

Policy Options Consultation

Local Plan 2021-2041

April 2022



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Introduction

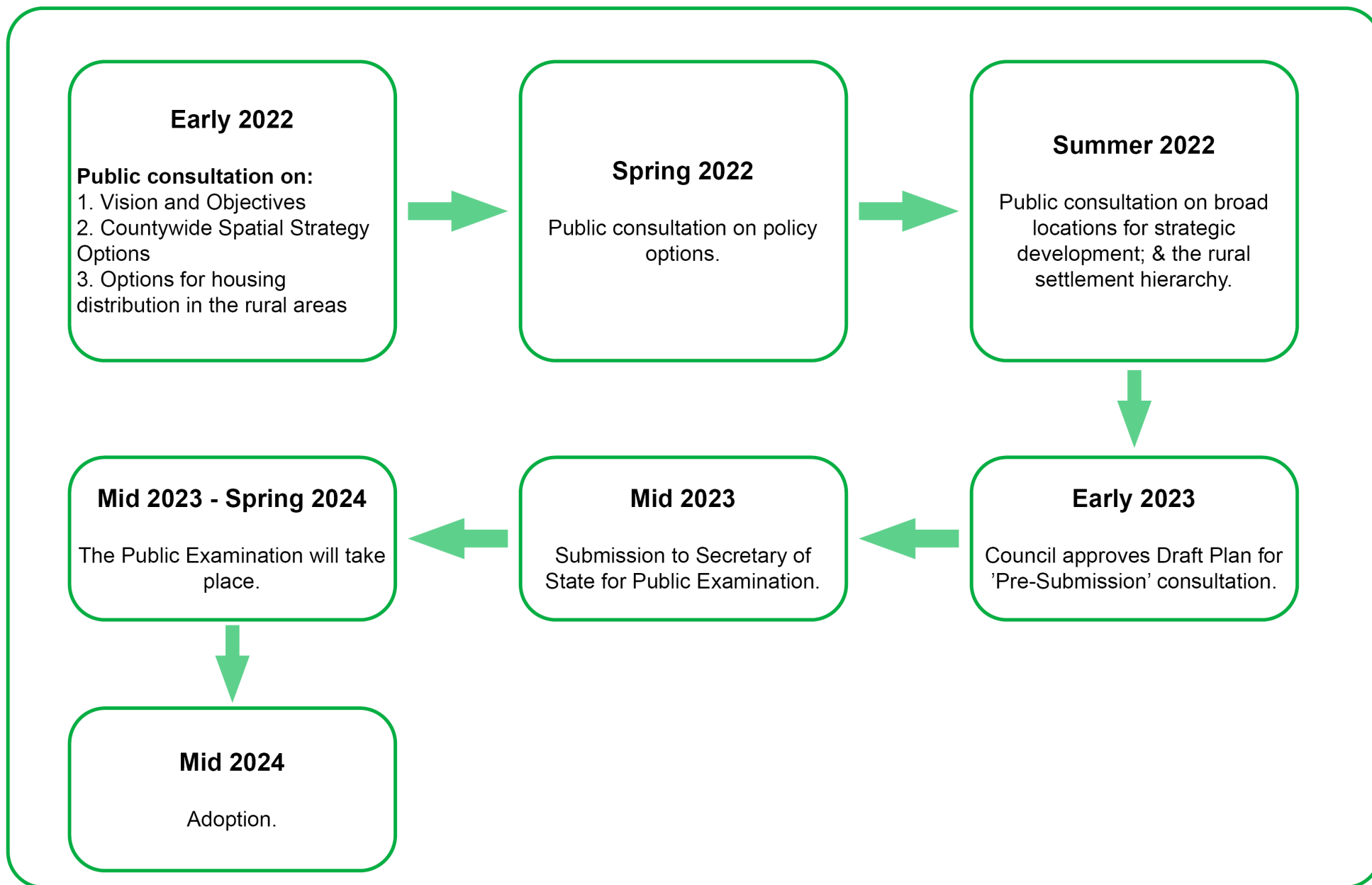
As part of the preparation of a new Local Plan for Herefordshire the range and content of existing County-wide planning policies need to be re-assessed to determine their effectiveness, consistency with national planning policy and to consider whether they would help to deliver key aspirations of the [Herefordshire County Plan](#). Consideration also needs to be given as to whether there is a need to include additional policies in the local plan in instances where there are gaps in the current suite of policies. However it should be borne in mind that the Government continue to stress the need for shorter more concise plans and the unnecessary inclusion of additional policies can make the plan making process slower and, once adopted, lead to plans becoming out-of-date more quickly.

This consultation paper sets out a summary of the context around each of the policy areas and includes range of possible approaches that the new local plan could include. The policies will be key in determining planning applications and so it is important that this consultation provides the opportunity for everyone to have their say at a formative stage of plan making. The paper does not set out detailed policy wording at this stage, which will come later in the process, but does look at different ways that the policies could be applied in the new plan.

The policy options within this consultation paper cover general and county-wide matters they do not refer to specific places or areas within Herefordshire. The policy options for specific places and areas, including the rural settlement hierarchy will be subject to consultation later in the year.

The responses received to this consultation, together with a number of evidence base studies, will inform the preparation of the draft Local Plan.

The diagram on page 2 sets out the proposed timetable for the preparation of the Local Plan



Climate Change

Background

Dealing with the worldwide effects of climate change will be one of the biggest challenge we will ever face. Rapidly warming temperatures resulting from human activities are changing global weather patterns, bringing: flooding; rising sea levels; droughts; wildfires; melting polar ice; catastrophic storms; and declining biodiversity.

The [Climate Change Act](#) sets a legally binding target for the UK to achieve net zero greenhouse gas emissions by 2050. It is now the role of Local Authorities to ensure that all planning polices embed the principles of net zero carbon and fully demonstrate that they will be a part of a net zero carbon future.

In 2019, Herefordshire Council unanimously declared a [Climate and Ecological Emergency](#), setting a target of carbon neutral by 2030. Herefordshire Council agreed to:

- Accelerate a reduction of emissions and aspire to become carbon neutral by 2030/31;
- Deliver an updated [Carbon Management Plan](#) and [Carbon Management Action Plan](#) for council emissions by April 2020;
- Work with strategic partners, residents and local organisations to develop a revised countywide carbon dioxide reduction strategy aspiring for carbon neutrality by 2030; and
- Use 100% renewably sourced energy where this provides the best carbon reduction return on investment.

In January 2022, the [Herefordshire Citizens' Climate Assembly](#) was held to discuss: *'How should Herefordshire meet the challenges of climate change?'*

In total, 35 recommendations were developed within the themes of buildings, transport, food, farming, and land-use. Individual assembly members then voted on the recommendations to form a [priority ranking](#), which included, amongst others, introducing and changing building and planning regulation, planning powers to address biodiversity and planning mandate to avoid car dependency. These recommendations will be used to influence council policy and spending priorities, as well as being addressed in the Local Plan, to help Herefordshire become a carbon neutral and nature-rich county by 2030.

The aim of planning is to create places where people can enjoy happy and healthy lifestyles, however, this will become difficult to achieve without policies which comprehensively address climate change adaptation and mitigation.

The following sets out how climate change is addressed through the Local Plan's new vision and objectives as well as a look at how the County Plan also addresses climate change.

Herefordshire County Plan

Throughout the [County Plan](#) (2020-2024), the significant effects of climate change have been considered, particularly the frequent, but unpredictable, periods of flood and drought.

The council aspires to *'consider the impact of climate change and the opportunity for carbon reduction in every aspect of our operation'*.

Ensuring that the Local Plan seeks to address climate change through its policies will therefore be important.

Local Plan Draft Vision

The Local Plan 2021-2041 has an environmentally themed countywide vision which states:

'By 2041, Herefordshire will be a place where planning has helped to create an environment where all of its residents have an exceptional quality of life and are able to live and travel in a more sustainable way. In addressing the climate and ecological emergency, the county will be carbon neutral, and biodiversity here will be thriving.'

The climate and ecological emergency is therefore a central part of the vision, and by having effective climate change policy within the Local Plan will play a crucial role in addressing this.

Local Plan Draft Objectives

Climate change is addressed in the environmental objectives, in particular objectives 9 and 10:

- *To ensure that development is located and designed in a way which requires less energy use and to increase the amount of energy generated from renewable sources, with a requirement for all new development to be net zero carbon by 2030.*
- *To enable net zero carbon goals to be at the heart of transport planning decisions, for environmental gains but also to allow people to make healthier more active travel choices.*

All of the environment objectives highlight the importance of the natural environment. These are all working towards achieving the county's carbon neutral goals. They also contribute to mitigating and adapting to the effects of climate change.

National Guidance

Addressing climate change is one of the core land use planning principles, which the [National Planning Policy Framework](#) (NPPF) expects to underpin both plan-making and decision-taking. It emphasises the importance of responding to climate change, as it is central to all economic, social and environmental aspects of sustainable development.

The NPPF states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account of issues including the long-term implications of flood risk, water supply, biodiversity, resource usage and landscapes, as well as the risk of overheating from rising temperatures, for example.

Local Considerations

Herefordshire is considered to be the West Midlands' most rural county.

The average household consumption emissions in Herefordshire is [17.8t CO2e](#) per year, which compares to the national average of 13.1t. This is primarily due to the rural nature of the county, with more oil-fired heating systems and generally poorer access to public transport.

Herefordshire's biological and geological diversity is vulnerable to the effects of climate change and there are significant areas that are liable to flooding, the severity of which is exacerbated by climate change.

Responses to the Parish and Town Council questionnaire (Feb 2022) suggest that more emphasis is needed on our resilience to the effects of climate change, with modifications suggested to current Policy SS7 (addressing climate change). These are summarised below:

- The policy has limited effect in practice, with no evidence that it is understood or followed;
- Reliance of private car: need more emphasis on sustainable transport;
- Very few eco-friendly developments have come forward;
- Need to link biodiversity with climate change; consider the impacts of climate change on wildlife habitats;
- Implementation weak and needs strengthening;
- Climate change should be embedded, not be a separate policy;
- Need to address Herefordshire's climate and ecological emergency;
- Climate change seen as an afterthought, needs higher priority.

The Town & Country Planning Association (TCPA) and the Royal Town Planning Institute (RTPI) have recently jointly published [guidance](#) on how the planning system can help communities face the climate crisis. Both organisations believe that climate change should be the top priority for planning;

'This is simply because the impacts of flooding, overheating and other consequences of climate change stand in the way of everything else we want to achieve in terms of the creation of vibrant communities and a sustainable and just society'.

It is suggested that the best way to introduce new, effective policies on climate change is to embed them throughout Local Plans. Successful solutions to the climate crisis require local planning policies to be based on a powerful, overarching objective of mitigation and adaptation. This should be set within the wider objective of planning to secure the delivery of sustainable development.

Evidence Base

Several evidence base reports provide advice and support in relation to the mitigation of and adaptation to climate change:

- Climate Change Study: this will identify the potential impacts of climate change and options for addressing these within Herefordshire.
- Level 2 Strategic Flood Risk Assessment (SFRA): This follows on from the completed [SFRA Level 1](#) and will include a detailed assessment of all sources of flood risk for specific sites.
- Sustainability Appraisal (SA): involving ongoing iterations to identify and report on the potential social, economic and environmental effects of development plans and the extent to which sustainable development is expected to be achieved.
- Habitat Regulations Assessment (HRA): this is the process to consider whether a development plan is likely to have significant effects on a national network site designated for its nature conservation interest.
- New Green Infrastructure Strategy: This is to be commissioned shortly. This will include an establishment of policies and principles for the protection and enhancement of natural and culturally important features and functions that contribute to a sustainable future for development in Herefordshire.
- Built Environment and Design: The Environmental Building Standards SPD set out ways to improve standards of building design and construction, providing minimum standards for building performance, energy use, accessibility and construction.
- A Transport Scoping Report: This will determine the overall approach to transport across the county.

Existing policy

The current Core Strategy includes policies such as SS7, SD1-SD3 that are relevant to mitigating and adapting to climate change, but there is recognition that these need to be strengthened to ensure delivery of the council's target to be carbon neutral by 2030.

Neighbourhood Development Plans (NDPs)

There is no explicit requirement from government for NDPs to address climate change mitigation and adaptation, with the exception of renewable energy. However, different communities may face different challenges relating to climate change. Therefore addressing these in an NDP can ensure that the local challenges faced can be effectively tackled. This can be done through: developing policies that can encourage energy efficient and small carbon footprint developments; making local decisions on the location of new developments; or enabling sustainable communities, for example.

Climate change policy options

Option CC1 – Retain an overarching strategic climate change policy

This option would revise and update policy SS7 'addressing climate change' and would include a more focused approach to mitigation and adaptation, taking forward amendments to meet the new Local Plan's vision and objectives and recent Government guidance.

- Ensure the policy conforms to the new changes in the Climate Change Act 2008 and refer to the council's Climate and Ecological Emergency;
- New aim for carbon neutral;
- Sharper focus on the requirements of the NPPF;
- Climate change mitigation: measures that contribute to slowing and reversing the emission of greenhouse gases, such as: reducing the need to travel; encouraging walking, cycling and public transport rather than private car; decentralised energy and heating; and promoting renewable and low carbon energy;
- Climate change adaptation: understanding the present and future impacts of climate change such as flood risk and heat, and planning the measures that need to be put in place to adapt to, and mitigate those impacts, such as: conserving water supplies and minimising the risk and impact of flooding; the use of green infrastructure to reduce heat; and ensuring design and construction of developments provides resilience to climate change.

Option CC2 - New cross-policy approach

This option would reflect the guidance from the TCPA and the RTPI and would ensure that individual Local Plan policies require development proposals to address climate change and ecological emergencies; putting climate change at the forefront of the Local Plan. It would ensure that specific development types would have tailored policy guidance, including the location based allocation policies within the Plan.

Change to the policy direction could refer to:

- Housing design: requiring all developments to be carbon neutral by 2030 and net zero carbon by 2050. Ensuring that development is located and designed in a way that requires less energy use and increases the proportion of energy generated from renewable sources;
- Green infrastructure: provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change, as well as encouraging people to walk and cycle within these areas;
- Transport: reduce the need for people to travel by promoting sustainable transport and ensuring there is an improved public transport network available for all residents;
- Water: consider the impact of and promoting design responses to flood risk;
- Considering availability of water, water infrastructure and design responses to promote water efficiency and protect water quality.

Option CC3 – A combination of options 1 and 2

This option would see a combination of a new strategic level climate change policy, plus a cross-policy approach in the Local Plan. This option will put climate change as a top priority throughout both the strategic and more detailed policies and proposals, so that its importance is emphasised.

This option will ensure that prospective developers understand that addressing climate change is an essential element in all forms of development, of whatever kind and at whatever scale. If climate change is not addressed in proposals, then this would be contrary to the Local Plan.

Biodiversity and Geodiversity

Background

In relation to biodiversity, the U.K is one of the world's most [nature deprived countries](#) and has lost nearly half of its wildlife and plant species over the last century as a result of human and land development. In 2018 the Government published the [25 year Environment Plan](#), which makes recommendations on how biodiversity can be enhanced, including through a [Nature Recovery Network](#). Local Nature Recovery Strategies (LNRS) are a flagship measure in the [Environment Act 2021](#). They are a new system of spatial strategies for nature, which will plan, map, and help drive more coordinated, practical, focussed action, and investment in nature's recovery to build the national Nature Recovery Network.

The Environment Act 2021 which is the legislative framework for the 25 year Environment Plan makes Biodiversity Net Gain (BNG) and nature recovery strategies mandatory. Biodiversity Net Gain is defined by Natural England as '*...an approach to development, and/or land management, which aims to leave the natural environment in a measurably better state than beforehand.*'

The Act also increases the biodiversity duty of Local Authorities, by making sure Biodiversity Net Gain is set at a minimum of 10%. Local Plans can require higher than 10% but this has to be weighed in the balance of delivering other policy objectives.

Opportunities for the restoration of woodlands and meadows to help restore habitat for endangered species and wildlife have strongly been encouraged in the 25 year Environment Plan. The term habitat refers to the area used by a particular species or an assemblage of animals and plants which is known as the biodiversity. The Plan recommends that the restoration of woodlands and meadows to be a part of the Nature Recovery Plan and also provides support for farmers to restore fields to rich woodlands and wildlife meadows.

In response to the global climate emergency, Herefordshire Council declared a [Climate and Ecological Emergency](#) in 2019 which makes various commitments towards improving biodiversity.

The following sets out how biodiversity and geodiversity is addressed through the County Plan and the Local Plan's draft vision and objectives.

Herefordshire County Plan

[The County Plan](#) (2020-2024) highlights the environment as one of the top priorities, and key area of focus for the county. It recognises the importance of Herefordshire's biodiversity and its contribution to the economy in particular tourism and in supporting the health and wellbeing of communities.

As part of the council's ambition, the council will seek strong stewardship of the county's natural resources and to '*protect and enhance the county's biodiversity, value nature and uphold environmental standards*'.

Local Plan Draft Vision

The Local Plan 2021-2041 has an environmentally themed draft vision, which states:

By 2041 Herefordshire will be a place where planning has helped to create an environment where all of its residents have an exceptional quality of life and are able to live and travel in a more sustainable way. In addressing the climate and ecological emergency, the county will be carbon neutral, and biodiversity here will be thriving.

It will be critical therefore to have an effective biodiversity and geodiversity policy to help achieve this vision.

Local Plan Draft Objectives

The draft Local Plan Objectives specifically mention a number of areas whereby the value of biodiversity, namely within these environmental objectives:

- *To protect the natural environment and heritage of the county, having particular regard to its characteristic features, including; retaining traditional orchards and woodlands as well as restoring its rivers to a good quality.*
- *To pay special regard to protected areas of the county, including the Wye Valley and Malvern Hills AONB's, whilst at the same time, valuing its ecology and landscape.*
- *To achieve Biodiversity Net Gain from all developments and significantly increase the tree cover in Hereford and the market towns.*
- *To enhance and extend Herefordshire's natural capital, green infrastructure and nature recovery networks to ensure good access and proximity to open and wild spaces for all residents.*

National Guidance

The [NPPF](#) was updated in 2021 to reflect the climate emergency and this includes a number of changes including strengthening wording, which now specifies that opportunities should be sought to improve biodiversity in and around development.

In the national policy there is a broad approach to what planning policies should be addressing. In summary it identifies the necessary protection of sites of biodiversity or geological value and soils, the wider benefits of natural capital and where new development can improve the local environment including provision of Biodiversity Net Gain.

National policy requires planning policies and decisions to contribute to and enhance the natural environment. Specifically, Local Plans should protect and enhance biodiversity sites, recognise the wider benefits of natural capital and ecosystem services, minimise impacts on and provide measurable net gains for biodiversity, and avoid creating or increasing risk from unacceptable soil, air and water pollution. Plans should also map and safeguard components of habitats and ecological networks and promote the conservation, restoration and enhancement of priority habitats and species.

National policy specifies that the scale of development within AONBs should be limited due to their landscape and ecological contributions. It states that , Local Plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Guidance on 'biodiversity, geodiversity and ecosystems' sits within the [Natural Environment](#) section of the Planning Practice Guidance.

Local Considerations

The biodiversity and geodiversity of Herefordshire features a broad range of assets including and not limited to the Special Area of Conservation (SAC) sites including the River Wye and Lugg and ancient woodlands and the habitats within the Malvern Hills AONB.

Geodiversity value includes nationally significant sites and such features are within remit of Natural England and are designated as Sites of Special Scientific Interest (SSSI). Locally Herefordshire Council works with Herefordshire & Worcestershire Earth Heritage Trust to identify and record Local Geological Sites that are a local consideration within the planning process.

Along with the national trend in biodiversity loss, Herefordshire has also experienced similar conditions. Evidence from the [Building Biodiversity 2009](#), attributes much of this loss to the post-war changes in agricultural practices, in particular agricultural intensification. There have been increasing declines in key habitats such as semi-natural grassland and woodland once common species such as hares, hedgehogs and turtle doves are at risk of disappearing.

The River Lugg is a tributary of the River Wye Special Area of Conservation (SAC), The River Lugg is currently [exceeding its limits](#) for phosphates, as a result of water pollution from both 'point' source (in particular sewage outlets) and 'diffuse' source (in particular agricultural run-off). In addition, Herefordshire Council is working collaboratively with partner organisations, to address the issue of high phosphate levels in the River Wye catchment, a significant contributor of which are discharges from agricultural land.

Evidence Base

The biodiversity and geodiversity of Herefordshire features a broad range of assets including and not limited to the AONBs and SAC sites including the River Wye and Lugg, and ancient woodlands. Work is underway to commission a refresh of the Habitat and Species evidence to review other pieces of essential natural environment evidence referred to within this Policy Option Paper.

There is significant reliance on Geographical Information System (GIS) and records for understanding ecological matters on sites. A review is required to address more up to date biodiversity matters and this will be underway soon. The new evidence will be integral across the major topic areas of open space, landscape, and blue/green infrastructure. This will make for better more integrated plans.

- The existing evidence, [Building Biodiversity 2009](#) is partly still relevant but is over thirteen years old. This study provides the base for Herefordshire's current Local Plan.
- The AONB management plans for the [Wye Valley](#) and [Malvern Hills](#) AONB's are reviewed every five years and sets priority for their management over that period.
- The [Green Infrastructure Strategy 2010](#) sets out the framework for the key natural and cultural features of Herefordshire and polices for the protection and enhancement of these features.
- The [Ecological Network Map and Guidance Note 2013](#) provides a detailed map of Herefordshire's ecological network and has many potential uses.

Other References

The Royal Society for the Protection of Birds (RSPB) [State of Nature Report \(2019\)](#) has highlighted scale of biodiversity loss over the last century and has found many wildlife species continuing to decrease. Biodiversity loss has also wider implication that reach beyond the natural environment, '*natural resources (food, pharmaceuticals, construction materials), a good physical environment (air, soil, water quality), a functioning climate, and for general health and wellbeing*'.

Natural Capital Assessment

[Enabling a Natural Capital Approach](#) is another policy approach and at its simplest, a natural capital approach is about thinking of nature as an asset, or set of assets, which benefit people. The ability of natural assets to provide goods and services is determined by their quality, quantity and location. This approach would see the audit and assessment of the stock of natural capital and subsequently placing a monetary value on the services or benefits provided by natural assets.

Biodiversity Metric Tool

The [Biodiversity metric tool](#) is a habitat based approach used to assess an area's value to wildlife. The tool can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for habitats. It will be this metric that underpins the Environment Act's provisions for mandatory Biodiversity Net Gain in England.

Existing Policy

Latest guidance on biodiversity recommends a number of ways in which Local Planning Authorities can address it more appropriately. This includes integrating biodiversity as a central aim in local plan and all other strategies which may have impacts on nature, including transport, economy, housing and infrastructure.

Additionally, to ensure opportunities to support biodiversity and ecological enhancement are maximised there is a need to provide clear planning conditions for promoting biodiversity such as Biodiversity Net Gain (BNG) and betterment.

The existing Core Strategy Policy LD2 Biodiversity and Geodiversity requires an update to bring it in line with the NPPF and the Environment Act 2021. This Act sets out the need for mandatory BNG plus a number of key components including:

- When responding to the Act, a minimum 10% gain is required on applications for over 10 dwellings and is calculated using a nationally set Biodiversity Metric & approval of net gain plan;
- Habitat secured for at least 30 years via obligations/conservation covenant;
- Habitat can be delivered on-site, off-site or via statutory biodiversity credits;
- Local issues needs more emphasis;
- Issue with Local Wildlife Sites, as they were designated some time ago. The state of many of them is unknown. This requires updating.

Neighbourhood Planning

All neighbourhood plans include references to the protection of the natural environment. There are often policies that seek to protect particular areas for their natural and biodiversity value.

Herefordshire was part of the Phase 1 Government's Design Code Pilot testing programme. The intention of design coding is to include local level and locally distinctive guidance within design codes produced by the local community to accompany future neighbourhood plans. This would allow additional details to guiding development at a parish level.

Biodiversity and Geodiversity Policy Options

Option BD1- Maintain existing policy with update on implication and adoption of a Biodiversity Net Gain (BNG) in line with national planning policy

Option 1 would update the current policy in respect of recent changes to national policy, and in particular, to incorporate the mandated BNG into the policy. However with the Environment Act 2021 now in place it is likely that the national planning policy will be amended to reflect legislative changes so it is possible that further policy changes may be required.

Option BD2- Establish new approach to Biodiversity and geodiversity policy

A stronger emphasis could be placed on securing net benefits for biodiversity. Such a policy approach could seek to secure additional improvements and enhancement to biodiversity and geodiversity than current baseline requirements, through a number of means including:

- Looking at the possibility of increasing the mandated adoption of a BNG. Considering the scope greater than 10% net gain and expand the application of BNG to more types of development including agricultural developments which have a significant impact on habitat and species.
- Encourage use of a national assessment tools such as Natural Capital Assessment and the biodiversity metric tool as an additional means of securing a net benefit.

Option BD3- Devolve policy for local biodiversity and geodiversity to Neighbourhood Development Plans and/or design codes

This option would be additional to Option BD1, which would remain to set out strategic level advice. This approach would allow consideration of distinctive aspects to biodiversity and geodiversity that could be addressed at a local level. This could be through policies set out in Neighbourhood Development Plans or via guidance set out in a Design Code for a particular area

Historic Environment

Background

Herefordshire possesses a rich historic environment which includes numerous Iron Age hill forts, sites of Roman towns, defensive features such as Offa's Dyke and the border castles, together with some of the best preserved traditional timber framed buildings in the country. The richness of the historic environment is reflected in the number of designated heritage assets encompassing a wealth of listed buildings, registered historic parks and gardens, scheduled ancient monuments and conservations areas. These add to the special built quality and environmental character of many areas of the county and their protection and enhancement is recognised as an important ingredient for economic and neighbourhood renewal.

The county's archaeological heritage is a valuable but fragile part of our historic environment. The city centre of Hereford is designated as an Area of Archaeological Importance. This is one of only 5 nationally.

The wider value of historic landscapes is recognised through the designation of conservations areas, which vary in character and size from tiny hamlets to villages to country house estates, market towns and Hereford's historic centre. Rather than one vernacular building style, Herefordshire has a diverse range of buildings of which perhaps the most well-known and distinctive is the 'black and white' timber framed traditional buildings of the northern half of the county.

Herefordshire County Plan

A key economic ambition of Herefordshire Council's adopted [County Plan](#) (2020-2024) is '*to protect and promote the county's heritage, culture and natural beauty to enhance quality of life and to support tourism*'. The environment ambition of the County Plan to '*Protect and enhance our environment and keep Herefordshire a great place to live*' also needs to be considered in regards to the Historic Environment.

Local Plan Draft Vision

The Local Plan 2021-2041 has an environmental vision which is crucial to this policy option in that:

The rich landscape and cultural heritage will continue to be protected and valued for all to enjoy.

Local Plan Draft Objectives

Protection and conservation of the historic environment is highlighted within the environmental objectives of the Local Plan namely:

- To protect the natural environment and heritage of the county.
- To conserve and, where possible, enhance heritage assets and their settings through carefully managed change, and to recognise and elevate the role these assets play in providing a sense of place and local distinctiveness.

National Guidance

[National guidance](#) states that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. It also states that Local Planning Authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Plan-making bodies will need to consider the relationship and impact of other policies on the delivery of the strategy for conservation.

Government guidance identifies three levels of harm in relation to considering the impact of a proposed development on the significance of designated heritage assets. These are total loss, substantial harm, or less than substantial harm. The guidance sets out how planning authorities should respond when a proposal may result in one of these levels of harm.

Historic England has produced a [Good Practice Advice Note](#) that sets out information to help Local Planning Authorities make well informed and effective Local Plans and provides examples of good practice.

Local Considerations

Herefordshire's historic environment and heritage assets are significant contributors to sustainable development. Together they contribute to the distinctiveness of the county and help to create a sense of place. Important local buildings, whether designated or not, can have a social and cultural value and can act as focal points for local communities.

A well cared for historic environment is key attractor for tourism and investment and generally contributes to a good quality environment. The sustainable re-use of existing buildings can also help mitigate climate change and resource use through reducing development pressures on greenfield sites, reducing demand for construction energy and materials and by minimising construction waste.

Despite having such nationally recognised heritage at its core, the great extent of Herefordshire's archaeological resource is not well surveyed or assessed. Opportunities associated with developments and externally funded projects will continue to be secured to gain a better understanding of our archaeological heritage. The Archaeology and Development Supplementary Planning Document will be reviewed in due course in line with current policy.

Evidence Base

- The [Herefordshire Historic Environment Record](#) (HER) is the most comprehensive available dataset on Herefordshire's historic environment. The HER is based around a Geographic Information System (GIS) database and consists of paper and digitised records of all known heritage sites in Herefordshire, spanning the full range of human activity in the county; from the Palaeolithic to modern heritage;
- [Rapid Town Centre Assessments](#) were carried out in 2010 for Hereford, Ross on Wye and Leominster;

- A conservation area appraisal of Leominster is being carried out as part of its [High Street Heritage Action Zone](#) scheme. It is anticipated that appraisals of other conservation areas in the county will follow;
- A Hereford Design Guide Supplementary Planning Document is being prepared that will provide design guidance and good practice advice to help developers, applicants and officers improve the quality of design in new development, public realm and movement projects across Hereford. It will include a study of the historic character of the city.

Existing Policy

The Historic Environment is currently addressed in the existing Core Strategy through a dedicated policy, LD4, but is also covered in the Landscape and Townscape policy as well as individual policies relating to the development of Hereford and the market towns. There are also other related policies that focus on landscape, townscape and the re-use of rural buildings.

The current policy framework for the historic environment is considered to be broadly effective. However, there is scope to update the historic environment policy to strengthen the approach and reflect current national guidance on this issue. The current policy needs review because there is a need to:

- Encourage a better quality of supporting information to accompany planning applications. A thorough Heritage Impact Assessment is a very useful tool in identifying the impact of a proposal on the historic environment and an assessment of the significance of the historic asset. Therefore it is suggested that the policy and supporting text is amended to make it clear that a robust assessment of the significance of the asset as well as proposal's impact will be required to support planning applications.
- Address the issue of when a proposal may cause harm to the heritage asset. The National Planning Framework (NPPF) sets out a series of criteria to take account of when a proposal will lead to some degree of harm to a designated heritage asset and it is considered that these should be reflected in the updated Local Plan.

Neighbourhood Planning

All neighbourhood plans make reference to the protection of the historic environment and local heritage assets. There are often policies that seek to protect and enhance locally significant buildings. A couple of neighbourhood plans have designated local 'heritage areas', these are in places without a formal conservation area designation but the local community consider are worthy of future status.

Historic Environment Policy Options

Option HE1- Continue with existing policy, but update supporting text

Retain policy as is currently worded but update supporting text to include reference to the updated national guidance in relation impact of a proposed development on the significance of a designated heritage asset.

Option HE2- Redevelop the policy

Update and amend policy to better reflect the up-to-date national planning policy and guidance, and the draft vision and objectives, these amendments could also include:

- The requirement for Heritage Impact Assessments (or similar) to accompany certain planning applications;
- A strengthened requirement for the recording and understanding of the significance of any heritage assets that are harmed or lost.

Landscape and Townscape

Background

With a greater knowledge and understanding of the landscapes in the county, there is an opportunity to seek high quality developments that can protect, conserve and enhance the character of these landscapes both in terms of historical urban townscapes and the landscape of Herefordshire's open countryside. The aim of seeking high quality development should extend further than just the designated landscapes of the Areas of Outstanding Natural Beauty but other distinctive places with local specific character.

The following sets out how landscape is addressed through the County Plan and the Local Plan's new vision and objectives.

Herefordshire County Plan

The [County Plan](#) highlights the environment as one of the top priorities and key area of focus for the county. It recognises the importance of Herefordshire's biodiversity and its contribution to the economy in particular tourism and in supporting the health and wellbeing of communities.

As part of the council's ambition is to '*seek strong stewardship of the county's natural resources*' and '*to protect and enhance the county's biodiversity, value nature and uphold environmental standards*'.

Local Plan Draft Vision

The draft vision indicates that by 2041 Herefordshire will be a place where planning has helped to create an environment where all of its residents have an '*exceptional quality of life and are able to live and travel in a more sustainable way*'.

In addressing the climate and ecological emergency, the county will be carbon neutral, and biodiversity here will be thriving. The rich landscape and cultural heritage will continue to be protected and valued for all to enjoy.

Local Plan Draft Objectives

The Local Plan 2021-2041 have environmental objectives which are of particular relevance to Landscape and Townscape policy:

- To protect the natural environment and heritage of the county, having particular regard to its characteristic features, including; retaining traditional orchards and woodlands as well as restoring its rivers to a good quality;
- To pay special regard to protected areas of the county, including the Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty (AONB), whilst at the same time, valuing its ecology and landscape;
- To ensure high-quality design of buildings and spaces that takes into account local character and heritage, in order to create attractive and inclusive places.

National Guidance

The [NPPF](#) is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally-designated landscapes but also the wider countryside.

National policy states that planning policies and decisions should ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

Local Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

There is particular emphasis on protecting the valued AONB landscapes. A wider approach should be take the elements that contribute to its environment and character. Great weight should be given to conserving and enhancing landscape and scenic beauty in the areas with the highest status of protection including AONBs.

Major development is discouraged in these areas other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. National Policy emphasises the need to limit the impact of light pollution from artificial light on local amenity, to safeguard intrinsically dark landscapes and the natural environment.

The Planning Practice Guidance on the [Natural environment](#) provides a broad framework for assessing landscapes as well as how development within designated AONBs should be looked at in relation to planning proposals. There is reference to AONB management plans and the part they play. Such management plans can help to formulate policy as well as providing evidence to enhance proposals where needed.

Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully.

Local Considerations

The landscape of Herefordshire is a key environmental and economic asset creating not only an attractive place to live and work but also contributes significantly to supporting the quality of life of local communities as well as the tourism sector. Herefordshire's Landscape is rich and diverse, large tracts of this landscape are of high quality with the Wye Valley and Malvern Hills having the national, AONB designation. The area along the western boundary with the Brecon Beacons National Park is also of the highest quality although it lacks any national designation. The west of the county in the Kington area is situated in beautiful countryside that is part of an area accepted by Natural England as a strong candidate for designation as an AONB.

Herefordshire is predominately rural in nature and its landscape, townscape and settlement patterns characterise the area's local distinctiveness. There are many different-sized settlements and towns that exist within Herefordshire, varying in context, form, size, layout and pattern. Townscape is primarily a form of urban landscape, formed of a composition of structures and buildings within towns that determine its distinctive character and sense of place. Similarly to landscape, townscape is reflective of the relationship between people and place, and form the setting of our everyday lives.

As all landscapes and townscapes in Herefordshire are important, the approach is to ensure that they are not harmed by development that would detract from their character and visual quality. In assessing harm to landscapes, there is a need to consider any direct, indirect and cumulative impacts. The landscape of Herefordshire is a mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other land forms. Many ancient local landscapes continue to survive intact in the face of development pressures and the county's more remote areas often possess a continuity and tranquillity that is increasingly scarce.

It is crucial that action is taken to ensure that Herefordshire's sense of place and distinctive natural and urban landscape is enhanced and preserved. The pattern of human and land development across Herefordshire will evidently have significant impacts on the built and natural landscape, therefore it is central that the planning policy ensures any impact or change to Herefordshire's distinct landscape and townscapes are avoided and opportunities to enhance and improve these are maximised.

Evidence Base

- The existing [Landscape Character Assessment](#) (2009) promotes the use of landscape assessment and defines 22 character areas across Herefordshire. An update is needed to bring it in line with current guidance by Natural England and best practice in Landscape Character Assessment methodology.
- The 2010 [Urban Fringe Sensitivity analysis assessment](#) classifies the level of landscape sensitivity on the edges of Hereford and its five market towns.
- The AONB Management Plans for the [Wye Valley](#) and [Malvern Hills](#) are reviewed every five years and set out priority for their management over that period.
- [Rapid Townscape Assessments](#) assessed Hereford city and the market towns of Ledbury and Ross. It identifies areas of local interest, sites of potential development and enhancement, and factors that contribute to loss of character.
- A characterisation of the [Historic Townscape of Central Hereford report](#) examines the townscape of central Hereford from an archaeological perspective. The emerging Hereford Design Guide will revise this document, this is anticipated to be published in summer 2022.
- [West Midland Farmstead and Landscape Project](#) undertaken by English Heritage in 2010, this project mapped the locations and characteristics of historic farmsteads. Herefordshire was divided into 6 character areas. The study provided local context which can help evaluate what future uses farmsteads should be based on their character and significance within the local setting.

Existing Policy

There is one main policy in the existing Core Strategy that deals with landscape and townscape issues.

LD1– Landscape and townscape, positively influences developments ensuring protection and enhancement of the built and natural environment. The policy requires proposals to demonstrate how the character of the landscape and townscape has positively influenced the design, scale, nature, site selection, protection and enhancement of the setting of settlements and designated areas. The policy ensures proposals conserve and enhance the natural, historic and scenic beauty of important landscapes and features.

Feedback from the parish questionnaire in February as well as from internal departments indicate there are parts of our current landscape and townscape policy that need strengthening.

The townscape element of the policy does not go far enough to include the built form in the rural areas. A definition of the 'built form' within the text could help to guide where the landscape/townscape applies. Built form is used in the current Core Strategy Policy RA2 in the absence of a settlement boundaries and applies to settlements in that regard. However, Farmsteads, additional farm buildings or other rural development also make up the character of rural areas. This will help to better demonstrate that character of the landscape and townscape has positively influenced the design, scale, nature and site selection, protection and enhancement of the setting of settlements and designated areas. There is a close connection to the existing 'Historic environment and heritage assets' policy known as LD4.

Previous development plans have included policies regarding the setting of settlements. A similar policy approach could be useful in identifying specific features such as views, green corridors and ridgelines where built form meets natural form. This could then be linked to design codes which can identify distinctive features of places.

There is a need for the cumulative impact of development across the landscape as this is currently not addressed in the policy. Design coding can pick up on related matters such as respecting local design materials as well as the use of a colour palette.

Dark night skies are a key characteristic of our rural setting which helps to contribute to the sense of tranquillity and sense of place by minimising light pollution. They are also a key aspect in the county's biodiversity, as it helps to protect bats and other light-sensitive species habitats.

Neighbourhood Planning

On a local level, there are already local dark skies policies featured in Neighbourhood Plans, suggesting there is strong support in the local community to protect and enhance the air quality in the natural and built environment. A dark skies policy could help to minimise light pollution at night, protecting and enhancing the night sky-scape and thus retaining the rural character and sense of place.

Landscape and Townscape Policy Options

Option LT1- Amend the current policy approach and add to the supporting text

Amend the current policy and supporting text to include more reference to the linkages between this topic and others such as the historic landscape. The aim is to help ensure the landscape is taken into account in a clearly holistic way. An explanation of townscape would also help to allow mutual understanding of where there are certain expectations.

The landscape and other policies in the current Local Plan do not currently enable the decision-maker to balance the level of harm/adverse impact against the public benefits of the development to be in line with national policy, to determine whether or not the proposal constitutes major development. Additional supporting text could be added to make it clear that policy should consider further 'exceptional circumstances', including climate change and the ecological emergency, when considering planning proposals.

Option LT2- Include separate Townscape policy and Landscape Policy

This option would separate the landscape and townscape into two separate policy areas. It would allow the townscape policy to include further and more detailed criteria specific to the built form that will help to ensure the built landscape is protected and where possible enhanced. This could address the setting of settlements and link to design coding.

Option LT3: Integrate townscape into the overarching design policy

This policy will integrate the townscape element into the overarching design policy. This is reflective of how the [National Model Design Code](#) and [Guide](#) are structured. This will help contain design and the form of the built environment into one main policy, this may help with clarity and implications of this policy.

Option LT4: Include a dark skies policy to retain and enhance the landscape and light quality in the countryside

This will add an individual policy to enhance light quality in Herefordshire and minimise light pollution. Following feedback from our parishes and internal departments as well as reflecting on locally developed policy, the inclusion of Dark skies policies within NDPs has demonstrated that it is any locally important issue to many parishes. Dark skies are a key characteristic of Herefordshire countryside which helps retain its character and sense of place. There are further opportunities within the built form to address this better through the use of improved technology and attention to street lighting.

Green and Blue Infrastructure

Background

Green infrastructure includes a range of spaces and assets including parks and gardens, playing fields, woodlands, wildlife habitats, street trees, amenity greenspace and other open spaces. Green infrastructure networks also include 'blue infrastructure' features, such as ponds, rivers, canals and other water bodies and may subsequently be referred to as green and blue infrastructure.

Green and blue infrastructure is essential to the success of the county, given its multi-functional benefits. These include the promotion of health and wellbeing through opportunities for recreation, exercise and social interaction. The environmental benefits are multiple and include mitigation against climate change and flooding, the protection of water quality and the provision of sustainable drainage systems; the conservation and enhancement of biodiversity through better ecological connectivity and the enhancement of local landscape character. This will assist economic growth through the creation high-quality environments. The term green infrastructure includes both green and blue infrastructure for the purposes of this topic area.

A variety of benefits can be gained from the inclusion of more green open space, waterways and corridors, connecting people and spaces. All green infrastructure provision works better when they are made safe and accessible by footpaths and cycleways. Green spaces contribute to quality of place, together with buildings, urban spaces and the wider public realm. Quality of place is a key factor in attracting investment, jobs and growth to an area. It is also important in making an area an attractive place to live, work and spend leisure time. So green spaces have real economic value to the surrounding area, in addition to supporting healthy lifestyles and community-wellbeing.

The following sets out how the vision and the objectives of the Spatial Options relate to green infrastructure and how its provision relates to the mission of the County Plan

Herefordshire County Plan

A key environmental ambition of Herefordshire Council's adopted [County Plan \(2020-2024\)](#) is to seek to protect and enhance the county's biodiversity, value nature and uphold environmental standards, and to seek strong stewardship of the county's natural resources.

The County Plan, recognises that healthy, connected and vibrant ecosystems strongly support the local economy, improve health and wellbeing and make the county an attractive place to live and to visit. One of the success of the County Plan will be measured by people's access to green space.

Local Plan Draft Vision

The Local Plan 2021-2041 has an environmentally theme countywide vision, which states:

'By 2041 Herefordshire will be a place where planning has helped to create an environment where all of its residents have an exceptional quality of life and are able to live and travel in a more sustainable way. In addressing the climate and ecological emergency, the county will be carbon neutral, and biodiversity here will be thriving'.

The attractiveness of the County as a place where people want to live and work depends in part on the environment. This is affected by landscape, biodiversity and open spaces (green and blue infrastructure), as well as heritage. It is very important that these are maintained to sustain the unique character of the area and its attractiveness.

Local Plan Draft Objectives

Green infrastructure is represented in the Local Plan draft environment objective:

- *To enhance and extend Herefordshire's natural capital, green infrastructure and nature recovery networks to ensure good access and proximity to open and wild spaces for all residents.*

The objective to enhance and extend the natural capital of the county seeks to ensure all residents are able to access nearby open space. Whilst not specifically mentioned in the other social and economic objectives, the need for good environments is recognised in these sections. There is a reference to the support of good health and wellbeing through infrastructure in the community objectives. The economic objectives seek to balance economic growth with the natural environment.

National Guidance

The [National Planning Policy Framework](#) describes green infrastructure as a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

In national guidance there is a section dedicated to green infrastructure and it sets out the planning goals that can be achieved through green infrastructure. These goals are repeated in elsewhere therefore making green infrastructure a multitasking and important element in plan making. In respect of green infrastructure, areas such as air quality, climate change, design and healthy and safe communities all rely on the importance of green infrastructure. One of the goals identified is about 'building a strong, competitive economy'. It is noted that green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors.

Local Considerations

As well as having intrinsic value, the environment of Herefordshire is significant in influencing the character of the county and supporting the quality of life of local communities. The landscape of Herefordshire is a complex mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other land forms. The landscape has been altered by human activity, so many distinctive features such as field boundaries are of historical interest as well as visual and ecological merit. There is however scope to develop and enhance the county's green infrastructure through improving the diversity and connectivity of landscape and habitats.

This will be through the conservation and enhancement of natural assets including both the Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty; the Sites of Special Scientific Interest, Local Nature Reserves, wildlife sites; and the county's trees and woodlands.

The landscape of Herefordshire is a complex mix of rural and urban areas, woodlands, wildlife habitats, farmland, water features and other land forms. The landscape has been altered by human activity, so many distinctive features such as field boundaries are of historical interest as well as visual and ecological merit. There is however scope to develop and enhance the county's green infrastructure through improving the diversity and connectivity of landscape and habitats, and through the conservation and enhancement of natural assets.

Public Rights of Way provide valuable footpath, cycle and bridleway routes within the urban area and out into the countryside. During the coronavirus pandemic Rights of Way have been prevalent, providing an extensive network to access and recreation within the countryside. Public Rights of Way are an important green corridor for pedestrian access encouraging both activity and more sustainable movement.

Any new development should take into account the importance of the Public Rights of Way running through the site and development should incorporate an appropriate buffer to enhance the existing Rights of Way. Given its importance to the County, it will be vital that all new developments protect existing and incorporate new green infrastructure wherever possible.

For many local communities, securing high quality green infrastructure in and around their neighbourhood is important. Parish Councils and Neighbourhood planning groups across Herefordshire have included policies for green spaces in their Neighbourhood Development Plans and these designations are known as 'Local Green Spaces'. Their designations signifies their importance to the local community and assists in their future.

Green and blue infrastructure can be addressed by developing a robust evidence base, drawing on the latest research and mapping to target green infrastructure creation and enhancements in the places where it will have the greatest impact. Natural England have recently launched their [nationwide interactive mapping tool](#). This will help local planning authorities and developers meet requirements in the National Planning Policy Framework to consider green infrastructure in Local Plans and in new development. It can support better planning for good quality green infrastructure, and help to target the creation or improvement of it, particularly where existing provision is poorest. The mapping tool is also being developed to enable other organisations and groups such as parks and green space managers and local communities to think more about green infrastructure and plan for its creation or improvement.

Trees are a critical component of our green infrastructure, providing a wide range of benefits including support for the biodiversity. They are an essential component in providing habitat and shelter to a variety of wildlife. While offering valuable biodiversity, trees and hedgerows also characterise the landscape and contribute to the local distinctiveness of settlements and towns across the county while also providing amenity value, and improving resident's health and well-being. They are planted in both gardens and streets, they are attractive, and make an area a more desirable place to live. They also provide significant benefits which include noise reduction, shading, cooling, air quality, frame views and vistas, store carbon, and reduce stress and improve mental health. Herefordshire Council is working to deliver more trees through a variety of projects.

Evidence base

- It has been twelve years since the [Green Infrastructure Strategy](#) was drafted. Therefore a new Green Infrastructure Strategy is required to bring it up to date to the requirements of current guidelines as there are gaps particularly for health and climate change requirements. This will be commissioned shortly with the draft anticipated to be completed by autumn 2022.

- The purpose of the [National Model Design Code](#) is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. They should provide a framework for creating high-quality places, with a consistent and high-quality standard of design to inform development proposals. The document is clear that development should enhance the natural as well as the built environment. The guidance on how to incorporate nature is derived from general principles but there is scope for more locally derived design codes.

Existing Policy

The current Core Strategy policy LD3 green infrastructure, protects the network of green infrastructure across the county, as well as requiring new developments to provide new green space in accordance with adopted standards. This supports national guidance which recognises the value of local access to high quality open spaces, as well as council priorities to maintain the natural environment, support wellbeing and assist in responding to our declared Climate Emergency. However there is scope to improve the policy.

- The policy is used for the larger strategic sites rather than smaller;
- There is no reference to blue infrastructure or developing a vision for a site;
- It does not seek the integration of all disciplines that are tasked with delivering green and blue infrastructure on a site;
- The policy does not currently provide an opportunity to improve areas of poor green infrastructure connectivity;
- The policy is leaning towards improving green infrastructure in housing developments but there is room for improvements in all developments;
- There is a lack of reference to trees/hedgerows and the value they can bring as part of the wider green infrastructure;
- There is still information presented for plans that do not connect with each discipline;
- A revised policy is required;
- Need to question whether there are more localised ways to better incorporate nature through design.

Green and Blue Infrastructure Policy Options

Option GI1 - Update the policy to reflect new evidence and guidance

Inclusion of a new strategic policy seeking to ensure that green infrastructure contributes to and enhances the quality of life in the county. Opportunities to achieve this include:

- Providing improvements that respect existing landscape character that will assist in attracting and retaining inward investment;
- Co-ordinating the use of green space to optimise its use for leisure, biodiversity, drainage, flood management and other socio-economic activities.

Option GI2 - Devolved policy for local areas and small scale details

This option would be additional to Option GI1, there could be locally distinctive aspects to green infrastructure that can happen on a smaller scale. There are a few ways to address these and this could be through policies set out in Neighbourhood Development Plans or guidance set out in a Design Code for a particular area. Pilot work as already begun on this and the council is working with the Woodland Trust to devise how Design Codes could be undertaken at a parish level. The cumulative benefits of small scale habitat and biodiversity improvements should be captured in developments where possible. It can lead to betterment and has potential to have significant overall beneficial effects on the natural environment.

Option GI3 - Include a new specific policy on trees and hedgerows

This option would be additional to Option GI1. There could be an additional specific trees and hedgerows policy. Trees, and hedgerows are an important part of the county's natural assets. There are parts of the county where tree canopy coverage is lacking and hedgerows need better consideration in new developments. There could be a new policy that addresses this issue and sets a net canopy target cover from trees across County. The policy could also seek to retain trees and hedgerows when development is proposed.

Design

Background

Well-designed places and buildings are not just about aesthetically pleasing places, but about improving the quality of life of our communities, helping create economic and social value by improving sustainability, access, and connectivity. The planning system currently manages the design through strategic and non-strategic policies in development plans. These are supported by Supplementary Planning Documents, Design Guides, and Design Codes. It is clear that the Government places design quality at the heart of planning, with the recent publications of [Building Better, Building Beautiful Commission](#) (BBBBC), The [National Design Guide](#), and [National Model Design Code](#) and the recent additions to the [NPPF](#).

The design of buildings and places not only has a key role to play in the aesthetics, character and sense of place but is also a tool in the fight against climate change, which can help places mitigate and adapt to a changing climate. Well-designed places can help promote sustainable patterns of development and influence layout, materials and the siting of development. This will help improve buildings efficiency and energy use which will help to reduce carbon emissions and waste.

Herefordshire is predominately a rural county with several historic market towns and a historic cathedral city. Townscape and building design vary throughout the county, in its towns and villages which have been shaped and developed over time and are all locally distinctive. In 2021, Herefordshire participated in the Herefordshire Design Code Pilot, where Design Codes were tested on a local scale with several parishes. It is anticipated that local communities will be able to develop their own local Design Codes for their parish/town to help define their local character and distinctiveness. It is also expected to have an overarching Design Code for Herefordshire.

In 2019 Herefordshire Council declared a [climate emergency](#) and committed to becoming a carbon-neutral county by 2030. Following this planning guidance was urgently required to help shape development in the direction of zero carbon and nature-rich development. The [Environmental Buildings Standards Supplementary Planning Document](#) was developed to promote the highest standards of sustainable design through setting out best practice recommendations. It is anticipated the revised design policies will focus on higher environmental standards for developments.

The following sets out how design is addressed through the County Plan and the Local Plan's new vision and objectives.

Herefordshire County Plan

The [County Plan](#), published in January 2020, sets out how the council intends to accomplish its environmental, social and economic ambitions over the next four years. The County Plan vision states that '*Herefordshire will be an exemplar of 21st century rural living, where rural settlements and market towns have resilient communities*'.

Design is key to place making, this helps improve the quality of the built and natural environment as well as the lifestyles for people who live and work in them. Innovative and sustainable building design can help Hereford for 21st century living.

Local Plan Draft Vision

The Local Plan 2021-2041 draft vision highlights the importance of creating an environment to enable residents to have an '*exceptional quality of life and to live and travel in a more sustainable way*'.

It also emphasises the importance of good quality housing and inclusive infrastructure to enable people to live healthy and active lives. Good design is a key tool in creating more accessible, healthier and sustainable places that will improve people's quality of life.

Local Plan Draft Objectives

The Local Plan environmental draft objectives 5 and 9 place a strong emphasis on well-designed, sustainable and efficient places:

- To ensure high-quality design of buildings and spaces that takes into account local character and heritage, in order to create attractive and inclusive places;
- To ensure that development is located and designed in a way that requires less energy use and to increase the amount of energy generated from renewable sources, with a requirement for all new development to be net zero carbon by 2030.

National Guidance

The Government has recently increased its focus on design quality, wishing to see an improvement in the design of new development and to put 'beauty at the heart of the Planning System' in response to this the Building Better, Building Beautiful Commission (BBBBC). The commission had 3 primary aims:

- To promote better design and style of homes, villages, towns and high streets, to reflect what communities want, building on the knowledge and tradition of what they know works for their area;
- To explore how new settlements can be developed with greater community consent
- To make the planning system work in support of better design and style, not against it.

A final report [Living with beauty](#) highlighted the importance of well-designed, beautiful and safe places to help achieve sustainable development. Several changes have been made to the national guidance in July 2021, placing greater emphasis on high-quality design. It also encourages Local Authorities to prepare Design Guides and Codes with a focus on community engagement when developing design policies.

National Planning Policy Framework (NPPF) 2021

The NPPF places great emphasis on high-quality design which is key to what the planning and development should aim to achieve.

Achieving well-designed places sets out expectations for high-quality places and advises to provide maximum clarity about design expectations at an early stage. The NPPF recommends that all Local Planning Authorities should produce Design Guides consistent with the principles set out in the National Design Guide and National Model Design Code.

National guidance recommends that Local Planning Authorities give significant weight to development that reflects local design policies and Government guidance on design, as well as Design Guides and Codes. Significant weight should also be given to developments that show outstanding and innovative design, or that helps to raise the standard of design in keeping with an area. It also advises Local Planning Authorities to refuse permission for developments that are poorly designed, especially where it does not reflect local design policies and Government guidance.

Meeting the challenge of climate change, flooding, and coastal change is a key feature in national guidance. The guidance encourages the planning system to transition into a low carbon future to help shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

National Planning Policy Guidance (PPG)

The [PPG](#) has been amended to place emphasis to encourage high-quality design and set out further guidance to ensure developments take a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of planning applications and the post-approval stage.

National Design Guide (NDG) 2020

The [National Design Guide](#) demonstrates the Government's priorities for well-designed places setting out how beautiful, well-designed places can be achieved in practice. The guide sets out ten characteristics. That can help inform place making that is beautiful, healthy, greener, and successful can be achieved in practice.

National Model Design Code (NMDC) 2021

Following the National Design Guide, the [National Model Design Code](#) was published in 2021. This establishes the ten characteristics of well-designed places and demonstrates what good design means in practice. The National Model Design Code and Guide is part of a wider strategy set out in 'Living with Beauty' report published in January 2020. This forms part of the national planning practice guidance and is to be used alongside the planning practice guidance notes.

The guide sets out 10 design characteristics for well-designed places. That are context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. Design coding is a tool to help define high-quality design-this tool can be utilised by local planning authorities, developers and local communities.



National Model Design Code -The 10 characteristics of well-designed places

Emerging Future Homes Standards (2020) & Future Buildings Standards (2021)

The [Future Homes Standard Consultation 2020](#), proposes building regulations set out higher building requirements to reduce carbon emissions and waste. The new standards set out in this are:

- Buildings to have a 31% reduction in CO2 from 2021 (interim standards);
- New homes should reduce CO2 emission by at least 75% from 2025;
- No new gas central heating in new homes from 2025;
- Councils can set out more ambitious local targets. For example Herefordshire Council could set out they want to have zero carbon homes rather than zero carbon ready homes.

The Future Buildings Standards made changes to ensure new developments are 'carbon zero ready'. This is proposed as a minimum standard and it does not prevent Local Authorities from requiring energy efficiency standards above Building Regulations.

Housing Act and Technical Guidance on Space Standards

This [document](#) sets out minimum space standards for internal spaces for new dwellings suitable for all tenures. This is not a building regulation but remains within the planning system as a new form of technical planning standard. Requirements are set out to ensure internal rooms are appropriately sized and suitable for human habitation.

Other emerging guidance and legislation to consider are:

- Herefordshire is developing a retrofit guidance documents for a Net Zero Carbon Toolkit;
- The [Environment Act 2021](#) - sets out zero carbon emissions by 2050.

Local Considerations

Existing evidence tells us:

- Climate emergency and aim to get to carbon zero by 2050 needs to be addressed and realised in design policy;
- The existing Core Strategy policies SD1 and LD1 requires updating to reflect the changes to the National Planning Policy Framework;
- The greater emphasis on design within the National Model Design Code and National Model Design Guide need to be reflected;
- The lessons learned from the National Model Design Code Testing pilot need to be reflected.

Feedback from Development Management and Town and Parish Councils raise some areas where the current policy can be improved. Areas for improving the current design policy are detailed below.

- Design policies should place greater emphasis on design, strive for low/zero carbon design, energy-efficient buildings that minimise waste reflecting the current climate context;
- Design policies need to be updated in line with changes to National Guidance;
- Design policies to be updated incorporate Housing Act and [Technical Guidance on Space Standards](#) into design policies;
- Further detail included in design policies/codes- to set out local distinctiveness/ provide design solutions for local issues;
- Policies to sit more closely with transportation policies/integration of these;
- State the density for schemes. This has been raised by parishes in rural areas;
- Inclusive design policy for all, including design for gender and disabled people;
- Designing safe spaces and minimising opportunities for crime.

Evidence Base

- [Environmental Building Standards Supplementary Planning Document](#) (SPD) sets out best practice guidance to improve efficiency and quality of design through sustainable development. A draft document has been published for public consultation.
- [Hereford Design Guide SPD](#) sets out design guidance in Hereford City and its historic core, transport also includes a historic characterisation assessment. A draft document was published in 2019, this is currently being updated.
- [Herefordshire Future Homes](#). This is guidance for developing low carbon council-built homes in Herefordshire.
- [Hereford Local Design Code Guidance](#). This is guidance formed of notes and templates covering the National Model Design Code characteristics of good design, and how this can be used by parish and town councils to develop their own design codes.

Existing Policy

The Core Strategy includes a specific design policy Sustainable Design and Energy Efficiency SD1. This policy is a high-level policy for a large topic area, specific detail and local detail are included in Supplementary Planning Documents, Hereford Design Guide, and Environmental Building Standards SPD along with 113 Neighbourhood Development Plans (NDPs); most of which include specific design policy. However, there are areas where there are policy gaps in local policy, particularly those areas without an NDP.

This policy approach requires updating, not only to address the changes in national policy and guidance regarding the emphasis on place-shaping design, but also modernised space standards and to formally address the climate emergency.

The first part of the Landscape and Townscape policy LD1, positively influences developments ensuring protection and enhancement of settlements and designated areas. The townscape element could be explored further and include more locally specific guidance for schemes.

Design Policy Options

D1 - A general strategic policy covering the county, supported by local policies in Neighbourhood Plans and Supplementary Planning Documents

This option would see an updated general strategic design policy within the Local Plan supported by local design policies in Neighbourhood Plans and Supplementary Planning Documents (Hereford Design Guide and Environmental Building Standards SPD).

This policy will update the strategic policy in line with the changes to national guidance. Detailed inclusive design criteria covering local issues will continue to feature in Neighbourhood Plans and Supplementary Planning Documents.

D2 - A strategic policy supported by local parish level Design Codes

This option would see an updated general strategic design policy within the Local Plan supported by local design codes at a parish and town level. At a city level, Design Codes will be informed by the Hereford Design Guide SPD.

This has been developed following Herefordshire participating in the Design Code Pilot with the Department for Levelling up Housing and Communities to test the application of the National Model Design Code and have developed guidance and worksheets for parishes to use to develop their own local Design Code. These local codes will vary and be reflective of their local area, most codes cover the character and appearance of area, character and context of the built and natural environments such as typography, historic uses, facilities, green spaces, movement in the area, suitability, and energy.

D3 - Additional specific Hereford and Market Towns strategic design policy supported by Design Code in rural areas

This option would see an additional strategic policy to set design criteria and guidance for Hereford and market towns. This will be supported by parish Design Codes to inform design in the rural areas.

This will provide design criteria for the urban areas in Herefordshire covering Hereford and the market towns. Criteria could cover design issues that feature in urban areas such as the character and design of townscape, high street character, criteria for large sites as well as criteria for extensions and annexes.

D4- Additional policy criteria specifically focussing on environmental building standards, transport and active travel and open space standards

In addition to a strategic overarching design policy, this option would provide additional policy for sustainable and energy-efficient design in new development and reference to retrofit guidance.

This will set out criteria so new development can be developed in the most efficient and low carbon way. This policy could set out higher and more ambitious targets to achieve higher environmental building standards in the county.

This will revise the policy in line with the national guidance as well as space standards and reference to internal room sizes and density, inclusivity and will integrate elements of sustainable transport into the design sections, placing greater emphasis on accessibility and active travel in line with guidance set out in the Manual for Streets Compendium.

Water Management

Background

Sustainable water management is the practice of minimising the impact of human activity on the functioning of the water cycle. This is of particular importance in a time where changes are occurring to our climate, with a greater frequency and unpredictability of extreme weather events such as storms, flooding and droughts. Water is a finite resource, with ever increasing demand as we seek to grow our communities. This presents the need to manage water resources effectively, in which the planning system has a significant role to play. This applies to both management of water supplies, and the safe discharge of wastewater into rivers.

The following sets out how sustainable water management is addressed through the County Plan and the Local Plan's draft vision and objectives.

Herefordshire County Plan

A central environmental ambition of Herefordshire Council's adopted [County Plan](#) is to seek strong stewardship of the county's natural resources.

The planning system has long had, and will continue to have, an important role to play in conservation of natural resources, including water.

Local Plan Draft Vision

The Local Plan 2021-2041 has an environmentally themed draft countywide vision, which states:

By 2041 Herefordshire will be a place where planning has helped to create an environment where all of its residents have an exceptional quality of life and are able to live and travel in a more sustainable way. In addressing the climate and ecological emergency, the county will be carbon neutral, and biodiversity here will be thriving...

Responsible management of our water resources is essential in addressing the climate and ecological emergency, and protecting the county's biodiversity, particularly in our rivers.

Local Plan Draft Objectives

Careful management of our natural resources is highlighted as an environmental objective of the new Local Plan. Namely, objective 7:

- To minimise and carefully manage the use of natural resources, including minerals, land, and water and to encourage the reduction, reuse and recycling of waste, to achieve a circular economy.

National Guidance

Planning practice guidance on water supply, wastewater and water quality was updated in 2019. The legal framework for water management - [The Water Environment Regulations](#) were also introduced in 2017. These regulations set out requirements to prevent the deterioration of aquatic ecosystems; protect, enhance and restore water bodies to 'good' status; and achieve compliance with standards and objectives for protected areas.

Local Considerations

On 8th March 2019, Herefordshire Council unanimously passed a motion declaring a [Climate and Ecological Emergency](#). This signalled a commitment to ensuring that the council considers tackling Climate Change in its future work and decisions taken. Water management policies will form a key element of ecological protection, and climate change adaptation.

The River Wye Special Area of Conservation (SAC) is a protected nature conservation site, under Habitats Regulations. To help conserve the ecology of the River Wye SAC (which includes a section of the River Lugg), Natural England have set targets for phosphorous levels in the river. Within the Herefordshire Council authority area, the section of the River Lugg from Leominster to the Wye confluence is currently [failing its phosphorous target](#), with levels too high. As a result, there is currently a moratorium on all new development within the catchment of this SAC that may threaten to increase phosphorous levels. The council is seeking to address this issue by developing 'integrated wetlands' in this area of the county, which are currently underway, in order to neutralise these effects.

Evidence Base

- The Environment Agency, in partnership with Natural England, has developed a [Nutrient Management Plan](#). It aims to ensure that the River Wye Special Area of Conservation (SAC) achieves and maintains favourable conditions, with respect to phosphate levels. The plan also considers proposed development growth within Herefordshire and calculates its predicted impact on phosphate levels within the SAC.
- The [Water Cycle Study](#) will determine how development in the county will affect the functioning of the water cycle and, in turn, overall environmental quality. If there are conflicts, it can propose solutions to them. These studies can form useful evidence to ensure that Local Plans are sound. This will be commissioned and developed in consultation with the Environment Agency.
- The [Strategic Flood Risk Assessment](#) (SFRA) aims to ensure that planning policies and any allocated development sites will not increase the risk of flooding on site, or in their surrounding areas. It identifies the county's main flood risk areas, taking into account all sources of flooding. This will include not only those areas identified by the Environment Agency, but also from county and local level intelligence to identify a more complete record of flood prone areas. The latest published SFRA is from 2019, but a reviewed and updated version is expected to be made available within the next year. A more detailed SFRA will be required as development sites begin to be identified for the Local Plan.

Existing Policy

There are two policies in the existing Core Strategy that deal with the management of water resources and quality, SD3 and SD4.

SD3 - This addresses issues surrounding flooding and protecting water sources. It contains detailed criteria and measures to ensure that development avoids adverse impacts on water source availability, and reduce the risk of flooding.

The policy remains justified and necessary, and no issues have been reported in its implementation by officers. However, some technical standards that are referenced within it are no longer relevant and will likely require updating or replacing with any equivalent standards, to be informed by the updated evidence base documents.

SD4 - This relates to dealing with wastewater treatment and ensuring river water quality. In the first instance the policy tries to direct development towards connecting to existing mains sewerage infrastructure, and sets out detailed stepped exception criteria for where this is not possible. At present, the policy remains justified. In areas currently affected by the River Wye SAC issue, the policy has effectively been usurped by European level regulations. Technical evidence arising from the evidence base documents may make recommendations on how this policy could be updated.

In addition to the Core Strategy policies, the emerging [Minerals and Waste Local Plan](#) includes Policy W3, which seeks to ensure that development proposals involving agricultural development will be required to demonstrate that they contribute to achieving nutrient neutrality within the River Wye SAC.

From the above facts, it is clear that the existing Core Strategy policies, written as they are, cannot be 'saved' for inclusion in the next Local Plan.

Neighbourhood Planning

Many of the county's Neighbourhood Development Plans (NDPs) have successfully produced their own policies relating to the sustainable management of water. In particular, safeguarding against development in areas liable to flooding in their respective areas. Whilst others have followed broadly the same guidance as that taken in the existing Core Strategy.

NDPs in development, covering areas within the River Lugg hydrological catchment, have recently been encouraged to include a nutrient neutrality policy to meet the requirements of any environmental assessments.

Water Management Policy Options

Option WM1- Continue with existing policy approach, but update to reflect current situation

This option would, using the existing policy approach as a basis, update and supplement to reflect emerging evidence, updated national/technical guidance and the ongoing work to achieve nutrient neutrality in the River Wye Catchment.

Option WM2- Include a separate policy dealing with nutrient neutrality issue

Taking into consideration the considerable constraints presented by the phosphorous issue in the River Wye Catchment, this option would see a standalone policy specifically dealing with this issue.

This would place requirements for development to achieve nutrient neutrality within the catchment. Guidance for this already exists for the production of NDPs in these areas, and this could be used to form the basis for a wider strategic policy on the issue.

Transport

Background

This section on transport will seek to update the Local Plan to make travel accessible for all, and to support the use of walking, cycling, and public transportation.

Herefordshire is a diverse county, incorporating both rural and urban communities. The A49 is a strategic trunk road, and the county also has a section of the M50 motorway within its boundary.

The county overall served by approximately 2,000 miles of road, 350 miles of pavement, four national railway stations, and a number of bus services operating within and across county boundaries.

The following sets out how transport issues are addressed through the County Plan and the Local Plan's draft vision and objectives.

Herefordshire County Plan

A key environmental ambition of Herefordshire Council's adopted [County Plan](#) (2020-2024) is to protect and enhance the county's environment and keep it a great place to live. Improving access to sustainable modes of transport will be key to achieving this.

The County Plan also aims to support an economy that builds on the county's strengths and resources. Appropriate maintenance of the county's road and footpath networks will contribute to this.

Local Plan Draft Vision

The Local Plan 2021-2041 has environmental and economic themed visions, which state respectively:

By 2041 Herefordshire will be a place where planning has helped to create an environment where all of its residents have an exceptional quality of life and are able to live and travel in a more sustainable way; and

Good quality housing and inclusive infrastructure will be provided to ensure that people are able to live active and healthy lives.

Planning policies that promote and improve access to sustainable modes of travel will clearly be central to realising this vision.

Local Plan Draft Objectives

Effective planning policies for transport will be key to delivering on the Local Plan's environmental, economic and social objectives, in particular:

- To significantly improve air quality;
- To enable net zero carbon goals to be at the heart of transport planning decisions, for environmental gains but also to allow people to make healthier more active travel choices;
- To provide connectivity and infrastructure that is designed for inclusion, with factors such as gender, age and disability fully considered;
- To provide transport infrastructure, which will support and prioritise active travel and public transport;
- To support good-health and wellbeing, through ensuring easy access to open space, sports facilities and active travel options.

National Guidance

The [NPPF](#) addresses transport within section 9 - Promoting sustainable transport. Transport '*should be considered from the earliest stage of planning*', and that planning policies should:

- Support an appropriate mix of uses across an area;
- Identify and protect sites and routes to widen transport choices and realise opportunities for large scale development;
- Provide for any large scale transport facilities that need to be located in the area;
- Identify and protect sites and routes to widen transport choice and realise opportunities for large scale development.

Local Considerations

Herefordshire Council declared a [climate emergency](#) on the 8th March 2019. Transport policies will need to be consistent with the council's overall intent to minimise our impact on the environment.

There has been significant changes in national transport policy in the last 12 to 18 months. The Department for Transport recently published its [Decarbonising Transport](#) strategy for Britain. The government aims to fully decarbonise transport by 2050, and to end sales of all combustion vehicles to cut CO2 emissions to zero. Additionally, the government has also published the [Bus Back Better](#) paper which seeks to increase national bus use.

This has also been referenced in the [Levelling Up White Paper](#) on which one of the levelling up missions is that by 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.

A new executive agency, [Active Travel England](#) (ATE), has been launched this year. ATE will manage the national active transport budget, awarding funding for projects which meet the new national standards. ATE will help Local Authorities in spreading good practice, and will be a statutory consultee on major planning applications. The government has also recently announced that at least [one electric vehicle charge point](#) per dwelling will be required for new developments.

[Great British Railways](#) will be a planned state owned public body that is to replace Network Rail as the operator of rail infrastructure from 2023, as outlined within the Williams-Shapps Plan for Rail.

The Government has also produced the [National Design Code](#) and the [National Model Design Code](#). This is to create well-designed and well-built places that benefit people and communities. The code has 10 ten characteristics to offer guidance to plan makers to create beautiful, enduring, and successful places. One of the characteristics is movement, of which is to ensure development to be accessible and easy to move around. In well-designed places, all modes of transport are positively designed into the built form.

Active travel should also be promoted, in which to give priority to pedestrian and cycle movements ahead of private car use. Herefordshire Council is currently drafting a Hereford Design Guide to offer a bespoke guidance on design using the new national guidelines and to reflect Herefordshire's unique characteristics.

Evidence Base

- The current [Local Transport Plan](#) covers the period 2016-2031, with the vision to deliver a transport network that support growth enabling the provision of new jobs and houses. The plan also covered the major investment schemes within the Core Strategy, such as the city link road, a southern link road, and a Hereford relief road. The current transport plan is also supplemented by additional market town studies. The Local Transport Plan, to cover all of Herefordshire, will be updated within the next eighteen months. A study to investigate a potential new road bridge and a link to the east of the city will also be required.
- The council has recently published a [Bus Service Improvement Plan](#) in which to build, develop and improve bus service provision by establishing a coherent, consistent, and integrated bus network that is well understood and easy to use.

Updates to come

Following the council's decision to stop the progress of the southern link road and Hereford relief road, the evidence base will need to be updated to reflect a new strategy in the Local Plan.

The Hereford Masterplan was commissioned in February 2020, to assess the best options to provide a modern transport system for the city, which would address the declared climate emergency, support the local economy, protect the environment and generate wider societal benefits.

A Transport Scoping Report is to be commissioned. This will comprise of two stages. Stage 1 will consist of a high level scoping assessment of likely transport scenarios, as outlined within the [Spatial Options Consultation](#), which ran from January to February 2022. Stage 2 will consist of a more detailed transport assessment once full site dwelling capacities are known. The scoping report is expected to be completed by the end of summer 2022.

Herefordshire Council will also actively engage with organisations such as National Highways, Active Travel England, and neighbouring councils. This will be consistent with national policy, to ensure that strategies and investments for supporting sustainable transport and development patterns are aligned.

Also consistent with national policy is that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence, which all of the above should provide.

Existing Policy

There are two policies in the existing Core Strategy which deal with the management of transport issues, SS4 and MT1.

Policy SS4 - Movement and transportation states that *'new developments should be designed and located to minimise the impacts on the transport network; ensuring that journey times and the efficient and safe operation of the network are not detrimentally impacted'*

Developments with high journey numbers should be in sustainable locations, and accessible by means other than private car and to promote travel by walking, cycling, and public transport. A list of major transport schemes is also listed. Policy SS4 is classed as a strategic policy, as it addresses strategic priorities within the Core Strategy. The policy sets out for the provision of infrastructure for transport county-wide, which is consistent with national policy.

Policy MT1 - This addresses traffic management, highway safety and promoting active travel. Development proposals should include principle requirements such as to encourage active travel behaviour, promote integrated transport connections, and to demonstrate that the strategic and local highway network can absorb the traffic impacts of the development. Additionally, it is likely that there will be specific transport policies and proposals within the place based policies of the Local Plan.

Neighbourhood Planning

Neighbourhood Development Plans (NDPs) have a role to play in addressing local transport issues, such as footpaths and cycleways in which to promote sustainable travel. In identifying sites for development, issues such as access, road safety, distance to public transport facilities and the capacity of transport networks, are key considerations.

There is a need for NDPs to be in general conformity with strategic local policies. NDPs should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators, and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.

Transport Policy Options

Option TR1- Continue with existing policy, but update to reference new government organisations and updated transport priorities

The current policies would be amended to update references to the Highways Agency, which is now the National Highways, and additionally Great British Railways now replacing Network Rail, as well reviewing all other relevant bodies.

Also, major schemes in Herefordshire following the completion of the Hereford Masterplan, the transport scoping report, and updated local transport plan, will need to be updated. Additionally the council will actively engage with ATE as they now are a statutory consultee on major planning consultations.

Option TR2- Add additional policy to specifically address the climate emergency through transport

Additional policy requirements would also be added to transport policies, reflecting national and local policy changes and comments from the Spatial Options consultation, and the move towards zero carbon emissions during the updated local plan period.

An additional policy could also detail how all developments would need to accommodate carbon reduction. This could take a view on the merits of locations for new developments, with the aim being to consider carbon impacts. New developments will need to be designed to reduce the need to travel, to support active travel modes and access to public transport.

The requirement for electric car charging points for new development proposals could be added to the transport policy, which will reflect the recent national and local policy changes.

Sustainable transport within the rural areas of the county could be further encouraged by the introduction of providing rural cycle highways in policy if possible. This could be adjacent to the major A roads in Herefordshire.

Option TR3- Greater emphasis on design guidance in relation to transport

An additional policy could be developed to reflect the national Design Code in relation to transport. This could create a greater synergy with the other Local Plan policies on design, and also emphasise the importance of active travel and accessibility.

A hierarchy of transport could also be referenced within this policy for development proposals. This would be to have an aspiration to prioritise walking, cycling, and public transportation over the use of private cars. This also would be consistent to the council's climate emergency aims. It is expected that further national guidance will be published in regards to transport and design guidance policy.

Housing Affordability and Balanced Communities

Background

Housing affordability has for a number of years presented a big issue nationally, with demand outstripping supply, leaving a limited choice of genuinely affordable homes and routes to home ownership.

These issues are particularly acute in Herefordshire, where there is a considerable disparity between average incomes and property prices, making for a poorer affordability ratio than the national average.

It is important that a genuine range and mix of housing is made available, in order to achieve more balanced and sustainable communities in Herefordshire. This area of planning policy needs to address this by ensuring that new residential developments contribute appropriately to providing a genuine range of sizes, types and tenures that meet the needs of all household types.

The following sets out how housing affordability is addressed through the County Plan and the Local Plan's draft vision and objectives.

Herefordshire County Plan

The [County Plan](#) cites the role that the new Local Plan 2021-2041 will play in delivering - '*Carefully planned policies for growth- sustainable development which meets the needs of local people while respecting our heritage and natural environment*'. '*Working with housing associations and developers to enable them to build more homes for sale and for long term rent*'. And '*to support Community Land Trusts and Community-owned housing projects to succeed*'.

A key measure of the success of the steps it sets out to take will be an improved housing affordability ratio of the county.

Local Plan Draft Vision

The Local Plan 2021-2041 has a community themed countywide draft vision, which states:

'Herefordshire will be an exemplar of 21st century rural living, where rural settlements and market towns have resilient communities, which are well connected digitally. Hereford will be recognised nationally as a green and pioneering university city, and will be a popular place to live, work and visit.'

Improving access to home ownership and diversifying the offer of housing to be create more inclusive and balanced communities has a significant role to play in fostering resilience in the county's rural areas and market towns.

Local Plan Draft Objectives

The need to deliver a diverse range and mix of housing is addressed in the Local Plan's community themed objectives, namely objective 5.

- Provide a range and mix of housing types to meet local needs, including affordability and specialist requirements. To provide diverse opportunities for home ownership for all.

Creating the conditions to foster balanced and resilient communities and increase home ownership through housing based planning policy could also contribute in a less direct way to achieving a number of the other Local Plan objectives.

National Guidance

Updated [national guidance](#) recommends consideration of a more diverse range of mechanisms that can deliver mixed and affordable units to be considered, and referenced in Local Plan policies. For example, through self and custom build projects and Community Land Trusts. Community Led Housing schemes can provide affordable homes for rent, shared ownership or sale, typically on sites which are less attractive to the development industry; and ensure the long-term protection for local people in housing need through legal and/or financial controls. The support for enabling Community Land Trusts is echoed in the County Plan. The Council maintains a [register](#) of those people who are interested in self or custom housebuilding in the county and is required to grant enough planning permissions to meet that demand in given time periods.

National planning guidance on [First Homes](#) requires a minimum of 25% of all new affordable housing delivered through Planning Obligations to be First Homes. These are a specific type of discounted market sale housing, to be sold at least 30% less than the market value with restrictions on the Land Registry Title to ensure that this discount is retained at each subsequent title transfer to those eligible to purchase. Local Authorities or Neighbourhood Planning groups may set their own eligibility criteria in addition to those set nationally, though care should be taken to ensure that these would not be so demanding that the properties would be difficult to sell.

[National planning policy](#) states that lower thresholds may be set as low as five dwellings locally to seek affordable housing contributions, but only in designated "rural areas", of which the only ones currently existing in Herefordshire are its AONB areas. It also suggests that Local Authorities should consider Vacant Building Credits. This allows for affordable housing contributions to be reduced by a proportionate amount if the development in question is bringing vacant existing buildings back into use.

National policy also states that Local Planning Authorities should support the development of entry-level exception sites, suitable for first time buyers and renters, unless the need for such homes is already being met within the authority area. They should be on land that is not already allocated for housing, and comprise entry level homes offering more than one type of affordable housing and be adjacent/proportionate to existing settlements.

Local Considerations

Housing affordability is a big issue in the county, with an affordability ratio of 9.0 when compared with the West Midlands region (6.8) as a whole. The main reason for this is that the offering comprises a high proportion of larger, high council tax band properties. This greatly limits opportunities for younger and lower income households to be able to afford to buy their own home, which presents a significant obstacle to achieving social mobility.

Housing affordability and mix still remains a particular issue in the more rural areas. A recent survey of Parish councils (February 2022) frequently highlighted a lack of affordable units being delivered in their areas with the new developments that they have accommodated. This is in part due to the sizes of developments that come forward in these areas, many of which are insufficient in scale to be able to trigger policy requirements to contribute to a range and mix of housing types and tenures. There has been support shown for requesting this in policy from smaller scale developments.

With increasing trends in home-based working across certain industry sectors, it needs to be considered whether ensuring that homes make sufficient provision of spaces for, or can be adapted to facilitate this is an issue that should be dealt with by this policy area.

Evidence Base

- The [Housing Market Area Needs Assessment](#) (HMANA) provides calculated evidence, using the Government's new 'standard method' on identified need for affordable and specialist types of housing in the county including affordable housing, housing for older people, House size split and student housing.

Existing Policy

The existing policies in the adopted Core Strategy concerned with ensuring the delivery of affordable and an appropriate range and mix of housing are SS2, H1, H2 and H3. An [Affordable Housing Supplementary Planning Document](#) (SPD) was published in June 2021 to offer guidance on the implementation of these policies in planning decisions. This was produced in light of revisions to the NPPF in 2019 and new local evidence. Whilst the policies remain valid and NPPF compliant in the general approach they take, the numbers of affordable housing and the mix required should currently be determined using the latest evidence available from Housing Market and Needs Assessment (HMANA), published in July 2021.

Policy H1 sets out the countywide affordable housing contributions threshold, and targets for the different Housing Market Areas in Herefordshire. It may be necessary to review these in light of the latest evidence from the HMANA. The implications of the government announcement in November 2014 need to be reviewed. This resulted in a national threshold of 10 units and above on market housing sites where affordable housing contributions could be sought and is reflected within the current Core Strategy policy. Local Planning Authorities could apply a lower threshold in areas formally designated as 'rural areas', national parks and Areas of Outstanding Natural Beauty.

However no parishes within Herefordshire were designated as 'rural areas' under the required Housing Act. Therefore possibilities could be explored to apply to the Secretary of State to designate eligible parishes as 'rural areas'. This would be outside of the Local Plan process but have an effect on affordable housing policy.

The thresholds and eligibility criteria for the percentage of affordable housing on individual sites could also be set on a more local level, provided that there is robust evidence in the HMAMA to support doing so and demonstrated by a viability assessment.

Policy H2 sets out the criteria for enabling affordable housing developments outside of or on the edge of rural settlements as an 'exception' to the normal policies that would restrict development at these locations, to support the delivery of affordable housing schemes. The exceptions approach is well established in national policy and it should be retained in the new Local Plan, its removal from the plan is not considered to be a reasonable option.

However, few such schemes have come forward in this way in recent years. Alternative criteria may need to be considered or wording clarified to make the policy more effective. It may be appropriate to direct such developments to the edge of or close to more sustainable rural settlements, with a good range of services. The Rural Settlement Hierarchy, currently being reviewed as part of the new Local Plan, will provide an up to date picture on where these locations are. Criteria may need to be added accordingly.

The potential for NDPs to allocate such sites on a local level, or through the place-based policies of the new Local Plan needs to be examined. Forthcoming consultation upon the Rural Settlement Hierarchy will enable more discussion on this subject.

This policy could also include reference to formal affordable community self-build schemes in line with the Affordable Housing SPD. These would involve groups of local people in housing need, building homes for themselves usually as part of a Community Land Trust or Community Led Housing Group. In these cases, the assets will remain in the ownership of the local community group as affordable homes.

In order to accord with updated Planning Practice Guidance, H3 policy wording will also need to be updated, in order to address the requirement to proactively enable self-build housing developments and support Community Land Trusts. The evidence would suggest that the policy's ability to achieve a mix and range of housing should be broadened to more developments, particularly smaller schemes in rural areas. Currently, this is not being attained on many developments as the threshold within the policy is for sites of 50 units and above.

In practice generally, for the purposes of applying H3, sizes of dwellings are measured by the number of bedrooms. Trends in schemes that have come forward would suggest that this may no longer be the most effective means of attaining genuinely affordable sized dwellings on a site, as many now include 'spare rooms' of a proportion that could effectively be used as an additional bedroom. This issue has been addressed in policy by other councils and may need to be addressed by an updated policy or in its supporting guidance.

On schemes that are 100% affordable housing, the policy could be more explicit in seeking to obtain on these sites a more diverse mixture of tenures and types, based on identified local need, to better deliver on the objective of balanced communities.

As well as the provision of affordable housing, this policy covers ensuring that specialist accommodation that caters for people in the community with additional needs, such as older people and the disabled. In particular, the county has received a large number of applications for care homes and sheltered housing in the plan period so far. This is cited in the HMANA's recommendations as a housing sector to be in high demand in the next plan period. Student accommodation may also increase in demand as Hereford's new university, NMiTE continues to grow.

Neighbourhood Planning

Neighbourhood Development Plans (NDPs) across the county have sought to build on countywide policies by specifying the types and sizes of housing required in their particular areas to diversify the housing offer. Some have also added supplementary criteria for the provision of affordable housing, for example ensuring that such housing is visually indistinguishable from that of market housing. There may be potential for NDPs to play a bigger role in seeking contributions to affordable housing going forward, which will be outlined in the options below.

Housing Policy Options

Option AHS1- Basic Update of existing policy approach

This option would make the necessary updates/additions to the policies and supporting text to reflect changes to national guidance. The proportional requirements for each defined Housing Market Area (HMA) could also be updated, if deemed necessary to reflect the latest identified need in the HMANA and any updated evidence upon economic viability in the county.

This would retain a uniform application of affordable housing development size threshold county-wide (10 and above), which would be simple to implement. However, would remain difficult to attain affordable housing and mix contributions on smaller rural sites.

Option AHS2- Revise the affordable housing threshold within Areas of Outstanding Natural Beauty

This option would make the necessary updates/additions to the policies and supporting text to reflect changes to national guidance. It would also take into account the national policy which allows for a lower affordable housing threshold to be set within Areas of Outstanding Natural Beauty.

Option AHS3 – Reflect possible future designation of parishes as ‘rural areas’ and ensure there is sufficient flexibility within policy to lower the affordable housing threshold in such circumstances.

This option would allow for adjustments to be made, if Herefordshire Council were successful in applying for parishes to become formally designated ‘rural areas’ in accordance with the Housing Act 1985.

This would require one or both of the following:

- Clarify in policy that the county’s AONB areas may seek contributions on smaller sites than 10, in line with national guidance and subject to evidence.

As the Local Plan process was ongoing, an application would need to be made to the Secretary of State seeking to designate parishes meeting the criteria as ‘rural areas’ under The Housing Act 1985.

- Parish densities would be required to meet the eligibility criteria and it would require an Order by the Secretary of State to be made. This process is estimate to take around 2 years. There would also be housing transfer and right to buy implications to not related to policy planning which would need to be assessment.

Range and Mix Policy Options

Option MHS1 – Retain existing policy approach

Update and retain the stance of the current policy. This including the criteria applied to the threshold of sites of 50 units and above.

Option MHS2- A more prescriptive mix/range of housing

This would set out a more detailed policy approach to increase effectiveness in achieving a genuine mix and range of housing types and sizes. This would remove the sites threshold of 50 units and above. It could introduce criteria that would, for example, try to ensure:

- Appropriate space standards are provided;
- Houses are sufficiently adaptable to meet need/demand for home-based working;
- New dwellings are provided which are accessible and adaptable are provided for all sections and ages of the community;
- Proactively support self and custom build plots are provided to help meet housing needs.

Specialist Housing Policy Options

Option SH1- Additional Policy for specialist housing types

This would see the inclusion of a policy specifically dealing with the enabling and regulating of specialist types of accommodation. This could include, but not necessarily be limited to:

- Student Accommodation;
- Care Facilities;
- Sheltered Housing.

This could help to address already identified and forecast growth in demand for these types of accommodation over the next plan period. It can ensure that such accommodation is delivered in the most appropriate locations, they are fit for purpose, and contribute to the social wellbeing of the county.

Gypsy and Travellers' Accommodation

Background

There has been a travelling community in Herefordshire for the last 500 years. Travellers live in different ways, including permanently 'on the road', in caravans or mobile homes, or in settled accommodation, for part or all of the year. The term Travellers is used to include Gypsies, Travellers and Travelling Showpeople.

Nationally, Travellers can face inequalities in terms of access to a range of services, and this can affect their life outcomes. Statistics about the Herefordshire Traveller population demonstrate that in general terms this is no exception in Herefordshire. Ensuring the provision of good quality and a sufficient supply of accommodation for Gypsy and Travellers is key to helping to address these inequalities.

The following sets out how gypsy and traveller accommodation issues are addressed through the County Plan and the Local Plan's new vision and objectives.

Herefordshire County Plan

A key social aim of Herefordshire's adopted [County Plan](#) (2020-2024) identifies the need to address the inequalities which result in some children and young people being at a disadvantage by delivering good learning facilities, great job opportunities and homes that young people can afford to buy or rent.

Local Plan Draft Vision

The Local Plan 2021-2041 has a socially themed draft vision which states:

'By 2041, Herefordshire will be a place where planning has helped to create an environment where all of its residents have an exceptional quality of life and are able to live and travel in a more sustainable way.'

Planning policies that provide for the needs of the travelling community will be key contribution to realising this vision.

Local Plan Draft Objectives

Providing accommodation in appropriate locations for needs of Gypsies and Travellers come under two of the social objectives of the Local Plan draft objectives:

- To ensure that all residents have easy access to an appropriate range of nearby services, with community hubs thriving in market town and rural settings, thereby reducing the need to travel and enhancing quality of life;
- To provide a range of housing and tenure types to meet local needs, including affordability and specialist requirements. To provide diverse opportunities for home ownership for all.

National Guidance

Government guidance requires Local Planning Authorities to increase the number of Traveller sites in appropriate locations with planning permission, and to enable provision of suitable accommodation from which travellers can access education, health, and welfare and employment infrastructure.

The Government's planning policies and requirements for Gypsy and Traveller sites are set out in the [Planning Policy for Traveller Sites](#) (PPTS), which must be taken into consideration in preparing Local Plans and taking planning decisions. Local Authorities are required to have an evidence base for Gypsy and Traveller accommodation needs, to set local targets for the number of pitches and plots to be developed.

The [Equality Act 2010](#) recognises Romany Gypsies and Irish Travellers as being distinct ethnic groups, and protects them from discrimination. There is a statutory duty on public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations in the course of developing policies and delivering services.

Local Considerations

In Herefordshire, there are a number of small privately owned traveller sites and larger sites that are managed by Herefordshire Council. Travelling Showpeople occupy plots on yards. As well as space for living quarters, due to work, Travelling Showpeople often require additional space in order to store and maintain large equipment.

It is important to ensure that there is an adequate supply of pitches and plots for Travellers on authorised sites in the county. Without a permanent site, it is difficult for Traveller families to access basic health care, support and education services, leading to poor life outcomes.

The Local Plan update will identify the following to meet the requirement over the plan period:

- Residential pitches and sites for Travellers.
- Residential plots and yards for Travelling Showpeople
- Temporary stopping places where travellers who are either passing through the County or without a permanent base can reside for a specified temporary period. These are sometimes referred to as Negotiated Stopping Places

A 'call' for all of these types of sites will be carried out as part of this consultation exercise. However, it is recognised that there is a lack of availability of sites and in the past, call for sites processes have returned a small number of sites for assessment. This means identifying a supply of suitable sites to meet the requirement can be challenging. Therefore, the council needs to consider other options for finding sites, and this could include identifying some pitches or plots within a strategic urban extension or large development.

There is an existing shortage of yards and plots for Travelling Showpeople. The Local Plan update needs to address how a more flexible approach to identifying sites for Travelling Showpeople can be reached. This could include considering land that is suitable for employment to be used for this purpose, given the residential and work mix that is characteristic of such sites.

Unauthorised encampments, for example on roadsides or in car parks, can lead to tension between Travellers and settled communities and are often unsuitable places for Traveller families to stay without access to basic facilities. Currently there is no temporary stopping place or transit site in the county where Travellers can go in these situations, although one was identified in the [Travellers Sites Development Plan Document](#) 2019. An additional approach to this is to identify pieces of unused land on an ongoing basis where Travellers on authorised encampments can be directed to for stay for an agreed length of time with the agreement of the landowner. Temporary sanitation and rubbish disposal facilities are provided on the site.

Any updated policy should continue to recognise the shortage of available sites for Travellers. It should continue to limit such development outside settlements, whilst being flexible enough to respond to any shortage of supply. However, sites should still be located in reasonable distance of services and facilities.

Evidence Base

- Local planning authorities are required to make their own assessment of accommodation need for the purposes of planning. A new Gypsy and Travellers Accommodation Assessment (GTAA) has been commissioned, and should be available imminently. This assessment will provide the council with information about the current and future accommodation needs of Gypsies and Travellers, and Travelling Showpeople.

Existing policy

Policy H4 of the adopted Core Strategy sets the requirement to prepare a Travellers Sites Development Plan Document (DPD) and sets out criteria for considering sites for Travellers in the interim and also for non-allocated sites. The Travellers' Sites DPD was adopted in 2019 and therefore policy H4 has broadly become out of date. Policy RA3 sets out what types of development may be permissible in rural locations outside settlements. This includes where the proposal includes a site providing the needs of Gypsies or other Travellers in accordance with policy H4.

The Travellers Sites Development Plan Document (DPD) addresses the provision of the three different types of Traveller accommodation as mentioned above. It allocates sites to meet a five year requirement for residential pitches and a temporary stopping place. However, no sites for Travelling Showpeople were identified. The DPD also includes policies setting out criteria in relation to the consideration of Traveller pitches and Travelling Showpeople plots.

Neighbourhood Planning

The provision of Traveller accommodation requirements and site provision is considered as a county wide issue. Therefore, there is no requirement for Neighbourhood Development Plans (NDPs) to address this issue individually.

Gypsy and Travellers Policy Options

It is likely that the emerging GTAA will identify a requirement for additional pitches and plots, and therefore all of the options below reflect this. Whilst we could consider updating the DPD separately instead of addressing the accommodation requirements in the Local Plan, this is not being suggested as an option, as this would cause too much of a delay in addressing the accommodation requirements.

Some of the sites identified in the Travellers Sites DPD have either been developed, or are currently being developed. The Local Plan update will need to review the status of the remaining sites to determine whether these are likely to come forward in the plan period.

Option GT1- 'Save' the existing policies and allocated undeveloped sites in the DPD

Allocate further sites and yards in the Local Plan, to meet the demand identified in the revised GTAA. Amend the Local Plan policy to reflect this. Consider using an approach of negotiated stopping places for temporary stays.

Option GT2- Review policies of the DPD and H4 to combine into a single policy in the Local Plan

Carry over allocated sites from the DPD into the Local Plan update. Allocate additional sites and yards, to meet the demand identified in the forthcoming revised GTAA. Consider using an approach of negotiated stopping places for temporary stays.

An additional Option GT3 could work with both Option GT1 and Option GT2:

Option GT3 Provide pitches or plots within strategic urban extensions/ strategic development to be identified in the Local Plan, to meet the demand in the forthcoming revised GTAA.

Consideration could be given that any strategic allocations within the Local Plan should also include pitches and plots for Travellers.

Health Issues and Social and Community Facilities

Background

This topic looks at how the Local Plan can protect and enhance the provision of social and community infrastructure and also looks at how the Local Plan can play a part in improving people's health and well-being.

Social and community facilities can include a range of public services, cultural and leisure uses and services provided by the community and voluntary sector.

Public Health England's (PHE) [Healthy Places guidance](#) states that both the built and natural environment are part of the wider determinants of health and wellbeing across your lifespan and have an influence on your physical and mental health, and on health inequalities. The quality of the built and natural environment can affect connectivity within a neighbourhood and people's social networks, the location and quality of housing, exposure to air and noise pollution, safe and accessible transport and opportunities for active travel. It also plays a crucial role in promoting access to open space, employment and healthy food options.

These health inequalities were brought into sharp focus through the way in which Covid-19 disproportionately affected certain communities which did not have as many easily accessible facilities.

It has been shown that residents living in areas which suffer from deprivation and a lack of community facilities and green spaces are much more likely to suffer from health problems. Conversely, studies have shown the detrimental health impacts of loneliness. Therefore, the twin issues relating to health and community are intertwined. The provision of strong community facilities that connect residents to each other through various activities and support groups contributes to people's sense of belonging and to combat loneliness.

This makes it easier for people to live in their community for longer, preventing more serious illness later on in life. Additionally local community facilities contribute to a more sustainable pattern of development with communities by helping to reduce the need to travel.

The Local Plan 2021-2041 will set out how new planning proposals coming forward can promote and facilitate healthy lifestyles, with regard to the mental and physical wellbeing of existing and new residents to the county, in the way that they are designed and are accommodated by easily accessible health, social and community facilities. In addition to a specific policy on health, the overarching aim will be to address the wider determinants of health by creating healthier places by improving the quality of, and access to, the built and natural environment and to reduce health inequalities. This will be embedded into the Local Plan.

The following sets out how the topics of health issues and community and social facilities are addressed through the County Plan and the Local Plan's new vision and objectives.

Herefordshire County Plan

The council's [County Plan](#) (2020-2024) sets out how the council intend to fulfil its environmental, social and economic ambitions over the next four years. A key community ambition is to '*Strengthen communities to ensure everyone lives well and safely together*'

Herefordshire Council's ambition is to strengthen communities and '*to make wellbeing inevitable*' through the [Talk Community](#) approach. As part of this approach, 39 Talk Community Hubs in Herefordshire signpost key health and wellbeing information and help to connect 'people to services, groups and activities within their local community or across the county'.

Under the economic ambition, a community wealth building initiative entails four key principles – spend more locally, skill-up, strengthen the use of our assets and speak up and out.

Local Plan Draft Vision

The Local Plan 2021-2041 has a community theme vision, which states:

'Herefordshire will be an exemplar of 21st century rural living, where rural settlements and market towns have resilient communities.'

By having relevant and up to date policies on health and community policy within the Local Plan, will play an important role to achieve this vision.

Local Plan Draft Objectives

Health and community ambitions are set out with the Local Plan community objectives, namely:

- To provide connectivity and infrastructure that is designed for inclusion, with factors such as gender, age, and disability considered;
- To support good-health and wellbeing, through ensuring easy access to open space, sports facilities, and active travel options;
- To ensure that health and social care infrastructure will meet the demands of a growing population, whilst supporting good-health and well-being and addressing inequalities.

National Guidance

[National guidance](#) emphasises the need to work collaboratively with health professionals and partnerships. National policy promotes planning for healthy lifestyles. This includes planning for the provision and use of shared facilities, protecting valued facilities, recognising local health, social and cultural strategies and facilitating an integrated approach to the consideration of location of housing, economic uses and community facilities and services.

Local Considerations

According to [Understanding Herefordshire data](#), people living in the most deprived areas of the county are 36% more likely to die prematurely of cancer, 22% more likely to die prematurely from cardiovascular disease and 18% more likely to die from respiratory disease. The areas suffering most acutely from health deprivation are located in south Hereford, pockets of the north of the city, as well as in Leominster. These areas are also more likely to suffer from poor air quality, with the county's two AQMA's (Air Quality Management Areas) being located around the A49 road in Hereford and the Bargates area in Leominster, contributing to negative health outcomes.

There are also hidden pockets of rural deprivation due to isolation and a lack of services that support communities. These communities struggle with poor connections, both in terms of digital, health and community infrastructure and access to reliable public transport.

A quarter of Herefordshire's population is in the over 65 age bracket with this figure likely to grow to 28% by 2028. Children and young people also lose out from a lack of services, preventing them from developing well and achieving more. Major obstacles in delivering healthy places are set out in Royal Town Planning Institute's (RTPI) [Enabling Healthy Placemaking](#) report, citing resourcing, managing developers' expectations and funding as key issues.

The lack of local services and facilities in rural areas is a key issue for the county particularly in rural areas. However the plan also needs to ensure that careful consideration is also given to the retention of these facilities in Hereford and the market towns where the cumulative loss of facilities may have a significant impact on local services and diversity of choice for recreation and leisure.

The Local Plan can safeguard land for health infrastructure, protect and extend green corridors and provide the framework to oblige developers to support the funding of health and community facilities that arises both for new and existing communities. It will also need a strong stance on protecting against the loss of existing social and community infrastructure.

The Parish Council questionnaire indicated that many rural areas have lost key services, such as post offices, public houses and shops. Opening times have been reduced, as well as having bus services cut. This impacts on local residents' ability to lead active, social lifestyles and access key services. The provision of rural medical centres or GPs were seen as a desirable key service..

Evidence Base

- The Herefordshire [Health and Well Being Strategy](#) is a statutory requirement for the council which sets out the approach taken by the council to improve the health and wellbeing of the population. Priority 4 Impact of housing – fuel poverty and poverty and the impact on health and wellbeing recognises the importance of housing as a determinant of health. Good standards of housing can reduce ill health, increase mobility and support discharge from hospital. This is most pertinent among vulnerable groups for whom access to decent quality housing will help to reduce health inequalities.
- The [Joint Strategic Needs Assessment](#) provides statistics about the health of the population, presented in the context of the wider determinants of health and well-being, and housing is specifically cited as one of these.
- The Physical Activity Strategy will set out ways in which the council can encourage more active lifestyles with regard to healthy environments, active communities, healthy individuals and partnership and collaborative working.

Existing Policy

SC1 - In the existing Core Strategy, this Social and community facilities policy recognises the importance of such facilities to accompany new developments and is recognised as a particular problem in rural areas. Types of facilities are set out according to their various functions in terms of recreational, social, educational, spiritual and health and wellbeing purposes.

Health and Community Policy Options

Option HC1- Over-arching strategic policy addressing health issues and an additional policy addressing health, social and community facilities issues

As health issues are interconnected with other policies (open space, housing, among others), this issue would be effective in a strategic policy overarching more specific areas. The existing policy SS6 Environmental quality and local distinctiveness includes important considerations which would be extended upon in order to ensure that developments had a positive impact on health.

The policy currently aims to '*maintain and improve the effectiveness of those ecosystems essential to the health and wellbeing of the county's residents and its economy*'. This policy would enable us to capitalise on our increased understanding of health inequalities.

This option would strengthen areas within a social and community facilities policy incorporating updated policies with regard to:

- Public toilet strategies.
- Co-location, examples and marketing of community facilities in the context of safeguarding against loss of existing facilities, as well as updated community ownership avenues.
- Updated examples of community facilities could be in the role that they play in community wellbeing.
- Role that planning for community facilities has in incorporating Cultural Strategy aims. ([Herefordshire Cultural Strategy 2019-2029](#) - See cultural infrastructure).

Option HC2- Retain social and community facilities policy and address health issues through other policies of the plan with a cross cutting approach

As well as being incorporated into the over-arching strategic policy, health considerations could be addressed in a number of policies in the Local Plan due to the cross-cutting nature of health issues. A criteria approach for each place based proposal would be included to ensure that any new development is properly served by good quality and sufficient infrastructure.

It would also take into account how issues such as transport, open space, design and housing can enable people to live healthier and more active lives. This would enable the policies to better take into account the health needs and accessibility of services through these policies.

In terms of health policies within a wider design topic, this would include healthy place making principles to be integrated into design policies.

In the housing and design policies of the plan, the need for good quality housing stock which meets the needs of and is accessible to all groups of the community will be required. This housing should be designed in a way that facilitates healthy living and addresses the needs of different groups.

A policy incorporating [Child Friendly Planning principles](#) could form an important part of the open space policy, which would contribute to more families being able to move to the county. For the wider population, the open space policy would promote healthy and active lifestyles.

Healthy neighbourhood aspirations could include particular opportunities for accessible, active travel in transport policies.

Option HC3- Include a social and community facilities policy and a separate health policy

This option would include a new policy dealing specifically with health, whilst retaining an amended social and community facilities policy. This separate policy could address all the issues outlined in options 1 and 2 and also include a framework for requiring [Health Impact Assessments](#) (HIA) as part of the planning application process. This would be in addition to a strategic over-arching policy incorporating health issues and an updated social and community facilities policy.

An individual health policy would detail when an HIA would be required and the contents required for a HIA. This would determine, among other factors, the threshold of houses, above which a HIA would be required in a residential development, for example, as well as factors which would need to be demonstrated had been met for a development to gain planning permission.

The guidance includes 'a properly conducted HIA recommends measures to maximise positive impacts; minimise negative impacts; and reduce health inequalities. HIAs puts people and their health at the heart of the planning process. An HIA supports the planning system to address local health and wellbeing needs and tackle inequalities through influencing the wider determinants of health.'

The planning team will work in partnership with the public health team to develop policies. The public health team also would support training for planners too in this area. Close collaboration will ensure that the right health and community infrastructure is provided with new development.

Access to Open Space

Background

Good quality, accessible open space that is fit for purpose serves many functions. Open spaces provide areas to exercise and opportunities for sport and physical activity, enable people to interact with each other and nature and to promote active lifestyles by contributing to active travel routes. Access to open space, however, is not evenly distributed among every community in this county. There needs to be a variety of open spaces to reflect the diverse needs of the community, based on recreational, leisure, sport and food growing needs and habitat.

Examples of open space could include:

- Parks and gardens;
- Amenity green space;
- Natural and semi-natural green space areas;
- Local Green Spaces (designated by Neighbourhood Development Plans);
- Children's play and facilities for young people (including equipped play areas);
- Cemetery space;
- Allotments areas/community gardens;
- Civic spaces;
- Bodies of water for rowing and canoeing.

Examples of areas for sport and physical activities could include:

- Facilities such as playing pitches (both grass and artificial turf pitches);
- Sports halls;
- Swimming pools;
- Health and fitness suites;
- Tennis courts;
- Lawn bowling facilities;
- Village/community halls.

Numerous studies have concluded a direct link between the quality of living environments, particularly those with access to green space, and happiness. The physical and mental wellbeing benefits of accessible open space is reported by Public Health England (2020) in their [Improving Access To Greenspace](#) review, saying that greener environments are '*associated with improved health and wellbeing outcomes such as reduced levels of depression, anxiety, and fatigue*'. This can also bind communities together to reduce loneliness. In addition to this:

- Physical inactivity is responsible for one in 6 UK deaths and is estimated to cost the UK £7.4 billion annually (including £0.9 billion to the NHS);
- Thirty-four percent of men and 42% of women are not achieving recommended levels of physical activity as recommended by UK Chief Medical Officers.

Sport England (2020) [reported](#) that almost two-thirds of adults consider exercise to be more important than ever, as a result of the Coronavirus (Covid-19) crisis. The impact sport and physical activity can have on mental wellbeing is every bit as important as the physical benefits. As well as developing individuals, such activity can help build stronger communities by bringing people together.

Open spaces can also have other invaluable uses relating to the preservation of species and tackling climate change, as part of flood mitigation strategies and carbon reduction. Crucially, nature has been in decline across the UK as a result of a number of factors. In response to this, the wheels have already been set in motion for the creation and improvement of green space in England, with the biodiversity net gain requirements set out in the [Environment Act 2021](#).

New developments should promote inclusivity by integrating nature and green space. This is a sustainable approach, and delivers important environmental, physical and mental health and social and economic benefits. Public awareness of the importance of open space has been heightened as a result of the climate and ecological emergency and the experiences of living with Covid-19.

The following sets out how open space is addressed through the County Plan and the Local Plan 2021-2041 draft vision and objectives.

Herefordshire County Plan

There are key community and environmental-based ambitions of Herefordshire Council's adopted [County Plan](#) (2020-2024). Namely:

Community- *'...open spaces are integral in the aim of putting physical and mental health at heart of what the council does, also placing importance on ensuring children have a healthy and active start in life.'*

Environment- *'We will...improve residents' access to green space in Herefordshire.'*

Developing policies which enable these through new development will be crucial to achieving this.

Local Plan Draft Vision

The draft Local Plan 2021-2041 has environmental, community and economic themes to its draft vision, which state:

Environmental- *'By 2041 Herefordshire will be a place where planning has helped to create an environment where all of its residents have an exceptional quality of life and are able to live and travel in a more sustainable way. In addressing the climate and ecological emergency, the county will be carbon neutral, and biodiversity here will be thriving. The rich landscape and cultural heritage will continue to be protected and valued for all to enjoy.'*

Community- *'Rural settlements and market towns to have resilient communities.'*

Economic- *'Inclusive infrastructure will be provided, to ensure that people are able to live active and healthy lives.'*

Policies that improve residents' access to open space and sporting facilities will be important to realising this vision.

Local Plan Draft Objectives

The need to provide opportunities for physical exercise and recreation is also supported in the community and environmental themes of the draft Local Plan draft objectives.

- Community - *'To support good-health and wellbeing, through ensuring easy access to open space, sports facilities, and active travel options.'*
- Environment – *'To enhance and extend Herefordshire's natural capital, green infrastructure and nature recovery networks to ensure good access and proximity to open and wild spaces for all residents.'*

National Guidance

[National policy](#) defines *'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity'*. Moreover, the process for the replacement of any lost open space, including sports and recreational buildings and land (including playing fields) is also addressed, in addition to the protection of public rights of way.

National policy also addresses the designation of Local Green Space. This is a mechanism that allows local communities such as Neighbourhood Planning groups to protect green spaces of local importance. This can be designated through local or Neighbourhood Development Plans (NDPs), where it can be demonstrated that the space in question is of value to the local community.

National guidance provides more detail on the [Local Green Space designation](#). This details how green space is designated in local plans or in NDPs, how this relates to development and to existing designations, as well as avenues to be registered as an Asset of Community Value. Assets of Community Value are community-owned assets which have value to the community, and are protected from being lost to redevelopment. 50% of Herefordshire's adopted NDPs have one or more designated Local Green Spaces.

Local Considerations

Herefordshire is a rural county, with rich countryside and around half of its population living in rural areas. However, access to open space is still something that some communities benefit from more than others, with place-based variations in recommended levels of need for access to open space identified in the [Joint Strategic Needs Assessment](#) (2021).

Physical activity helps to improve the wellbeing of individuals and the wider community. In 2017/2018, approximately two thirds of Herefordshire adults met the recommended level of physical activity per week, according to [Understanding Herefordshire](#) statistics. Physical activity rates within Herefordshire are similar to England's average, although over 20% of the population are considered to be physically inactive. The impact of Covid-19 could result in a further reduction in these figures, which will need to be considered in planning policy formation.

It is important that there are a variety of types of open spaces available in a local vicinity. This is to ensure that mental and wellbeing needs can be addressed, and opportunities through our open spaces to tackle climate change are taken, both through preventative and mitigation measures, and to preserve and enhance biodiversity. Open spaces form part of the wider Green and Blue Infrastructure network. These are interconnected. So, for instance, the ecological status of the River Lugg and Wye will impact the quality of open space for wildlife, as well as residents along these corridors. These form the spine of our green and blue corridors that feed into more urban areas.

As well as providing formal and informal recreation opportunities, open space also has multiple benefits in:

- Tackling poor air quality – there are two Air Quality Management Areas in the county: along the A49 (T) corridor in Hereford and in the Bargates area in Leominster. Tree cover being integrated into open space can contribute to reducing carbon out of the atmosphere.
- Mitigating the impacts of flooding - With the prevalence of flooding around the county's rivers becoming more frequent, the role that flood mitigation strategies play as a part of open space is important.
- Attracting habitat and attracting biodiversity – such natural spaces also offer the opportunity for species done, in the right way, to thrive. This restores functioning ecosystems which bring many benefits in terms of the variety of species, for wider resilience against disasters and for a greater variety of crops.
- Providing local growing spaces – [Herefordshire is a Sustainable Food Place](#), through its Herefordshire Food Alliance, which is a partnership of stakeholders from various sectors dedicated to working together toward a more sustainable food system, promoting affordable, healthy and environmentally friendly food production.
- Bringing communities together – the activities associated with open space allows members of the community to come together through projects such as markets, community gardens and as mentioned above, growing spaces. [Haygrove Community Gardens](#) has two gardens in Herefordshire – in Leominster and Ross-on-Wye – which reaches out to those who would benefit from the 'therapeutic nature of horticulture' as well as being a place for wider public enjoyment.
- Helping to reduce health inequalities including among children and elderly people – Haygrove also engages with school children in the growing of fruit and vegetables. A report produced by the Royal Town Planning Institute (RTPI) on [Child Friendly Planning](#) in the UK provides a framework through which open space is suitable for all children and young people, to enable active and fulfilling lifestyles. The county also has a higher than average elderly population, some of whom suffer from health problems. According to a [King's Fund study](#) on access to green and open spaces and the role of leisure services, access to green space can reduce years of expected health problems among the elderly. Recognition of ageing populations staying active for longer means that specific facilities for over 55s with regard to indoor sport facilities should be considered.

[Fields in Trust](#) provides some guidance to ensure that the right kind of open space is available to residents as part of new developments. It centres on the quantity and quality of open space, walking distance from peoples' homes to open space, with specific regard to factors hindering access to open space, and buffer zones. Buffer zones work to ease the possibilities of overlooking and potential disagreements which may arise between groups of people with seemingly conflicting priorities.

These factors ensure that new developments can provide open spaces which are inclusive, in that they are accessible, fit for purpose and meet the needs of all age groups. This benefits both new and existing residents to an area. [Sport England](#) has a specific role in the planning system as a statutory consultee on planning applications for development affecting or prejudicing the use of playing fields and indoor sports facilities requirements. The organisation will be instrumental in developing playing fields policy further.

It is also recognised that open space is not always designed with the safety of women in mind. Gender mainstreaming is the process by which issues that affect females when navigating around the built environment are reflected in all processes of planning policy and decision-making. Such issues relating to open space include unlit routes, infrequent benches and a lack of natural surveillance. Natural surveillance is a strategic planning method that reduces crime through the placement of housing and businesses around open space or walking routes in order to create activity and footfall in that area.

Evidence Base

- [Open Spaces Study](#) (2006) was an assessment of open space, outdoor sport and recreational facilities in the county. It looked at local needs for provision and opportunities for enhancement, development or replacement of current facilities.
- [Play Facilities Study 2012](#) assessed the provision across the county of play areas and provided guidance to developers on enhancement opportunities.
- As part of the [Playing Pitch Assessment 2012](#), existing facilities were reviewed for each area, in order to forecast future playing pitch requirements.
- Additionally there is also the [Sports Facilities Framework](#) (2010) by Sports Partnership Herefordshire and Worcestershire. This reviewed the major indoor built facilities in the county, and took account of demographic changes over time.

As part of the local plan update, the council has commissioned the Herefordshire Playing Pitch and Outdoor Sports Strategy and Built Indoor Sports Facilities to cover 2021-2041. This is to ensure that the evidence is accurate and up to date to guide policy formation.

This assessment will provide a detailed and bespoke study to review current playing pitch and indoor facilities, and outdoor sports facilities, and the potential impacts on these of future development within the plan period. It will also be beneficial to have a combined study to ensure that the approach will be the same for providing both playing pitch and indoor facilities. It is expected that the indoor sports facilities assessment will be completed by Autumn 2022 and outdoor sports facilities by September 2022.

The 2022 Open Space update will provide a land use framework to promote opportunities for new and improved open space and recreation facilities and for the protection of existing facilities. In particular it will identify priorities to:

- Address deficiencies in recreation facilities in main areas of population;
- Meet needs arising from new residential development;
- Develop a network of green space, taking on board the principles of green infrastructure;
- Develop sustainable facilities which cater for a wide range of users;
- Identify existing contribution to nature conservation, and promote opportunities for improvements.

Existing Policy

Policies OS1 to OS3 in the Core Strategy address the provision of open space.

Policy OS1 outlines the provision for appropriate open space, sports, and recreation facilities. These will arise for all planning applications concerning all new residential dwellings, retail and employment proposals, where there is need to provide informal areas of amenity greenspace for the use of employees and visitors, and residential institutions, student accommodation, assembly and leisure, hotels or hostels. The need for such facilities will need to be considered on a site by site basis with either on-site or off-site provision, where appropriate.

Policy OS2 states that, in order to meet the needs of the community, these facilities will be sought (where appropriate), with any new development that creates a need for it. It must be in accordance with all applicable set standards of quantity, quality and accessibility. The provision of these facilities should be also located on-site unless an off-site, or partial off-site contribution, would result in an equally beneficial enhancement for the community.

Policy OS3 addresses the loss of open space, sports, or recreation facilities. In determining proposals which result in the loss of these facilities, clear evidence is required to show that this is surplus to requirements, the loss results in an equally beneficial replacement or enhanced facility, the loss is for an ancillary development which improves the functioning of existing open space, sport or recreation use, or that the loss will not result in the fragmentation or isolation of sites which are part of a green corridor.

Neighbourhood Planning

Neighbourhood Development Plans (NDPs) have played a role in ensuring that the important open spaces across the county valued at a local level are safeguarded, through the Local Green Space designation. 60% of Herefordshire's adopted NDPs have one or more designated Local Green Spaces.

Access to Open Space Policy Options

In developing new policies relating to open space in the Local Plan, there are a number of suggestions on what will need to be considered:

- How the policy works alongside developer contribution policy – as the population ages, but retains an active and sociable lifestyle, specific provision for sports for people over-55 must be considered, in line with new extra care and other supported care facilities.
- How open space and sports facilities can contribute to the extension of green and blue infrastructure networks, promoting active travel, improving physical and mental wellbeing and providing habitats for wildlife.
- Provide more growing spaces and tree cover as part of the provision of open space, in line with the wishes of the local community.

To ensure that open space aspirations are taken into consideration in the Local Plan, a decision will have to be taken as to how open space issues can be addressed in the new plan. Some proposed options are outlined below:

Option OS1- Maintain the overall approach of the existing policies, but updated with the benefit of new evidence

Continue with the general requirements to provide open space within residential, employment, retail and specialist housing schemes.

Option OS2- Restructure the policy framework, to seek to address the following:

- Improve access to open space, recognising that not all communities across the county have easy access to good quality open space which is fit for purpose.
- Ensure that open space is accessible for vulnerable groups, such as elderly residents, those with dementia, residents with disabilities and children and young people, recognising the importance of open space in physical and mental wellbeing.
- Consider gender mainstreaming in provision of open space, ensuring, among other factors, that open spaces are well-lit and enable natural surveillance.
- Extend and strengthen green and blue infrastructure networks.
- Capitalise on opportunities to 're-wild' parcels of land as part of developments, and provide local growing spaces for communities such as allotments and planting wild flower meadows.
- Make sure that sports needs of the community are fulfilled through recognising the need for a variety of indoor and outdoor sports facilities.
- Harness the role of open spaces in mitigating against the effects of climate change, by integrating sustainable drainage systems and attenuation ponds into and alongside spaces which also have recreational and sport functions.
- Integrate national guidelines with regard to tree-lining streets to develop a policy to provide canopy cover as part of open space provision.
- Actively seeking out opportunities for wildlife corridors as part of open space provision, to help species thrive.

Infrastructure Delivery

Background

New development can place additional demands upon physical, social and green infrastructure and it is vital that sufficient infrastructure is available to serve new and existing communities. It is a well-established principle that new development should contribute towards the provision of such infrastructure to ensure existing communities are not disadvantaged by any increased pressure on facilities from new development and that new communities are served adequately by new infrastructure as required.

Local Planning Authorities can secure funding from developers towards necessary infrastructure including through a Section 106 agreement as introduced by the Town and Country Planning Act 1990 as amended. This is the mechanism that the council currently uses and an [Infrastructure Funding Statement](#) is published annually to provide a summary of financial contributions the council has secured from new developments for off-site infrastructure works and affordable housing, and highway works completed as part of new developments.

The [Community Infrastructure Levy](#) (CIL) came into force in April 2010 and allows local authorities to raise funds from owners or developers of land undertaking new building projects in their area, to help fund infrastructure. Following the adoption of the Core Strategy in 2015, Herefordshire Council developed a preliminary draft charging schedule in 2016 which introduced charge variations by geographical zone.

However in 2017 the Government published a white paper [Fixing the Broken Housing Market](#) which proposed to examine the options for reforming the system of developer contributions including ensuring direct benefit for communities. In 2018, given the uncertainty surrounding changes to CIL, the Council took the decision to pause progressing the adoption of CIL locally. In 2020 the Government published a [White Paper on Planning for the Future](#) for public consultation. This included further proposals to reform the Community Infrastructure Levy with a consolidated Infrastructure Levy. However the white paper has not progressed further and the more recent [Levelling Up White Paper](#) proposes reforms to, amongst other things, the system of developer contributions to infrastructure.

Policy Approach

As there is still uncertainty over the future mechanism for developer funding at this stage it is not possible to set out in any detail how the Local Plan update may address this issue.

However, Policy ID1 remains broadly relevant as a strategic approach to setting out the principle of ensuring that new or enhanced infrastructure will be provided to support development and sustainable communities. Until there is a clear guidance from the government on the new approach to funding mechanisms it is not possible to say whether a Planning Obligations Supplementary Planning Document (SPD) will still be required as included in Policy ID1.

The council understands the concerns of residents about the need to ensure suitable infrastructure and services and it is committed to ensuring that an extensive range is provided to support the new development. The council will work closely with infrastructure providers and the community as the Local Plan update is progressed and the location of new development is decided.

Rural Areas

Background

This section is concerning policies for the rural area. This relates to general policies, and not place specific. These are general policies and not place based specific. The proportional growth in rural areas, rural settlement hierarchy, rural housing distribution and the role of settlement boundaries will be subject to a further consultation in the summer 2022.

These general policies more specifically seek to address:

- Housing in open countryside;
- Agricultural, forestry and other occupational dwellings in the countryside;
- Reuse and adaption of rural buildings.

Housing in Rural Areas

Herefordshire is predominantly a rural county, with around 53% of its population living in rural areas outside of the five market towns and Hereford City. To ensure the future sustainability and resilience of rural communities it's important that the right type and volume of housing is built in the right locations. This requires planning for growth in a way which will strengthen rural communities and ultimately maximising the benefits that could come from growth such as increasing opportunities for the retention and upgrade of key services and/or delivery of new ones.

Focusing growth in appropriate settlements will avoid unsustainable patterns of growth and isolated speculative development in Herefordshire's countryside. This is to minimise adverse effects on Herefordshire's natural and heritage assets, as well as the unique character of Herefordshire's villages and settlements. Moreover, addressing the climate emergency will require a strategic and joined-up approach. Rural housing can contribute significantly in Herefordshire, by channelling development to suitable rural areas where there is a need to strengthen services, such as sustainable transport modes.

However, it is recognised that there are circumstances in which housing is required outside of settlements and within the open countryside. Examples of this would be replacement dwellings, subdivisions, rural workers dwellings and conversions. Adaptable living modifications to existing housing, such as annexes, garden offices and extensions to enable additional living and working capacity, has also become an increasing issue in the past few years.

Agricultural, forestry and other occupational dwellings in the countryside

Herefordshire's economy is more dependent upon agriculture, food and manufacturing than any other economy in the West Midlands or the UK, 32% of the workforce in Herefordshire is employed in this industry above the national average of 16%. The forecast through to 2031 indicated agriculture, food and manufacturing suggests this would continue to be a significant source of employment.

The [NPPF](#) seeks to ensure that policies and decisions enable the development and diversification of agricultural and other land based businesses, and provide opportunities for housing in the countryside where there is a need for rural workers to live permanently at or nearby their workplace.

Reuse and adaptation of rural buildings

Within a predominately rural county such as Herefordshire, farm buildings are a common, distinctive and prevalent type of building within the open countryside. When these buildings are no longer required, they can offer a potential alternative use either as housing, employment, tourism or a community use. These buildings can vary greatly in terms of scale, design and materials as well as location, from an isolated building to a farmstead or cluster.

Historically, the reuse of rural buildings has been focused on traditional barns with some heritage value, however more recent changes to national policy means that increasingly more modern structures are also coming forward for conversion.

The following sets out how rural area policy is addressed through the County Plan and the Local Plan's new vision and objectives.

Herefordshire County Plan

The County Plan ambition is to protect and enhance the environment and keep Herefordshire a great place to live. It acknowledges the rich beauty and rural environment of the county, is proud of its rural heritage, and keen to work in partnership with rural and farming communities to maintain stewardship of the countryside.

It specifies that Herefordshire will deliver carefully planned policies for growth, which will deliver sustainable development to meet the need of local people whilst respecting heritage and the natural environment.

Local Plan Draft Vision

The Local Plan 2021-2041 draft vision has a community themed countywide vision, which states:

'Herefordshire will be an exemplar of 21st century rural living, where rural settlements and market towns have resilient communities, which are well connected digitally.'

It also has an Economic themed vision, which states:

'The County will be economically prosperous, with its farming heritage and sustainable tourism continuing to play an important role. It will be well known as a place where innovative, green and creative businesses can thrive. Good quality housing and inclusive infrastructure will be provided, to ensure that people are able to live active and healthy lives.'

Effective Local Plan policies for rural areas will be crucial in ensuring that this vision is achieved county-wide, including outside of the market towns and Hereford.

Local Plan Draft Objectives

There are a number of Local Plan 2021-2041 draft objectives that can be addressed in making policy for rural areas. Listed below are the most relevant:

- Protect the natural environment and heritage of the county.
- Ensure high quality design of buildings and spaces taking into account local character and heritage.
- Minimise and carefully manage the use of natural resources, including mineral, land and water.
- Provide a range of housing and tenures types to meet local needs, including affordability and specialist requirements.
- Grow a thriving, diverse local economy.
- Continue to recognise the importance of the role of agriculture plays in the local economy and support appropriate diversification and modernisation to strengthen this sector.

National Guidance

The [NPPF](#) indicates that planning policies should be responsive to local circumstances, and support housing which reflects local needs. Housing should be identified for villages to grow, thrive and support local services. Policies should avoid the development of isolated homes in the countryside. However, there are some exceptional circumstances in which development could take place:

- Essential need for a rural worker to live on site.
- An optimal and viable use that secures the future of a heritage asset.
- Re-use of a redundant or disused building.
- Subdivision of an existing building.
- A building with an exceptional quality of design.

Supporting a prosperous rural economy is a key theme in national guidance, and indicates that planning policies should enable the sustainable growth of rural business through the conversion of existing buildings and well-designed buildings and that some of these may be found beyond existing settlements. It highlights the importance of ensures that development is sensitive to its surroundings, does not have unacceptable impact on local roads and has the opportunity to be a sustainable location.

[National Guidance](#) provides additional details on defining 'essential' rural workers. This includes details of the evidence of the necessity of the rural worker to live in that location, the degree of confidence that the enterprise is viable, whether additional dwellings will enable the continued viability of the farming business, if there is already any existing accommodation, and is there the ability for a trial temporary accommodation period.

It also indicates that the need for seasonal workers will generally not be sufficient to justify building an isolated rural dwelling.

There have been a number of changes to the [General Permitted Development Order](#), which has had a significant effect on the conversion of buildings within the county. Class Q in this order, supports the re-use of redundant farm buildings for housing development in rural areas, including within the countryside and area outside of settlements. It can permit up to five dwellings if a range of conditions and criteria are met.

National Guidance also indicates that consideration should be given to resisting inappropriate development of residential gardens, especially where it would cause harm to the area. Therefore a balance will need to be found, that is flexible enough to respond to adaptable living and national policy requirements.

Local Considerations

Housing in the countryside

Isolated dwellings within the open countryside are discouraged within national planning policy unless under certain circumstances. Though national guidance has changed since the adoption of the council's existing policies relating to this, this broad principle remains the same.

Within a recent parish council questionnaire, some parishes have questioned the appropriateness of some dwellings deemed to be of 'exceptional design quality' permitted in the open countryside.

The potential for self-build dwellings to be included within the criteria requirement has also been raised. In addition, the potential to limit the size of isolated dwellings in rural locations and in contrast the need to have adaptability to modern sustainable living have been highlighted. In particular, the recent rise in working from home has elevated the importance of the adaptation of dwellings and additional living space within the rural area.

Agricultural worker's dwellings and seasonal worker's accommodation

The requirement for agricultural workers dwellings and seasonal workers accommodation is a continuing issue within the county. Current local policy deals predominately with single dwellings, rather than larger numbers of seasonal accommodations, such as caravans, cabins, pods or dwelling units.

National Guidance and criteria relating to rural workers accommodation has been updated since the council's existing Core Strategy was produced. There are concerns regarding occupancy control elements of the policy, which will require a review.

Within the recent parish council questionnaire, there was some concern that some seasonal workers accommodation has appeared to be more permanent.

Suitable accommodation for both permanent and seasonal workers is cited as a barrier to recruitment in this sector. Seasonal workers are often housed in mobile homes, or temporary structures onsite, with permanent workers living in fixed accommodation on site.

There are challenges around the 'essential functional need' test and property size limitations in existing policy. Greater clarity within the policy regarding design requirements, the role of larger family accommodation, and the justification needed for the essential functional needs test could improve this.

Reuse of rural buildings

Since the council's existing policy was adopted, significant changes have occurred to the permitted development rights and national policy. This means that it is no longer consistent, and leads to ambiguity between those buildings still requiring a planning application to convert and those permitted under Class Q of the permitted development rights.

There are some concerns that the current policy is permitting the conversion of buildings that are not sustainable or in suitable locations. Issues have been raised about the size, scale and design quality of replacement dwellings particularly when it comes to historic buildings. There are also concerns expressed about the need to properly demonstrate a building's long standing redundancy, to prevent the conversion of recently constructed buildings for alternative uses.

Evidence Base

- The [Herefordshire Market Area Needs Assessment](#) (HMANA) provides crucial evidence on the likely demands of the housing market in the county that the Local Plan will need to provide for. This includes forecasts on the likely need for onsite agricultural worker's accommodation.
- The [Herefordshire Joint Strategic Needs Assessment](#) indicates that agriculture and horticulture is a fundamental employment sector, reflecting the rural nature of the county. It is estimated that there are around 6000 to 7000 seasonal workers required within the county. Employers within Herefordshire have found it increasingly difficult to recruit sufficient numbers of seasonal workers over the past few years, and partly attributed to this has been a lack of suitable accommodation.
- The [Herefordshire Employment Study](#) (2012), undertaken to inform the current Core Strategy, recognises that Herefordshire's economy is more dependent on agriculture and manufacturing than any other economy in the West Midlands and it will continue to be a significant source of employment. An update to this study is currently underway in the form of the Herefordshire Employment Land Requirements Study (HELRS) 2022.
- The [West Midlands Farmstead and Landscape Project](#) was undertaken by Historic England in 2010, this project mapped the locations and characteristics of historic farmsteads within the West Midlands, including Herefordshire. It records 3092 farmsteads and 854 farms in Herefordshire, indicating the diverse ranges in size, scale, arrangement, age, function, character, materials and density. This assessment highlighted the importance of using historic farmsteads and their buildings in a sustainable and integrated way. The study provided local context which can help evaluate what future uses farmsteads could take on, based on their character and significance within the local setting.
- Historic England developed [guidance](#) in 2017, setting out a best practice guide to how traditional farmsteads and farm buildings, redundant for modern agricultural purposes, could be repaired and redeveloped to accommodate a variety of economically viable new uses. The guidance highlights the importance of understanding the building's relationship to its landscape setting, ensuring redevelopment of traditional farm building is sympathetic to its surroundings.

Existing Policy

The existing general policies in the Core Strategy concerned with the delivery of housing and employment within the rural areas are RA3; RA4; RA5 and RA6.

Core Strategy Policy RA3 – Housing in Herefordshire countryside indicated the limited circumstances in which new dwellings will be permitted. Outside of designated settlement boundaries or rural settlements defined in the existing Core Strategy, residential development would be limited to the following:

- Agricultural, forestry or a farm diversification enterprise where the worker was required to live on site.
- Necessary for the establishment/growth of a farm enterprise.
- Replacement dwellings.
- Re-use of a redundant building.
- 'Rural exception' affordable housing schemes.
- Of an exceptional or innovative design quality.
- Meeting an need for Gypsy or Traveller accommodation.

The National Planning Policy Framework has been updated since the adoption of the existing Core Strategy, and this has resulted in the current wording of policy RA3 no longer reflecting the national policy guidance. Terminology is required to be updated to ensure that there is not ambiguity between local policy and national policy.

Core Strategy Policy RA4 – This addresses in more detail agricultural, forestry and rural enterprise dwellings. This requires a functional need test, a demonstration of the economic sustainability of the enterprise, temporary accommodation, design and landscape considerations and occupational conditions.

Again National Guidance on this has been updated since the adoption of the Core Strategy, and therefore some of the terminology within the currently Policy RA4 is no longer in conformity with the national wording.

Core Strategy Policy RA5 – This relates to the re-use of rural buildings. It recognises the importance, both in terms of environmental sustainability and economic benefits, of reusing existing buildings. It provides criteria that any proposals for the reuse of an individual or group of buildings would need to meet. This includes considerations such as heritage, design, protecting species and biodiversity. Buildings must also be capable of being converted without substantial extensions and alterations.

National policy regarding the conversion and reuse of buildings have changed significantly since the existing Core Strategy was adopted, meaning this policy criteria would also be in need of updating.

Core Strategy Policy RA6 – Rural Economy reflects the important and strong role that the rural areas of Herefordshire play in both local, regional and national food and drink production. This policy and potential options are considered separately.

Neighbourhood Planning

The main role of Neighbourhood Development Plans (NDPs) in this regard is defining the geographical boundaries between their settlements, and the open countryside. This usually involves drawing a settlement boundary (or suitable alternative) to indicate where development would be most appropriate. The role of NDPs in delineating these policy boundaries is discussed further in the Role of Neighbourhood Planning section of this document.

Rural Areas Policy Options

Housing in Countryside Options

Option RPH1– Continue with the existing policy approach, updated to reflect national guidance

This option would continue a well-recognised and used policy approach which has been subject to testing through planning application and appeals over the past 10 years. There is a requirement to update the wording to ensure it is in conformity with national planning policy.

Option RPH2– Inclusion of an additional adaptable living policy or guidance

The adaptation of existing dwellings to enable home working and increase living space has become more commonplace and important during the Covid-19 pandemic. There is currently no specific policy or guidance regarding annexes, garden offices, or extensions to accommodation living or working space.

This option would look to:

- Add an additional rural policy, to balance the requirement of national planning policy, with the recognition of changing requirement and needs for adaptable living within rural areas.

OR

- An alternative option would be to provide policy guidance within the Local Plan, which could devolve this policy area to individual NDPs, to respond to local circumstances and needs within their area.

Agricultural, Forestry and Other Occupational Dwellings Options

Option AFOD1- Continue with existing policy approach, updated to reflect national policy

This option would continue as well recognised and used policy which has been subject to testing through planning application and appeals over the past 10 years. There is a requirement to update the wording to ensure it is in conformity with national planning policy.

Option AFOD2– Consider inclusion of an additional criteria regarding size and space standards, design and carbon reduction

This option would include space standards and size requirements for permanent isolated rural workers dwellings. It would also seek to reduce the carbon footprint of the buildings, given the rural nature of their location.

Option AFOD3– Consider an additional policy for seasonal workers accommodation and dwellings

This option would seek to include a specific and new policy specifically related to seasonal workers accommodation. This is not covered within the current Core Strategy Policy. This would include greater clarity on the functional need requirements, design, and size of accommodation permissible.

Option AFOD4– Develop a policy for local distinctiveness

This option would look to include criteria elements to reflect the 6 area character types defined in the West Midlands Farmstead and Landscape Project, making the policy Herefordshire distinctive. The siting, design, and positioning of dwellings would be reflective of the historical character of the area

Reuse of Rural Buildings Options

Policy RRB1– Continue with existing policy approach, updated to reflect national policy

This option will continue the policy which has been subject to testing through planning application and appeals over the past 10 years. There is a requirement to update the wording to ensure it is in conformity with national planning policy

Policy RRB2– Consider inclusion of an additional criteria to demonstrate the buildings are genuinely redundant

This option would include additional criteria outlining the requirements for evidence to be submitted with any application to demonstrate that the buildings are genuinely redundant.

The Role of Neighbourhood Planning

Background

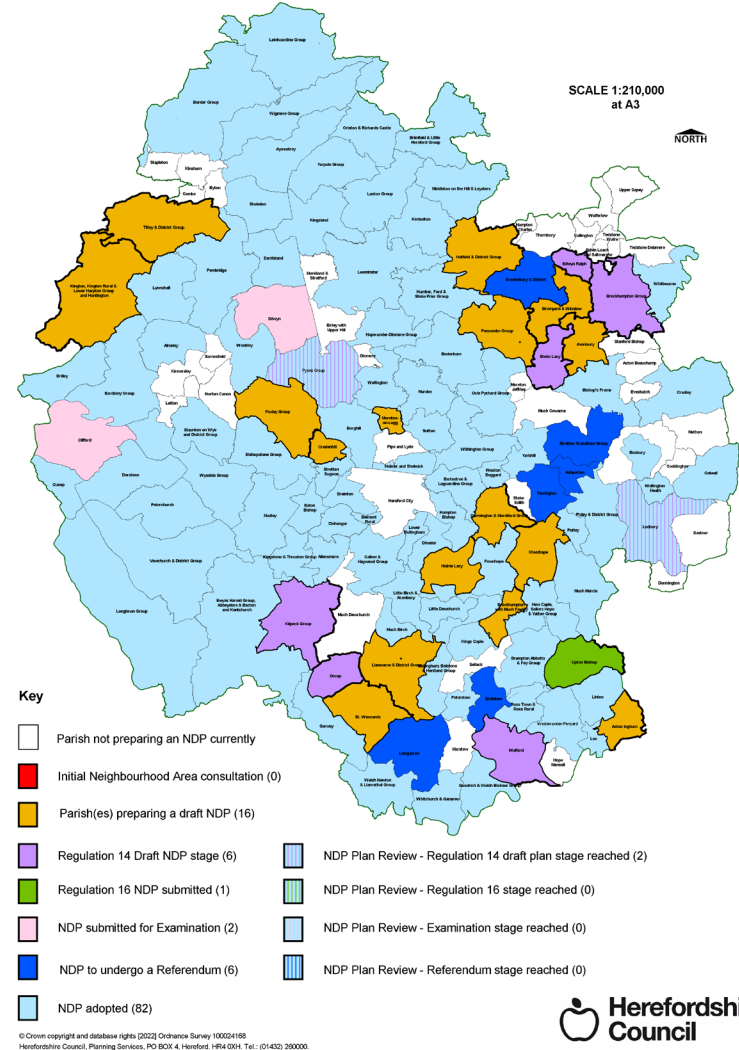
The [Localism Act 2011](#) introduced the opportunity for plan making by parish and town councils by producing their own Neighbourhood Development Plans, Neighbourhood Development Orders and the Community Right to Build. In 2012, Herefordshire Council took a positive approach to neighbourhood planning and provided support and advice to any community interested in producing plans to complement the Core Strategy 2011- 2031. As a result Neighbourhood Development Plans were included within the [Local Development Scheme](#) from 2014 and have now become an established part of the package of local policies over the past 10 years.

National guidance outlines that Neighbourhood Development Plans (NDP) must be in general conformity with the strategic policies contained within the adopted development plans; in Herefordshire case the Core Strategy as outlined in para 1.14 of the document. They should not duplicate or repeat local or national policies but include additional local distinctive policies and proposals to support the delivery of strategic policies.

After 10 years in practice, it is now appropriate to review the role of Neighbourhood Development Plans in Herefordshire and how they could align with the emerging Local Plan 2021-2041.

The first Neighbourhood Development Plan to be made/adopted in Herefordshire was in May 2016. To date, there are 113 designated neighbourhood areas within the county, resulting in 92% of the settlements highlighted within the Core Strategy for proportionate growth being within a neighbourhood area. 82 plans have been made/adopted with a further 18 in production. 13 plans are yet to reach draft stage. In addition, nine plans have or are currently undertaking their first formal review. This means that 88% of all Herefordshire town and parish councils have been engaged in producing local level planning policies during the last plan period.

Neighbourhood Development Plans (NDP) in Herefordshire



Herefordshire was one of 14 Local Planning Authorities who took part in the Department of Levelling Up, Housing and Community and Office of Place's Phase 1 National Model Design Code Testing Programme. This was to test aspects of the [National Model Design Code](#) and [Guide](#) locally between March-September 2021. Four parish councils (Bartestree with Lugwardine, Ewyas Harold, Fownhope and Weobley) assisted in devising and testing a number of guidance notes and templates which could enable local communities to produce a locally distinctive design code either as part of the Neighbourhood Development Plan or standalone supplementary planning document.

The following sets out how neighbourhood planning is addressed through the County Plan and the Local Plan's new vision and objectives.

Herefordshire County Plan

The provision of Neighbourhood Development Plans has been supported by Herefordshire Council since 2012 and currently corporately continues to do so. The [County Plan 2020-2024](#) indicates that we will utilise '*communities own Neighbourhood Development Plans*' to make sure we deliver sustainable developments which meets the needs of local people while respecting our heritage and our natural environment. This is therefore showing continuing commitment to neighbourhood planning.

Local Plan Draft Vision

The draft Local Plan 2021-2041 draft vision sees '*exceptional quality of life, living and traveling in more sustainable ways where rural communities and market towns have resilient communities with good quality housing*'. Distinctive local policies contained within individual Neighbourhood Development Plans will assist to achieve these aims tailored to the local landscape and cultural heritage of the place.

Local Plan Draft Objectives

The provision of locally based policies will also assist in enabling the 27 objectives outlined under Environment, Community and Economic underpinning the Local Plan strategy and policies.

National Guidance

Neighbourhood Development Plans are not a legal requirement but local communities have the right to choose to produce one. [National Planning Policy Guidance](#) (NPPG) indicated that Neighbourhood Development Plans should:

- Support the delivery of the strategic policies of the local plan.
- Shape and direct development.
- Support the provision of affordable housing.

However the specific areas and policies topics to be covered is left to the discretion of the Local Planning Authority and their communities. These should be 'non-strategic policies' of which national policy guidance indicates are:

- Allocating sites.
- Provision of community facilities and infrastructure.
- Design principles.
- Conserving and enhancing natural and historic environments and;
- Other development management policies.

National policy highlights that Local Planning Authorities should provide specific housing requirements to neighbourhood area. Proportional growth figures have been provided to parish councils undertaking a Neighbourhood Development Plan since 2015. The proportional growth figures and the monitoring of progress is reported annually within the [Authority Monitoring Reports](#).

As part of the review of Local Plan options, the range and scope of Neighbourhood Development Plans can be determined at a local rather than national scale. Reviewing their application during the last plan period and their relationship with the Core Strategy will point toward whether there is a different approach to be adopted.

Core Strategy and current Neighbourhood Development Plan approach

The Core Strategy does not contain a specific policy regarding Neighbourhood Development Plans and their role however they are mentioned in a number of policies and reasoned justification text. Para 1.13 to 1.15 of the Core Strategy outlines the role that Neighbourhood Development Plans will play in policy planning. This highlights that the allocation of housing, employment and other uses as well as locally detailed policies can be included within any locally produced plan.

The 'Place Shaping' section of the Core Strategy also devolved specific elements to Neighbourhood Development Plans including the delineation of settlement boundaries, site allocations, Local Green Space designations and some specific elements within the market towns.

Within the rural areas, this includes decisions on how proportional growth for housing is distributed. Para 4.8.21 indicated that local communities could be flexible to apportion their parish housing requirements between the settlements named within the Core Strategy in their area.

Of the current made/adopted Neighbourhood Development Plans within the county:

- 95% include a settlement boundary;
- 60% include a Local Green Space;
- 65% include site allocations;
- 100% include local distinctive general policies.

Parishes responding to the questionnaire (February 2022) indicated that they considered the scope of Neighbourhood Development Plans to be right. Additional areas highlighted for possible inclusion were specific design criteria, local building styles, local ecological and environmental policies.

There were no responses suggesting that the scope of Neighbourhood Development Plans was too wide however some parishes have raised concerns about the technical work and associated tensions of allocating sites with the local community.

The responses highlighted that there are greater concerns about the level of weight being applied to plans in decision making and the effect that the 5 year land supply figure can have on material weight than the overall scope and content of plans.

Producing the Local Plan 2021-2041 gives the opportunity for the relationship between policies within the two documents to be reviewed.

Neighbourhood Planning Policy Options

Option NP1- Continue with the current approach – settlement boundaries, site allocations, Local Green Spaces, locally distinctive policies including design coding

As outline above, the current level of local distinctive policy making at parish or community level has been relatively successful. There are a significant number of Neighbourhood Development Plans in Herefordshire and these can form the basis for a review against the emerging Local Plan strategic policies. Additional support could be given to areas which have seen the most controversial or technically challenging over the past plan period.

This option reflects the spirit of the Localism Act and the National Planning Policy Framework as providing a mechanism of local communities to shape their local environment and be involved in creating planning policies for their local area.

The recent [Planning for the Future White Paper](#) indicated within Proposal 9 that '*Neighbourhood Development Plans should be retained as an important means of community input*'.

[Research](#) undertaken by the University of Reading in September 2019, showed that NDPs across England have contributed to the housing supply significantly, helped to improve design and refined local priorities. It also reports that NDPs have improved the involvement of local community in strategic plan making and the relationship with the Local Authority policy making teams.

In Herefordshire, Neighbourhood Development Plans have been used to determine planning applications, appeals and inform the review of the Local Plan.

Option NP2- Locally distinctive policies and design coding, with settlement boundaries and site allocations within the Local Plan

It has been raised by town and parishes that the one area which has proved to be locally contentious and requires the most technical support has been site search and allocations.

This option would revert the site allocations and settlement boundary delineation back to the Local Planning Authority. This would mean that Neighbourhood Development Plans would be developing local distinctive criteria based policies.

However, the underlying principle of neighbourhood planning are that communities are able to shape the places they live, housing growth is one of the major contributor to evolving landscapes, settlements and peoples sense of place. To remove the ability of communities to determine the locations of this growth would directly effect this underlying principle.

This option would affect the material weight of Neighbourhood Development Plans should the Local Authority not be able to demonstrate a five year housing land supply or that it had not passed the housing delivery test. Para 14 of the National Planning Policy Framework requires plan to be able to meet two specific tests; one is being adopted within the last two years, the other is that the plan contains policies and allocations to meet its identified housing requirement. If future Neighbourhood Development Plans did not contain site allocations they would not be able to meet these tests.

Option NP3- Design codes only with all other policies within the Local Plan

[National Model Design Code](#) and the [National Model Design Guide](#) published in July 2021 are part of the government's wider strategy to create beautiful places, improve energy efficiency, enhanced nature and move towards zero carbon targets by 2050. The National Planning Policy Framework is clear that design policies should be developed with local communities and reflect local aspirations. Therefore, there is an option for investment in design codes for parishes during this plan period rather than Neighbourhood Development Plans.

Town and Parish Councils could prepare design codes for their local area rather than a Neighbourhood Development Plan. The content of these code would be varied and reflect local circumstances. Further details can be seen within the 'Design Options' later in this paper.

This would mean that all other aspects of local policies including the site allocations, settlement boundary delineation would be included within the Local Plan 2021 – 2041. Given the successes of local produced Neighbourhood Development Plans over the last 10 years this may be seen as a backward step of returning previously delegated local policy making to the Local Planning Authority.

Rural Economy

Background

Development of an economic nature in the countryside/rural areas has the potential to meet local needs and enable prosperous, sustainable communities. This includes the re-use and adaptation of existing rural-based buildings for businesses as well as the development of new ones.

Businesses, services and crafting in rural areas often directly serve local communities and their development, diversification and expansion can help to support the wider local economy. Many businesses, such as those for agriculture and forestry, are also necessarily based in rural areas in order to have access to the land resource upon which they depend.

Agricultural policy has also changed considerably in the past few decades, and farm/agricultural land owners and owners of other land-based rural businesses are increasingly seeking to diversify their economic activities to make more profitable use of their land and buildings, thereby sustaining their businesses in the long-term.

There are also other types of business such as those for tourism, community use and recreation that may benefit from a countryside location and these should be encouraged where it would not be in conflict with other aims in the interest of supporting the rural economy. Local Plan policies need to strike a suitable balance between encouraging rural economies, maintaining and, where possible, improving the sustainability of smaller rural settlements and conserving the character of the countryside.

The following sets out how the rural economy is addressed through the County Plan and the Local Plan's new vision and objectives.

Herefordshire County Plan

The [County Plan](#) seeks to ensure the rural communities are well connected which will help to sustain a strong rural economy.

Local Plan Draft Vision

The draft Local Plan 2021-2041 draft vision identifies the rural areas as resilient areas, having a strong farming and sustainable tourism role and how they continue to have an important input in to the local economy.

Local Plan Draft Objectives

The Local Plan's draft objectives clearly state the important role that agriculture plays in the local economy. The objectives are supportive of appropriate diversification and modernisation to strengthen this sector.

National Guidance

The [National Planning Policy Framework](#) promotes the sustainable growth and expansion of all businesses in rural areas. Diversification of agricultural and other land based businesses is encouraged. A policy that seeks to actively encourage and enable appropriate forms of development in principle could therefore help to expand and/or diversify the rural economy by enabling ‘*the sustainable growth and expansion of all types of businesses in rural areas...*’

As well as agricultural developments, such developments might include the redevelopment or conversion of agricultural buildings to community, recreational or small-scale business uses; or the development of new uses such as farm shops and other farm diversification proposals, tourist accommodation and small-scale rural tourism attractions. Small-scale leisure facilities that respect the character of the countryside may also be appropriate uses that a rural development policy could support, subject to demonstrating that their location is appropriate.

It is recognised that sites may not always be available close to settlements, and may need to go into the wider countryside. Sustainable tourism is a factor for the rural economy. Rural accessibility will be an important consideration when looking at developments coming forward within and adjacent to rural settlements and in the open countryside.

Local Considerations

Herefordshire is one of England’s most sparsely populated counties, with 95 per cent of the land area being ‘rural’, and 53 per cent of the population living in rural areas, according to Herefordshire’s [Joint Strategic Needs Assessment](#) (2021).

Being a predominantly rural county presents opportunities in, for example, tourism, food and drink production and agriculture. The economy of Herefordshire is dominated by small businesses, with a higher representation of employment in agriculture and manufacturing.

Coupled with its rural nature are the geographical barriers to services. Across the rural areas, road infrastructure mainly comprises minor roads, with only the south-east directly connected to the motorway network. Apart from the three urban railway stations, there is just one rural station in the village of Colwall in the whole county. Reducing carbon emissions from transport has additional challenges in rural areas, therefore the Council is looking at an Electric Vehicle Strategy going in to the future.

These challenges have implications in terms of access to services and employment. Almost two thirds of all Herefordshire areas are among the 25% most deprived in England, in respect to geographical barriers to services. They act as a constraint to both social mobility and business investment (with consequent implications for productivity and growth).

Access to a good broadband service has long been an issue for those living and working in rural Herefordshire. The [FasterShire](#) project covers both Herefordshire and Gloucestershire in the delivery of faster broadband. The latest [ThinkBroadband](#) figures show that over 93% of properties in Herefordshire can access a superfast broadband connection, defined as 30mbps.

The economy and the environment are closely linked. The outstanding natural and historic environment of the Local Plan area contributes to the economy by making the area an attractive place to live, work and visit. Although the farming industry and other land based businesses of our rural areas employ a relatively small proportion of the population, the rural economy has a great influence on the landscape and active management of the countryside.

Agriculture is particularly important to the Herefordshire economy and there is a need to enable the sector to replace and erect buildings, structures and infrastructure to enable the business to grow, modernise and function efficiently. It is acknowledged that these buildings may need to be located in countryside locations. Across the County, there are a large number of farms and rural diversification schemes on isolated sites, which provide employment opportunities or which through investment, could provide new economic opportunities in the form of traditional B class industries, cultural or tourism activities. Rural estates present particular opportunities related to their long term management and diverse economic functions. Within the valuable Herefordshire countryside design, green infrastructure and appropriate screening should be utilised to reflect the location within the rural landscape.

Economic developments particular to the rural economy relate to larger scale developments such as polytunnels, intensive animal farming, sawmills, breweries and anaerobic digester units (AD Units). In the past 10 years, there has been an increase in the number of intensive animal farming developments. To meet environmental and welfare standards, poultry farms have transformed in nature, size, and operation. Many new developments have become larger to allow for this. More recently, proposals for new units on undeveloped sites have declined due to contract demands from the processing plants, therefore it is more redevelopment of existing sites that are in progress. It is important that development proposals for intensive animal agriculture should take into account of the local ecology and green infrastructure.

Evidence Base

- The Herefordshire Employment Land Requirements Study (2022) is currently underway, and will provide up to date information on the likely demands of different industry sectors in the county, along with recommendations on how the Local Plan can best support the county's economy.
- The Herefordshire's [Joint Strategic Needs Assessment](#) report indicates that agricultural has a higher than average representation in agriculture which currently stands at 12%. In the county and similar to elsewhere, intensive agriculture and development has over many decades degraded or destroyed habitats and led to a loss of biodiversity.
- The [Wye Valley AONB Management Plan](#) sets out the vision for the designated Area of Outstanding Natural Beauty (AONB), and the priorities for its management over a 5 year period. The Plan is a material consideration in the respective Core Strategies and Local Development Plans and for the Neighbourhood Development Plans. It also provides guidance to the local communities and many landowners, residents and visitors in the area.
- The [Malvern Hills AONB Management Plan](#) incorporates the views of a wide range of public, private and voluntary bodies and is the key document through which the AONB Partnership expresses its intentions for conserving and enhancing the special character of the area. It identifies the issues and challenges facing the special features of the area and contains policies and objectives which help address them.
- The [Polytunnels planning advice guide](#) is there to help potential developers prepare their planning applications. It assists in clarifying which types of polytunnel development requires planning permission, and highlights the planning policy issues and requirements such proposals will be expected to address. It expands upon and provides more detailed planning guidance on a number of relevant, but non polytunnel-specific Core Strategy policies.

- An Agriculture and Planning Supplementary Planning Document (SPD) is currently being drafted and will provide a checklist approach to agricultural development. The document is being drafted to address concerns over the relationship between some agricultural developments and the impacts these can have on the River Wye, whose water quality has significantly declined partly as a result of this activity over recent years.

Existing Policy

The current policy in the Core Strategy addressing support for the rural economy is RA6.

The policy is positively framed, and includes support for the provision of the development of rural business hubs, in appropriate locations. In summary, the existing rural economy policy covers the following areas:

- For agriculture, the policy supports proposals around food and drink production.
- Supports diversification of agriculture, rural businesses and services.
- Supports tourism development.
- Encourages the effective re-use of traditional buildings.
- Promotes the sustainable use of the environment.
- Military site retention.

The policy then sets out the criteria for rural diversification, which is expected to be a wide array of non-agricultural developments. There is no reference to agricultural/land based developments and what criteria might be needed to assess such proposals. Particular land based developments include food and drink production and sawmills, for instance.

Issues have been raised with the policy not being adequate enough to deal with very large agricultural buildings, horticultural developments, intensive poultry and livestock units and anaerobic digesters. There is a need to consider how new proposals are assessed, as well as redevelopments of existing sites. The farming industry is responding to new technologies and licensing permissions, that sees a wide variety of developments coming forward and this is ever-changing. Any new agriculture related policy needs to be future-proofed, and flexible enough to adequately determine diverse proposals. In light of the pollution issues affecting the River Wye and Lugg, scope for ecological betterment and gain should be a consideration within the policy.

There are concerns that the negative impact on the landscape is not considered enough and AONBs should be given more protection where such developments happen. Specifically relevant to the economy is the commitment to ensuring a future for agriculture by supporting farming which protects and enhances the natural and cultural environment. This can be achieved with both small and large scale developments. There is a need to consider rural areas in a wider sustainable way.

Rural Economy Policy Options

Option RE1- Update the rural economy policy to reflect changes to national policy

Continue with an updated rural economic policy to reflect the changes within the NPPF 2021. The broad policy approach of that in the existing Core Strategy would continue as a well-used and effective policy for the purpose of assessing new proposals in the countryside. Due to the rural nature of this policy, and the wide coverage of locally produced Neighbourhood Development Plans (NDPs), it could be a consideration that regard should be given to similar policies within made NDPs when formulating the final policy.

Option RE2- Update the rural economy policy as in option RE1, but include specific criteria for agricultural developments

Add in additional criteria to address agricultural developments which can better address how these proposals should be assessed for access, size, mass, scale, green infrastructure and ecology within rural landscapes.

Option RE3 Update the rural economy policy as in option RE1, and include a new separate policy specifically for large scale agricultural and land based developments

In addition to Option RE1, include a new policy, specifically with criteria to address agriculture developments which can better address how these proposals should be addressing access, size, mass, scale, green infrastructure, ecology within rural landscapes. Therefore resulting in two policies for the rural economy.

Supporting Jobs

Background

The planning system has a key role to play in supporting a prosperous local economy. Policies should support proposals that create job opportunities, retain a skilled labour force and reduce out commuting from the county. From a planning policy perspective, this presents a great challenge, as the make up of local economies, working practices and guidance evolve ever faster.

Supporting growth is of particular importance to economic recovery from the impacts of the Covid-19 pandemic nationally. During 2020, the economy contracted by [9.9%](#). It also remains to be seen what lasting impacts the resulting changes to working practices during the pandemic will have, but [it is predicted](#) that some sectors of industry will shift to working, learning, and engaging in commerce remotely.

Herefordshire is a predominantly rural county, with agriculture, food and drink production, and tourism all forming important components of the local economy. These will be dealt with in separate topic areas, under Tourism and the Rural Economy. This area will deal with policies concerned with the provision of employment land, the safeguarding of the county's best employment land, and the facilitation of home based working.

The following sets out how housing supporting jobs is addressed through the County Plan and the Local Plan's draft vision and objectives.

Herefordshire County Plan

Supporting a thriving economy for Herefordshire has been set out in Herefordshire Council's [County Plan](#) (2020-2024)

'We want to emphasise the critical role the market towns and villages play in Herefordshire's economy and we will ensure high quality employment land, business space and business support is made available throughout the county.'

'Building on existing local strengths and seizing global opportunities we will support growth in new technology-enabled and digital business sectors, such as cyber security. We will also encourage the use of green technologies to support the growth of a clean, low-carbon economy whilst maximising the new economic opportunities this will bring to forward thinking companies and communities throughout the county.'

The importance of digital connectivity in facilitating economic prosperity and attracting forward-thinking, creative industries is also recognised.

Among the success measures set out are increasing average wage earnings, growing jobs and keeping low unemployment rates, increasing local wealth creation and to extend the superfast broadband network across the county

Local Plan Draft Vision

The Local Plan 2021-2041 has an economic themed countywide vision, which states:

'The county will be economically prosperous, with its farming heritage and sustainable tourism continuing to play an important role. It will be well known as the place where innovative, green and creative businesses can thrive. Good quality housing and inclusive infrastructure will be provided to ensure that people are able to live active and healthy lives.'

Ensuring that there is a sufficient and appropriate supply of employment land made available will be key in facilitating an environment where new innovative, green and creative industries can thrive.

Local Plan Draft Objectives

The need to support the growth of Herefordshire's economy, create jobs and help businesses to thrive is supported in the economic objectives of the Local Plan. In particular, objectives 1-4 will be addressed directly by these policies.

- To ensure that new development is accompanied by fast and reliable digital connectivity.
- To grow a thriving, diverse local economy and for Herefordshire to be recognised as a good place for a broad range of businesses to invest and prosper, particularly the green technology and creative sectors.
- To help generate more and higher skilled jobs that are well paid, close the pay gap and retain and attract working age people to live in the county.
- To recognise the importance of the small business sector, help independent businesses to thrive, boost job opportunities and encourage the creation of hyper-local business identities.

Economic Vision

An [Economic Vision](#) for the county was published in 2018. This is, however, now considered out of date and afforded little weight by the current council administration. It has been proposed following a review that a new county-wide Economic Vision is produced. Updated planning policies concerning the economy will need to ensure that they align with the aspirations and objectives of this document.

National Guidance

An important shift in national planning policy that will affect the approach of the new Local Plan in this area is the changes to the Use Class Order in September 2020. Uses formerly classed as B1 (offices, research and development industry, light industry) now fall under 'Class E' for the purposes of permitted development in change of use planning applications. This effectively now means that buildings under former B1 employment uses may now change to other uses without planning permission that fall under the broad Class E.

Currently, little guidance exists to plan makers to determine how policies to safeguard employment land can be adapted to these changes, or if these are still recommended in practice. Other Local Planning Authorities have however explored some potential options for this, through updated evidence base studies. In practical terms, it is likely that a greater deal of flexibility will have to be afforded in the updated approach going forward.

Transition to a 'Net Zero' Economy

The Local Government Association has published [guidance](#) with estimated projections on how many green and renewable energy sector jobs will likely be required in English Local Authority areas, in order to achieve the nationwide drive to a net zero economy by 2050. Herefordshire sits in one of the higher quartiles for this, with an estimated 2500 to be employed in these sectors by the middle of the Century.

Updated employment policies will need to take account of this and proactively enable and create the conditions to attract these industries to the area.

Investment Plans

Following the receipt of grants from the Government's [Stronger Towns Fund](#), some investment plans have been published in February 2022 for the county's market towns. These all outline notable projects that aim to deliver new employment land.

- Leominster: 10ha extension of the Enterprise Park and growth at the "Incubation Hub"
- Ross: around 15ha of new employment land at Model Farm and mixed use development of 18ha at Tanyard Lane
- Ledbury: 3ha allocation at Viaduct Site
- Bromyard: Up to 8ha "Eco Hub"
- Kington: Small extension to existing Hatton Gardens Industrial Estate, or a new site along the bypass.

Local Considerations

Herefordshire has the [lowest economic output](#) of any county in England, [19% below](#) the national average. Though the county benefits from relatively low unemployment levels, it does however have a low wage economy, a deficit of higher level skills, an aging population and a shortage of labour.

There are also notable external factors nationally that continue to create economic uncertainty - such as fallout from the pandemic and Brexit.

In the Core Strategy's plan period so far, there has been an under-delivery of new employment sites, with only one of the strategic employment allocations coming forward.

It has become clearer than ever that improving access to superfast broadband in the county will be central to accommodating a mass permanent shift to remote working across many industry sectors, and to creating an attractive economic environment in which to do business.

Changes to the planning Use Class Order may mean that a change of approach may be required if the Local Plan is to be able to continue to safeguard the county's highest quality employment sites from being lost to other uses.

The creative and green technology sectors have a key role to play in the transition to a low carbon economy. Policies need to proactively support and attract these industries to the county.

Evidence Base

- A key base of evidence that will be informing the Local Plan on requirements for employment land over the next plan period will be the Herefordshire Employment Land Requirements Study (HELRS) 2022. This study is currently underway, and will provide an up to date picture of, Employment land requirements in the county over the next plan period, based on economic forecasting. Employment land availability in the county to deliver on the requirements. And also the factors influencing the under delivery of sites, and recommendations on alternative policy approaches that may remedy this.

Existing Policy

The existing Core Strategy policies which aim to facilitate the provision and safeguarding of employment land are SS5, E1 and E2 respectively.

Policy SS5 sets out the overarching county wide strategy for employment land provision and retention. However, it is clear from the under delivery of the larger sites, that the existing approach of identifying sites to fit market demand has not worked. The HELRS may make fresh recommendations on this strategy. It could also place stronger emphasis on the green industry sectors that the policy wishes to attract the county, based on the latest evidence and ambitions of associated council strategies.

Policy E1 sets out the overarching strategic criteria for the provision of new employment land in the county, directing larger proposals to Hereford and the market towns. The policy approach remains valid and national policy compliant. The HELRS may provide some updated recommendations on where larger proposals should be directed.

Policy E2 sets out in more detail the parameters for the safeguarding of the county's best quality employment land from being lost to other non-employment uses. It is likely, in light of changes to the Use Class Order, that a new approach will need to be found that takes account of the changes to controls available to the council through the planning system that this affords. The existing employment sites that qualify for safeguarding in this way are also based on recommendations from the Employment Land Study of 2012, which can now be considered out of date. The HELRS employment land review of sites in the county will provide a fresh appraisal of which sites may warrant such controls.

Policy E3 seeks to facilitate and enable home based working. Through the plan period so far, it is has been noted that very few applications have been approved or assessed against using this policy. This would lead to questions over whether it is superfluous and should be removed from the Local Plan. It is however acknowledged that, particularly in light of recent shifts in working patterns that this is an important issue, and it should be considered whether the policy could be strengthened, or perhaps 're-homed' in a different topic area, such as the design of new homes.

Neighbourhood Planning

The majority of Neighbourhood Development Plans (NDPs) have successfully produced their own planning policies supporting jobs at a local level. Many of these generally reflect the predominant industry sectors and types that operate in their respective NDP areas, and seek to positively support the continuing growth of.

Supporting Jobs Policy Options

Option SJ1- Employment Land Provision

This would follow a similar approach to the existing policy for employment land provision, but updated to reflect changes in the evidence of need, and to reflect changes in national guidance and economic trends.

- Update the employment land requirement figures, and if necessary the strategy, based on recommendations from the HELRS.

AND/OR

- Strengthen the policy's drive towards the objective of delivering a net zero economy, by placing an emphasis on attracting green and renewable energy industries to the county.

Option SJ2- Protecting Economic Opportunities

- Based on the findings of the HELRS employment land review, adopt a new approach by identifying any core areas of business activity, on good quality employment land, and explore the possibility that such areas could be specially designated for changes of use to be allowed for class E(g), B2 or B8 only.

OR

- Broadly retain the existing policy approach but amend to apply the criteria only to good quality sites identified in the HELRS of B2 and B8 only, leaving the flexibility for former B1 business uses (now in class E) to change use to other non-employment uses.

Option SJ3- Home Based Employment

- Do not include a policy on home working, and rely on other policies within the local plan to provide suitable enablement and controls on home based work proposals.

OR

- Remove the policy from the employment topic area of the Local Plan, and re-house the criteria into the housing design policies section.

AND/OR

- Strengthen the policy by recognising the increasing popularity of remote working, and requiring new homes to consider this in design, subject to justifiable evidence.

Town Centres and Retail

Background

This section deals with town centre and retail policy, in light of significant changes in shopping habits and national and local policy. It is important to ensure that the updated Local Plan remains sound and effective in this area.

Being predominantly rural, the county's town centres have an important role to play in serving its communities. Hereford City serves as the county's main service and retail centre. There are also five smaller market towns. These towns comprising Leominster, Ross-on-Wye, Ledbury, Bromyard and Kington offer a more restricted range of services to their local catchment areas, and the wider rural hinterland.

The following sets out how Town Centre and Retail policy is addressed through the County Plan and the Local Plan's draft vision and objectives.

Herefordshire County Plan

A key economic ambition of Herefordshire Council's adopted [County Plan](#) (2020-2024) is to support an economy which builds on the county's strengths and resources.

By having an effective policy on town centres and retail, this should assist the market towns and Hereford City to play a critical role in supporting Herefordshire's economy in the Local Plan.

Local Plan Draft Vision

The Local Plan 2021-2041 has community and environmental themed visions, which state respectively:

Herefordshire will be an exemplar of 21st century rural living, where rural settlements and market towns have resilient communities, which are well connected digitally. Hereford will be recognised nationally as a green and pioneering university city, and will be a popular place to live, work and visit.

The county will be economically prosperous, with its farming heritage and sustainable tourism continuing to play an important role. It will be well known as the place where innovative, green and creative businesses can thrive.

Creating the conditions for thriving town centres will be critical to making the county an attractive place to live, work and do business.

Local Plan Draft Objectives

The role of having thriving town centres can be linked to a number of objectives in the Local Plan's draft objectives:

- To ensure high quality design of buildings and spaces taking into account local character and heritage, in order to create attractive and inclusive places.
- To ensure that all residents have easy access to an appropriate range of nearby services, with community hubs thriving in market town and rural settings, thereby reducing the need to travel and enhancing quality of life.
- Support the renewal of the county's high streets and town centres to create a vibrant network of economic centres with a diverse range of easily accessible shops and services.
- To grow a thriving, diverse local economy and for Herefordshire to be recognised as a good place for a broad range of businesses to invest and prosper, particularly the green technology and creative sectors.
- To recognise the importance of the small business sector, help independent businesses to thrive, boost job opportunities and encourage the creation of hyper-local business identities.
- To encourage and support responsible tourism that contributes to the county's economic diversity, whilst respecting its historic and natural character.
- To strengthen the role of Hereford City as the central hub of the county where people have easy and equitable access to business, leisure, cultural, retail and employment opportunities.

National Guidance

The [NPPF](#) sets out the Government's planning policies for England and how these should be applied. It addresses Town Centre and Retail within Section 7 - Ensuring the vitality of town centres.

It requires Local Planning Authorities to '*define the extent of town centres and primary shopping areas*'. Notably, there previously had been a requirement for policies to safeguard units in primary areas for retail use only, there is no such requirement anymore.

It goes on to state that *planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation*. All new retail proposals should be preferably located within town centres, if not possible then edge of centre locations. Only if suitable sites are not available should out of centre areas be considered.

There have been significant changes in national policy in regards to town centres. In September 2020 the [Use Classes](#) order was significantly amended, with a new classes E and F. This covers commercial, business, and services and supersedes the previous class A and B1, and D uses. In addition some uses which were previously given their own class have moved into the sui generis category, with the aim of giving greater flexibility to use classes.

August 2021 has also seen the introduction of class MA, which covers change of use from class E to residential (class C3), with some exceptions such as listed buildings. The introduction of classes E and F is intended to bring greater flexibility to town centres. Planning permission is now no longer required to switch between and some other main town centre uses.

Permitted development rights have also had other changes. Since August 2020, a [separate right](#) (paragraph 008) allows a range of uses to convert temporarily to another use for a single continuous period of up to three years.

Local Considerations

In recent years retail has undergone significant structural changes. The Covid-19 pandemic has seen significant changes in physical retail use, with large national retail companies going into administration with significant job losses and closures of retail units. Shopping centres have been particularly hard hit with a drop in footfall. The [vacancy rate](#) has increased from over 14% to over 19% nationally in the past two years. Across the country repurposing of former retail units into new leisure use is already underway with examples such as food halls, bowling, or even go-kart tracks.

The Covid-19 pandemic has also accelerated the rising trend of online retail. A combination of the social distancing measures, and an increase of working from home has had a negative impact on town centre footfall. The [internet sales](#) as a percentage of total retail has increased from 19% to 29% from 2019 to 2021.

The [High Street Task Force](#) was launched in 2019 by the government to provide support to town centres and high streets. The Stronger Towns Fund is a national £3.6 billion fund as part of the government's plan to level up our regions.

[Herefordshire Stronger Towns Partnership](#) has successfully been awarded £22.4 million to support the post Covid-19 recovery, with significant projects at Hereford Museum and Maylord shopping centre. Additionally the Hereford Centre Improvement scheme is a £6 million project to refurbish the historic city centre.

Evidence Base

- The [Town Centre Study](#) (2012) concluded that there was limited requirement for any further retail and leisure development in the county, and advises there is no need for out of centre retail allocations in Hereford or the five market towns. Additionally, the study advised for no further allocations for leisure facilities and other town centres are made in Hereford or in the market towns. However the provision of new leisure facilities in locations within town centres will be encouraged, where they serve an identified community need or meet a shortfall in existing provision.

As part of the local plan update the Council has commissioned the Town Centre and Retail Assessment to cover 2021 to 2041. This is to ensure that the evidence is accurate and up to date to guide policy formation. This approach is consistent with national policy in that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This assessment is expected to be completed by early summer 2022.

The study will provide an assessment of the need for future development of town centre-based uses up to 2041, and also up to date town centre and retail evidence for Local Plan policy formation.

Existing Policy

The current core strategy has two main policies relating to town centres, E5 and E6.

E5 - This ensures that town centres will be the main focus for retail, commercial, leisure, cultural, and tourism uses. Proposals for such uses will be supported, provided that they do not adversely affect the primary function of the town centres as shopping destinations; and are of a scale and design appropriate to the size, role, character and heritage of the centre. Any proposals for development outside the town centres will only be permitted that the requirements of the sequential test as outlined within paragraph 24 of the NPPF, have been met.

E6 - This relates to primary shopping areas and secondary shopping frontages, in that they will be protected and enhanced. The overall emphasis on retail trading should be retained in order to maintain character and to protect the vitality and viability of the primary shopping areas of Hereford and the market towns. In light of the changes earlier highlighted, a review of this approach may be necessary.

Neighbourhood Planning

The market towns of Ledbury, Ross-on-Wye, and Leominster all have adopted Neighbourhood plans. These plans will need to be considered as part of the review of the town and retail centre policies. Issues to consider will be how to seek town centre retail development ahead of any such proposals out of town, and how to retain the local appearance and distinctiveness of each centre.

The Neighbourhood Development Plans of Ledbury, Leominster, and Ross-on-Wye have all reviewed their town centre boundaries since the publication of the Core Strategy. Additionally both Ledbury and Leominster have also reviewed their primary and secondary shopping frontages. This will need to be considered when drafting new policy.

Town Centre and Retail Policy Options

Option TC1- Continue with existing policy, but update in line with recent national policy changes

To revise policies in regards to the changes in the NPPF which has removed the definition of a secondary shopping centres, and additionally the change of use classifications, with class E superseding the former class A.

Option TC2- Review the role of town centres and primary shopping areas within...

- The Local Plan

OR

- Market Town Neighbourhood Development Plans (NDPs)

What level of plan-making is best suited to defining town centre boundaries, the county-wide Local Plan or Neighbourhood Development Plans?

The continued use of the term 'primary shopping areas' could also be considered here. The traditional role of retail being the anchor of town centres appears to be in transition. Does this term still reflect the modern town centre role? Should town centres become more diversified? A more flexible blend of work, leisure, retail, residential, and cultural experiences approach could be taken. This could make town centres more resilient and flexible living spaces.

The boundaries of all of these areas could be reviewed within the town centre and retail assessment, along with all reviewed boundaries from NDPs of the market towns. Feedback from the Spatial Options consultation will also have to be considered in policy formation.

Due to the fast-paced recent changes in shopping behaviour, the Local Plan will need to consider how to make town centres more flexible and adaptable to shifting trends.

Option TC3- Additional policy to be drafted to the use of permitted development in the upper floors of town centres

With the recent changes in permitted development of class E and class MA, there is an opportunity to draft an additional policy in regards to the use of upper floors within town centres for residential and office use. There have been some concerns over the quality of housing that has resulted from such permitted development in the past, with the possible effect of town centres losing some vitality and variety. Therefore, an additional policy could also be developed that introduces design controls on these developments, for instance, sound proofing of residential upper floor conversions in order to remove conflicts with different uses in the same, or nearby, buildings.

Tourism

Background

Tourism plays an important role in the economy of Herefordshire, accounting for over [5000 jobs](#) in the county. A challenge for the planning system is how development proposals in this industry sector can be best supported in the new Local Plan without adverse impacts upon Herefordshire's natural and historic assets, that are in themselves central to the county's visitor appeal.

The following sets out how supporting tourism is addressed through the County Plan and the Local Plan's draft vision and objectives.

Herefordshire County Plan

Supporting sustainable tourism in Herefordshire has been set out in Herefordshire Council's County Plan (2020-2024)

'We will... Protect and promote our heritage, culture and natural beauty to enhance quality of life and support tourism...

... We are convinced that there continues to be a significant role for the council to play in enabling growth in the number of visitors to the county, especially for those encouraged to stay for more than a day.'

The Local Plan will have a role to play in enabling the establishment and expansion of businesses that will increase the number of leisure visitors to the county.

Local Plan Draft Vision

The draft Local Plan 2021-2041 has an economically themed countywide vision, which states:

'The county will be economically prosperous, with its farming heritage and sustainable tourism continuing to play an important role. It will be well known as the place where innovative, green and creative businesses can thrive. Good quality housing and inclusive infrastructure will be provided to ensure that people are able to live active and healthy lives.'

Planning policy that proactively enables sustainable tourism based proposals recognises the importance of this sector to help carry forward this vision.

Local Plan Draft Objectives

The need to support the growth of Herefordshire's economy and support the growth of its tourist sector is supported in the economic objectives of the Local Plan. In particular, policy in this topic area should deliver on objective 7:

To encourage and support responsible tourism that contributes to county's economic diversity, whilst respecting its historic and natural character.

National Guidance

National [planning policy](#) recognises the role tourism plays in the rural economy by stating planning policies and decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside

Local Considerations

There is an increasing proliferation of proposals for less 'traditional' forms of visitor accommodation coming forward, such as glamping sites and woodland cabin parks in the county.

There is also a tension between the desire for tourist-based proposals to be in sustainable locations, ie. directed towards the larger settlements, whilst also recognising that many proposals will come forward in the rural areas, as these are the areas that form the attraction of the county to most visitors.

It has also been highlighted that there is a need to define exactly what 'Sustainable Tourism' means.

Sustainable Tourism Definition

The Travel Foundation has provided a comprehensive definition of Sustainable Tourism:

- Protecting natural environments, wildlife and natural resources when developing and managing tourism activities
- Providing authentic tourist experiences that celebrate and conserve heritage and culture
- Creating socio-economic benefits for communities through employment and income earning opportunities

With regards to land-use planning, policy has a role to play (to varying degrees) in ensuring that proposals secured deliver on all 3 of those outlined benefits.

Existing Policies

The Core Strategy has only one policy directly concerning the development of tourist accommodation and attractions, Policy E4. It sets out some detailed criteria for the types of tourist based proposals it seeks, and infrastructure that enhances the overall tourist offering of the county.

The policy broadly remains compliant with national policy and guidance. However, it has not proven to be effective in assessing the many recent proposals for new tourist accommodation innovations, such as glamping and woodland cabin sites that have come forward in the county.

There is a clear policy gap in that little guidance or definition is provided on the permanence of tourist accommodation structures. For instance, should permanent structures of this type (that could become dwellings subsequently) in the countryside be restricted in the same way as the policies for rural housing developments? This needs to be clarified in any updated policy.

A gap has also been identified in that there also needs to be a rule or metric for measuring the sustainability of a proposal in terms of its location, such as proximity to a settlement, or related to the scale of a given proposal.

Also to be considered is how the new Local Plan can continue to support the long term restoration of the Herefordshire and Gloucestershire Canal over the next plan period.

Neighbourhood Planning

Many Neighbourhood Development Plans (NDPs) across the county have successfully produced their own localised policies to positively enable and regulate tourism-based proposals in their respective areas. Some of the most successful among these could have a role to play in providing some basis to help formulate policy direction as the new Local Plan is developed.

Tourism Policy Options

Option TM1- Enabling new accommodation types

- Including an enabling and flexible criterion in the tourism based policy, specifically applying to glamping/holiday park sites in the countryside.

OR

- Introduce a standalone policy that applies to these accommodation types, with more detailed criteria for defining the locations in which these may be permitted.

Option TM2- Defining a 'sustainable location' for tourist accommodation and attractions

- Develop a policy to strictly focus significant new tourism development for accommodation and facilities in Hereford and the market towns to maximise sustainable transport opportunities and to protect environmental amenity.

OR

- Develop a more flexible policy, that defines clear parameters for what constitutes a sustainable location, for instance by setting scale thresholds on proposals, or restricting proposals to those defined as sustainable settlements under the revised Rural Settlement Hierarchy.

Option TM3 - The Herefordshire and Gloucestershire Canal corridor

- Continue to safeguard through the tourism based policy(ies) the designated route corridor, as is defined in existing policy and defining the route on the policies map.

OR

- Do not include in the tourism policy chapter, and instead seek to support through designating the canal route as a green infrastructure corridor.