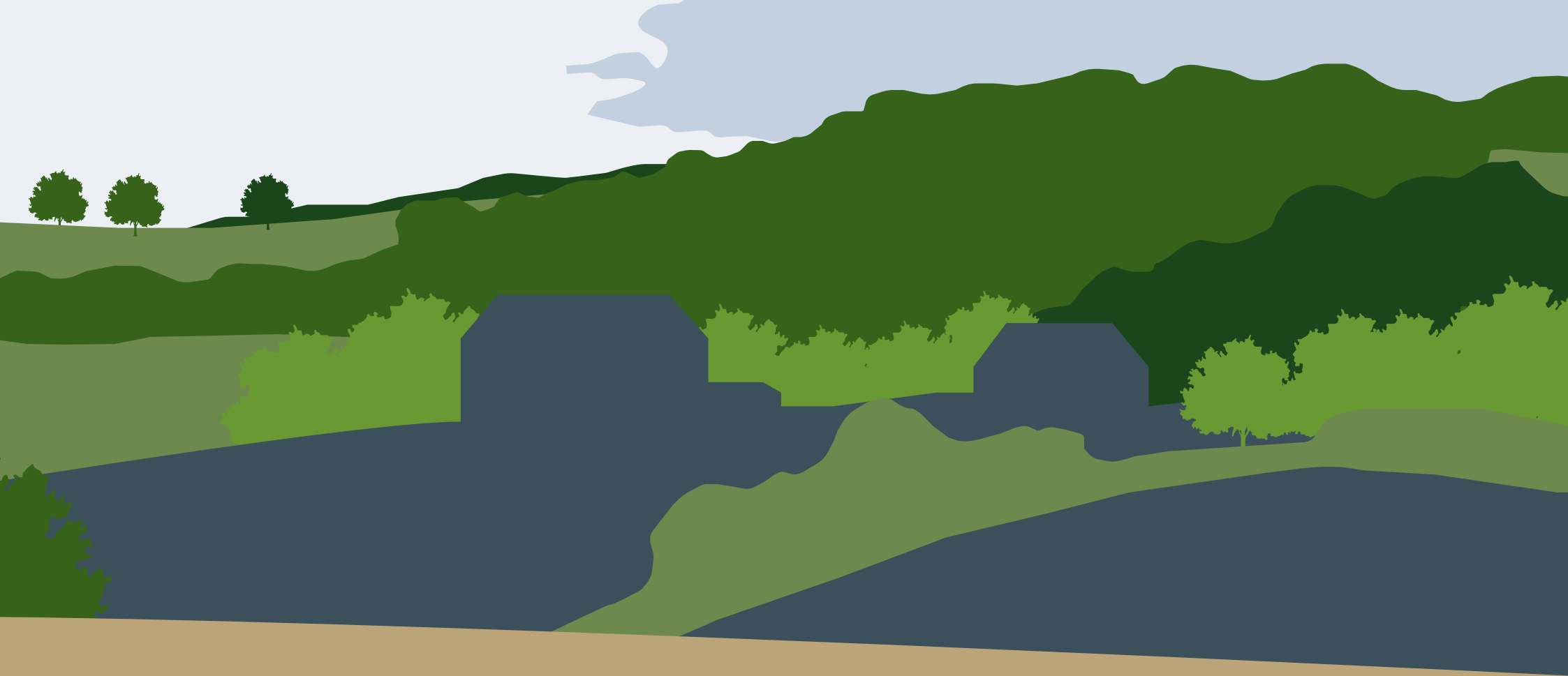
The site is located south of the Kings Acre Road (A438), 1km east of Hereford city centre.

The site comprises a number of agricultural fields separated largely by hedgerows. A road/track crosses the centre of the site running approximately east to west. Lower Hill Farm lies to the south of the site and The Cotts agricultural property is located within the south east portion of the site. These are both outside of the Commissioners ownership. The site comprises an area of approximately 61.79ha.

The site is located within predominately agricultural land to the west and south of the site, and predominately residential land and allotments to the north and east. A Crematorium and Cemetery is located along the eastern boundary of the site and a water works is located to the south.

### Key

- Site THR23 (Land North of Lower Hill Farm)
- Other HAP Sites
- Three Elms Sustainable Urban Expansion



2.



*Site one -*  
Land at Huntington,  
King Acres Road

## 2\_Land at Huntington Aerial Photo

Aerial Perspective for Land at Huntington Within the Context of Hereford City



## 2\_Land at Huntington Site Photos

View along Kings Acre Road looking east



Local vernacular along Kings Acre Road



View across fields to the east of the site



View towards the site from the west



View north of the site to housing on Roman Road



Nursery greenhouses to the west of the site



## 2\_Land at Huntington

# Landscape Analysis of the Site

### SITE DESCRIPTION

The site consists of two arable fields in active use bound and separated by hedgerows which are failed and support no notable mature standard trees. The context of the site is due to change in the coming years as a result of the delivery of the Three Elms Sustainable Urban Expansion (SUE) and western section of the Hereford Bypass relief road immediately to the north and east of the site.

It is considered that the site displays a degree of landscape features which are noted as typical within the surrounding landscape character type. The site is perceived as a land parcel on the settlement edge of Hereford with existing residential development on Kings Acre Road clearly discernible.

Direct views of the site's interior are possible from adjoining and nearby residences situated to the south of the site along Kings Acre Road; direct views are possible from the small cluster of residences to the northeast of the site on Huntington Lane (approximately 0.4km northeast of the site at its closest point); and there are also direct views possible on the public right of way to the west of the site (approximately 0.25km west of the site at its closest point).

View of Land at Huntington Site



## 2\_Land at Huntington Landscape Analysis of the Site

Landscape Analysis Plan for Land at Huntington



EDP has reviewed the site from a landscape perspective. EDP considers that the site has a relatively intact landscape character which is of medium quality; although due to the location at the urban edge there are landscape detractors. The site is perceived as a land parcel at the outer settlement edge of Hereford and is not deemed as a valued landscape enhancement. It is considered that the existing landscape fabric within the site could provide opportunities to mitigate the emerging development.

Overall, in principle the development of the site would be acceptable from a landscape perspective with an appropriate design strategy and mitigation, such as landscape buffering at the southern edge.

### Key

- Site Boundary
- ➔ Direct views of the site
- - - ➔ Filtered views of the site
- ⋯ Filtered views of the site from local landmark (site is seen against the wider urban context of Hereford)
- ~ ~ ~ Sensitive residential edge with direct views of the site
- - - - - Public Right of Way
- - - - - Roadway with filtered views of the site
- Roadway where the site is screened by existing mature landscape and / or built form

## 2\_Land at Huntington

# Constraints & Opportunities

The technical team has reviewed the proposed site allocation to shape the masterplan. This section provides an overview of the key technical studies and the opportunities and constraints that are present in this location.

### ACCESS & MOVEMENT

The site is located to the north of Kings Acre Road (A438) although has no direct highway frontage. Bus stops located on Kings Acre Road are served by bus routes 71, 71A, 71A, 446, 461, 462 and X15 providing public transport links to Hereford, Almeley, Credenhill, Llandrindod Wells, Kington and Weobley.

There are no existing public rights of way through the site, however the adjacent Three Elms Sustainable Urban Expansion proposes a footpath link along the dismantled railway line which extends through the site. There is potential to continue this footpath link through the Land at Huntington site.

Due to the site's capacity and the quantum of development that could be delivered, it is considered that two access points would be required. The proposed Hereford Bypass indicative alignment passes the eastern boundary of the site and this provides the opportunity to potentially gain access to the site. The exact locations of the accesses will need to be determined through further study and will likely need to be designed in accordance with Design Manual for Roads and Bridge standards. There is potential to provide a highway link through the neighbouring site to the west (THR19), if allocated, connecting to Kings Acre Road (A438) and also potential to deliver a footpath cycle link through proposed site THR28 from the site to Kings Acre Road (A438).

The site is in a sustainable location in terms of accessibility, and following the delivery of the river crossing as part of Hereford Bypass it is considered that there should be sufficient capacity in the road network for the development of this site.

### ECOLOGY

There are no statutory ecological designations within the site or immediately adjacent.

The River Wye Special Area of Conservation (SAC), also designated as a Site of Special Scientific Interest (SSSI), is located south of the site within a 5km distance. The closest point of the SAC is approximately 1.9km away from the site but is likely to be within the catchment of the River Wye via the Yazor Brook which lies north of the site.

There are no non-statutory designations within the site. However, it does lie within the catchment of nearby Local Wildlife Sites (SINC\_01 and SINC\_02). SINC\_01 comprises the Railway Line near Green Farm and is described as mostly bramble. SINC\_02 is the Yazor Brook and is recognised as an important habitat, albeit the spatial context will change following the Three Elms development.

In terms of the site itself, it comprises arable land in active use and mature hedgerows with significant standard trees. Other than the peripheral hedgerows the arable habitat is of negligible ecological note. The site is considered to have limited potential to support notable or protected species with any potential primarily associated with the boundary hedgerows and mature trees. Protected and notable species that the site could have limited potential to support include roosting bats and nesting barn owls, foraging and community bats, breeding birds, legally protected reptile species such as slow worm and common lizard, and badgers (although based on provisional walkover no incidental observations of badger setts were made). This potential is considered typical of this sort of arable land on the urban edge.

Mitigation for the loss of any habitats and the maintenance of any protected species would be achievable through appropriate design of development. In particular the following mitigation measures are recommended for any forthcoming scheme:

- The site should be subject to a Habitat Regulations Assessment Screening given its proximity to the River Wye SAC
- LWS SINC\_02: Drainage of the site should not adversely change the water quality and flow. This can be achieved through standard design and engineering solutions

- Retain, consolidate and enhance the peripheral hedgerows and associated mature trees
- Retain, consolidate and enhance line of the dismantled railway
- Deliver biodiversity gain where possible consistent with the published NPPF
- Species specific enhancement measures should be incorporated into schemes based on detailed surveys.

Overall, with the incorporation of appropriate mitigation measures, the development of the site is considered acceptable in principle from an ecological perspective.

### HERITAGE

There are no designated heritage assets within the site.

The site lies approximately 600m west of Huntington Conservation Area, which includes four Grade II Listed buildings. It is recommended that any forthcoming scheme is informed by an assessment of the setting of the Conservation Area, similar to the approach adopted for the Three Elms SUE. Overall, it is considered unlikely that the development would lead to any significant harm to the Conservation Area or its constituent heritage assets.

A listed bridge is located approximately 600m north-west of the site. The setting of the bridge will not be affected by the future proposals for the site.

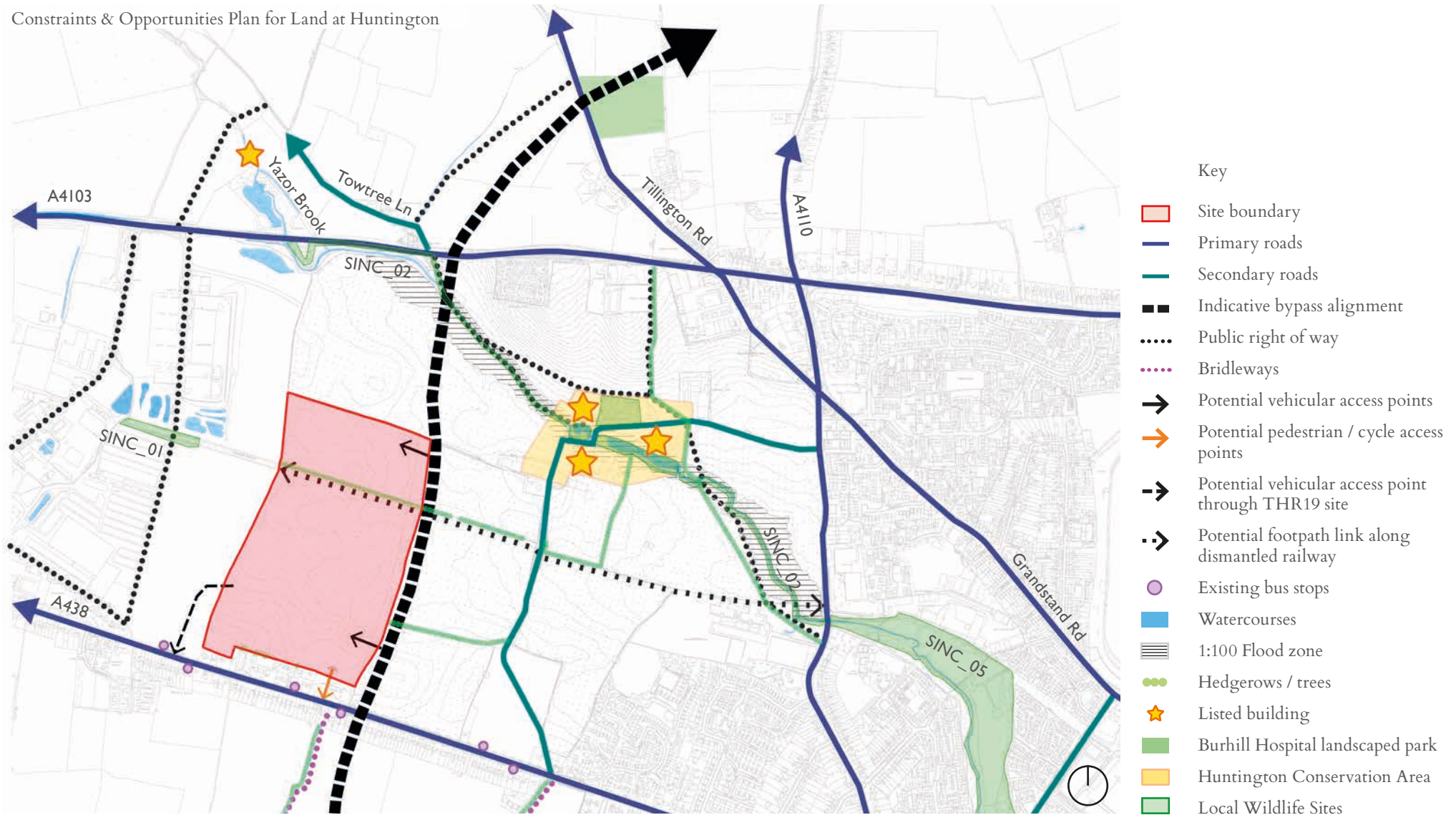
Burghill Hospital landscaped park lies approximately 1km northeast of the site and is unlikely to be sensitive to future proposals.

Overall, it is considered that from a heritage perspective the development of the site would be acceptable in principle, subject to appropriate mitigation and design measures.



## 2\_Land at Huntington Constraints & Opportunities

Constraints & Opportunities Plan for Land at Huntington



## 2\_Land at Huntington Constraints & Opportunities

### GEO-ENVIRONMENTAL

A preliminary geo-environmental data review has been completed which assesses the geology, hydrogeology, hydrology and radon of the site. There are no historic boreholes on the site and there are 12 boreholes within the vicinity of the site. The site is situated in close proximity to a number of licensed groundwater abstractions which draw water from the Yazor Gravels beneath the site. Similar to the adjacent Three Elms site, the Land at Huntington site would be viewed as sensitive hydrogeologically and it is recommended that a site-specific assessment is required.

A series of opportunities and constraints have been identified including:

- The site is predominantly underlain by Devensian Till which is considered to provide low permeability cover to the underlying Yazor Gravels and Raglan Mudstone aquifer limiting the migration of potential contamination
- Site conditions are likely to be suitable for low rise residential development with traditional foundations
- Groundwater levels are anticipated to be approximately 5m below ground level and should not impact shall excavations associated with future development
- A preliminary review indicates that there are no mineral reserves located on the site
- The site is within groundwater Source Protection Zone (GWSPZ) 2 which will require careful consideration
- The former railway track presents a potential source of Made Ground and the former Petrol Filling Station is immediately south of the site. These pose a potential contamination risk, albeit this is anticipated to be localised in nature
- The Yazor Brook and Raglan Mudstone bedrock are shown to be classified as Secondary A Aquifers which may be vulnerable to potential contamination from surface sources

View Along Kings Acre Road



## 2\_Land at Huntington Constraints & Opportunities

It is recommended that any future planning application is supported by a Hydrogeological Risk Assessment and a Desk Top Study including a CIRIA 552 Compliant Risk Assessment. As the ground conditions are anticipated to be similar to the adjacent Three Elms development site, it is considered likely that a robust risk assessment could be developed for the site. Overall, it is considered that development of the site would be acceptable, subject to appropriate mitigation measures.

### FLOODING AND DRAINAGE

The site is entirely in Flood Zone 1 and at low risk of flooding from surface water, overland flows, sewers, groundwater and reservoir failure. Therefore, it is considered that there are no constraints for the residential development of the site from a flood risk perspective and no specific flood risk mitigation works will be required.

It is considered that an acceptable surface water drainage strategy can be achieved on site. It is located within GWSPZ 2, but taking into account infiltration testing in the adjacent Three Elms site, it is considered that infiltration testing could be used, subject to consultation with the EA. Alternatively, if infiltration is not acceptable, then a new surface water sewer through the Three Elms site discharging to the brook could be constructed. The site does not present any obvious constraints for the implementation of a Sustainable Drainage System (SuDS) and it is considered that a variety of SuDS elements can be introduced in the proposed drainage system of the site to provide the required attenuation volumes and an element of water quality treatment. A SuDS management train would provide the required level of treatment to surface water runoff prior to infiltration into the GWSPZ.

An initial attenuation requirement of approximately 860 m<sup>3</sup> per hectare of impermeable land has been estimated, based on the pre-development greenfield Q<sub>bar</sub> (mean annual maximum flow rate) rate of 1.71 l/s per hectare.

Consideration has also been given to foul drainage. It is considered that foul drainage connection can be achieved to serve the proposed development and an engagement with Welsh Water is required to inform a forthcoming scheme.

A Flood Risk and Drainage Assessment is recommended to support any future planning application and infiltration testing should be undertaken to confirm the viability of infiltration systems within the site. SuDS elements should be incorporated into the site masterplan and to any surface water drainage proposals. During the course of the design process engagement with Welsh Water, the Lead Local Flood Authority and the EA is recommended.

# 2\_Land at Huntington Concept Masterplan

The concept masterplan illustrates the potential for residential development west of the proposed Hereford Bypass. Indicative access is shown off the bypass to the north of the site and an additional potential access via the adjacent site to the west (THR19) providing a link to Kings Acre Road. Employment use is proposed on the land to the north of the site, there is an opportunity to provide a vehicular connection north to the Roman Road (A4103).












The masterplan shows green corridors east west through the site linking to green routes through the Three Elms SUE. There is potential to provide a footpath/cycle route along the dismantled railway line linking to Three Elms Road on the existing urban edge of Hereford.

Residential parcels set within a network of green linkages and spaces have the potential to deliver circa 400 new homes.

## CONCLUSION

Land North at Huntington provides an excellent opportunity to provide residential development and make a significant contribution to helping Herefordshire Council meet its housing requirements over the plan period. The Vision Document demonstrates that the site is suitable, available and developable. It presents a concept masterplan for the site, informed by various technical evidence documents to demonstrate how sustainable development can be delivered in this location.

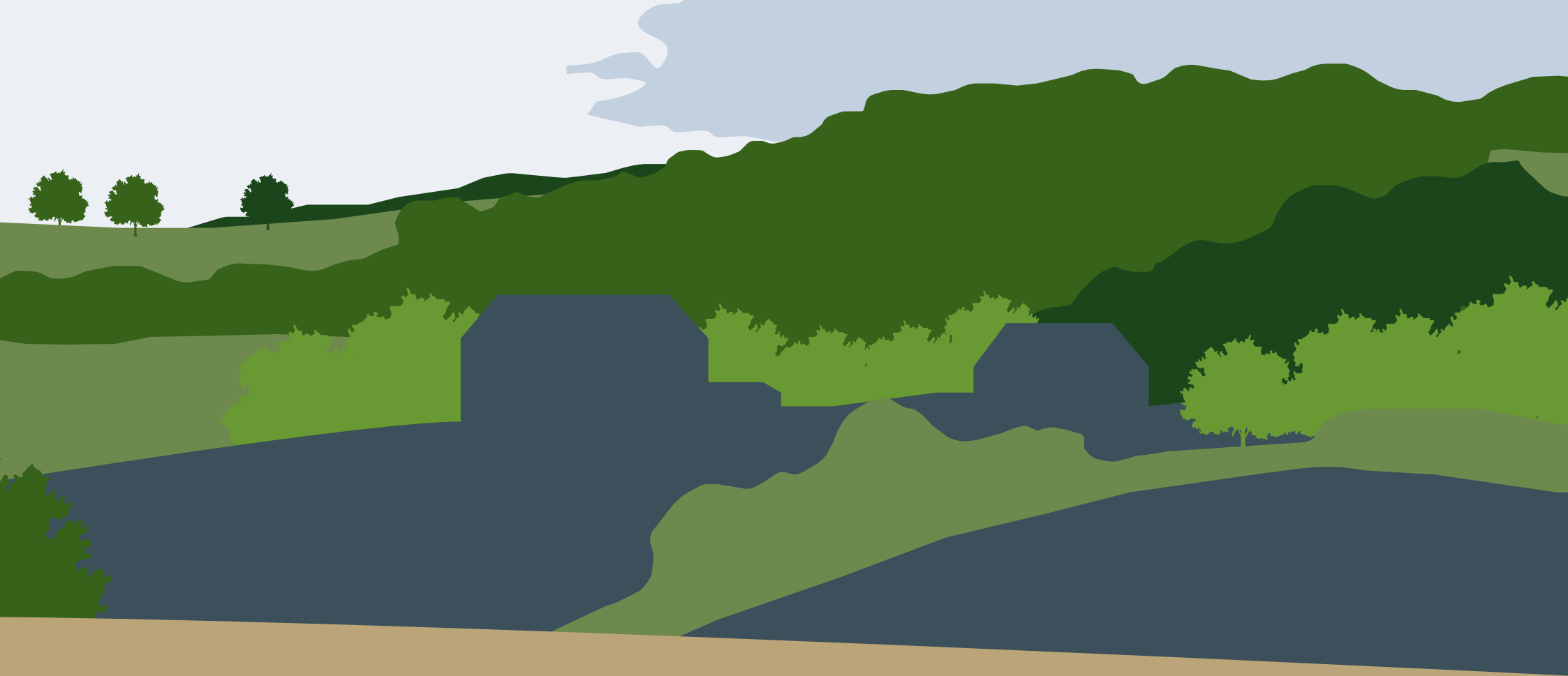
## Key

-  Existing roads
-  Proposed primary route
-  Potential alignment of proposed Hereford bypass
-  Potential vehicular access point through THR19 site
-  Public right of way/footpath
-  Proposed residential development
-  Proposed Three Elms employment development
-  Proposed public open space
-  Trees and hedgerow
-  Green corridors
-  Site Boundary

## LAND BUDGET

Site Area	24.98 ha
Residential	13.58 ha
Open Space	9.54 ha
Infrastructure	1.86 ha
New Homes:	400 (at ave. 30 dph)





3

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*Site two—*  
Land North of  
Lower Hill Farm

# 3\_Land North of Lower Hill Farm Aerial Photo

Aerial Perspective for Land North of Lower Hill Farm Within the Context of Hereford City





# 3\_Land North of Lower Hill Farm Site Photos

View from Kings Acre Road looking south across the site



View of houses backing onto the northern site boundary



Pond at the north of the site, at Kings Acre Road



View along Kings Acre Road with site to the right of the view



View from southern boundary of site looking towards Whitecross



View from Lower Hill Farm looking east



### 3\_Land North of Lower Hill Farm

# Landscape Analysis of the Site

#### SITE DESCRIPTION

The site consists of multiple arable fields bound and divided by a well-connected network of hedgerows. In some places the hedgerows form green lanes and there are several standard trees within fields. A small number of ponds are located within the site and there are also ponds evident within the wider landscape close to the site. The northern edge of the site borders existing residential development; including a cemetery and allotment. There is a small farm-stead, The Cotts, located in the south eastern part of the site.

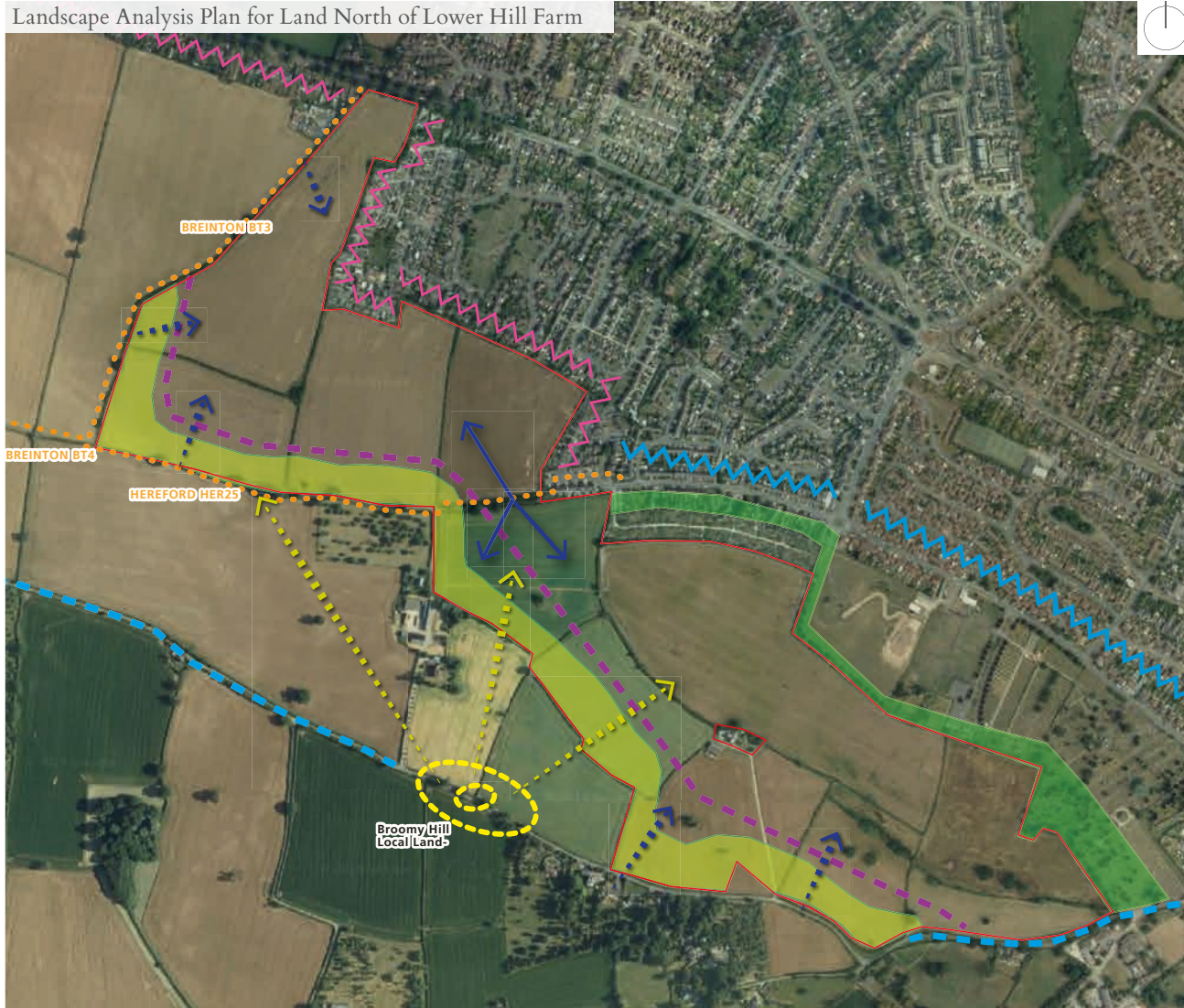
There are direct views of the site at close range from existing residences adjoining the site's western and north-western edge; there are direct views from the public right of way which passes through the site and there are direct views from elevated landform to the south of the site.

View of Land North of Lower Hill Farm Site



# 3\_Land North of Lower Hill Farm Landscape Analysis of the Site

Landscape Analysis Plan for Land North of Lower Hill Farm



EDP concludes that from a landscape perspective there are no in principle constraints to the development of the site. Recommended mitigation measures include landscape buffering along the southern and western edge of the site to:

- Create a defensible edge to expand the settlement edge southwards, which combined with the rising landform at this point would contain and limit the discernibility of the development from the wider, more open landscape;
- To buffer off views of the northern site area when viewed from locally higher landform and the local landmark around Broomy Hill;
- To ensure new built form does not break the skyline when view southwards and westwards from the existing urban edge; and
- This landscape buffer should wrap around to the east to limit the perception of the wider development when viewed from existing development to the west and northwest of the site i.e. Kings Acre Road.

### Key

- Site Boundary
- ➔ Direct views of the site
- - - ➔ Filtered views of the site
- - - ➔ Filtered views of the site from local landmark (site is seen against the wider urban context of Hereford)
- ~ ~ ~ Existing urban edge with only filtered views of the site area. Residential curtilage in these zones are quite raw and exposed
- ~ ~ ~ Existing urban edge with filtered and / or screened views of the site area
- - - Vehicle routes where site is predominantly screened or heavily filtered
- Landscape buffer required to filter and screen views of the site
- Existing woodland and landscape feature filter and screen views of the site
- Potential zone of development (based on landscape and visual constraints)
- - - - Public Right of Way

## 3\_Land North of Lower Hill Farm

# Constraints & Opportunities

The technical team has reviewed the proposed site allocation to shape the masterplan. This section provides an overview of the key technical studies and the opportunities and constraints that are present in this location.

### ACCESS & MOVEMENT

The site is located off the Kings Acre Road (A438) with bus stops adjacent to the site served by bus routes 71, 71A, 71A, 446, 461, 462 and X15 providing public transport links to Hereford, Almeley, Credenhill, Llandrindod Wells, Kington and Weobley. A bus stop adjacent to the site on Breinton Road is served by bus route 436 which provides a single service each day between Swainshill and Hereford.

There is an existing bridleway which crosses the site from Stephens Close in White Cross across the site to Upper Hill Farm and continues west to the countryside beyond. A bridleway along extends along the western boundary of the site connecting to Kings Acre Road.

The site has the capacity to provide a quantum of new homes which requires two points of access, there is potential to deliver a point of access off Kings Acre Road (A438) and an secondary point of access off Breinton Road. The proposed Hereford bypass indicative alignment passes the western boundary of the site. The proposed layout for the site should allow for the potential to provide a road connection to the bypass in the future. The site is in a sustainable location and is available to come forward following an assessment of the road network capacity and delivery of the river crossing as part of the bypass.

### ECOLOGY

The site is not covered by any non-statutory designations. However, two Local Wildlife Sites (LWS) can be found within the site, namely LWS SINC\_35 consisting of several small ponds and LWS SINC\_37 comprising a short green lane at the western end of Westfaling Street. A further two LWS are located immediately adjacent, including a farm pond at Lower Hill Farm (SINC\_36) and 'Land at end of Green Lane' (SINC\_38) which

appears to be an orchard. Other Local Wildlife Sites can be found within the vicinity, including the Kings Acre Reserve.

The various field parcels are divided by a strong and well-connected network of hedgerows which are likely to include those which are considered ecologically important. There are also several mature standard trees, predominantly oak, both associated with the hedgerows and as stand-alone field trees. Overall, it is a typical agricultural landscape of the edge of Hereford and the fields are likely to be of negligible ecological value with the hedgerows, standard trees, ponds and green lane of greater local value. Protected or notable species that the site could have potential to support include roosting bats and nesting barn owls, foraging and community bats, breeding birds, legally protected reptile species such as slow worm and common lizard, badgers, amphibians including great crested newts due to the presence of ponds.

Mitigation for the loss of any habitats and the maintenance of any protected species would be achievable through appropriate design of development. In particular the following mitigation measures are recommended for any forthcoming scheme:

- The site should be subject to a Habitat Regulations Assessment Screening given its proximity to the River Wye SAC
- Retention of LWS SINC\_35 with a buffer of natural green space and connectivity enhanced with the land to the south
- Retention of LWS SINC\_37 with a buffer of natural green space and explore the opportunity to extend the green land feature westwards as part of a green infrastructure strategy
- Retention of LWS SINC\_36 with a buffer of natural green space
- Retention of LWS SINC\_38 and incorporation as part of the green infrastructure connectivity of the site
- The Kings Acre Reserve should inform the Green Infrastructure Strategy of the site
- Retain, consolidate and enhance the peripheral hedgerows, green lane and associated mature trees;

- Retain, consolidate and enhance the existing standard field trees;
- Retain, enhance and improve connectivity of the local network of ponds; including the design of any new ponds as part of the drainage strategy for the site;
- Deliver biodiversity gain where possible consistent with the NPPF; for example through habitat creation in the greenspaces such as the creation of an orchard
- Species specific enhancement measures should be incorporated into schemes based on detailed surveys.

Overall, with the incorporation of appropriate mitigation measures, the development of the site is considered acceptable in principle from an ecological perspective.

### HERITAGE

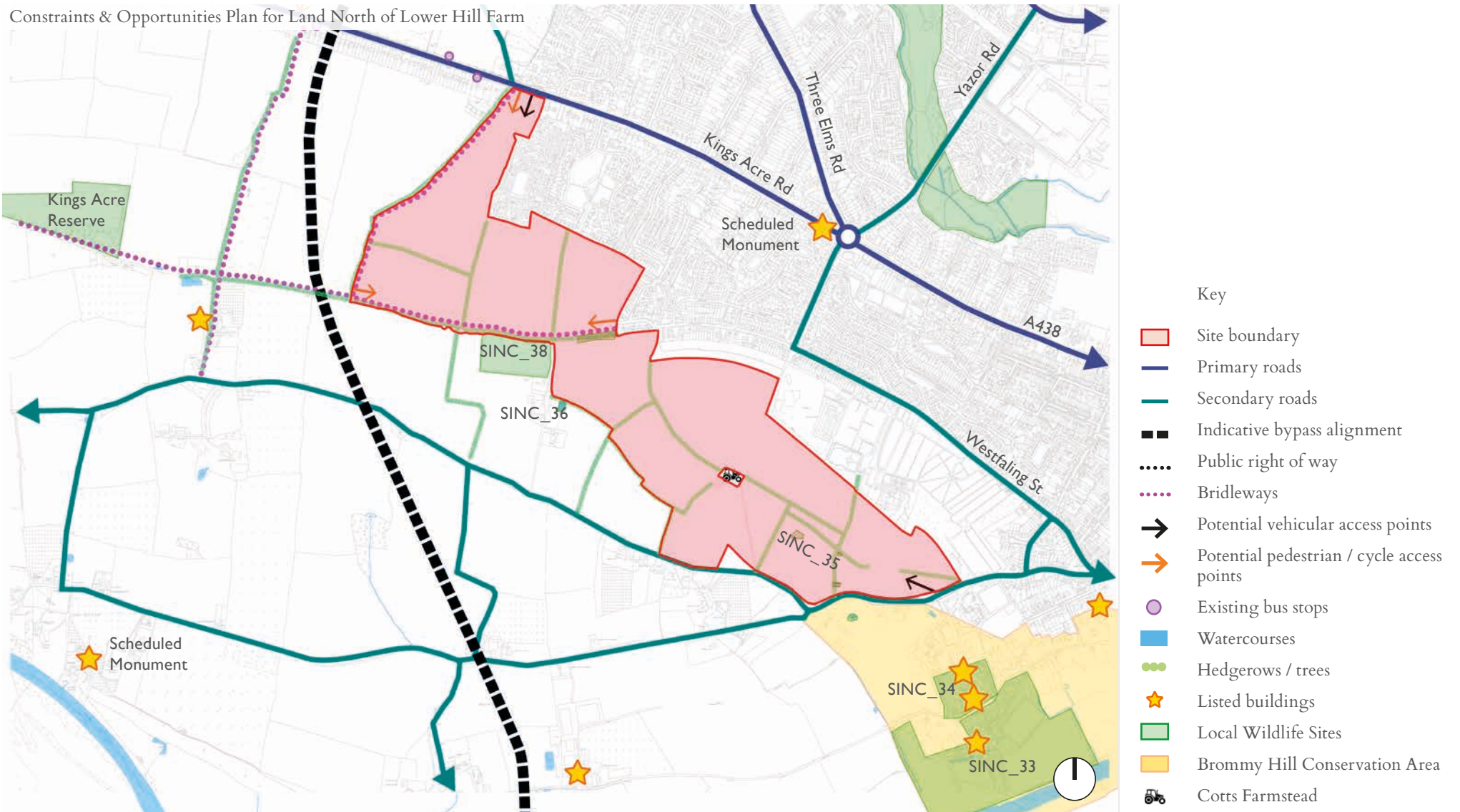
The site has no designated heritage assets. No significant archaeological remains are recorded in the site although finds have been made of a Bronze Age sword and dagger and Roman coins, illustrating general prehistoric and Roman activity in the area.

The setting of the Broomy Hill Conservation Area, located south-east of the site, should be considered when developing future proposals. The view of the Grade II listed water tower at the waterworks forms an important part of its setting. Key views should be assessed to determine the extent of the proposed development.

Within its wider context, there are Grade II listed buildings at Upper Hill Farm and a group of listed buildings and Scheduled Monument east of Breinton. The Grade II listed Warham Court lies to the south of the Site, and several listed buildings lie within urban development to the south-east at Broomy Hill, including the Grade II\* listed pumping station). Further groups of listed buildings to the east of the Site lie within a firmly urban context.

Overall, the principle of development at this site is considered to be acceptable from a heritage perspective.

# 3\_Land North of Lower Hill Farm Constraints & Opportunities



# 3\_Land North of Lower Hill Farm Constraints & Opportunities

## GEO-ENVIRONMENTAL

A preliminary geo-environmental data review has been completed which assesses the geology, hydrogeology, hydrology and radon of the site. The site is situated within the Yazor Gravels Aquifer Catchment area. The site is underlain by Glacial Till which is likely to thin towards the south and south-west of the site. The superficial sands and gravels (Yazor Gravels) are expected to underlie the Till but may not be saturated. They represent a potential pathway for recharge and contamination. Contamination impacts at the site are expected to infiltrate to ground and migrate northwards towards the saturated portion of the aquifer.

The northern extent of the site is adjacent to King Acres Road and near 6 No. groundwater abstraction boreholes owned and operated by Heineken which have an EA defined GWSPZ 1. Similar to the Three Elms site, it is expected that the site would be viewed as a sensitive hydrogeologically.

A series of opportunities and constraints have been identified including:

- The British Geological Society (BGS) GeoIndex dataset indicates that the site is predominantly underlain by Devensian Till which is expected to provide some protection to the underlying Yazor Gravel Aquifer and the Raglan Mudstone aquifer limiting the migration of potential contamination;
- Limited made ground is anticipated on site. Any potential contamination is likely to be localised, if present;
- Site conditions are likely to be suitable for low rise residential development with traditional foundations;
- Based on nearby historical boreholes, anticipated groundwater levels are likely to be approximately 5m below ground level and should not impact shallow excavations associated with future development;
- A preliminary review of the BGS GeoIndex indicates

there are no mineral reserves located on site;

- The site is located within the Yazor Gravels Aquifer Catchment area;
- The northern extent of the site is located within GWSPZ 1-3 due to the number of commercially important abstraction wells located adjacent to the north of the site Any future development in this area is considered to represent a potential risk to the underlying Yazor Gravels aquifer and these abstraction boreholes and would therefore require further assessment;
- The cemetery immediately north east of the site represents a potential source of contamination to shallow soils and groundwater underlying the site. Any impact is, however, anticipated to be localised in nature;
- The Till is thought to thin out towards the south of the site;
- The Yazor Gravels and Raglan Mudstone bedrock are classified as Secondary A Aquifers which may be vulnerable to potential contamination. In addition, the BGS indicates that there are areas of the site in the south east extent which are lacking superficial deposits which adds to the underlying aquifer vulnerability; and
- The south of the site is within a Drinking Water Protected Area for surface water features. Additional mitigation measures over and above standard good practice pollution prevention measures could potentially be required for construction activities.

## FLOODING AND DRAINAGE

The site is entirely in Flood Zone 1 and at low risk of flooding from, overland flows, sewers, groundwater and reservoir failure. In respect to surface water flooding, although the majority of the site is at low risk of flooding, there is a small area within the north western part of the site which is at a higher risk. It is considered that further investigation into this area would be appropriate to consider potentially mitigation

measures or alternatively this area could remain undeveloped and used for public open space. Overall, there are considered to be no constraints for residential development from a flood risk perspective.

The north western part of the site is partly within groundwater source protection zones 1, 2 and 3; and therefore infiltration may only be acceptable outside of source protection zones 1 and 2, subject to suitable ground conditions. Borehole records indicate ground conditions that indicate that infiltration may not provide a feasible discharge mechanism on Breinton Road. The following alternatives are presented to discharge surface water runoff:

- Infiltration outside the GWSPZ, subject to infiltration testing;
- Discharge to the nearest surface water sewers;
- New sewer under the public highway discharging to Yazor Brook to drain the western part of the site; and
- New sewer through third party land to an unnamed watercourse to the south east of the site to drain the eastern part of the site.

The site does not present any obvious constraints for the implementation of SuDS and it is considered that a variety of SuDS elements can be introduced in the proposed drainage system of the site to provide the required attenuation volumes and an element of water quality treatment.

An initial attenuation requirement of 860 m<sup>3</sup> per hectare of impermeable land has been estimated, based on the pre-development greenfield Q<sub>bar</sub> rate of 1.69 l/s per hectare.

Consideration has also been given to foul drainage. The area to the north of the site is urbanised and therefore there will be public foul sewers near the site boundary. It is considered that foul drainage connection can be achieved to serve the proposed development and an engagement with Welsh Water is required to inform a forthcoming scheme.

## 3\_Land North of Lower Hill Farm Constraints & Opportunities

A Flood Risk and Drainage Assessment is recommended to support any future planning application and infiltration testing should be undertaken to confirm the viability of infiltration systems within the site. SuDS elements should be incorporated into the site masterplan and to any surface water drainage proposals. During the course of the design process engagement with Welsh Water and the Lead Local Flood Authority is recommended.

View of Land North of Lower Hill Farm Site



# 3\_Land North of Lower Hill Farm

## Concept Masterplan

The concept masterplan illustrates the potential for residential development to the south of White Cross. Indicative access is shown off Kings Acre Road with a primary route through the site linking to Breinton Road.

An existing bridleway is retained through the site providing a footpath link to Stephens Close at White Cross.

The masterplan shows green corridors and green spaces which retain existing hedgerows and trees. The existing ponds (SINC 35) to the south east of the site have been retained within the proposed green network.










The Cotts farmstead is outside the Commissioners ownership and the masterplan will be sensitively designed to respond to the farmstead by seeking to preserve the current landscaping setting and safeguarding residential amenity.

The site has the potential to deliver circa 960 homes supported by a local centre and primary school, located centrally to ensure accessibility for existing and future residents.

### CONCLUSION

Land North of Lower Hill Farm provides an excellent opportunity to provide residential development and make a significant contribution to helping Herefordshire Council meet its housing requirements over the plan period. The Vision Document demonstrates that the site is suitable, available and deliverable. It presents a concept masterplan for the site, informed by various technical evidence documents to demonstrate how sustainable development can be delivered in this location.

### Key

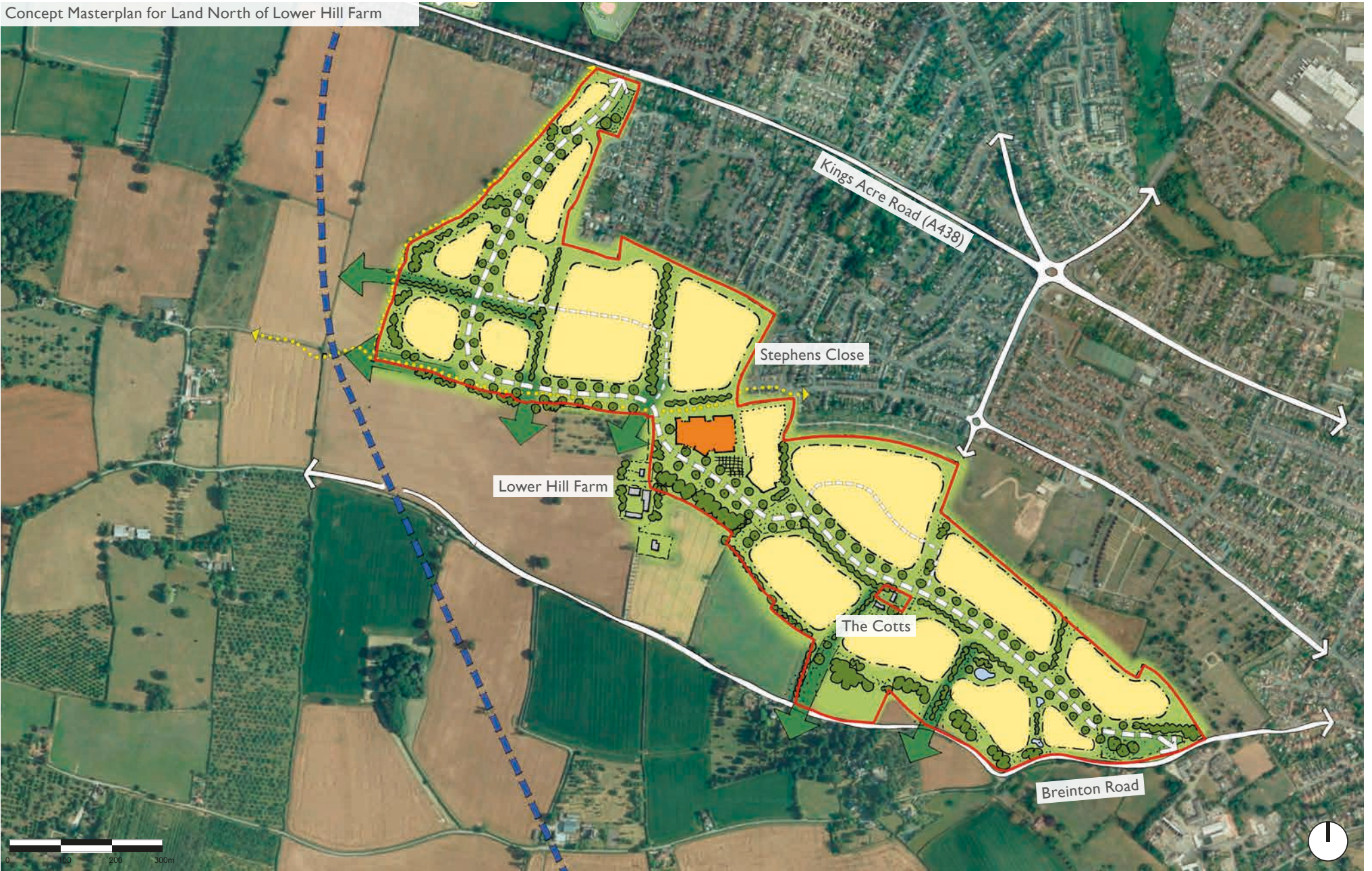
-  Potential alignment of proposed Hereford bypass
-  Existing roads
-  Proposed primary route
-  Public right of way/footpath
-  Proposed residential development
-  Proposed public open space
-  Trees and hedgerow
-  Green corridors
-  Proposed local centre
-  Site Boundary

### LAND BUDGET

Site Area	61.79 ha
Residential	32.25 ha
Open Space	24.37 ha
Infrastructure	4.62 ha
Local Centre	0.55 ha
New Homes	960 (at ave. 30 dph)



Concept Masterplan for Land North of Lower Hill Farm



# Our Success Awards

Our unique approach to placemaking has received high praise. JTP is the only architectural practice in the UK to have won eight Building for Life Awards, the national standard for well-designed homes and neighbourhoods.

In the last twenty years, our work has achieved recognition at international, European and national levels and we have been the recipient of more than 200 awards. These include:

JTP Sunday Times 100 Best Small Companies to Work For 2018 • JTP Best Companies Three Star Status Accreditation • JTP Building Awards Architectural Practice of the Year 2017 • **Battersea Power Station: Phase 2** Winner Best Regeneration Planning Awards 2017 • **Southall Waterside** Highly Commended Best Use of Brownfield Land Placemaking Planning Awards 2017 • **Kew Bridge** Highly Commended Best Housing Scheme (fewer than 500 homes) Planning Awards 2017 • JTP The AJ100 (Architects' Journal) Practice of the Year Shortlisted 2017 • JTP Best Companies Two Star Status Accreditation • JTP BD Awards - Masterplanning & Public Realm Architect of the Year Award 2017- Shortlisted • **A Home for All Seasons**, Sunday Times British Homes Award for Resilient Home of the Future • **Park Street & Lombard Close**, Nottingham, Local Authority Building Control (Labc) East Midlands Region Winners 2016, Best Social Or Affordable New Housing Development • JTP The AJ100 (Architects' Journal) Practice of the Year Shortlisted • **Bow River Village**, First Time Buyer Readers' Awards 2016, Best Large Development • JTP BD Awards - Masterplanning & Public Realm Architect of the Year Award 2016 • **Wimbledon Hill Park** London Sunday Times British Homes Awards Development of the Year – Scheme of up to 25 homes • **Changzhi Island**, China Successful Design Awards - Award for Social Innovation • JTP Best Companies Two Star Status Accreditation • **The Oaks**, Prague AJ120 Awards - Architectural Collaboration of the Year - Shortlisted • **St Clements Hospital**, Bow Placemaking Awards - Community-led Placemaking – Highly Commended • **Water Colour** Placemaking Awards - Best Housing Scheme – Highly Commended • **St Clements Hospital**, Bow National Housing Awards - Overall Winner, Urban Design Group Award • **The Hamptons** Evening Standard New Homes Awards - Best New Large Development • JTP Best Companies One Star Status (Accreditation) • **Graylingwell Park**, Chichester Royal Town Planning Institute Planning Awards (South East) Community Engagement Award • **Kip Village**, Inverkip What House? Awards Best Development - Gold • **Water Colour**, Surrey Building for Life Silver Standard • **The Hamptons** What House? Awards Best Development - Bronze, What House? Awards Best Exterior Design - Silver • **Graylingwell Park** Sustainable Housing Awards -Sustainable Larger Social Housing Project of the Year; The Housebuilder Awards - Best Low or Carbon Zero Initiative • **JTPs' London Studio** City of London Sustainable City Awards Sustainable Building of the Year; The AJ100 (Architects' Journal) Sustainable Practice of the Year Shortlisted, Retrofit Awards - Commercial Building Category, Highly Commended, Green Business Awards, Giant Green Business Awards, Islington Council Sustainable Transport (Medium/Large Business), Sustainability and Innovation Award, CoreNet Global UK Chapter Awards • **Water Colour** What House? Awards Best Brownfield Development Silver Award • **Royal Clarence Yard**, Gosport RTPI Regional Award Heritage Category Commended • **Scarborough Renaissance** International Association for Public Participation's (IAP2) Core Values Awards Project of the Year • JTP Best Companies One Star Status (accreditation), The AJ100 (Architects' Journal) Practice of the Year Shortlisted • **Scarborough Renaissance** European Enterprise Awards Grand Jury Prize, Enterprising Britain Award Winner • **Royal Clarence Yard** The International Green Apple Awards for the Built Environment and Architectural Heritage Gold Award • **Gunwharf Quays**, Portsmouth Building for Life Silver Standard Award • **Royal Clarence Yard** RICS South East Awards Regeneration Category Runner up • **Water Colour** The Evening Standard New Homes Awards Best New Family Home (4 bed) Burchfield, Best New Family Home (3 bed) Sommer, Best New Starter Home (2 bed) Keller • **Manse Road**, Dirlerton, East Lothian Homes for Scotland Quality Awards Rural Small Project Award • **Briery Meadow** (Rowanlea House Type) East Lothian Scottish Home Awards Business Stream House of the Year • **Briery Meadow** Homes for Scotland Quality Awards Rural Large Project Award • **Water Colour** The Daily Telegraph Your New Home Awards Waterside Category: Highly Commended, What House? Award (Property Week/Builder Magazine Group) Joint Gold Winner for Best Brownfield Development • **Urridaholt**, Gardabaer, Iceland BSA/Build Boston Citation for Urban Design, International LivCom Award for Built Projects Silver Award • **Putney Wharf** The Waterways Renaissance Awards Winner of the Design and Construction Category • **The Manor**, Lower Earley Building for Life Silver Standard Award • **Hoebridge Works** Evening Standard Home of the Year • **Briery Meadow** (Rowanlea House Type) What House? Award (Property Week/Builder Magazine Group) Silver winner for Best House • **The Belvedere**, Cambridge The Daily Mail 4 Star Award for Best Development (Regionally), The Daily Mail 5 Star Award for Best Apartment (Regionally), The Daily Mail Award for Best UK Apartment • **The Village at Caterham** Building Awards Major Housing Project of the Year • **The Hamptons** What House? Award Silver Winner for Best Exterior Design • **Nordica**, London What House? Award Bronze Winner for Best Brownfield Development • **Hoebridge Works** What House? Award Gold Winner for Best Starter Home • **Cassio Metro** What House? Award Silver Winner for Best Brownfield Development • **The Village at Caterham** Building for Life Gold Standard Award • **Putney Wharf** Building for Life Silver Standard Award • **French Quarter** Housing Design Awards Exhibition of Excellence • **Royal Clarence Yard** Regeneration Awards (Property Week/Builder Magazine Group) Best Housing-led Regeneration Project • **Queen Elizabeth Park**, Guildford Building for Life Gold Standard Award, Your New Home Awards Best Development for Family Living • **Putney Wharf** Planning for London Awards (Mayor's Office) Best Planning Built Project Contributing to London's Future • **Peter Scott Centre** The Waterways Renaissance Awards BURA and The Waterways Trust Heritage and Conservation Award Winner • **Makins Court** The National HomeBuilder Design Awards Commendation for Best Retirement Development • **Lawfords Wharf**, London The National HomeBuilder Design Awards Commendation for Best Small Housing Development • JTP Architect of the Year Awards Runner up • **Charter Quay**, Kingston Upon Thames Building for Life Gold Standard Award • **Gunwharf Quays** The National HomeBuilder Design Awards Best Mixed-use Development Commendation for Best Use of a Brownfield Site • **The Village at Caterham** The Deputy Prime Minister's Award for Sustainable Communities Finalist • **Queen Elizabeth Park** The Evening Standard Awards 2003 Best Three Bedroom House & Best Home of the Year • **Makins Court**, Winchester Alresford Society Rosebowl Winner • **Kew Riverside** Bentley International Property Awards Best UK Development Best Architecture (5 star rating) • **Kew Riverside** What House? Award Gold Winner for Best Development • **Charter Quay** The Waterways Renaissance Awards Commendation for Riverside Regeneration Project, The National HomeBuilder Design Awards Best Mixed-Use Development • **The Village at Caterham** The European Urban and Regional Planning Awards 2002 Conversion (Joint Winner) • **Charter Quay** Association of Town Centre Management Annual Awards Best Town Centre Mixed-use Development • **The Village at Caterham** BURA Community Award Caterham Barracks Community Trust • **The Village at Caterham** The RTPI National Awards for Planning Achievement Award for Planning for the Whole Community • **Peter Scott Centre** RICS Award for Regeneration, Silver Unicorn Award from the British Guild of Travel Writers for UK Best New Tourist Attraction, Tourism for Tomorrow Global Winner for Sustainable Tourism • **Freiman Frankfurter** Allgemeine Zeitung Award for Planning Innovation • **Berlinerplatz**, Essen, Germany Robert Jung Prize • **Barnes Waterside** What House? Award Best Luxury Housing Development

# Our Success Our credentials

JTP realise that it is important to practise what you preach. To this end we have taken steps to create a sustainable and enjoyable working environment, minimise our carbon footprint in our premises and how we work; embed quality and design excellence throughout our projects and implement measures that stimulate and engage our members of staff.

We continue to ensure that our accreditations, memberships, awards and affiliations reflect the importance we place on our people, our clients, and our collaborators in the delivery of great places.



JTP Chartered Practice Registration Number 2249624P



JTP Royal Institute of Architects Scotland Chartered Practice Services Number 2363



JTP is a member of the NLA. The organisation is a focus for the debate and discussion of issues facing architecture, planning, development and construction in the capital.

[www.newlondonarchitecture.org](http://www.newlondonarchitecture.org)



JTP is a supporter in kind of The Academy of Urbanism which brings together a group of thinkers and practitioners involved in the social, cultural, economic, political and physical development of our villages, towns and cities.

[www.academyofurbanism.org](http://www.academyofurbanism.org)



JTP is committed to the continued investment in time and technology to improve quality, efficiency and accuracy of our work and in turn deliver exceptional solutions to our clients. We have in place a Quality Management System and hold ISO9001 certification.



JTP seeks to minimise the impact of our project and studio activities on the environment. We have in place an Environmental Management System and hold ISO14001 certification.



JTP (London Studio) is a member of the First Mile Mixed recycling scheme.

[www.thefirstmile.co.uk](http://www.thefirstmile.co.uk)

JTP (Edinburgh Studio) use Changeworks Recycling for all our recycling and carbon monitoring needs in Edinburgh.

[www.changeworksrecycling.co.uk](http://www.changeworksrecycling.co.uk)



JTP has achieved Best Companies Three Star "Extraordinary" Accreditation status for 2018, recognising the highest standard of workplace engagement and representing organisations that truly excel, focusing on employee engagement as an integral component of a business's success and growth.



JTP was named in the Sunday Times 100 Best Small Companies to Work For 2018, placed at number 73 in our inaugural entry to the prestigious list. The top 100 employers are determined by employee feedback collected via an anonymous survey, against eight factors of workplace engagement and satisfaction.



JTP is a Carbon Smart Silver certified company. This is awarded for taking an intelligent and practical approach to reducing our carbon footprint and improving our environmental performance in various ways.



JTP is associated with BREEAM, one of the world's leading and most respected building assessment schemes that can be applied across all stages of a building's life cycle.



JTP London and Edinburgh Studios are accredited by the Contractors Health & Safety Assessment Scheme (CHAS) having demonstrated compliance as a Designer under the CDM Regulations.



JTP is also accredited under the SMAS WorkSafe Assessment Scheme. Both schemes are members of the Safety Schemes in Procurement (SSIP) forum.



JTP was awarded Employer of the Year at the 2012 AJ100 Awards.

The award recognises staff satisfaction, workplace culture, benefits and staff turnover.



JTP was awarded Masterplanning and Public Realm Architect of the Year Awards 2016.

The awards reward the practices responsible for the best overall body of work in 13 different categories.



JTP has achieved a Top Five place in the Building Good Employer Guide for 2017 and 2016. We are delighted to be recognised for the hard work we put into making our studios stimulating and enjoyable places to work, and for the innovative programs we put in place to reward our talented team.



JTP is a member of the Green Register of Construction Professionals.

Joining a list of practitioners working towards addressing key issues relating to sustainability in the built environment.

jtp

## 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](http://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](http://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.

No:

The clear focus of the revised National Policy Framework (NPPF) (2018) is the delivery of housing to meet identified needs. Through measures such as the new Housing Delivery Test and a revised definition of the term “deliverable” for the purposes of five-year housing supply assessments, the NPPF is placing much weight on ensuring that housing needs are not just quantified, but also met.

In respect of plan preparation, the importance of ensuring that allocated sites are deliverable and capable of contributing towards the identified housing need is also emphasised in the revised NPPF. Whilst it is recognised that the Hereford Area Plan (HAP) is at a relatively early stage of preparation, and it is helpful to have cast the net as wide as possible in terms of potential allocation opportunities, deliverability must be a key focus in the assessment of which sites to take forward.

To this end, Keepmoat Homes has identified a number of potential constraints to the future delivery of sites that are said to be potentially suitable for residential development. These are summarised below:

## Lack of evidence on site availability

The availability of a site for development is a fundamental pre-requisite for allocation. If a landowner is not willing to release their land, it cannot be relied on to meet identified housing needs. The site assessments that have been prepared by Herefordshire Council (quite properly) consider the evidence of site availability. However, the following sites lack any such evidence:

Table 1: Sites lacking evidence of availability

Site	Reference	Capacity
Argyll Rise*	BEL14	20
Wyebridge Motors*	CEN29	10
Land at Bullingham Lane	HOL12a	70
Lower Bullingham	HOL12b	190
Grafton Haulage*	HOL14	25
Land opposite Leys Farm	STM05	65
Land rear of Grafton House	STM17	50
Land adjacent to Nelson Building, Whitecross Road*	THR32	35
Faraday Road*	THR34	100
Total capacity		565

\* Sites also included in Table 3: Sites subject to pressure from other uses

It is recognised that such evidence might be forthcoming in the future, but this cannot be guaranteed. Unless or until appropriate evidence of the availability of these sites is forthcoming, they cannot be relied upon to contribute towards the future housing supply of Hereford, and should therefore not be allocated in the HAP.

## City Centre Car Parks

**In line with the Council's Local Transport Plan, Alpha Parking** was commissioned to consider the feasibility of replacing the relatively large number of smaller car parks in the city with more cost-effective solutions, such as one or more multi-storey car parks. The assessment considered the 19 car parks located in and around the City Centre and identified those with particularly high levels of occupancy and income. It found that:

- 1 The Bus Station, Gaol Street and West Street car parks generate a high income;
- 2 The Bus Station, Gaol Street, West Street and Maylord Orchard car parks have a very high occupancy of 90% or more of capacity at weekday and weekend peak periods;
- 3 The Bath Street, Union Walk and Venns Close car parks also have a very high occupancy, reaching of 90% or more of capacity on weekday, although not at weekends;
- 4 The Garrick House multi-storey and Wye Street car parks have medium occupancy; whilst,
- 5 All other car parks have low occupancy.

The report identifies two main options for providing **“more efficient and attractive car parks in the city”**, namely to build one or more new multi-storey car parks and/or to provide separate level parking (such as on rooftops or underground) as part of other major developments. It states that, depending on the location of the new facilities, some of the existing car parks could be closed, subject to need. However, it is understood that no conclusions have been drawn in respect of the future car parking strategy for Hereford. Accordingly,

it would be inappropriate to pre-empt any such decision through the allocation of existing car parking sites for residential development.

Against this context, it is noted that the following sites are identified as having capacity for residential development. Two of these sites (Gaul Street and Bus Station) have been identified as being suitable to accommodate a multi-storey car park. It should also be noted that any redevelopment of bus station site would be dependent on the relocation of the bus station to the proposed public transport hub, the plans for which have not yet been finalised. In advance of having clarity on their future contribution to meeting **Hereford’s car parking needs, it is not considered that it would be appropriate to allocate** existing car parking sites for housing in the emerging HAP.

Table 2: City Centre car park sites

Site	Reference	Capacity
Gaul Street car park	CEN08	25
Hereford bus station/car park	CEN22	90
Venn Street car park	CEN30	12
Union Walk car park	CEN31	10
Total capacity		137

#### Pressure from other uses

In addition to car parks, a number of other sites are subject to pressure for existing or alternative uses which may undermine their potential to come forward for residential development. Careful consideration should be given to the suitability of these sites to accommodate different types of development before making any decision regarding their allocation for residential development.

#### *Hereford Racecourse*

Site THR29 forms part of Hereford Racecourse and is used for overflow car parking purposes on occasion. The **“Invest Herefordshire: Herefordshire’s Economic Vision”** recognises the important role of the Racecourse, and the potential to expand its range of other events and commercial activities. In particular, it points towards its potential role as a **“home to an expanded high-class sports and leisure facility”**, comprising high quality leisure oriented development, a sporting village, and high-quality hotel accommodation and conferencing facilities.

This site might be well suited to accommodate some of the additional facilities that are proposed for the Racecourse and the technical assessment notes that its development for residential purposes **“may threaten the racecourse’s ability to remain viable in the future”**. In the context of the availability of other sites to meet **Hereford’s housing need**, the implication of this is that Keepmoat Homes would question the appropriateness of allocating this site for residential development before the future plans for the Racecourse are fully understood.

#### *Employment sites*

Several sites that are currently or were previously in use for employment purposes are included as having potential for residential development. Policy E2 of the Herefordshire Local Plan Core Strategy seeks to protect against the loss of the best quality employment land to other uses. This policy sets out that **employment sites that are rated as “best” or “good” using the methodology** set out in the Employment Land Study (2012) or any successor document will be safeguarded from loss to non-employment use. It states that **the loss of employment land rated as “moderate” will only be permitted where it meets one of the specified** criteria, namely that:

- 1 The development of the site for other uses would not result in an overall shortage in the quality and quantity of employment land in the area; or,

- 2 There would be a net improvement in amenity through the removal of a non-conforming use from within a residential area; or,
- 3 The proposal would not result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme.

Based on the requirements of Policy E2, Keepmoat Homes consider that existing employment sites should not be allocated **for redevelopment in the HAP if they are rated as “best” or “good”**, or if they are rated as **“moderate”** but no evidence has been provided to demonstrate that they will meet one of the criteria in Policy E2. In all cases, sufficient evidence should be provided to demonstrate that the site is not needed as employment land. This evidence has not been provided for the site identified at Table 3 below. This is a significant consideration given that the HAP will need to accord with the policy provisions of the Core Strategy.

#### *Public open space*

Additionally, a number of sites are included in the HAP consultation document that currently serve as public open space. The NPPF states at paragraph 97 that existing open space should not be built on unless:

- 1 It is assessed as surplus to requirements; or,
- 2 It would be replaced by equivalent or better provision in terms of both quantity and quality; or,
- 3 The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current/former use.

This approach is reflected at Policy OS3 in the Core Strategy, which also adds that the loss of the open space must not result in the fragmentation or isolation of a site which is part of a green infrastructure corridor.

Keepmoat Homes consider that, without the relevant assessments to support the release of the identified public open space sites, they should not be included in as allocations for housing in the HAP.

Table 3: Sites subject to pressure from other uses

Site	Reference	Current / alternative use	Capacity
Land north of St Francis Xaviers School	AYL16	Public open space	10
Argyle Rise*	BEL14	Public open space	20
Wyebridge Motors*	CEN29	Garage	10
Grafton Haulage*	HOL14	Vehicle storage	25
Hereford Racecourse	THR29	Racecourse; Identified in <b>“Invest Herefordshire: Herefordshire’s Economic Vision” as having potential to accommodate expanded business, sports and leisure facilities, including a “sporting village”, a hotel and conferencing facilities</b>	70
Land adjacent to Nelson Building, Whitecross Road *	THR32	Bulmers/Heineken raiing and delivery area and car parking	35
Faraday Road*	THR34	Former employment site, assessed as a <b>“good site” in the Council’s ELR. Site</b> located in flood zone 2 and in close proximity to the Cargill Meat Factory which is bound by environmental regulations to ensure that odour is prevented or minimised. In the light of this, it suitability for residential purposes might be limited and retention of the land for employment	100



		purposes may be the appropriate option.	
Land off Queenswood Drive	TUP26	Public open space	20
Land at the Paddock, Hampton Dene Road	TUP27	Public open space	20
Total capacity			350

\* Sites also included in Table 1: Sites lacking evidence of availability

## Key opportunities

The evidence set out above indicates that a total of 17 sites are subject to deliverability concerns. These have been identified as having a total capacity of 862 units. Keepmoat Homes considers that very careful consideration should be given before allocating any of these sites for residential development through the HAP. The total capacity of the sites detailed in the Issues and Options consultation document is such that the non-allocation of these sites (the deliverability of which is a matter of concern to Keepmoat Homes) would not jeopardise the overall delivery of housing in Hereford.

By contrast, the Urban Village sites is both considered to be appropriate and available for development and Keepmoat Homes endorses its allocation in the HAP.

### Hereford Urban Village (CEN21)

The Edgar Street Grid area (CEN21) includes several development parcels **that form part of the “Urban Village” strategic site** identified in the Core Strategy (Policy HD2). This area provides an important development opportunity in a central location that is currently under-utilised but has been opened up by the City Link Road which was completed in December 2017. Its future redevelopment will also build upon the regeneration success of the former Cattle Market site, which is located on the opposite side of Blackfriars Street.

The location of the Urban Village site in close proximity to Hereford railway station, the proposed new transport interchange and the City Centre means that they offer important opportunities for sustainable development. The ability to redevelop a larger area of land within this key location also means that there is the potential to provide new pedestrian and cycle links, thereby increasing the use of sustainable and active modes of travel.

The Urban Village site offers a valuable regeneration opportunity. The Local Super Output Area (LSOA) where the sites are located (Herefordshire 012C) is ranked overall as one of the 30% most deprived in England, based on the Government’s 2015 Index of Multiple Deprivation. **In relation to the domain of “living environment”, the LSOA is ranked in the 10% most deprived in the country, and in relation to crime it is within the 20% most deprived.** The physical regeneration of this area will be an important intervention that will help to improve the quality of life for people living and working in the area.

Policy HD2 in the Core Strategy identifies a capacity for 800 units within Hereford City Centre, with *“the majority”* to be provided as part of the new Urban Village. The text of this policy includes a modification by the Plan Inspector to create the flexibility for some of the 800 new dwellings to be provided elsewhere in the City Centre where there is capacity.

The HAP consultation document identifies a capacity of only 300 homes within the Urban Village area (CEN21). However, further investigative work is underway in relation to flood risk, transport, and infrastructure matters, the results of which may indicate that the sites can accommodate some additional homes. Also, as stated in Policy HD2, additional homes could be delivered in the City Centre by through the redevelopment of brownfield sites, the re-use of upper floors above commercial premises and infill development. In any case, Keepmoat Homes considers that the sites identified in this area in the emerging HAP should contribute to the specific requirement for this area, as identified in Policy HD2, rather than the residual requirement. Otherwise, there is a risk of under-delivery across Hereford (please see our response to Q8).

As also specified in Policy HD2 in the Core Strategy, the Urban Village will be complemented by a range of uses and infrastructure, creating a sustainable mixed-use development. It is recognised that this will limit the capacity of the area to accommodate housing but will help to ensure the most appropriate and efficient use of the site (please also see our response to Q6).

The Urban Village site is available for delivery, as it is **largely within the Council's ownership** and benefit **from developer commitment from Keepmoat Homes and Engie which have been appointed as the Council's** Development and Regeneration partners. It is therefore entirely appropriate that this area is allocated as part of the emerging HAP for residential/mixed use development. Keepmoat and Engie are working with the Council in progressing work in relation to this site in order to identify a preferred development option. This work includes flood risk assessment and modelling and an assessment of additional land parcels that could be included within a more comprehensive development area. It is anticipated that more information will become available as the HAP process moves forward.

### Small Sites

The NPPF states at paragraph 68a that small and medium sized sites can make an important contribution to housing supply and are often built out relatively quickly. It requires local authorities to identify, through development plans and brownfield registers, land to accommodate at least 10% of their housing requirements on sites no larger than 1ha. The emerging HAP has identified a number of sites that meet this definition.

Some of these smaller sites are identified at Tables 1, 2 and 3 above as having specific issues that could limit their ability to be delivered. However, subject to further work to ascertain ownership and availability and the **publication of the Council's car parking strategy, it may be that some of these sites do come forward.**

Excluding those identified at Tables 1, 2 and 3, the emerging HAP includes the following sites of less than 1ha in size:

Table 4: Sites of less than 1 hectare

Site	Reference	Whole site area (ha)	Capacity
The Orchard, Lyde	BUR32	0.826	25
Hereford police station, Bath Street	CEN27	0.354	25
Hereford fire and rescue, St Owen Street	CEN28	0.222	15
Former health authority office	STN05	0.352	25
Former bus depot, Friar Street	STN21	0.491	35
Land at Grandstand Road (north)	THR37	0.286	15
TA site	TUP22	0.259	20
Land adjacent to Foley Trading Estate	TUP25	0.506	10
Land at Queenswood Drive	TUP26	0.6	20
Land at the Paddock, Hampton Deane Road	TUP27	0.663	20
Total capacity			210

Whilst it is recognised that there are often instances of non-delivery of small sites (for a range of reasons), a number of these smaller sites are owned by the Council and therefore may have a greater chance of coming forward, subject to competing pressures for the use of the land.

Keepmoat Homes considers that the inclusion of the smaller sites above in the emerging HAP is appropriate, in order to offer a range of development opportunities and to help the Council meet its obligation under the NPPF.

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

No comment

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?**

No

Keepmoat Homes consider that it is important to ensure that the HAP is as flexible as possible, and capable of responding to changing circumstances over the period to 2031 and beyond. To this end, it is considered that a phasing policy would not be appropriate. This is because it might create a barrier to delivery and undermine the ability to maintain a constant supply of housing within certain parts of the Plan period.

However, particular consideration does need to be given to the sites that are expected to come forward over the next five years, taking account of the definition of deliverability found in the glossary of the revised NPPF:

***“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*** (emphasis added)

This represents a clear change in approach from that advocated by Lindblom LJ in *St Modwen Developments v Secretary of State for Communities and Local Government and East Riding of Yorkshire Council and Save our Ferriby Action Group* (2016, EWCA Civ 1643) and places a burden of responsibility on the part of the local planning authority to demonstrate that all sites that are intended to contribute towards the five-year supply will come forward within that period. This is likely to include a need to obtain evidence from developers regarding the promotion of the site and the timetable for delivery. Whilst separate to a phasing policy, this is nevertheless a critical consideration for the Council as it seeks to use the HAP to improve its housing supply position.

Over the longer period, it is important to recognise that a number of factors might impact on when sites might be expected to come forward for development. These might include infrastructure – in particular delivery of the Hereford Relief Road – and the availability of individual sites – for example, the police and fire station sites will only become available following the completion of the new emergency service hub, whilst the car park sites are only likely to become available in the event that alternative car parking

arrangements are delivered. Whilst such considerations might require a limit on the number of dwellings that can be delivered prior to a certain intervention (e.g. achievement of increased capacity through the completion of relief road), this is not the same as a more restrictive phasing policy that would be unable to respond to the non-delivery of particular sites.

Keepmoat Homes would also emphasises that flexibility should also be achieved through an over-allocation of land to ensure that the housing requirement is achieved, even in the event that individual sites are delayed in coming forward (or do not come forward at all). The identification of reserve sites could provide a further level of flexibility. Such sites could be identified for release only in the event of under-delivery from other sources of supply, and triggered through sanctions applied by the Housing Delivery Test, as appropriate.

## **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

Engie has been consulted and is supportive of the employment proposals set out in the HAP.

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

No comment

**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

The Urban Village site (CEN21), which forms part of the Hereford City Centre strategic allocation in the Core Strategy (Policy HD2), could be suitable for a range of different uses.

Policy HD2 in the Core Strategy states that the Urban Village will be complemented by other uses and infrastructure, forming part of the wider regeneration area and creating a sustainable mixed-use development. It states that these uses could include:

- 1 Commercial;
- 2 Tourism;
- 3 Education;
- 4 Leisure;
- 5 Health; and,
- 6 Civic, police and fire uses.

The policy does not seek major new retail facilities in this location but also states that Herefordshire Council will work with the tenant/s of Edgar Street football stadium to explore opportunities for a sports-led mixed-use redevelopment and new public car parking facilities.

Keepmoat Homes and Engie consider that there may also be opportunities for the following types of uses:

- 1 University facilities;
- 2 Student accommodation

The *“Invest Herefordshire: Herefordshire’s Economic Vision”* also considers the Urban Village site. Whilst referring to its contribution of *“up to 800 new houses within the city centre”*, the document recognises that *“in addition to the desire for housing units within the site, considerable demand also exists from a range of public services and the new NMiTE University for space within this location. This will lead to a genuine mixed-use development site.”* It goes on to refer to the *“opportunity to support the enablement of the NMiTE university and the required student accommodation and services”*.

Keepmoat Homes and Engie welcome the flexibility to provide such a range of uses within the Urban Village and recognise that these would provide the most appropriate basis for the sustainable regeneration of this strategic site. They consider that the HAP should be supportive of a mixed use solution for the site, but retain flexibility regarding the specific range of uses and number of dwellings that might come forward. As set out in response to Question 1, Keepmoat Homes and Engie are working with the Council in progressing work in relation to this site in order to identify a preferred development option. This work includes flood risk assessment and modelling and an assessment of alternative land parcels that could be included within a more comprehensive development area. It is anticipated that more information will become available as the HAP process moves forward.

**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?**

No comment

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

Yes

Remaining Residual Requirement

The HAP consultation document sets out the calculation for the remaining residual requirement for housing at Table 1, which applies the figures from Policy HD1 in the adopted Core Strategy:

Table 5: Major residential development sites in Hereford

Total requirement for Hereford as set out in HD1	6,500
Strategic Sites	New dwellings
- Hereford City Centre (HD2)	800
- Northern Urban Expansion Area (HD4)	500
- Western Urban Expansion Area (HD5)	1,000
- Southern Urban Expansion Area (HD6)	1,000
Total for Urban Expansion sites	3,300
Remaining Residual Requirement	3,200

Source: Hereford Area Plan Housing and Employment Site Options and Consultation Main Report Table 1

Importantly, the residual requirement does not need to be allocated in full through the HAP because it would also include dwellings that have been completed since the start of the Core Strategy period in 2011, and

outstanding commitments. Keepmoat Homes consider that there would be merit in breaking the residual requirement down in order to provide clarity as to the amount of additional housing that is to be allocated in the HAP.

The HAP consultation document states at paragraph 5.33 that it has made an adjustment to the total capacity of the identified sites to reflect the fact that some of these sites will contribute towards meeting housing need in Hereford City Centre. However, it does not identify the specific sites that could deliver these units in the City Centre. It instead deducts the number of completions since 2011 (191) and commitments for new dwellings (161) in Hereford City Centre from the Policy HD2 housing requirement in the Core Strategy (800 homes), indicating that 448 homes remain to be delivered in the City Centre. It then reduces the total site options capacity by 448 units from 3,647 to 3,200 units (rounded up from 3,199).

Keepmoat Homes consider that a more transparent and robust approach would be to identify specific (deliverable) sites within the list of site options to meet the remaining homes needed under the Policy HD2 housing requirement. This analysis is set out below.

As identified above, 191 units have been completed in Hereford City Centre since 2011 whilst a further 161 have planning permission. This equates to total of 352 completed/committed dwellings against the strategic site requirement of 800. This leaves an additional 448 dwellings to be identified to meet the Policy HD2 requirement.

Appendix 3 to the HAP consultation document identifies 8 sites in the City Centre with potential for a total of 487 dwellings. However, the analysis set out in response to Question 1 has identified some concerns about the deliverability of 5 of these sites, such that the potential capacity is reduced to 340 units – less than that required to meet the remainder of the Policy HD2 requirement for the City Centre.

Table 5: Hereford City Centre sites

Site	Reference	Capacity	Comment
Gaol Street car park	CEN08	25	Car park site. Deliverability concern.
Edgar Street Grid	CEN21	300	Urban Village site. Suitable for mixed-use redevelopment, including c.300 dwellings.
Hereford bus station/car park	CEN22	90	Car park site. Deliverability concern.
Police Station, Bath Street	CEN27	25	Available for redevelopment, subject to relocation of police/fire service to new emergency service hub
Fire Station, St Owens Street	CEN28	15	
Wyebridge Motors	CEN29	10	Existing garage site. Availability not known. Deliverability concern.
Venn Street car park	CEN30	12	Car park site. Deliverability concern.
Union Walk car park	CEN31	10	Car park site. Deliverability concern.
Total capacity		487	

According to **Herefordshire Council's 2017 Annual Monitoring Report**:

- 1 1,087 dwellings were completed in the HAP area between 2011 and 2017, of which 191 would have contributed towards the Policy HD2 requirement; and,
- 2 422 dwellings in the HAP area benefitted from planning permission, of which 161 would have contributed towards the Policy HD2 requirement.

In addition, paragraph 5.29 of the HAP states that a windfall target of 25 dpa is proposed. This is a proportion of the 100 dwellings windfall allowance across the county as set out in the Core Strategy and is based on past levels of delivery. Whilst it is entirely reasonable to apply a windfall allowance to future supply, it is not appropriate to do so from the base date of the plan. Any supply over the next 2-3 years is likely to already benefit from planning permission and so a short-term windfall figure would represent a double

count. This approach of non-application of windfalls for the immediate short term is commonly adopted when assessing five-year housing supply, and is equally relevant in this case. The implication is that the HAP could reasonably apply a windfall allowance for the 10-year period from 2021 to 2031, but not from 2018 (or earlier). This amounts to a total of 250 dwellings from this source (25dpa x 10).

This means that:

- 1 352 completed and committed dwellings would have contributed towards the Policy HD2 figure (191 + 161), leaving a residual of 448 dwellings (as identified above);
- 2 1,157 completed and committed dwellings would have contributed towards the remaining residual requirement of 3,200 dwellings (1,087 – 191 = 896 plus 422 – 161 = 261);
- 3 A windfall allowance of 250 units could also contribute towards the remaining residual requirement;
- 4 The overall residual requirement to be allocated in the HAP amounts to 1,793 units (i.e. 3,200 – 1,157 – 250).

The approach set out above is important in ensuring that any risk of under-delivery across Hereford is avoided. Keepmoat Homes therefore propose that the emerging HAP should separately identify the proposed **allocations in Hereford City Centre (HD2) and those elsewhere that will count towards the “remaining residual requirement”**.

However, as set out in response to Question 2, there is merit in allocating more than the minimum residual of 1,793 units for Hereford plus 448 as part of Policy HD2. The purpose of this would be to ensure flexibility and to maximise the potential to meet the identified housing requirement, even in the event that some sites do not come forward at the expected rate. A 10% non-implementation figure is commonly applied in Local Plans, and Keepmoat Homes consider that this level of over-allocation would be appropriate in this case. Taking account of the remaining requirement of 2,241 dwellings, this would result in a requirement to identify land for 2,465 dwellings over the period to 2031.

### **About you:**

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

**Yes**

(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](http://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](mailto: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](mailto:ldf@herefordshire.gov.uk)

**Please return this questionnaire by midnight on 8<sup>th</sup> October 2018**

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



Entered - 17/9/18.

Ref - 03.



## 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](http://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](http://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:

**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](http://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:

Development should be completed within a time scale, and clearly put in with the planning permission condition 0-5 years no longer.

## **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](http://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](http://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 be advised the Lower Bulingham Parish Council have an adopted N.D.P. and the H.A.P must be in conformity with that, as well as the Core Strategy.

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

**About you:**

Name: Lower Bulingham Parish Council

Address: Hackford House  
Dnedar. Hereford.

Email: clerk@lowerbulinghamparishcouncil.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**

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Email: [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) or telephone 01432 383357

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Plough Lane  
Hereford  
HR4 0LE

Or by email to [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

**Please return this questionnaire by midnight on 8<sup>th</sup> October 2018**

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

Question 8 continued...

## Latham, James

---

**From:** Idf  
**Sent:** 01 October 2018 10:23  
**To:** Gilson, Susannah  
**Subject:** FW: TUP27

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Susi

This appears to be a response, it seems similar to the phone call you received earlier. Stu should be able to provide the site ref.

Regards

Kev

---

**From:** Emma Lowther  
**Sent:** 30 September 2018 22:14  
**To:** Idf <ldf@herefordshire.gov.uk>  
**Subject:** TUP27

Dear Sirs

I write in regard to your plan to change the use of the land behind Rosemary Gardens, with the intention to build 20 houses on.

To put it simply, are 20 houses really worth losing such highly valued green space?

This area is used mainly for dog walkers. I have already been told by my neighbour they will have to find a new owner for their dog if your plans go ahead as she would have nowhere to walk her dog who requires a lot of walking. We also have a dog who loves this field. I appreciate this may not be important to you, but I can promise you it is important to the countless number of dog owners who use this field.

Because this field is used all day by so many people it really brings the community together. We have met so many different people, and dogs, in this field who we wouldn't normally have met.

This field has also been home to various wildlife. We have have multiple sightings of deer, possibly a muntjac, in this field. Because of this, the animal also came up Rosemary Gardens, which was fantastic. Myself and my neighbour have photo evidence of this.

Since moving here in 2011, I have had the pleasure on many evenings of hearing barn, tawny and screech owls. As well as seeing bats, squirrels and other wildlife.

This space is also home to numerous trees and plants. We need greenery to help the environment, and you would be cutting this down.

This area now seems to be dominated by houses and we are losing our much needed green spaces.

I also have concerns about the access being so close to 3 schools. Have you actually considered viewing this site at school drop off and pick up times? The road is what can only be described as chaos, and you would only be adding to this and I would worry about the safety of the children at the schools.

The houses who back onto this field all tend to have access to this field by a gate, and so this field is also used by children. Our new neighbours who moved in just before Christmas have 3 young children and they are out there playing every night after school. It is a relief for them to be able to let their children outside to play and know they are safe.

We shall be getting our house valued. If you go ahead with your plans, we will have it revalued and expect to be compensated with the decrease in value and the fact we will need to move. I do not want to be backing onto someone elses garden nor do I want to be overlooked. How can 20 houses be worth so much upset?! Is Hereford really that short of housing?

I would appreciate being kept up to date with the progress of this plan.

Regards

Emma Lowther

Sent from my Samsung Galaxy smartphone.



## Latham, James

---

**From:** Idf  
**Sent:** 02 October 2018 09:05  
**To:** Gilson, Susannah  
**Subject:** FW:

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Susi

Another Queenswood Drive representation attached. Can you explain there is not a planning application but we'll accept the email as a rep.

Thanks

Kev

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

**From:** Ella Lucy  
**Sent:** 01 October 2018 19:48  
**To:** Idf <ldf@herefordshire.gov.uk>  
**Subject:**

Hello, I've just heard from a neighbour that their is a planning application for the dog walking field on queenswood drive. However if we weren't told we wouldn't have known about this as there are no signs up about it. I would like to strongly object this application:

- 1.) there will be way too many cars especially when the football is on on the weekend. We live opposite the field where these houses want building and we already have the problem with way too many cars. We are unable to get out of our drive on the weekend as there are cars parked all along the opposite roadside.
- 2.) school children use this field as a walk- through to get to school. This is a potential safeguarding issue.
- 3.) there are lots of dog-walkers that use this field every day.
- 4.) this will definitely disturb a lot of the nature and wildlife that live there.

We use this field also as a recreational area.

Thanks



## 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](http://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](http://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:

The identification of site Hol13 as having potential is agreed and supported by the land owners. That being, the land adjacent to the A49 of 11.2 hectares in Grafton jointly owned by Ian & Peter Morgan and Keith & Mary Morgan with the remainder of Hol13 at Leys Farm in sole ownership by Ian & Peter Morgan.

We would like express our concerns regarding the number of dwellings stated - 155 for the whole site, which extends to 34.58 hectares. This figure, in our opinion, seems low when actually a figure of 250 plus dwellings on 11.2 Hectares is achievable and can be accommodated on the 11.2 hectare portion of Hol13.

**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](http://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:

The 11.2 hectare site at Grafton Lane (Part of Hol13) has been identified principally to contribute to short term needs over a 5 year period. It is for this reason that a planning application is being prepared in the light of a persisting 5 year land supply shortfall. The site is considered to be **available, suitable and achievable**, and is therefore **deliverable** in accordance with the NPPF.

The remainder of Hol13 that lies within the control of Ian & Peter Morgan is also considered **available and suitable** in accordance with the NPPF. In theory, it is also **achievable**, thus making the remainder of Hol13 **deliverable**, but it is acknowledged that a more realistic timetable for delivery would be in the medium to long term within the Plan period.

## **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](http://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](http://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:

With reference to the remainder of Hol13 that lies outside the HAP mapped area and subject to the imminent outline planning application, we would state this land has great potential in the medium future as once the SLR has been completed through the remainder of Hol13 and the western bypass progresses, it is inevitable the SLR will form a new City boundary adjacent to the remainder of Hol13

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

**About you:**

Name: ...IP & PJ Morgan

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**

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**Please return this questionnaire by midnight on 8<sup>th</sup> October 2018**

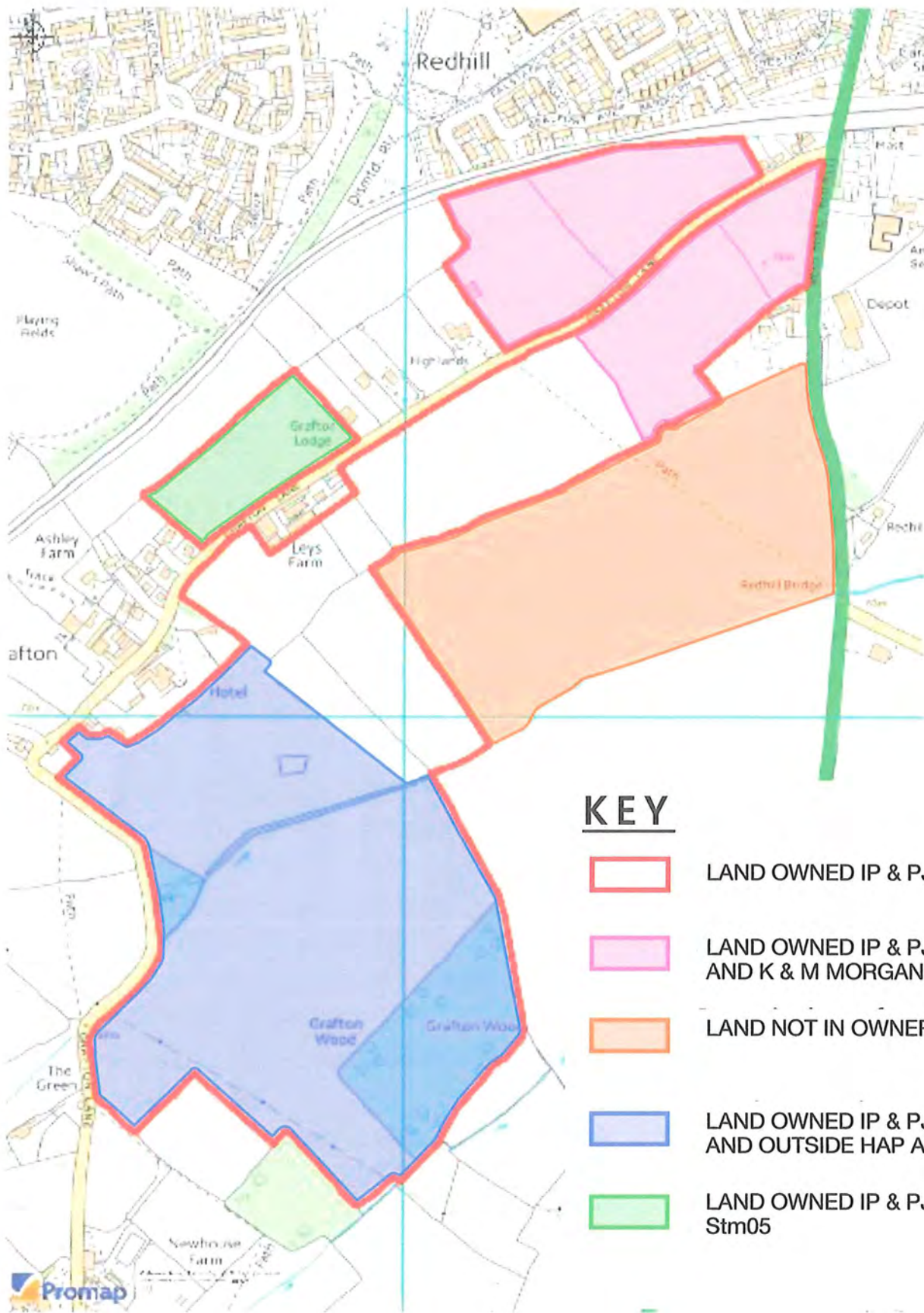
**Thank you for taking time to share your views with us.**

**Question 8 continued...**

**Please Note.**

**When considering these responses please also refer to statements, submitted plans and supporting documents lodged by Taylor Wimpey Plc (presently our option partners) in support of Hol13 and Stm05.**

**Also refer to Taylor Wimpey Plc. submissions relating too land outside HAP area which is fully supported by us and notated on attached plan,**



**KEY**

- LAND OWNED IP & PJ MORGAN
- LAND OWNED IP & PJ MORGAN AND K & M MORGAN
- LAND NOT IN OWNERSHIP
- LAND OWNED IP & PJ MORGAN AND OUTSIDE HAP AREA
- LAND OWNED IP & PJ MORGAN Stm05



Forward Planning  
Herefordshire Council Offices  
Plough Lane  
Hereford  
HR4 0LE

Hannah Lorna Bevins  
Consultant Town Planner

Tel: 01926 439127  
[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

Sent by email to:  
[ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk)

10 September 2018

Dear Sir / Madam

**Herefordshire Council: Hereford Area Plan – Housing and Employment Site Options Consultation  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Hannah Lorna Bevins  
Consultant Town Planner

[n.grid@amecfw.com](mailto:n.grid@amecfw.com)

Wood E&I Solutions UK Ltd  
Gables House  
Kenilworth Road  
Leamington Spa  
CV32 6JX

Spencer Jefferies  
Development Liaison Officer, National Grid

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Yours faithfully

[via email]

**Hannah Lorna Bevins  
Consultant Town Planner**

cc. Spencer Jefferies, National Grid



**Latham, James**

---

**From:** ldf  
**Sent:** 08 October 2018 16:59  
**To:** Gilson, Susannah  
**Cc:** Riddle, Siobhan  
**Subject:** FW: Hereford Area Plan Housing and Employment Site Options - Don't miss the opportunity to give us your views  
**Attachments:** hap\_site\_options\_-\_questionnaire.pdf

NE comments attached.

Regards

Kev

---

**From:** Driver, Gillian (NE) [mailto:Gillian.Driver@naturalengland.org.uk]  
**Sent:** 08 October 2018 16:49  
**To:** ldf <ldf@herefordshire.gov.uk>  
**Subject:** Hereford Area Plan Housing and Employment Site Options - Don't miss the opportunity to give us your views

Dear Siobhan Riddle

**RE: Hereford Area Plan – Housing and Employment Site Options Consultation**

Please find attached Natural England's response for the above proposal.

We noticed in Table 1.1 Sites inside Herefordshire Boundary of the SA that Downton Gorge SAC was not included. The SA should be amended to include this SAC.

Kind regards

Ms Gillian Driver  
Lead Adviser  
Planning for a Better Environment – West Midlands Team  
Natural England, Worcester County Hall, Spetchley Road, Worcester, WR5 2NP  
Direct Dial: 0208 02 60995 / 07771 844 523

Follow the West Midlands team on Twitter - **@NE WestMids**

**[www.gov.uk/natural-england](http://www.gov.uk/natural-england)**

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

**Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-**

## 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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**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:

#### General

All the sites have the potential to impact on the River Wye SAC through foul and surface water drainage. Some of the sites due to their proximity to either the River Wye or water courses which are a tributary of the River Wye may have impacts on otters which are an interest feature of the SAC and SSSI.

#### Bel08.

Some of the site is listed as deciduous woodland which is priority habitat. The whole site is listed in the wood pasture parkland inventory. Wood pasture and parkland are distinct forms of ancient woodland and this site is likely to fall under this category. We would be happy to discuss this site and potential impacts with you further.

Tup 26, Tup 27

A water course which is either in close proximity or within the site runs into the Lugg and Hampton Meadows SSSI before joining the River Lugg SSSI/River Wye SAC. Potential impacts on the SSSIs and SAC will need to be considered.

**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 comment.

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

Capacity of the sewage system should be considered in the phasing. There may be a need to delay delivery/development until improvements have been made.

## **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:

General

Both sites have the potential to impact on the River Wye SAC through foul and surface water drainage.

**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 comment.

(We are currently running a Call for Sites – Please refer to [www.herefordshire.gov.uk/HAPcallforsites](http://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 comment.

**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 comment.

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

We understand that the proposed University and extension to the Rotherwas Enterprise Zone were not included in the calculations of capacity of the sewage treatment works when impacts on the River Wye SAC/SSSI were assessed in the Core Strategy. This will need to be considered further as part of the assessment of sites and in the HRA for the Plan.

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

**About you:**

**Name:** Gillian Driver.....

**Address:** Natural England, Worcester County Hall, Spetchley Road, Worcester, WR5 2NP

**Email:** Gillian.Driver@naturalengland.org.uk.....

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

Yes  X

No

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

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**Please return this questionnaire by midnight on 8<sup>th</sup> October 2018**

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

**Question 8 continued...**

## Latham, James

---

**From:** North Planning <NorthPlanning@cyfoethnaturiolcymru.gov.uk>  
**Sent:** 20 September 2018 16:17  
**To:** Gilson, Susannah  
**Subject:** {Disarmed} - - Hereford Area Plan - Housing and Employment Site Options (Major)  
- NRW Response NRW:01101679

Dear Siobhan Riddle,

Thank you for consulting with NRW on the Hereford Area Plan and the call for candidate sites.

We have no comments to provide.

Best regards,

Geraint Blayney

**Tîm Cynllunio Datblygu / Development Planning Team**  
**Cyfoeth Naturiol Cymru / Natural Resources Wales**

Ffôn / Tel: 03000 654680

Gwefan / Website: **[MailScanner has detected a possible fraud attempt from "www.naturalresourceswales.gov.uk" claiming to be www.cyfoethnaturiolcymru.gov.uk / www.naturalresourceswales.gov.uk](#)**

**Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu defnyddio a'u gwella mewn modd cynaliadwy, yn awr ac yn y dyfodol.**

**Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.**



From: Mrs. A. Neal

6th November, 2018

To: Ms S. Gilson (Local & Neighbourhood Planning Community Engagement Officer)

Herefordshire Council

Plough Lane

HEREFORD

HR4 OLE

Public Consultation for HAP Site Option TUP 26, Queenswood Drive

Dear Ms Gilson,

In respect of the above, please could you note as follows:

Firstly, the site is protected land. It has a covenant registered with the Land Registry. This says:

The Council hereby declare that they will hold the Land upon the trust following, namely, upon trust for the perpetual use thereof by the public for the purpose of exercise and recreation ....

The Council to the intent and so to bind the Land and each and every part thereof and to benefit and protect the remainder of the land in the above mentioned title covenants with the Transferor that it will forever after maintain the Land as public open space in a neat and tidy condition and will not erect or permit to be erected and buildings and structures on the Land at any time save for those appurtenant to the use of the Land as public open space.

Secondly, residents from Queenswood Drive and surrounding areas have used the site to remember those who sacrificed their lives in armed conflict. You are probably aware that there is a war memorial bench there already. There has been a request that the site become a Centenary Field. There are many direct links to that field, e.g. one resident living in Queenswood Drive lost her great, great uncle in WW1 and he was the son of the then vicar of Tupsley.

There are eye witnesses who will tell you that the bench is used every day. The War Memorial Cross at the Junction of Ledbury Road/Church Road is in a wonderfully prominent position, but it is surrounded by traffic lights in the middle of a busy road junction. It does not allow to sit quietly and contemplate. The site in Queenswood Drive, however, is quiet,

sheltered from traffic and the bustle of life. The view from the bench is into green surroundings, the trees provide shade in the summer. There is ample road parking from those who come from further away and the field can be reached from many different directions on foot, as various footpaths link there and cross the field in a variety of directions. The Hereford Times and BBC Hereford & Worcester are covering the locals' feeling about this site in terms of its importance to local residents in their run up to Armistice Day.

I do hope the Council will be sufficiently sensitive to take into account what this site means to residents, not only in Queenswood Drive, but also surrounding streets and areas. To build on it would be the ultimate in insensitivity and, indeed, injustice on a very personal level as well as for the whole community. A lot of residents have lived here for a long time and their memories are intrinsically linked to this site.

Yes, new houses have to be built, but sites have to be chosen more carefully. This is only a small site; some 20 houses I believe are envisaged. It must be possible to accommodate these elsewhere, especially as you have put out a call for sites.

Sincerely

A. Neal

Mrs. A. Neal

## Latham, James

---

**From:** Idf  
**Sent:** 09 October 2018 08:40  
**To:** Gilson, Susannah  
**Subject:** FW: Foley street playing field

And another

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

**From:** Polly Neill  
**Sent:** 08 October 2018 18:17  
**To:** Idf <ldf@herefordshire.gov.uk>  
**Subject:** Foley street playing field

To whom it may concern,

We strongly object to the council building on the children's playing field in Foley Street. This has been a playing field for over 35 years and my son and other children have used it for many years . The street is not suitable for more traffic flow. Also I believe the land was bequeathed for use of the public of Foley Street.

Yours sincerely

Polly Neill  
Clive weavin

Sent from my iPhone

## 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/herefordareaplan](http://www.herefordshire.gov.uk/herefordareaplan)

**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/herefordareaplan](http://www.herefordshire.gov.uk/herefordareaplan) 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. *TUP 25*

Yes:

No:

If no, please explain:

*SPECIFICALLY FOR TUP 25. BOTH ACCESS ROADS ESPECIALLY FOLEY ST. ARE UNSUITABLE.*

*AS AN INFORMAL PLAYING AREA, IT IS USED FREQUENTLY AND THE POTENTIAL NUMBERS OF CHILDREN IN THE AREA IS GROWING (WHO MAY USE THE AREA).*

*WAS THERE A COVENANT ON THE SITE DEMANDING THAT IT ONLY BE FOR 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](http://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](http://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](http://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:

MY MAIN CONCERN IS FOR TUP 25 AS THIS IS THE AREA IN WHICH I LIVE. I DO WONDER WHY THE BROWNFIELD SITE, EAST OF MORTIMER ROAD HAS NOT BEEN IDENTIFIED

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

**About you:**

Name:..... R. A. & MRS P. A. NORGATE .....

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**

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](http://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](mailto: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](mailto:ldf@herefordshire.gov.uk)

**Please return this questionnaire by midnight on 8<sup>th</sup> October 2018**

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



**Question 8 continued...**

**Latham, James**

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**From:** ldf  
**Sent:** 08 October 2018 11:26  
**To:** Gilson, Susannah  
**Subject:** FW: Hereford Area Plan Ref. Tup 26 and Tup 27

[And another](#)

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**From:** Timothy O'byrne  
**Sent:** 08 October 2018 10:51  
**To:** ldf <ldf@herefordshire.gov.uk>  
**Subject:** Hereford Area Plan Ref. Tup 26 and Tup 27

Dear Sir,

## **Hereford Area Plan**

It has just been brought to my attention that in the Hereford Area plan there are two sites in Tupley (Tup 26 and Tup 27) that are currently out to consultation for housing development.

As Chairman of the Governors at the Bishop of Hereford's Bluecoat School, I must register an immediate concern as both of these proposed areas for development are adjacent to our detached school playing field. If these developments take place I am concerned that there will be a serious impact on our school sports field. The loss of this existing recreational space (Tup 26 and Tup 27) will mean that the only remaining green space in the immediate area left for residents of the area to use for leisure time and dog walking will be our school's playing field and the community sports playing field and this will undoubtedly result in increased dog excrement and rubbish in previously designated sports areas. As Chair of Governors I am concerned that this could have a significant impact on the health and well being of the pupils at the school when using their sports facilities. In pointing out these potential hazards I would also note that there has already been significant residential development in the close proximity of these new proposals (Bishop Field estate) and that these are already producing a negative impact on our field in a manner similar to that which I fear may happen if these proposed developments are likely to take place.

I appreciate that I am registering my concern on the last day of the consultation period. I am, however, very concerned and hope that you will acknowledge this email and give full consideration to the issues I have raised.

If I have not sent this concern to the appropriate address, I would be grateful if you would forward it as necessary.

Yours faithfully,

Tim O'Byrne  
Chair of Governors  
Bishop of Hereford's Bluecoat School