

Rural Proofing Paper

Herefordshire Local Plan

September 2014

HEREFORDSHIRE CORE STRATEGY AND RURAL PROOFING

1. Introduction

- 1.1 The purpose of rural proofing is to ensure that organisations developing policies and programmes which will have an effect on rural areas ensure that the needs and interests of people living and working in these areas are properly considered. Rural Proofing applies to all disciplines and is not exclusively related to planning processes. In 2013 Defra published Rural Proofing Guidelines to enable government departments to assess the impact of their policies and programmes on rural areas. However the assessment of the impact of policy of other organisations at a more local level is also considered to be important. It is relevant to a range of projects from the small scale initiatives to strategic longer term plans.
- 1.2 Many of the issues relevant to rural planning have been assessed through the Sustainability Appraisal. However it was considered useful to also broadly assess the Core Strategy as a whole against the issues set out in the Defra Toolkit 2013. This report demonstrates how the requirements of the rural proofing process align with planning policy making in general and in particular with the Herefordshire Core Strategy, where the future of rural areas is a central consideration and this is shown in Appendix 1.

2. The Herefordshire Core Strategy and Rural Areas

- 2.1 Herefordshire is a predominately rural, sparsely populated county with approximately half of its resident population living in rural areas in villages, smaller settlements, farms and other isolated properties. Therefore the impact of the Core Strategy on rural areas has been a central theme of the policy making process. Whilst rural areas have their own particular issues that need to be addressed through the planning process, there is a strong functional relationship between the rural areas and Hereford and the market towns. Therefore whilst there are separate policies on rural areas in the place making section, the Core Strategy's vision and strategic objectives and a range of other policies apply equally to all areas of the County.
- 2.2 The Rural Housing Background Paper March 2013 explains how a revised policy approach was explored and taken forward to the current submission stage. This approach represents a significant change from that included in the Unitary Development Plan for Herefordshire 2007 and reflects a number of key considerations including:
 - The need to increase the sustainability of individual settlements.
 - The need to protect the open countryside and prevent dispersed development.
 - The need to provide an appropriate framework for neighbourhood planning.
 - That nearly half of the county population live in rural areas of Herefordshire
 - The role of planning in influencing the market forces and personal behaviour.
- 2.3. In the first stages of the Core Strategy preparation the proposed housing strategy for rural areas was broadly based on the approach in the Unitary Development Plan. That is, a limited number of main villages and smaller settlements would accommodate the focus of rural housing growth. Whilst in principle this two tier approach is similar to that proposed in the pre submission core strategy, the number of villages identified as

suitable for some proportional growth is now greater. However given changes to the planning system by central government, including the publication of NPPF and the introduction of neighbourhood planning, a different approach to rural housing policies was considered appropriate.

2.4 In developing a housing strategy for rural areas, an analysis of information sources (e.g. annual monitoring, Office of National Statistics) took place to identify issues and challenges. Consultation with councillors and stakeholders was also undertaken. Furthermore government initiatives including The Taylor Review of Rural Economy and Affordable Housing (July 2008) also had to be taken into account. Key issues to emerge from this work included:

- Problems with access to services and employment due to dispersed nature of settlements and transport provisions.
- Deprivation levels
- Housing affordability
- Social isolation

2.5 Following the identification of these issues, and given changes in government approach to planning, it was considered that a revised strategy was required. Three different options were considered:

Option Considered	Evaluation	Decision
Option 1 – Development of approach outlined in the Preferred Options: Rural Areas (August 2010)	Insufficiently flexible to respond to localism and emerging neighbourhood planning process. Would prevent opportunities for smaller settlements to become more sustainable.	Not taken forward
Option 2 – Allow unrestricted development to meet housing demand.	Encourage isolated and dispersed housing in the Countryside. Contrary to national guidance.	Not taken forward
Option 3 -A growth target for a larger number of villages based on housing market area.	More effective in responding to needs for affordable housing. Greater opportunity to enhance social and economic sustainability. Considered to be a fairer approach to rural communities without resulting in unacceptable dispersal of new development.	Included in draft core strategy march 2013 and taken forward in the pre submission draft.

2.6 Employment in rural areas was considered as part of the Employment Land Study 2012. This divided the County into different study areas and its purpose was to consider the economic opportunities and threats to Herefordshire as a whole, and also the specific issues regarding Hereford city, the individual market towns and the wider rural area, in helping to maximise the economic opportunities of the county. It recommended that Core Strategy should include policies to promote and guide expansion of existing employment uses in rural areas, promotion of rural diversification

and the re-use of rural buildings for employment uses. This has been achieved through RA4, RA5 and RA6. The Employment Land Study forms part of the evidence base for the Core Strategy.

- 2.7 In addition to ongoing evaluation of individual policies, the Core Strategy was subject to a Sustainability Appraisal (SA). This is a statutory requirement of the Planning and Compulsory Purchase Act 2004 and assesses the likely social, environmental and economic effects of the strategy and policies. SA is an iterative process that has taken place at the various stages of the Core Strategy's development. The most recent SA was published as part of the pre-submission publication consultation that took place between May and June 2014. In summary it found that the effects of the rural policies on different identified themes are broadly positive. However a potential mix of positive and negative outcomes is identified in relation to certain policies. This does not mean that a policy is unacceptable as tensions are inevitable when trying to achieve a range of policy objectives.
- 2.8 Although it is considered that the SA addresses rural proofing issues, the Core Strategy has also been assessed against issues raised in Defra's Rural Proofing Toolkit and the findings of this are found in Appendix 2. Many of these questions appear to be related to issues surrounding service delivery but it demonstrates that these issues have been addressed by the Core Strategy where they are within its remit.

3. Next stages

- 3.1 As the Core Strategy process continues towards adoption, the neighbourhood planning process in the County is making good progress. Over 130 Parishes have started the process of producing their plans. These will further develop the policies of the Core Strategy and may allocate sites for development to meet their target of growth identified in policy RA1 of the Core Strategy. Over 60% of the County's parishes have started the process of neighbourhood planning. This gives a good indication of the degree of engagement of rural areas in the planning process.

4. Conclusion

- 4.1 The future of rural areas and their population is a central theme of the Core Strategy. By following a comprehensive approach to policy formulation and consultation the requirements for rural proofing have been met. The Core Strategy has further stages to complete prior to its adoption and any modifications that take place will be made with full regard to the impact on rural areas and the rural proofing process.

Appendix 1 – Table showing Rural Proofing and Core Strategy Processes.

Rural Proofing Stages	Core Strategy Stages
Define the issue	<ul style="list-style-type: none"> • Internal Review of issues. • Analysis of monitoring reports • Issues stage 2007
Understand the situation	<ul style="list-style-type: none"> • Consideration of Issue Stage consultation responses. • Evidence base including Background Papers and Policy Direction Papers
Develop and appraise options	<ul style="list-style-type: none"> • Developing options 2008 & Sustainability Appraisal • Place shaping options 2010 & Sustainability Appraisal • Preferred options 2010 & Sustainability Appraisal • Draft Core Strategy 2013 including Rural Background Paper & Sustainability Appraisal
Prepare for Delivery and commit to responsibilities	<ul style="list-style-type: none"> • Take forward policies and proposals to pre submission consultation stage in May-July 2014. • Submit representations received at pre submission consultation stage to Inspectorate with the Core Strategy. • Examination of policies and proposals for rural areas if required by the Inspector. • Adoption of Core Strategy by Council following consideration of any modifications proposed by the Inspector.
Implement and Monitor	<ul style="list-style-type: none"> • Development Management Process • Neighbourhood Planning Process. • Annual Monitoring Report
Evaluate and Adapt	<ul style="list-style-type: none"> • Review of Core Strategy 5 years or as required after adoption

Appendix 2: Rural Proofing of the Core Strategy –Submission Document

Rural Proofing Topic	Comment
Availability and Provision	
Will the Core Strategy affect the availability of public and private services?	The Rural Area policies seek to encourage the provision of both affordable and market housing in some communities which associated supporting service provision and infrastructure.
Will the policies rely on existing services outlets, such as schools, libraries and GP surgeries?	New housing growth is more likely to be directed to areas where there is some existing service provision. However development will be required to contribute to improved services through S106 and CIL as appropriate.
Will the policy rely on the private sector or a public-private partnership?	The private sector will play a major role in delivering the required development set out in the Core Strategy. However public sector organisations will also play a key role in the delivery of certain elements such as affordable housing, health provision etc.
Delivery Costs	
Will the cost of delivery be higher in rural areas where clients are more widely dispersed and economies of scale can be harder to achieve?	The Viability Assessment 2014 found that for RA1, RA3, RA5, and RA6 there are no specific requirements which would impact upon viability. RA2 requires a set of specific infrastructure requirements but found to be no implications for viability testing. The occupancy restrictions in RA4 will affect values but not tested as related to individual business requirements rather than property development values.
Will the policy rely on local institutions for delivery?	Herefordshire Council will support parish councils in the production of their neighbourhood plans. New development will be delivered by private house builders, housing associations and registered providers.
Accessibility and Infrastructure	
Will the policy affect travel needs or the ease/cost of travel?	With increased populations, public transport provision to some of the rural settlements will become more viable although it is recognised that many journeys will be car based.
Does the policy rely on infrastructure (e.g. broadband ICT, main roads, utilities) for delivery?	Some new and improved infrastructure will be required to support the new development in rural areas. This is addressed through Policy ID1.
Will delivery of the policy be challenging at the 'edges' of administrative areas? Many rural people find it easier to cross an administrative boundary to access facilities.	Herefordshire Council has worked closely with neighbouring authorities on any cross boundary issues as is explained in the duty to cooperate statement. No significant issues have been raised. There will always be some cross boundary movements for access to facilities and services although it is recognised that the rates of in and out commuting in the county are relatively low.

Rural Proofing Topic	Comment
Is the policy dependent on new buildings or development sites?	This is the central theme to the Core Strategy which sets out how development requirements over the plan period will be met.
Communications	
Does the policy rely on communicating information to clients?	There has been a series of consultation periods and events throughout the plan process as the involvement of a range of stakeholders is a key objective. Engagement of parish councils in the neighbourhood planning process and those delivering the development and associated infrastructure is key to the success of the plan.
Economies	
Will the policy impact on rural businesses, including the self-employed?	Yes this should have a positive impact through policies RA.6 and Policies E1-5.
Will the policy affect land-based industries and, perhaps, rural economies and environments?	This is the purpose of the Core Strategy policies. Policy RA6 seeks to allow the rural economy to grow by setting out the criteria against which proposal for new or expanded economic activity will be considered.
Will the policy affect people on low wages or in part time or seasonal employment?	Although this is outside the remit of the Core Strategy by encouraging employment generating proposals through RA6, there may be a positive impact on this issue.
Disadvantage	
Will the policy target disadvantaged people or places?	A number of policies aim to improve conditions for disadvantaged people e.g. H1 affordable housing, H2, Rural Exception Sites, H3 Range and mix of housing, RA6 Rural Economy, SC1 Social and community facilities.