#### **Appendix D:**

## Sustainability Appraisal of Spatial Options

#### **County-wide Spatial Options**

- Option 1: Housing Need Baseline
- Option 2: Focus on Market Towns and Rural Based Growth
- Option 3: Focus Growth Across Market Towns and Hereford
- Option 4a: Leominster as a Growth Town
- Option 4b: Ross-on-Wye as a Growth Town
- Option 4c: Ledbury as a Growth Town
- Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard

SA objective 1: To mitigate climate change by actively reducing greenhouse gas emissions, and to support climate adaptation.

#### All county-wide options

**D.1** New development in any location will generate new demands for energy and, consequently, this will lead to increased greenhouse gas emissions.

However, the extent of this is dependent on the proposed overall scale of growth and the design of individual developments and is unlikely to be significantly affected by the overall spatial strategy. The extent to which the options would result in increased car use, with the associated emissions, is considered separately under SA objective 9, and the extent to which the options would result in reduced or improved air quality is considered under SA objective 10. A **negligible effect** is therefore recorded against all options for SA objective 1.

# SA objective2: To provide a suitable supply of housing including an appropriate mix of types and tenures to reflect demand and need.

#### County-wide option 1

**D.2** This option delivers housing based on need, with medium scale growth being proposed at Hereford, Leominster, Bromyard and Ross-on-Wye. Ledbury and Kington are identified for low-scale growth, while just under half of the housing need would be directed to rural areas. The distribution of growth under this option would be similar to that of the current development plan and seeks to emphasise the role of the county's market towns. This option would go a long way to provide an appropriate mix of market, specialist and affordable housing that is well designed and meets the needs of existing and new residents. It will also assist in providing diverse opportunities for home ownership. Overall, a **significant positive effect** is expected in relation to this SA objective.

#### County-wide option 2

**D.3** This option directs large scale growth towards Leominster, Bromyard and Ross-on-Wye. Kington is identified for medium scale growth, while Hereford and Ledbury are identified for low-scale growth. Over half of the county's housing is directed to rural areas.

**D.4** By dispersing growth across Herefordshire's five market towns and rural areas, there is potential to deliver more affordable housing and better infrastructure at these locations. Directing development away from Hereford city could lead to a decrease in the attainment of affordable housing and contributions to community infrastructure, however this would also help to address the imbalances of housing provision and opportunities in the city and the rest of the county. The option would also help to reduce development pressures on Hereford. There is a lack of affordable housing in rural areas, something that this option would seek to address. Overall, a **significant positive effect** is expected in relation to this SA objective.

#### County-wide option 3

**D.5** This option involves focussing more growth across Herefordshire's five market towns, and Hereford city. Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford city, Ledbury and Kington identified for medium scale growth. The county's rural areas would take less than a quarter of housing need. Such a strategy would result in a significantly higher number of dwellings for the market towns when compared to county-wide option 1. Whilst a greater focus on larger developments in urban areas will help to deliver affordable housing, reduced numbers of dwellings in rural areas could impact rural housing affordability and lead to stagnation with limited growth. Overall, a **mixed (minor positive and minor negative) effect** is therefore likely in relation to this SA objective.

#### County-wide options 4a to 4c

**D.6** These options involve identifying either Leominster (option 4a), Ross-on-Wye (option 4b) or Ledbury (option 4c) as a growth town that would receive large scale growth. The selected town under each option would need to accommodate approximately 2,000 dwellings. Under options 4b and 4c, Leominster is identified for medium scale growth. With regards to Ledbury, the town is identified for low-scale growth under option 4a and medium scale growth under option 4c. In terms of Ross-on-Wye, the town is identified for medium scale growth under both sub-options 4a and 4b. Under each of the sub-options, Hereford city is identified for medium scale growth, while Kington and Bromyard are identified for low scale growth. Under each of the sub-options, the county's rural areas would accommodate just over a quarter of the county's needs.

**D.7** The scale of growth at Hereford city would enable it to continue its role as the main centre in the county for housing, employment and retail. To achieve the numbers required, the peripheral expansion of the identified growth town would be required. To deliver each sub-option, the rural areas of Herefordshire would accommodate a low level of housing growth, which could have implications for the provision of affordable housing. Overall, a **mixed (minor positive and minor negative) effect** is therefore likely in relation to this SA objective for all of options 4a-4c.

#### County-wide option 5

**D.8** This option would see the development of a new settlement at a location between Bromyard and Leominster. The option also involves large scale growth for Leominster and Bromyard, and medium scale growth for Kington, Ross-on-Wye and Ledbury. Ledbury is identified for low scale growth, while the county's rural areas are identified for approximately a quarter of the county's housing need. A new settlement would provide new opportunities for affordable and diverse housing schemes including potential for self-build schemes. It can also set out innovative ways to provide new housing, whilst enhancing quality of life

through good planning and design. Under this option a new settlement could help to deliver a large proportion of the rural housing growth. The remainder of the rural housing is expected to be distributed in rural settlements across the County. However, the emphasis towards a new settlement could impact upon housing need being met in other rural parts of the county. Overall, a potential but **uncertain minor positive** effect is identified in relation to this SA objective.

### SA objective 3: To support community cohesion and safety

#### All county-wide options

**D.9** The effects on this SA objective will depend on the exact nature of the development provided and effects are unlikely to be significantly affected by the overall spatial strategy. For example the provision of meeting places, mixed development and accessible and safe design solutions will depend on factors other than the broad distribution of development. A **negligible effect** is therefore recorded against all options.

#### SA objective 4: To support the vitality of Herefordshire's town and retail centres

#### County-wide option 1

**D.10** As noted above, this sub-option identifies Hereford city, Bromyard, Leominster and Ross-on-Wye for medium scale growth, with Kington and Ledbury being identified for low-scale growth. The county's rural areas are identified to accommodate just under half of the county's housing need.

**D.11** The distribution of growth under this sub-option would result in the sustained development of the larger market towns and Hereford city. It would also deliver a significant amount of development to rural areas. The option therefore makes a concerted effort to enable rural businesses to grow, by allowing higher levels of growth in villages and rural areas in order to meet the affordable housing needs of communities. Whilst a wider spread of development would mean that Herefordshire's town and retail centres' vitality would be supported, the more that development is spread, the more limited the individual benefits, particularly in maintaining and providing infrastructure and services in smaller settlements that may benefit from higher levels of development. Overall, a **minor positive effect** is expected in relation to this SA objective.

#### County-wide option 2

**D.12** As noted above, this option involves large-scale growth at Leominster, Bromyard and Ross-on-Wye. Kington is identified for medium scale growth, and Hereford city and Ledbury for low scale growth. Over half of the county's housing is directed to rural areas (the largest share of all the options). By focussing development at the market towns and rural areas of Herefordshire, there is an opportunity 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 whilst in turn reducing future pressures on Hereford city as a retail centre. Increased growth would also broaden the scope for rural areas to seek improvements to services and infrastructure, helping to address imbalances between the rural and urban areas in terms of provision and access to facilities. The low level of growth in Hereford city presented by this option would not achieve the objective to strengthen the role of Hereford City as the central hub of the county, however. Overall, a **minor positive effect** is expected in relation to this SA objective.

#### County-wide option 3

**D.13** As noted above, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington identified for medium scale growth. Rural areas would receive less than a quarter of the county's housing (the lowest share of all the options).

**D.14** By focussing development at the market towns and Hereford, this option supports 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. Here, the vitality of Herefordshire's town centres may be supported by considering sustainable forms of development such as 15-minute neighbourhoods. By also locating development in Hereford, this would further strengthen the role of Hereford city as the central hub of the county. Under this option however, development would be restrained in smaller rural areas, which may lead to their stagnation. Overall, a **mixed (significant positive and minor negative) effect** is expected in relation to this SA objective.

#### County-wide options 4a to 4c

**D.15** As noted above, these options involve identifying either Leominster (option 4a), Ross-on-Wye (option 4b) or Ledbury (option 4c) as a growth town. Under each sub-option, Hereford is identified for medium scale growth, while rural areas are allocated just over a quarter of the county's housing need.

**D.16** For the town selected for growth, an increase in footfall would be likely. This would therefore be in line with the objective to support the renewal of high streets and town centres. However, by prioritising growth towards a single market town, the option could be detrimental to the achievement of this objective in other locations. There would be a need to ensure that each of the identified market towns has the space and capacity to grow as intended. Overall, a **mixed (minor positive and minor negative) effect** is therefore likely for each sub-option in relation to this SA objective.

#### County-wide option 5

**D.17** As described above, this option envisages large scale growth being directed to a new settlement. Under this option, large scale development is also envisaged for Leominster and Bromyard, while medium scale growth is directed to Kington, Hereford and Ross-on-Wye. Approximately a quarter of the county's housing need is directed to rural areas.

**D.18** Master planning a new settlement provides opportunities for inclusive design and for sustainable place making that would support the vitality of a new town and retail centre, for example via a 15-minute neighbourhood. However, there might be concerns over financial viability, at least in the short-term.

**D.19** The low amount of growth envisaged for the county's rural areas could limit the potential for retail to be sustained in village locations. Medium scale growth in Hereford could limit the ability of the city to achieve its full potential as a retail and cultural centre. Overall, a **potential mixed (significant negative and minor positive) effect** is expected in relation to this SA objective.

### SA objective 5: To provide access to services, facilities and education

#### County-wide option 1

**D.20** As the text above describes, this option involves medium scale growth in Leominster, Bromyard, Hereford, and Ross-on-Wye. Kington and Ledbury are identified for low scale growth, with the rural areas taking just under half of the county's housing need. The growth levels proposed under this option are therefore similar to that of the current development plan in that this option would result in sustained development across a broad range of locations. Under this option, the city and market towns would continue to act as sustainable service

centres, serving the surrounding rural areas. With more evenly distributed levels of growth, this option would help to deliver better accessibility to services, facilities, and education across the county. However, the more that development is spread, the more limited the individual benefits - particularly in maintaining and providing infrastructure and services in smaller settlements that may benefit from higher levels of development. Overall, a **minor positive effect** is expected in relation to this SA objective.

#### County-wide option 2

D.21 This option envisages over half of the county's housing need being directed to rural areas. Large scale growth is directed to Leominster, Bromyard and Ross-on-Wye. Low-scale growth is envisaged for Hereford and Ledbury. By increasing the level of growth to be delivered at the towns and the rural settlements, there is potential to deliver more facilities, services and better infrastructure across a broader area. The growth directed to rural areas could be particularly helpful to sustain and provide rural services, although there are other influencing factors beyond housing provision. The option would help to address the imbalances between service provision and opportunities in the city and the rest of the county. The option would also further reduce future pressures on Hereford's existing services and facilities. Overall, a minor positive effect is identified in relation to this SA objective.

#### County-wide option 3

**D.22** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington identified for medium scale growth. In comparison with the first two options, the amount of rural growth is low, with the county's rural areas envisaged to accommodate less than a quarter of Herefordshire's housing need. New development in Hereford and the market towns would be expected to have good access to services and facilities given current provision. New development in these areas would also provide scope for additional services and facilities to be introduced. Accessibility

would be expected to be high with any development in central areas but could be less certain with peripheral development. Low levels of rural growth could limit the ability for existing services and facilities to be maintained or enhanced. Taken together, a **mixed** (significant positive and minor negative) effect is identified in relation to this SA objective.

#### County-wide Options 4a to 4c

**D.23** As noted above, these options involve identifying either Leominster (option 4a), Ross-on-Wye (option 4b) or Ledbury (option 4c) as a growth town. The market town selected for growth would have the potential for increasing the range of, and the accessibility to, key services and facilities for the benefit of residents. However, prioritising development in one of the three market towns would potentially affect the range of services and facilities being offered in other nearby towns, and the rural areas of the county, notably Kington and Bromyard to the north and Ledbury to the east. Under each sub-option, Hereford city would accommodate a medium scale of growth which would enable it to continue to perform its role as the main centre in the county for housing, employment and retail. Overall, a **minor positive effect** is expected for each sub-option in relation to this SA objective.

#### County-wide option 5

**D.24** A key element of this option is the direction of large scale growth towards a new settlement, but large scale growth is also directed to both Leominster and Bromyard as well. Low scale growth is envisaged for Ledbury, while the county's rural areas would receive approximately a quarter of Herefordshire's projected growth.

**D.25** The allocation of a new rural settlement would be expected to include the provision of associated services and facilities. This would be beneficial to those living at the new community, as well as those living in surrounding settlements, such as Leominster and Bromyard. A factor in the choice of location could also

be the extent to which these additional services would benefit the surrounding area; however the exact location of the potential development site is not yet known. Providing a new suite of services and facilities would also generate viability and phasing challenges. The low level of growth being directed to rural areas, at least when compared with options 1, 2 and 4, would potentially challenge the ability to stimulate improved service provision in Herefordshire's rural communities. Overall, a **potential minor positive effect** is expected in relation to this SA objective.

## SA objective 6: Improve the physical and mental health and wellbeing of residents and reduce health inequalities

#### County-wide option 1

**D.26** As outlined above, this option envisages a similar level of distribution to that currently provided across Herefordshire. Leominster, Hereford city and Bromyard are identified for medium scale growth, with Kington and Ledbury identified for low scale growth.

**D.27** Improved health and well-being is dependent upon a multitude of factors, including the specific form and design of an individual development. A distinction also needs to be made between interventions that can encourage better health (e.g. sports facilities), and those that are designed to treat incidents of poor health (e.g. doctors' surgeries). From a strategic perspective, the growth levels proposed under this option would result in sustained development across the larger market towns and Hereford, and help to maintain and enhance health facilities. A similar outcome could also be possible in rural areas given that just under half of the housing growth in Herefordshire is to be directed to rural areas under this option. This greater dispersal of development may mean that existing services and facilities, including healthcare facilities, are less likely to become overloaded. However the more that development is

spread, the more limited the individual benefits, particularly in maintaining and providing infrastructure and services in smaller settlements that may benefit from higher levels of development. Widespread development across the county should mean that opportunities for living and working in close proximity are reasonably good, particularly if housing is provided where the evidence shows it is needed. This could help to support active travel and lead to better health outcomes.

**D.28** Overall, a **significant positive effect** is expected in relation to this SA objective.

#### County-wide option 2

**D.29** As noted already, this option gives greater emphasis to rural based growth, with over half of the county's housing need being directed to rural areas. Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, Kington for medium scale growth, and Hereford city and Ledbury for low scale growth. As with the option above, this option would focus growth across Herefordshire's market towns and rural areas. This more dispersed development may mean that existing services and facilities, including healthcare facilities, are less likely to become overloaded. More dispersed development would also mean that existing healthcare facilities in smaller and rural areas continue to be supported. While development would also take place in the market towns where opportunities for walking and cycling day to day are more likely, there would also be some development in rural settlements where levels of car use are likely to be high, to the detriment of physical activity. Furthermore, by reducing future pressures on Hereford's services, facilities and infrastructure this may ensure that health and social care infrastructure will meet the demands of a growing population.

**D.30** As noted under option 1, improved health and well-being is dependent upon a number of factors, including the location, design and form of arising development proposals. Taken together, a **significant positive effect** is expected in relation to this SA objective.

#### County-wide option 3

**D.31** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington identified for medium scale growth. In comparison with other options, option 3 provides the lowest share of growth for rural areas. Focusing most new development in Hereford and the market towns would likely achieve good levels of access for new residents to existing healthcare facilities in those areas of the county. Any improvements delivered as part of new development or as a result of an increase in the local population would also be accessible to more existing residents. Opportunities for walking and cycling day to day are likely to be greater where new development is broadly distributed across the main urban centres, and levels of sustainable transport use may be higher for longer journeys, benefitting levels of noise and air pollution. However, noise levels and access to the countryside and open space may be less good under this option.

**D.32** As noted above, improved health and well-being is dependent upon a number of factors, including the location, design and form of arising development proposals. That aside, a **minor positive effect** is expected in relation to this SA objective.

#### County-wide options 4a to 4c

**D.33** As noted above, these options involve identifying either Leominster (option 4a), Ross-on-Wye (option 4b) or Ledbury (option 4c) as a growth town. Across all of the options, Hereford is identified for medium scale growth, while the county's rural areas are identified to accommodate just over a quarter of the county's housing need. The settlement identified as a growth town would allow for maximum benefits in terms of planning obligations and would allow for the delivery of necessary infrastructure such as healthcare facilities in the town. This may help to avoid existing facilities becoming overloaded by concentrated growth. However, focusing new development in one area would mean that opportunities to stimulate and regenerate service provision (including healthcare facilities) in other areas are lost, which may exacerbate existing health

inequalities across the county. The sub-options may also result in more people living further away from work places, thereby creating higher levels of car use and less walking and cycling. As noted above, improved health and well-being is dependent upon a number of factors, including the location, design and form of arising development proposals. That aside, a **mixed (minor positive and minor negative) effect** is therefore likely for each of the sub-options in relation to this SA objective.

#### County-wide option 5

**D.34** Beyond directing large scale growth towards a new settlement, this option also envisages large scale growth at Leominster and Bromyard. Kington, Hereford and Ross-on-Wye are identified for medium scale growth, with the county's rural areas taking approximately a quarter of Herefordshire's identified growth. Delivering one large site would allow for maximum benefits in terms of planning obligations and would allow for the delivery of necessary infrastructure such as healthcare facilities. This may help to avoid existing facilities becoming overloaded by new development. There may also be good opportunities to masterplan a single large site and achieve good opportunities for walking and cycling, as well as delivering open space and green infrastructure appropriate for active outdoor recreation. However, focusing new development in one area would mean that opportunities to stimulate and regenerate service provision (including healthcare facilities) in other areas is lost which may only exacerbate existing health inequalities.

**D.35** As noted already, improved health and well-being is dependent upon a number of factors, including the location, design and form of arising development proposals. Nevertheless, a **potential mixed (minor positive and minor negative) effect** is likely in relation to this SA objective.

### SA objective 7: To support the sustainable growth of the economy

#### County-wide option 1

D.36 The growth levels proposed under this option are similar to that of the current development plan in that this option would result in sustained development in the larger market towns and Hereford city and the rural areas respectively. Medium scale growth is identified for Leominster, Bromyard, Hereford and Ross-on-Wye, with low scale growth being directed to Kington and Ledbury. Just under half of Herefordshire's growth is directed to the county's rural areas. With a reasonably high level of growth focused in Hereford this option will go towards strengthening the role of Hereford city as the central hub of the county where people have easy and equitable access to a variety of services and opportunities. This may lead to a continuation of inequalities in other smaller and more rural areas of Herefordshire. However the option does direct a large share of growth to rural communities that could help to encourage economic development. Overall, a potential mixed (minor positive and minor negative) effect is therefore identified in relation to this SA objective.

#### County-wide option 2

**D.37** This option would focus growth across Herefordshire's market towns and rural areas. As noted already, over half of the county's housing growth is directed to rural areas under this option. By directing development to the market towns, there is an opportunity to 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. The market towns (notably Ross-on-Wye and Leominster) and Hereford have some of the most deprived areas in the county, so targeting growth in these areas will help to target economic gain in areas of the county where it is needed most. Similarly, development in more rural areas of Herefordshire may create opportunities for

smaller settlements to diversify their economy by attracting business and tourism. Conversely, Herefordshire's economy is more dependent upon agriculture and manufacturing than any other economy in the West Midlands or the UK, and a strong agricultural economy brings local benefits by increasing productivity, employment, and income. The potential loss of large scale agricultural greenfield land through a high level of development in rural areas with high agricultural value may be detrimental to the sustainability of this economy, if this is not managed effectively. Overall, a **potential mixed** (significant negative and minor positive) effect is therefore expected in relation to this SA objective.

#### County-wide option 3

**D.38** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford city, Ledbury and Kington identified for medium scale growth. Of all the options, county option 3 envisages the lowest share of growth being directed to rural areas.

**D.39** By focussing development at these key urban centres there is an opportunity support the renewal of the county's high streets and town centres to create a vibrant network of settlements with a diverse range of easily accessible shops and services. With a high level of growth focused in Hereford city, this option will also go towards strengthening the role of the city as the central hub of the county where people have easy and equitable access to a variety of services and opportunities. Focusing employment growth around existing areas of activity facilitates access to new and existing employment, education and training opportunities. The market towns (notably Ross-on-Wye and Leominster) and Hereford have some of the more deprived areas in the county, and so targeting growth in these areas will help to target economic gain in areas of the county where it is needed most. This option does run the risk of neglecting growth in more rural areas of the county however, possibly impacting rural service retention due to limited economic opportunities in these areas. Overall, a mixed (minor positive and minor negative) effect is therefore identified in relation to this SA objective.

#### County-wide options 4a to 4d

**D.40** As noted above, these options involve identifying either Leominster (option 4a), Ross-on-Wye (option 4b) or Ledbury (option 4c) as a growth town. Kington and Bromyard are identified for low scale growth across all the sub-options. Similarly, the rural areas of the county are envisaged to accommodate just over a quarter of the county's growth.

**D.41** The settlement identified as the growth town under each sub-option would be expected to support additional footfall, thereby helping to revitalise and expand commercial areas. Directing employment growth to one of the three market towns will help to provide jobs close to areas of population. Furthermore, many of Herefordshire's urban areas are the most deprived in the county, so targeting growth in one of the three market towns will help to target economic investment where it is needed most. However, the concentrated nature of development under each sub-option does potentially neglect other areas of the county, including other market towns or the rural areas of Herefordshire that may require equal investment. Overall, **mixed (minor positive and minor negative) effects** are identified for each sub-option in relation to this SA objective.

#### County-wide option 5

**D.42** Directing large scale growth towards a new community is a key element of this sub-option. However, large scale growth is also directed to Leominster and Bromyard, with Kington, Hereford and Ross-on-Wye being envisaged to support medium scale growth. Under this option, approximately a quarter of the county's housing need would be directed to rural areas.

**D.43** Locating a large amount of development in a new rural settlement could ease pressure on other settlements in Herefordshire where there is demand for development. The potential to masterplan a new settlement will allow for necessary infrastructure and facilities to be delivered within the area, supporting

sustainable economic development in that location whilst also delivering commercial land in a chosen area of high demand and desirability. However, this option would not support the continued economic development of other areas of the county. It would also result in the benefits of development being focussed in a very concentrated area, which could be positive for the area around the new settlement but negative for other parts of the county. Furthermore, Herefordshire's economy is more dependent upon agriculture and manufacturing than any other economy in the West Midlands or the UK, and a strong agricultural economy brings local benefits by increasing productivity, employment, and income. The potential loss of large scale agricultural greenfield land through the development of a new settlement may be detrimental to the sustainability of this economy, if this is not managed effectively.

**D.44** With regards to rural areas, effects are likely to be similar to those that are described under option 3. Specifically, a low share of growth could limit the potential for sustainable economic growth and the potential benefits this gives rise to. Overall, a **mixed** (**significant negative and minor positive**) **effect** is expected in relation to this SA objective.

# SA objective 8: To deliver and maintain sustainable and diverse employment opportunities and reduce inequality and poverty

#### County-wide option 1

**D.45** As noted already, this option involves distributing growth in a similar way to that currently provided by the existing development plan. Specifically, medium scale growth is directed to Leominster, Bromyard, Hereford, and Rosson-Wye. Rural areas are envisaged to receive just under half of the county's

housing need. The growth levels proposed would result in sustained development in the larger market towns and Hereford and rural areas respectively. With a reasonably high level of growth focused at Hereford this option will go towards strengthening the role of Hereford City as the central hub of the county where people have easy and equitable access to a variety of services and employment opportunities. This may lead to a continuation of inequalities in other smaller and more rural areas of Herefordshire, however, that may potentially benefit from more concentrated development. Overall, a potential but uncertain mixed (minor positive and minor negative) effect is therefore expected in relation to this SA objective.

#### County-wide option 2

**D.46** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large-scale growth. Over half of the county's housing need is directed to rural areas. Consequently, this option would support a higher level of rural diversification with the potential to attract a broader range of employers partly by supporting population increases at rural settlements and the option may help to stimulate economic growth in rural areas. The approach also encourages economic growth across Herefordshire's key settlements as the market towns would also see a large scale of growth. However, by allowing for rural growth across the county, employment maybe generated in areas that are less accessible, requiring workers to use private vehicles to access the jobs. Furthermore, Herefordshire's economy is more dependent upon agriculture and manufacturing than any other economy in the West Midlands or the UK, and a strong agricultural economy brings local benefits by increasing productivity, employment, and income. The potential loss of large scale agricultural greenfield land through a high level of development in rural areas with high agricultural value may be detrimental to the sustainability of this economy, if this is not managed effectively. Overall, a potential but uncertain mixed (significant negative and minor positive) effect is therefore expected in relation to this SA objective.

#### County-wide option 3

**D.47** As noted above, this option identifies Leominster, Bromyard and Ross-on-Wye for large scale growth, with Hereford, Ledbury and Kington being identified for medium scale growth. Larger scale development focussed at the locations above would mean that more people are able to access jobs in those areas, including via sustainable modes of transport. New residents may also have access to sustainable transport links in other locations to access employment opportunities elsewhere. However, this approach would limit job creation in rural areas and potentially lead to economic stagnation. Overall, a **mixed (minor positive and minor negative) effect** is expected in relation to this SA objective.

#### County-wide options 4a to 4c

**D.48** By identifying either Leominster (option 4a), Ross-on-Wye (option 4b) or Ledbury (option 4c) as a growth town, there is potential to encourage job growth and investment in areas that existing residents can access, including by sustainable modes of transport. However, the ability for people to travel in from elsewhere in order to access employment will depend upon the transport options available. For instance, although Leominster and Ledbury have railway stations, Ross-on-Wye does not. Lastly, the concentrated approach to development under each sub-option could limit job creation in the County's other market towns and rural areas. Overall, a **mixed (minor positive and minor negative) effect** is therefore identified for each sub-option in relation to this SA objective.

#### County-wide option 5

**D.49** As noted above, a key feature of this option is to develop a new settlement. This, together with the existing settlements of Leominster and Bromyard, are identified for large scale growth. Kington, Hereford and Ross-on-

Wye are identified for medium scale growth, and Ledbury for low scale growth. The rural areas are envisaged to accommodate approximately a quarter of the county's housing need.

**D.50** The new settlement is likely to support a range of jobs. If these are taken by local residents, the settlement should be able to achieve a degree of self-sufficiency. A new rural settlement may also offer good opportunities to incorporate sustainable transport links, providing access to jobs for those without a car. However, under this option any job creation would be narrowly focussed in one rural area, where existing sustainable transport provision is poor. Furthermore, Herefordshire's economy is more dependent upon agriculture and manufacturing than any other economy in the West Midlands or the UK, and a strong agricultural economy brings local benefits by increasing productivity, employment, and income. The potential loss of large scale agricultural greenfield land by developing a new settlement may be detrimental to the sustainability of this economy, if this is not managed effectively. Overall, a **mixed (significant negative and minor positive) effect** is therefore identified in relation to this SA objective.

## SA objective 9: To reduce the need to travel and encourage sustainable and active alternatives to the private car

#### County-wide option 1

**D.51** The growth levels proposed under this option are similar to that of the current development plan in that this option would result in sustained development in the larger market towns, Hereford city, and the county's rural areas. Development is intended be distributed on the basis of need, with Leominster, Bromyard, Hereford and Ross-on-Wye being identified for medium scale growth. Ledbury and Kington are identified for low scale growth, with just under half of the county's housing need being directed to rural areas. Whilst

some of the areas being developed might have good transport links, others may not. A lack of public transport could encourage private car use, leading to increased traffic levels across Herefordshire. Due to the area this option covers, effectively promoting sustainable transport would be much less viable. Overall, a **minor positive effect with uncertainty** is expected in relation to this SA objective.

#### County-wide option 2

**D.52** As noted above, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Kington identified for medium scale growth. Hereford and Ledbury are identified for low scale growth. Significantly, over half of the county's housing need is identified for rural areas. Consequently, this option has the potential to distribute new development across a wider range of settlements. Of the options, option 2 directs the largest share of development to rural areas and this could help to improve the coverage and frequency of public transport. However, if it does not, residents may become more reliant on private cars, particularly if they are needing to access employment, and services and facilities, that are located elsewhere. However, the option would still see a significant amount of development being directed to Herefordshire's market towns, with opportunities for urban intensification. In particular, urban intensification schemes would provide opportunities to locate new development within walking distance of key services, including rail and bus links. While this has potential to reduce trip generation it may exacerbate existing congestion problems should residents choose to use private vehicles. Overall, a mixed (significant negative and minor positive) effect with uncertainty is therefore expected in relation to this SA objective.

#### County-wide option 3

**D.53** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington identified for medium scale growth. In comparison with others, option 3 involves the lowest share of

development being directed to rural areas. Concentrating growth towards Hereford and the market towns would help to sustain and extend public transport services. It may also help to generate additional critical mass for investing in sustainable and active travel. Directing housing growth to existing areas of development could reduce the need to travel, and the need to use private vehicles, if housing growth is directed close to areas of employment, or where there are services and facilities available. However, there is also a risk for the additional use of private cars and the congestion that these cars could give rise to. Specifically, congestion could arise if development occurs at locations where public transport is not available, or where the additional development does not encourage any additional investment in public transport or active travel. Traffic congestion is particularly significant in Hereford city, generating issues with respect to safety and impacting upon the attractiveness and friendliness of the city centre's pedestrian environment. Focussing development at Hereford may lead to a worsening of these issues if sustainable transport options are not delivered alongside new development. Overall, a mixed (minor positive and minor negative) effect is therefore identified in relation to this SA objective.

#### County-wide option 4a

**D.54** As noted above, the sub-options of option 4 involve identifying one of three market towns as growth towns. Under each sub-option, Kington and Bromyard are consistently identified for low scale growth, with the rural areas of the county accommodating just over a quarter of the county's housing growth.

**D.55** Option 4a involves the designation of Leominster as a growth town. Leominster is served by a rail station but there is limited access to other sustainable transport links such as frequent bus services and cycle and walking paths. Focussing Leominster as a growth town could increase the use of the railway service to offer greater connectivity and encourage sustainable travel. This is supported by The Local Transport Plan which looks to encourage and facilitate sustainable travel to reduce car use and support for additional services in order to enhance accessibility, support the economy and encourage a modal shift. Development under this option may therefore support infrastructure

provision and encourage alternatives to the private car. Furthermore, by concentrating new development at sites which are in close proximity to the market towns such as Leominster, this approach has the potential to reduce trip generation, due to jobs, services and facilities being generally more closely located. It may also reduce reliance on private vehicles, by giving residents greater choice of differing modes of transport. Overall, a **minor positive effect** is therefore expected in relation to this SA objective.

#### County-wide option 4b

**D.56** Option 4b identifies Ross-on-Wye as the growth town. Again, Kington and Bromyard are identified for low scale growth, with the rural areas of the county accommodating just over a quarter of the county's housing growth.

**D.57** There is no train station in Ross-on-Wye, however there are regular bus services to Hereford and Gloucester. Focussing large scale development in Ross-on-Wye may therefore encourage the use of private vehicles if alternative transport infrastructure is not provided or bus capacity is not improved. However, by concentrating new development at sites which are in, or in close proximity to Ross-on-Wye, the option has the potential to reduce trip generation, due to jobs, services and facilities being nearer. Overall, **a minor positive effect** is therefore expected in relation to this SA objective.

#### County-wide option 4c

**D.58** Option 4c identifies Ledbury as the growth town. Again, Kington and Bromyard are identified for low scale growth, with the rural areas of the county accommodating just over a quarter of the county's housing growth.

**D.59** Ledbury is served by a rail station. As a growth town, large scale development could increase the use of the railway service which offers greater connectivity and encourages sustainable travel. The Neighbourhood Plan for Ledbury is also exploring the possibility of improved accessibility and extended

parking to the eastbound platform at the railway station, which would be encouraged under this option. Development under this option may therefore support infrastructure provision and encourage alternatives to the private car. Furthermore, by concentrating new development at sites within, or in close proximity to the centre, the option of has the potential to reduce trip generation, due to jobs, services and facilities being generally more closely located. It may also reduce reliance on private vehicles, by giving residents greater choice of differing modes of transport. Overall, a **minor positive effect** is therefore expected in relation to this SA objective.

#### County-wide option 5

**D.60** As noted already, this option envisages large scale growth being directed to a new settlement. Large scale growth is also directed to Leominster and Bromyard. Ledbury is identified for low scale growth, with the rural areas being envisaged for approximately a quarter of the county's housing growth.

**D.61** As with the options described above, directing large scale growth towards Leominster and Bromyard would help to sustain, and potentially extend, the availability of public transport and active travel opportunities at both settlements. While Leominster has a railway station, Bromyard does not. Development located within the central areas of these towns could minimise the need to travel if sites are found close to the destinations that residents wish to travel to. However, residents might need to rely on private cars if development sites are poorly located with respect to public transport, or if the development sites do not give rise to investments in infrastructure.

**D.62** In terms of the new settlement, effects will be dependent on where it is sited and the transport links that the new development can connect with. However, master planning a new settlement provides opportunities for creating environments that are more conducive to walking and cycling. Designs can also help to reduce trip generation by help to co-locate homes with jobs, services and other facilities. However, focussing a significant amount of development in one location is likely to lead to higher levels of car use as people need to travel

to reach jobs in other parts of Herefordshire. Overall, a **mixed (minor positive and minor negative) effect** is therefore identified in relation to this SA objective.

#### SA objective 10: To improve air quality

#### County-wide option 1

**D.63** As noted already, this option envisages medium scale growth in Leominster, Bromyard, Hereford and Ross-on-Wye. Kington and Bromyard are identified for low scale growth, with the rural areas being envisaged to accommodate approximately half of the county's housing need. Consequently, in line with the strategy of the existing development plan, the option shares growth around the county. It has the potential for meeting local needs, without putting undue pressure on particular areas. By delivering a wider and more even distribution of development across Herefordshire, this option has the potential to distribute new development amongst a wider range of settlements and sites of differing scales. This will help to disperse road traffic, and reduce the cumulative impact on air quality in any one location. Development that is accessible to jobs and other services and facilities will reduce, and potentially eliminate, the need to travel, generating benefits to air quality in response.

**D.64** Whilst option 1 could impact both AMQAs in Herefordshire, the dispersed nature of development means that impacts should be minimal in comparison to other spatial options. This considered, allowing for a higher level of growth in rural areas, including those which are amongst the smallest and most isolated, is likely to result in a proportion of new residents relying on private vehicle use on a day-to-day basis. Overall, a **mixed** (**significant positive and minor negative**) **effect** is therefore expected in relation to this SA objective.

#### County-wide option 2

**D.65** This option gives greater emphasis to rural based growth, with over half of the county's housing need being directed towards the county's rural areas. Leominster, Bromyard and Ross-on-Wye are identified for large sale growth, with Kington identified for medium scale growth. Hereford and Ledbury are identified for low scale growth.

**D.66** The effects arising with option 2 are similar to those described with the option above. Again, growth is shared around the county to help meet local needs without putting undue pressure on particular areas. This dispersed pattern of growth should prove beneficial with respect to limiting air quality challenges. However, allowing for a higher level of growth in rural areas, including those which are amongst the smallest and most isolated, could lead to residents relying on private vehicles on a day-to-day basis. Air quality would be impacted if these journeys are made by either petrol or diesel powered vehicles. Overall, a **mixed** (**significant positive and minor negative**) **effect** is therefore expected in relation to this SA objective.

#### County-wide option 3

**D.67** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington identified for medium scale growth. Of the five options, county option 5 allocates the lowest scale of growth to the county's rural areas. Urban intensification has potential to exacerbate existing congestion problems should residents choose to use private vehicles. If these vehicles are powered by petrol or diesel, air quality challenges could follow. It is also noted that two AQMAs would be affected by this option, notably the Hereford AQMA and the Bargates AQMA in Leominster. However, concentrating most development in more urban areas has the potential to reduce reliance on private vehicles, by giving residents greater choice of differing modes of transport or providing new infrastructure capable of improving air quality, for example a relief road to divert traffic away from Bargates and address air quality issues. The market towns and Hereford city

offer a greater level of access to employment, services, facilities, and public transport in close proximity which reduces the need to travel by private vehicle. Overall, a **mixed** (significant negative and minor positive) effect is therefore expected in relation to this SA objective.

#### County-wide option 4a

**D.68** As noted already, the sub-options aligned to option 4 allocate either Leominster, Ross-on-Wye or Ledbury as a growth town. Just under a quarter of the county's growth is identified for rural areas.

**D.69** Option 4a identifies Leominster as a growth town. By focussing new development predominantly in Leominster, urban intensification in an already compact town has the potential to exacerbate existing congestion and air pollution problems associated with the Bargates AQMA should residents choose to use petrol or diesel-powered private vehicles. Whilst the Core Strategy includes proposals for a new southern link road to divert traffic away from this area and to reduce air pollution, this has not reached the planning stage although this option may encourage this and similar development. Alternatively, concentrating most development in more urban areas has the potential to reduce reliance on private vehicles, by giving residents greater choice of differing modes of transport, for example increasing the use of Leominster rail station. Furthermore, Leominster offers a greater level of access to employment, services, facilities, and public transport in close proximity which reduces the need to travel by private vehicle. However, concentrating more development at Leominster could result in higher levels of car use and potentially longer journeys if housing need in other parts of the County is not addressed.

**D.70** Overall, a **mixed (minor positive and minor negative) effect** is therefore expected in relation to this SA objective.

#### County-wide option 4b

**D.71** This option identifies Ross-on-Wye as the growth town. By focussing new development predominantly in Ross-on-Wye, the strategy has potential to exacerbate existing congestion and traffic circulation problems should residents choose to use petrol or diesel powered private vehicles. However, development sites that well-located to jobs and other services and facilities may reduce or eliminate the need to travel thereby helping to maintain, and hopefully limit, air pollution challenges. Conversely, sites at the periphery of Ross-on-Wye, that are poorly located to public transport options, could generate car use and adversely affect air quality. Growth in Ross-on-Wye may encourage sustainable travel infrastructure such as active travel routes, improved bus facilities or more compact development. Furthermore, Ross-on-Wye offers a greater level of access to employment, services and facilities in close proximity which reduces the need to travel by private vehicle. However, unlike Leominster and Ledbury, Ross-on-Wye does not have a railway station which may lead to greater car use and therefore generate more emissions. As noted for option 4a, concentrating more development at Ross-on-Wye could result in higher levels of car use, and potentially longer journeys, if housing need elsewhere in the County is not addressed. Such a scenario could lead to people driving further for work.

**D.72** Overall, a **mixed** (**minor positive and minor negative**) **effect** is therefore expected in relation to this SA objective.

#### County-wide option 4c

**D.73** This option identifies Ledbury as the principal growth town. The effects would be similar to those described under option 4b, although Ledbury has the benefit of a railway station. By focussing new development predominantly in Ledbury, urban intensification has the potential to contribute towards congestion and air pollution problems should residents choose to use private vehicles powered by petrol or diesel. However, if development is located close to jobs and other services and facilities, the need to travel would be reduced, providing benefits to air quality in response. Directing additional growth in Ledbury could

help to sustain and extend public transport options, for example by increasing the use of Ledbury rail station. Furthermore, Leominster offers a greater level of access to employment, services, facilities, and public transport in close proximity which reduces the need to travel by private vehicle. Again, concentrating more development at Ledbury could result in higher levels of car use, and potentially longer journeys, if housing need elsewhere in the county is not addressed. Such a scenario could lead to people driving further for work.

**D.74** Overall, a **mixed (minor positive and minor negative) effect** is therefore expected in relation to this SA objective.

#### County option 5

**D.75** As noted above, this option envisages a new settlement with large scale growth focused in Leominster and Bromyard. Having one large site as a new settlement would allow for maximum benefits in terms of planning obligations and would allow for the delivery of necessary infrastructure, including public transport links and sustainable transport infrastructure such as walking and cycle paths. Ideally, the new settlement would also be located near a sustainable transport route such as rail or along sustainable electric vehicle bus networks. The creation of a new rural settlement would also maximise opportunities to develop and incorporate a net zero carbon scheme, develop innovative and sustainable place making and develop green building technologies which would each contribute towards improved air quality. However, levels of car use and air pollution may be higher if development is concentrated in one area which may be some distance from residents' jobs. There will also be viability challenges with respect to bringing necessary infrastructure forward. Overall, a potential but uncertain mixed (minor positive and minor negative) effect is therefore expected in relation to this SA objective. Currently little information exists as to the availability of sufficient land assemblies that could potentially deliver a new rural settlement in the county, and so this effect is recorded as **uncertain**, particularly as it is unknown whether this option would impact nearby AQMAs.

## SA objective 11: To conserve and enhance Herefordshire's biodiversity and geodiversity

#### County-wide option 1

**D.76** This option envisages medium scale growth at Leominster, Bromyard, Hereford and Ross-on-Wye. Kington and Ledbury are identified for low scale growth, with the county's rural areas accommodating less than half of Herefordshire's housing need.

D.77 Overall, the option has the potential to distribute new development amongst a wider range of settlements, particularly leading to a more dispersed pattern of development across the county and reducing the potential for cumulative adverse impacts on biodiversity. With more evenly distributed growth, this also creates the opportunity to achieve biodiversity net gain from all developments and significantly increase the tree cover in the market towns associated with this option. A wider distribution of development does potentially mean more areas are affected. Across Herefordshire, there are 77 Sites of Special Scientific Interest (SSSIs), four Special Areas of Conservation (SACs), seven Local Nature Reserves (LNRs), four National Nature Reserves, and 140 Local Geological Sites. However, for all options, effects are uncertain as impact will depend on the specific locations of sites. Overall, a potential but uncertain minor negative effect is therefore expected in relation to this SA objective.

#### County-wide option 2

**D.78** Since this option focuses growth towards the market towns and the rural areas of the County, the option has the potential to distribute new development across a wide number of areas. This is particularly so for the county's rural

areas that are expected to accommodate over half of the county's housing need.

**D.79** Dispersing growth in such a way has the potential for reducing cumulative adverse impacts on biodiversity. However, distributed growth also provides opportunities for achieving biodiversity net gain across the county, and particularly in the market towns. A wider distribution of development does potentially mean more protected areas being affected. As noted above, Herefordshire contains a large number of protected sites, although impact will ultimately depend upon the location and design of particular development projects. Overall, a **potential but uncertain minor negative effect** is therefore expected in relation to this SA objective.

#### County-wide option 3

**D.80** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington identified for medium scale growth. The option therefore avoids intensive development at any one location. Of all the options, option 3 envisages the lowest share being directed to the county's rural areas.

D.81 Such a strategy could help to balance potential impacts, and encourage the wider application of biodiversity net gain. The low share of growth to the county's rural areas could help to protect designated sites from being adversely affected, since most of these sites are located beyond existing urban areas. Hereford city, together with the market towns, have their own unique sensitivities. However as Hereford would have the most proportional development in line with the settlement hierarchy, Hereford may face the largest capacity constraints. The River Wye, a SSSI and SAC, passes through the centre of Hereford. The River Lugg, that is also a SSSI and SAC, is located further eastwards. There are also a number of Local Nature Reserves throughout the city, as well as areas of ancient woodland further beyond. As with the options above, impact will ultimately depend upon the location and

design of particular development projects. Overall, a **minor but uncertain negative effect** is therefore expected in relation to this SA objective.

#### County-wide option 4a

D.82 Focussing development predominantly in Leominster may lead to impacts on the town's sensitive environmental assets, particularly from outward growth. Leominster is affected by the current restrictions on various types of development, including housing that could lead to an increase in the levels of phosphorus in the River Lugg SAC catchment. The River Lugg is also classified as a SSSI which may be sensitive to development. The town is also bounded to the south by Cockcroft Hill, which incorporates the Ryelands Croft Local Geological Site, a locally important landscape and geological feature and seminatural open space that may be sensitive to development. There are small pockets of ancient woodland on the periphery of Leominster. As with the options above, impact will ultimately depend upon the location and design of particular development projects. Overall, a potential but uncertain significant negative effect is therefore expected in relation to this SA objective.

#### County-wide option 4b

**D.83** Focussing development predominantly in Ross-on-Wye may lead to impacts on the town's sensitive environmental assets, particularly from outward growth. Development in the town may impact upon the biodiversity of the area, including the River Wye, a SSSI and SAC that runs through the west of the town. There is also a large pocket of ancient woodland to the south of the town that may particularly be affected by outward expansion. Regarding the geodiversity of the town, there are two Regionally Important Geological Sites that this option must consider – Overross Cliff to the north and Wilton Bluff towards the town centre. As with the options above, impact will ultimately depend upon the location and design of particular development projects. Overall, a **significant but uncertain negative effect** is therefore expected in relation to this SA objective.

#### County-wide option 4c

**D.84** Focussing development predominantly in Ledbury may lead to impacts on the town's sensitive environmental assets, particularly from outward growth. Development in the town may impact the biodiversity of this area, including two SSSIs to the north east of the town - Ledbury Cutting and Upper Hall Farm Quarry and Grassland. There are also large pockets of ancient woodland surrounding Ledbury, including Coney Green and Mayhill Wood to the east of the town, the latter of which is also a SSSI. There are a further four Regionally Important Geological Sites to the south east. Overall, a **significant but uncertain negative effect** is therefore expected in relation to this SA objective.

#### County-wide option 5

**D.85** As noted already, a key feature of this option is to direct large scale growth towards a new settlement. Leominster and Bromyard are also identified for large scale growth. Kington, Hereford and Ross-on-Wye are identified for medium scale growth. Approximately a quarter of the county's housing need is directed to rural housing.

**D.86** As with option 3, the low level of rural development would help to lessen the impact on protected wildlife sites given that these are located predominantly in rural areas. In terms of the new settlement, the allocation of significant development in a single location would help to avoid biodiversity being impacted in other parts of Herefordshire. It is likely that the new settlement will involve the use of previously un-developed land, but site-specific impacts will be dependent upon the location chosen, its features, and the potential it offers for biodiversity net gain. As with the options above, impact will also be dependent upon the location, form and the design of the other development schemes that will need to accompany the option. Overall, a **significant but uncertain negative effect** is therefore expected in relation to this SA objective.

# SA objective 12: To conserve and enhance the character and distinctiveness of landscapes and townscapes

#### County-wide option 1

**D.87** This option maintains the status-quo by distributing development in a similar way to the existing development plan. Leominster, Bromyard, Hereford and Ross-on-Wye are identified for medium scale growth, with Kington and Ledbury for low-scale growth. As noted already, just under half of the county's housing need is directed to rural areas. Ultimately the option seeks to distribute growth around the county and meet local needs without putting significant pressure on particular areas. The distribution of development based on housing need across the county provides greater scope to select sites that avoid the most sensitive landscapes. These include the Malvern Hills and Wye Valley Areas of Outstanding Natural Beauty, designated landscapes whose character and natural beauty are being safeguarded in the national interest. Furthermore, without focussing large amounts of development in any one location, this option may reduce the potential for cumulative adverse landscape impacts. It may, however, mean that it is harder to avoid development in the areas of highest landscape sensitivity, particularly in Herefordshire's rural areas, due to the dispersed and fairly prescriptive pattern of development. While dependent on the form, scale and design of any development, a minor negative effect is identified for this SA objective.

#### County-wide option 2

**D.88** This option directs growth towards the market towns and rural areas of Herefordshire. Just over half of the county's housing growth is directed to rural

areas. By distributing development more evenly, this option provides scope to select sites that avoid the most sensitive landscapes. Without focussing large amounts of development in one location, this option may reduce the potential for cumulative adverse landscape impacts. It may, however, mean that it is harder to avoid development in the areas of highest landscape sensitivity, particularly in Herefordshire's rural areas, due to the dispersed and fairly prescriptive pattern of development. With respect to designated landscapes, development at Ross-on-Wye would be particularly sensitive since the town falls within the Wye Valley National Landscape. Development at Ledbury would also be sensitive given that the Malvern Hills National Landscape adjoins to the town to the east. Similarly, Hereford city has the Wye Valley National Landscape to the south of its urban area. The northern tip of the Malvern Hills National Landscape is located approximately 6km to the south east of Bromford. Consequently, adverse impacts are likely to be avoided should Bromyard be extended at its periphery. There are no National Landscapes close to either Kington and Leominster. While dependent on the form, scale and design of any development, a minor negative effect is identified in relation to this SA objective.

#### County-wide option 3

**D.89** Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington identified for medium scale growth. Focussing growth towards these locations would steer new development away from rural greenfield sites in more sensitive landscape areas. With respect to designated landscapes, development at Ross-on-Wye would likely to impact the Wye Valley National Landscape that surrounds the town. Similarly, any development at Ledbury would need to avoid impacting the Malvern Hills National Landscape that is adjacent to the town to the east. Development at Bromyard is unlikely to adversely affect the Malvern Hills National Landscape that is located 6km to the east of the town. There are no National Landscapes in close proximity to either Kington or Leominster. Focussing built development in the central areas of Ross-on-Wye, Ledbury and Hereford city would help to manage impact, although this would be dependent

on the location, size and design of development being proposed. Overall, a **minor negative effect** is therefore identified in relation to this SA objective.

#### County-wide option 4a

**D.90** As noted already, each sub-option of option 4 identifies one of three towns as a growth town. In addition, Leominster and Bromyard are consistently identified for large scale growth. Under each sub-option, just over a quarter of the county's housing need is identified for rural areas.

**D.91** Under option 4a, Leominster would be appointed as a new growth town, accommodating a large scale of development. To achieve the numbers required, peripheral expansion of Leominster would be required. Development would need to be accommodated without adversely affecting the character and distinctiveness of Leominster as a place. Unlike some of the other market towns, Leominster does not have a National Landscape close by which would help to support the case for peripheral development. Although the extent of impact would be dependent on the location, form and design of any development, a **minor negative effect** is identified in relation to this SA objective.

#### County-wide option 4b

**D.92** Under this option, Ross-on-Wye would be appointed as a new growth town, accommodating a large scale of development. To achieve the numbers required, peripheral expansion of Ross-on-Wye would be required. Since the majority of Ross-on-Wye is set within the Wye Valley National Landscape, any peripheral expansion of the town is likely to have an adverse impact on the designation. Development within the urban area of Ross-on-Wye would need to respect the character and distinctiveness of the town. While the severity of impact would be dependent on the location, form and design of any development, a **significant negative effect** is identified in relation to this SA objective.

#### County-wide option 4c

**D.93** Under option 4c, Ledbury would be appointed as a new growth town, accommodating large scale of development. Leominster, Hereford and Rosson-Wye would be identified for medium scale growth, with Bromyard and Kington being identified for low scale growth. To achieve the numbers required, peripheral expansion of Ledbury would be required. Since the Malvern Hills National Landscape adjoins the town to the east, adverse effects on the National Landscape may be difficult to avoid. Development within the central areas of the town could help to minimise impacts, but schemes would need to ensure that the character and distinctiveness of Ledbury is protected. While the severity of impact will be dependent on the location, form and design of any scheme, a **significant negative effect** is therefore identified in relation to this SA objective.

#### County-wide option 5

**D.94** A key feature of this option is the identification of a new settlement, although Bromyard and Leominster are also identified for large scale growth as well. In addition, approximately a quarter of the county's housing need is directed to rural areas. The allocation of a new settlement is likely to have an adverse impact on the landscape in a rural area of Herefordshire. However, there are no designated landscapes in the area between Leominster and Bromyard. While the development of a new strategic site may offer good opportunities to masterplan and incorporate high quality design and landscape mitigation from the outset, it is unlikely that significant landscape effects could be avoided from a development of this scale. The lower scale of growth that option 5 directs to rural areas could be beneficial on the basis that many of Herefordshire's protected landscapes are found in rural areas. Again, intensification at Hereford city and the market towns could lead to undeveloped sites being used for housing, potentially at the expense of local townscape.

**D.95** Overall, a **significant negative effect** is therefore identified in relation to this SA objective.

# SA objective 13: To conserve and enhance the historic environment including the setting of heritage features

#### County-wide option 1

**D.96** This option would deliver homes in those locations where need is highest. By distributing growth around the county, there is potential to manage the pressures upon the historic environment more effectively. However, since there are more heritage assets in the built-up areas of the county, there is greater potential for the market towns to be adversely affected by new built development. The support this option provides for delivering new development at the more isolated and rural settlements in the county is likely to result in adverse impacts in terms of preserving established character and the setting local heritage assets. However the amount and type of heritage across each settlement of rural Herefordshire varies. It is noted that opportunities may exist for enhancing character and the setting of heritage assets, but this will be dependent on the design and layout of specific proposals. Overall, a **minor but uncertain negative effect** is therefore identified in relation to this SA objective.

#### County-wide option 2

**D.97** This option focuses development across the market towns and the rural areas of Herefordshire. Under this option, Leominster, Bromyard and Ross-on-Wye are identified for large-scale growth; Kington for medium scale growth; and Hereford and Ledbury for low-scale growth. All of these locations are important in heritage terms and each has their own conservation area, although the amount of land covered by each designation varies. Development at these locations could therefore adversely affect heritage, particularly if schemes are

inappropriately located and designed. The dispersal of growth towards the county's rural areas could impact upon other heritage assets but these effects will be site dependent. Opportunities may exist for enhancing character and the setting of heritage assets, but this will be dependent on the design and layout of specific proposals. Overall, a **minor but uncertain negative effect** is identified in relation to this SA objective.

#### County-wide option 3

**D.98** As noted above, this option involves large scale growth being directed to Leominster, Bromyard and Ross-on-Wye. Hereford, Ledbury and Kington are identified for medium scale growth. Under this sub-option, less than a quarter of the county's housing need is identified for rural areas. All of the market towns are important in heritage terms and each has their own conservation area, although the amount of land covered by each designation varies. In addition to the central area of the city, Hereford also has conservation areas at Widemarsh Common, Hampton Park, Bodenham Road, and the Bulmer Garden Suburb. Development in the central areas of these settlements could generate negative effects, although the scale of impact will be dependent on the location, form and design of development. Overall, a **minor but uncertain minor effect** is therefore identified in relation to this SA objective.

#### County-wide option 4a

**D.99** As noted above, the sub-options of option 4 identify one of three settlements for accommodating large scale growth. Kington and Bromyard are consistently highlighted for low scale growth, while the county's rural areas are identified to accommodate just over a quarter of the county's housing requirement. Option 4a identifies Leominster for large scale growth.

**D.100** Leominster is a compact market town. Its centre includes many historic buildings and has recently been identified as a Heritage Action Zone to help it improve the historic environment to stimulate economic growth and tourism.

The town has a number of historical and cultural assets with four designated Conservation Areas throughout its centre (Leominster, River Meadows, Bargates and Bridge Street). Any development in the central area of the town could generate adverse impact, although effects would be dependent on the location, form and design of any scheme. However, the primacy given to Leominster under this option could make it more challenging to manage and limit impact. Overall, a **potential but uncertain minor negative effect** is identified in relation to this SA objective.

#### County-wide option 4b

**D.101** Option 4b proposes Ross-on-Wye as the focus for large scale growth. Again, Kington and Bromyard are highlighted for low scale growth, while the county's rural areas are identified to accommodate just over a quarter of the county's housing requirement.

**D.102** Ross-on-Wye town has a variety of Grade I, II\*, and II Listed Buildings that fall mainly within a Conservation Area at its centre. Within this are two further Scheduled Monuments located to the west. By focusing large scale growth in and around Ross-on-Wye, the compact nature of this option could mean that it is more challenging to avoid impacts on heritage assets in the settlement area. However, effects will be dependent on the location, form and design of development schemes. Overall, a potential but **uncertain negative effect** is therefore identified in relation to this SA objective.

#### County-wide option 4c

**D.103** This option prioritises development at Ledbury, with the settlement being identified for large scale development. Leominster, Hereford and Ross-on-Wye are identified for medium scale growth, with Kington and Bromyard for low scale growth. Again, rural areas are identified to accommodate just over a quarter of the county's housing need.

**D.104** As with the other market towns, Ledbury is covered by an extensive Conservation Area along its central crossroads, within which a number of Grade I, II\*, and II Listed Buildings are found. Wall Hills Camp, a Scheduled Monument also sits to the west of the settlement. Since Ledbury is compact in its form, any major development will be challenging to accommodate without adversely impacting upon the town's heritage. However, these effects will be dependent on the location, form and design of development projects. Overall, an **uncertain negative effect** is identified for this SA objective.

#### County-wide option 5

**D.105** As noted already, this option envisages a new settlement that would deliver large scale growth. Leominster and Bromyard are identified for large scale growth. Kington, Hereford and Ross-on-Wye are identified for medium scale growth. Ledbury is identified for low scale growth, with rural areas accommodating approximately a quarter of the county's housing need.

**D.106** Since the new settlement is likely to involve greenfield land, it is less likely to affect the heritage assets in the surrounding market towns. However, the option also envisages large scale growth for Leominster and Bromyard, and medium scale growth for Kington, Ross-on-Wye and Ledbury. Ledbury is identified for low scale growth. All of these settlements have heritage assets which could be adversely affected depending on the location, form and design of each arising development scheme. However, a **minor but uncertain negative effect** is identified in relation to this SA objective.

### SA objective 14A: To manage and reduce flood risk from all sources.

#### County-wide option 1

**D.107** As noted above, this option delivers housing based on need, with medium scale growth being envisaged at Hereford, Leominster, Bromyard and Ross-on-Wye. Ledbury and Kington are identified for low-scale growth, while just under half of the housing need would be directed to rural areas. Given the wide distribution of development that this option would involve, there is potential to spread development around the county in order to help manage and reduce impacts. However, Hereford city and the market towns are at risk of flooding. In Hereford city, significant risk arises from the River Lugg to the east / south east of the city. Further risk comes from the River Wye to the south. There are also areas of flood risk within the city itself, for example, from Eign Brook. At Leominster, the River Lugg flows through the eastern side of the town, with the River Kenwater flowing through the centre. The River Frome generates flood risk at Bromyard, with the river extending around the north and eastern edges of the town. At Ross-on-Wye, flood risk is associated with the River Wye that extends along the western edge of the town, and from Rudhall Brook that extends through the centre. At Ledbury, flood risk is associated with the River Leadon that forms the western boundary of the town. Lastly, in the context of Kington, flood risk is generated by the River Arrow and Gilwern Brook, with significant parts of the town at risk to the south and east. Development at these locations would affect surface water, particularly if development is directed to un-developed land. While flood risk will ultimately be determined by the location, form and design of development schemes, a minor negative effect is expected in relation to this objective.

#### County-wide option 2

**D.108** As noted above, this option envisages large scale growth at Leominster, Bromyard and Ross-on-Wye. Kington is identified for medium scale growth, and Hereford and Ledbury for low-scale growth. Just over half of the county's growth is anticipated to be directed to rural areas. As noted for option 1 above, Hereford and the market towns are subject to significant areas of flood risk. Urban intensification at the settlements identified could generate further flood risk due to surface water run-off, particularly if any development results in the loss of greenspace that would otherwise be supportive for drainage purposes. Directing large-scale growth towards Herefordshire's rural areas could also involve the loss of greenfield land, thereby generating further surface water. However, development in market town centres should maximise the limited opportunities that exist for using brownfield sites where possible across the county, minimising to some extent the loss of greenfield land. This option would also reduce impacts on Hereford's flooding constraints, notably some of the largest areas that are prone to flooding in the county. Overall, a minor negative **effect** is therefore expected in relation to this SA objective.

#### County-wide option 3

**D.109** As noted above, this option involves large scale growth being directed to Leominster, Bromyard and Ross-on-Wye. Hereford, Ledbury and Kington are identified for medium scale growth. As noted above, these settlements are subject to flood risk meaning that any further development could exacerbate existing vulnerabilities. Specifically, urban intensification in these areas could result in increased flood risk due to surface water run-off, particularly if a development results in significantly lower areas of greenspace which would otherwise allow for surface water retention. However, focussing development in market town centres should maximise the limited opportunities that exist for using brownfield sites where possible across the county, minimising to some extent the loss of greenfield land. Overall, a **minor negative effect** is therefore expected in relation to this SA objective.

#### County-wide option 4a

**D.110** As noted above, this option directs large scale growth towards Leominster, with Hereford and Ross-on-Wye being identified for medium-scale growth. Kington, Bromyard, and Ledbury are identified for low-scale growth, with the rural areas of the county accommodating approximately a third of the new homes required. Despite the varying levels of growth, each of the settlements are subject to flood risk, as outlined in the text accompanying option 1. Large-scale growth at Leominster would apply greater pressure to the flood risk associated with both the River Lugg and the River Arrow, with these two rivers placing significant tracts of land in both Flood Zones 2 and 3. As indicated above, the existing areas of the town are unlikely to have the necessary amount of land to accommodate the large-scale growth being envisaged under this option, meaning that development will need to be directed to the edges of Leominster. Flood risk is particularly high to the east of Leominster, but land without flood risk is found to the south, south west and west of the town. However, developing on this greenfield land would increase flood risk by removing land that would otherwise be used for surface water retention. Overall, a minor negative effect is therefore expected in relation to this SA objective.

#### County-wide option 4b

**D.111** As noted above, this option directs large scale growth towards Ross-on-Wye, with Hereford and Leominster being identified for medium-scale growth. Kington, Bromyard, and Ledbury are identified for low-scale growth, with the rural areas of the county accommodating approximately a third of the new homes required. The description accompanying option 1 above explains how there are existing flood issues in Ross-on-Wye associated with the River Wye, with there being areas of Flood Zones 2 and 3 around the town. Particularly affected is land adjacent to the river as well as the lower town centre, the Broadmeadows area and beyond the A40 to the east. Notably, several homes were badly affected by the 2020 floods, demonstrating the issues Ross-on-Wye has previously faced regarding pluvial flooding. The intensification of existing

areas could exacerbate flood risk due to an increase in surface water, particularly if development is directed to areas of greenspace which would otherwise allow for surface water retention. However, as indicated already, it is unlikely that Ross-on-Wye would be able to accommodate large-scale growth within the existing areas of the town, meaning that peripheral expansion would be needed. Land to the west of Ross-on-Wye is heavily constrained but there are areas of land without flood risk to the east, south east and south west. However, developing on this greenfield land would increase flood risk by removing land that would otherwise be used for surface water retention. Overall, a **minor negative effect** is therefore expected in relation to this SA objective.

#### County-wide option 4c

**D.112** As noted already, this option directs large scale growth towards Ledbury, with Hereford, Leominster and Ross-on-Wye being identified for medium-scale growth. Kington and Bromyard are identified for low-scale growth, with the rural areas of the county accommodating approximately a third of the new homes required. The description accompanying option 1 above describes the flood issues in Ledbury that are associated with the River Leadon. To the west of the town there is land liable to flooding which is mainly flood zone 3 along the river. Development within the existing areas of the town could exacerbate flood risk if under-developed land, which would currently retain surface water, is developed. However, it is likely that large scale growth would require the development of greenfield land beyond the periphery of the town. There are areas of land without flood risk to the north, east, and south of the town. However, the development of this greenfield land would also increase surface water, and flood risk, since the development of this land would by remove land that would otherwise be used for surface water retention. Overall, a minor negative effect is therefore identified in relation to this SA objective.

#### County-wide option 5

D.113 This option envisages a new settlement that would deliver large scale growth, together with large scale growth at Leominster and Bromyard. Medium scale growth is envisaged for Kington, Ross-on-Wye and Hereford, while Ledbury is identified for low-scale growth. The text accompanying option 1 above describes the flood risk in Hereford city and the market towns. With regards to the new settlement, flood risk could be avoided by selecting a strategic site that avoids areas of flood risk. However due to brownfield constraints across the county, the development of the new settlement would likely involve the loss of rural greenfield land, which could reduce runoff and increase flood risk in the area. However, the development of a new settlement may offer good opportunities for the incorporation of strategic flood risk solutions within the development, including SuDS. Overall, given the various elements to this option, a **minor negative effect** is identified in relation to this objective.

## SA objective 14B: To protect the quality and quantity of water resources.

#### County-wide option 1

**D.114** This option envisages large scale growth being directed to Leominster, Hereford, Bromyard and Ross-on-Wye. It also, as noted above, directs low-scale growth towards Kington and Ledbury. Just under half of the county's housing growth is directed to the rural areas.

**D.115** As discussed through the baseline review that is included in Appendix C, the majority of Herefordshire is identified as a Nitrate Vulnerable Zone. Indeed, only Kington is excluded from the zone. The designation of the zone comes in

response to the struggles that Herefordshire's rivers have had with respect to high levels of nutrients entering the watercourses and adversely affecting water quality. The Rivers Wye, Frome, Lugg and Clun are affected, although particular concern has been directed to the Rivers Lugg and Wye given their status as Sites of Specific Scientific Interest and Special Areas of Conservation. Predominantly the nutrient is phosphate, however, the River Clun is also suffering from high levels of nitrates. Nutrients arise from site specific sources, including sewage treatment works, septic tanks, livestock, arable farming and industrial processes. However the waste water from new development can accentuate matters and undermine recovery activities. Since this option proposes to distribute development over large parts of the county, there is a risk that existing problems are extended with respect to their spatial impact. Conversely, spreading development in this way, may help to avoid specific concentrations arising in a particular location.

**D.116** In terms of water supply, there are Source Protection Zones (SPZ) adjacent to Leominster, Hereford and Ross-on-Wye, settlements that are identified for medium scale growth under this option. However, there is no SPZ close to Bromyard, the fourth settlement identified for medium scale growth. There is a SPZ adjacent to Ledbury, although this location is identified for low-scale growth under option 1.

**D.117** As noted through the baseline review of Appendix C, the Environment Agency also identifies certain locations as Drinking Water Protected Areas (DrWPAs). These areas, that comprise rivers, lakes and groundwater sources, are those that currently (or will in the future) supply more than 10m3/day of water for human consumption, or provide drinking water to more than 50 people. In the context of this option, Hereford, Ross-on-Wye, and Bromford are directly impacted by a DrWPA. In terms of Leominster, a DrWPA is located to the south of the town.

**D.118** Taken together, the option is identified to have a **minor negative effect** in relation to this objective.

#### County-wide option 2

**D.119** As noted already, this option envisages large scale growth at Leominster and Bromyard, while medium scale growth is proposed for Kington. Over half of the county's housing need is directed to rural areas.

**D.120** The effects described above are also applicable to option 2, particularly in terms of the constraints affecting Leominster and Bromyard. Kington is less constrained in that it falls outside of the county's Nitrate Vulnerable Zone, is not located adjacent to a SPZ, nor is located close to a Drinking Water Safeguard Zone. Option 2 proposes more rural development than option 1. As noted above, this could help to distribute pressures across a broader area of the county. However, doing so, could also generate challenges with respect to mitigation. Should sites not be available in the villages, this rural development would require the development of agricultural land. While the waste water arising from this development would generate challenges, there might be benefits if the scheme was to replace a farming unit considered particularly polluting.

**D.121** Taken together, the option is identified to have a **minor negative effect** in relation to this objective.

#### County-wide option 3

**D.122** This option involves the least amount of rural development, and directs large-scale growth towards Leominster, Bromyard, and Ross-on-Wye. Kington, Hereford and Ledbury are identified for medium-scale growth. The sensitivities of Hereford, Leominster, Bromyard, and Ross-on-Wye have been considered above, as has the more favourable position of Kington. This option, unlike the first two, directs medium-scale growth to Ledbury. However, this town is equally constrained and sensitive since it falls within the Nitrate Vulnerable Zone, and has a Source Protection Zone (SPZ) close by.

**D.123** The concentrated nature of this option would help to offer additional protection to rural areas. This could prove beneficial in that it would save some of the most important and vulnerable sites, that typically extend across rural areas, from being developed.

**D.124** There might be an intensification of issues at Hereford city and the market towns, but these pressures would be lessened if previously developed land can be used. The concentration of development, and its associated challenges, could also help with the generation of appropriate mitigation. The pooling of contributions from closely-located developments could also help with the viability of identified interventions.

**D.125** Taken together, the option is identified to have a **minor positive effect** in relation to this objective.

#### County-wide options 4a to 4c

**D.126** As noted above, options 4a to 4c involve the designation of Leominster (4a), Ross-on-Wye (4b) and Ledbury (4c) as a principal growth town. Across these options, Kington and Bromyard are consistently identified for low scale growth, with just over a quarter of the county's growth being directed to rural areas. Under options 4a and 4b, Ledbury is identified for low scale growth, whereas Ross-on-Wye is identified for medium scale growth under options 4a and 4c. Hereford is identified for medium scale growth across all three options.

**D.127** The sensitivities and constraints affecting these settlements have already been considered with the appraisal of options 1 to 3 and the challenges remain. Limiting the size and extent of rural development could help to lessen some of the impacts, while the concentration of development around each of the principal towns could assist with the bringing forward of appropriate mitigation.

**D.128** Taken together, each of the sub-options of option 4 are identified to have a **minor negative effect** in relation to this objective.

#### County-wide option 5

- **D.129** A distinguishing feature of option 5 is that it involves the creation of a new settlement that would receive large scale growth. Large scale growth is also envisaged for Leominster and Bromyard, while Kington, Hereford and Ross-on-Wye are identified for medium scale growth. The county's rural areas would receive approximately a quarter of Herefordshire's housing need.
- **9.6** In terms of the new settlement, there would be potential to develop this at a location that avoids the constraints outlined above. While the Nitrate Vulnerable Zone covers the bulk of the county, the other designations are more areaspecific. There would therefore be potential to locate it in a location that avoids the county's Source Protection Zones (SPZs) and the Drinking Water Protected Areas (DrWPAs). Providing development as a new settlement would also provide scope for building-in current best-practice and mitigation on-site. There might also be potential of locating the new settlement at an area of existing concern, a strategy that would provide scope for treating and enhancing local conditions.
- **9.7** The other parts of the strategy would be accompanied by the same challenges as described above. After county option 3, county option 5 offers the next lowest share of rural development. This could prove beneficial in that it would save some of the most important and vulnerable sites, that typically extend across rural areas, from being developed. Similarly, focusing growth towards the larger market towns will provide opportunities for more targeted mitigation. The pooling of contributions from closely-located developments could also help with the viability of identified interventions.
- **D.130** Taken together, option 5 is identified to have a **minor positive effect** in relation to this objective.

## SA objective 15: To support efficient use of resources, including land and minerals

#### County-wide option 1

**D.131** The growth distribution proposed under this option is similar to that of the current development plan in that this option would result in sustained development in the larger market towns and Hereford and the rural areas respectively. Specifically, Hereford city, Leominster, Bromyard and Ross-on-Wye are identified for medium scale growth, with Kington and Ledbury identified for low-scale growth. Just under half of the identified housing need is assigned to the county's rural areas. This option would result in a broader distribution of development across the county, providing greater opportunity to utilise previously developed land.

D.132 However, option 1 is also likely to require the use of greenfield or previously undeveloped land, thereby posing a threat to the best and most versatile areas of land across the county. As the baseline review of Appendix C describes, Hereford is largely surrounded by excellent (grade 1) and very good (grade 2) agricultural land, although the quality falls in the city's floodplain areas where the land is of a good to moderate quality (grade 3). The same pattern also applies to Ross-on-Wye, although there is excellent quality land immediately adjoining the town to the south west. At Leominster, very good (grade 2) quality agricultural land surrounds the town to the south and west, with pockets of excellent (grade 1) quality land being found to the south and south west. At Bromyard, there is very good (grade 2) agricultural land to the north and west, with good to moderate (grade 3) land in areas of floodplain. With respect to Kington, poor quality agricultural land is located to the west of the town, with good to moderate quality land being found to the north, south and east. There are pockets of very good agricultural land to the north east and south west. Lastly, at Ledbury, there is very good (grade 2) quality agricultural

land to the north west, south west and south east, with pockets of excellent (grade 1) quality land to the south and west.

**D.133** Similarly, the use of undeveloped land also poses a threat to those areas that are designated for the safeguarding of minerals. There are no such areas around either Kington or Bromyard. However, there are substantial areas of designated land to both the north east and north west of Hereford city, as well as smaller areas of designated land to the south and south west. With regards to Ross on Wye, there are areas of safeguarded land to the north west and west, and in Ledbury, to the east of the town. Lastly, in Leominster, there are areas of safeguarded land immediately adjacent to the town to both the south and east. There are also sporadic pockets of safeguarded land in south west, west and north west.

**D.134** While the overall effect will be dependent on the location, form and design of individual development schemes, a **mixed** (**significant negative and minor positive**) **effect** is therefore expected in relation to this SA objective.

#### County-wide option 2

**D.135** This option directs large scale growth towards Leominster, Bromyard, and Ross-on-Wye, medium scale growth to Kington, and low-scale growth to Hereford and Ledbury. The county's rural areas are identified as having the potential to accommodate over half of the county's housing need. In comparison to option 1, the lesser role for Hereford, and the greater role for the county's rural areas, could lessen the potential for using previously developed land. It is also questionable whether the urban areas of either Leominster, Bromyard or Ross-on-Wye would have sufficient capacity to accommodate the necessary number of homes. As noted in the description for option 1, all three of these towns are surrounded by agricultural land of very good (grade 2) or excellent (grade 3) quality. While Bromyard does not have any areas for the safeguarding of minerals close by, both Leominster and Ross-on-Wye do. Although site-dependent, rural housing options are likely to involve agricultural land of a very good (grade 2) or excellent (grade 3) quality.

**D.136** Overall, a **mixed** (significant negative and minor positive) effect is identified in relation to this SA objective.

#### County-wide option 3

**D.137** As noted above, this option envisages large scale growth at Leominster, Bromyard and Ross-on-Wye. Kington, Hereford and Ledbury are identified for medium scale growth. Just under a quarter of the county's housing need would be directed to rural areas. In comparison with options 1, 2 and 4, this option would see less growth being directed to rural areas which would help to protect areas of previously undeveloped land from being developed. Similarly, areas of the best and most versatile land are likely to be better safeguarded. Focusing growth towards Hereford city and the market towns would help to prioritise the use of previously developed land, but peripheral development is likely to be needed given the scale of growth being envisaged.

**D.138** As noted in the description accompanying option 1, Hereford city and the market towns are surrounded by agricultural land of a very good (grade 2) or excellent (grade 2) quality. Similarly, with the exception of Kington and Bromyard, Hereford city and the three other market towns have areas for the safeguarding of minerals close by. Taken together, a **mixed (minor positive and minor negative) effect** is therefore identified in relation to this SA objective.

#### County-wide option 4a

**D.139** As explained above, this option identifies Leominster for large-scale growth, with Hereford and Ross-on-Wye being identified for medium scale growth. Kington, Bromyard and Ledbury are identified for low-scale growth. Just over a quarter of the county's growth is directed to rural areas. Key constraints and sensitivities have already been discussed as part of the appraisal of option 1 above. As with the options above, the directing of growth to the market towns will help to facilitate the use of previously developed land, where such sites are

available. Similarly, as with option 3, the directing of growth away from the county's rural areas should help to protect undeveloped areas and help to protect the best and most versatile agricultural land.

**D.140** In terms of directing large scale growth towards Leominster, the option envisages the development of the sustainable urban extension that is included in the 2015 Core Strategy. In order to respond to need in the period to 2041, this extension would either need to be increased in size, or there would be a need for further sites to be found. These additional sites could be found in central areas, but peripheral development is likely to be needed. As noted above, Leominster is immediately adjoined by very good (grade 2) and excellent (grade 3) quality agricultural land to the west. Very good and excellent quality agricultural land is also found in other directions too, beyond the areas of floodplain that adjoin the town to the north and east. Furthermore, areas for the safeguarding of minerals are found to the east, south and south east of Leominster, with further areas being located further away from the town to the north west and south west. It is therefore likely that peripheral development will adversely affect these assets in some way, although the magnitude of impact will be dependent on the location, form and design of specific development schemes. Overall, a significant negative effect is therefore expected in relation to this SA objective.

#### County-wide option 4b

**D.141** In a similar way to option 4a, this option envisages medium-scale growth at Leominster and Hereford, and low-scale growth at Kington, Bromyard, and Ledbury. Large-scale growth is directed to Ross-on-Wye, with the rural areas being expected to take over a quarter of the county's need. In order to accommodate the potential level of growth, Ross-on-Wye would need to accommodate additional sites beyond the strategic urban extension identified in the 2015 Core Strategy. These sites would ideally be found in central areas, to help facilitate the use of previously-developed land, but peripheral development would likely to be required.

**D.142** Whilst the main built-up area of Ross-on-Wye is classified as Urban under ALC criteria, there is a mixture of agricultural land surrounding the town. Notably, a large portion of the land to the south of the town centre comprises agricultural land of an excellent standard (grade 1), with surrounding land being of a very good (grade 2) or good to moderate quality. Any peripheral development is therefore likely to use previously undeveloped land, and lead to the loss of the best and most versatile agricultural land. Furthermore, as noted above, there are pockets of land safeguarded for minerals close to the northeastern edge of the town. There is also large area to the south, close to Deepdean. Although dependent on the location, form and design of arising schemes, a **significant negative effect** is identified for the collective suboption in relation to this SA objective.

#### County-wide option 4c

**D.143** As with options 4a and 4b, this option envisages medium-scale growth at Leominster, Hereford and Ross-on-Wye, with low-scale growth at Kington and Bromyard. Large-scale growth is directed to Ledbury, with the rural areas being expected to take over a quarter of the county's need. As with the previous two sub-options, the strategy would help to direct growth to areas of the county where previously-developed land is likely to be available. In particular, the large-scale growth proposed for Ledbury could assist the un-locking of sites across the town's central areas. However, the scale of growth suggests that some peripheral development would be needed.

**D.144** Whilst the main built-up area of Ledbury is classified as Urban under ALC criteria, there is a mixture of agricultural land surrounding the town. The east of the town is classified as having poor quality agricultural land (grade 4), but the majority of land immediately surrounding the town centre is of a very good quality (grade 2). There are smaller pockets of good to moderate (grade 3) quality land to the north east, and there are two pockets of excellent (grade 1) quality land to the south and west. Any peripheral development could therefore adversely affect this best and most versatile agricultural land. As noted above, there are no areas for the safeguarding of minerals close to the urban edge of Ledbury, but large swathes of land are safeguarded beyond the A417. Taken

together, a **significant negative effect** is therefore expected in relation to this SA objective.

#### County-wide option 5

**D.145** As noted above, this option envisages the development of a new settlement in a rural area of the county. It also envisages large scale growth at Leominster and Bromyard, and medium scale growth at Kington, Hereford and Ross-on-Wye. Ledbury is identified for low-scale growth, while the rural areas receive approximately a quarter of the county's growth. The broader impacts of the strategy, with respect to developing at the market towns, have been considered above. In relation to the new settlement, there is potential to orientate the development so that its location can use previously-developed land. However, since Herefordshire does not have large areas of previously developed land to develop, the new settlement is likely to require a previously un-developed (greenfield) site. Although there is potential to avoid those areas that are being safeguarded for minerals, it is likely to be more challenging to avoid use of the best and most versatile agricultural land. Taken together, **significant negative effect** is therefore expected in relation to this SA objective.

#### **Rural Spatial Options**

- Option 1: Current Strategy dispersed approach across settlements
- Option 2: Focus on larger settlements
- Option 3: Focus growth on rural hubs
- Option 4: Focus growth within settlements outside AONBs and Conservation Areas

SA objective 1: To mitigate climate change by actively reducing greenhouse gas emissions, and to support climate adaptation.

#### All rural options

**D.146** New development in any location will generate new demands for energy and, consequently, this will lead to increased greenhouse gas emissions. However, the extent of this is dependent on the proposed overall scale of growth and the design of individual developments and is unlikely to be significantly affected by the spatial strategy. The extent to which the options would result in increased car use, with the associated emissions, is considered separately under SA objective 9, and the extent to which the options would result in reduced or improved air quality is considered under SA objective 10. Overall, a **negligible effect** is therefore expected in relation to each of the options for SA objective 1.

SA objective 2: To provide a suitable supply of housing including an appropriate mix of types and tenures to reflect demand and need.

#### Rural option 1

**D.147** This option will continue the current rural housing strategy and envisages distributing rural housing growth between a greater number of settlements. A graphic included with the Spatial Options Consultation of January 2022 suggests how rural development, under this option, will be directed to 49 settlements [See reference 214]. Rural areas are identified to receive just under half of the county's housing needs. The dispersal of development across this number of settlements will see housing widely provided, thereby assisting with the provision of different tenure types to meet local needs, including affordability and specialist requirements. This option will therefore provide diverse opportunities for home ownership across the rural areas of Herefordshire. However, having smaller numbers of new homes in a larger number of villages could provide fewer opportunities for affordable housing. Overall, a **minor positive effect** is expected in relation to this SA objective.

#### Rural option 2

**D.148** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. A graphic included with the Spatial Options Consultation of January 2022 suggests how rural development, under this option, will be directed to 25 settlements [See reference 215]. Whilst a range of housing will be supplied, with larger sites potentially providing better opportunity for affordable housing, this option is a more limiting strategy, benefitting a reduced number of rural settlements.

Overall, a **minor positive effect** is therefore expected in relation to this SA objective.

#### Rural option 3

**D.149** This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. While these places are described as rural hubs, the option does not identify specific settlements. A graphic included with the Spatial Options Consultation of January 2022 suggests how rural development, under this option, will be directed to 15 settlements [See reference 216]. Whilst a range of housing will be supplied under this option, the concentration of growth in these hubs would mean other settlements would have a reduced level of growth and housing needs may be less well met in those areas. Like Option 2, whilst larger sites under this option may provide better opportunity for more affordable housing, this would only benefit the smallest number of settlements. Overall, a **negligible effect** is therefore expected in relation to this SA objective.

#### Rural option 4

**D.150** This option seeks to protect the county's Areas of Outstanding Natural Beauty (AONBs, now National Landscapes) and Conservation Areas. As the baseline account of Appendix C explains, Herefordshire has two National Landscape, the Wye Valley and Malvern Hills National Landscapes. There are approximately 40 conservation areas in rural Herefordshire. For these protected areas, rural option 4 envisages only limited development, with higher rates of growth being directed to those areas and settlements located beyond a National Landscape or Conservation Area. However, these settlements might be constrained in other ways, for instance, with respect to flood risk. Nevertheless, the option provides scope for the delivery of larger housing projects, that could assist with the provision of affordable housing and delivering a greater mix of housing with respect to type, size and tenure.

**D.151** While limited development is envisaged for the county's protected areas, there is a risk that this will be inadequate to respond to the housing needs of the affected areas. A restriction in supply could lead to higher house prices, and place further pressure on the supply of relevant services and facilities.

**D.152** A graphic included with the Spatial Options Consultation of January 2022 suggests how rural development, under this option, will be directed to 15 settlements [See reference [See reference 217]. The Draft (Regulation 18) identifies 68 villages as 'Identified Service Hubs and Service Settlements'. Of these, 11 settlements fall within either the Wye Valley or the Malverns Hills National Landscapes. In terms of conservation areas, 25 of the 69 settlements listed have a designation that covers either part or the whole of the village. Five of the villages fall within a National Landscape and have a designated conservation area, namely Wilton, Wellington, Cradley, Fownhope and Petersnow. The protected settlements vary in their size and the services and facilities they offer. Restraining growth purely on the basis of landscape quality and heritage could therefore remove locations for growth that might otherwise be appropriate for development. Overall, a **minor positive effect** is therefore identified in relation to this SA objective.

## SA objective 3: To support community cohesion and safety

#### All rural options

**D.153** The effects on this SA objective will depend on the exact nature of the development provided and effects are unlikely to be significantly affected by the overall spatial strategy – for example the provision of meeting places, mixed development and accessible and safe design solutions will depend on factors other than the broad distribution of development. Consequently, a **negligible effect** is expected for all of the rural spatial options in relation to this SA objective.

### SA objective 4: To support the vitality of Herefordshire's town and retail centres

#### All rural options

**D.154** The effects of this SA objective are not likely to be affected by the spatial strategy for Herefordshire's rural areas, which does not contain any town or retail centres. Overall, a **negligible effect** is therefore expected in relation to each of the options for this SA objective.

### SA objective 5: To provide access to services, facilities and education

#### Rural option 1

**D.155** This option will continue the current strategy and distribute rural growth between the greatest number of settlements. This more dispersed development may mean that existing services and educational facilities, are less likely to become overloaded, however the more that development is spread, the more limited the individual benefits may be, particularly in maintaining and providing infrastructure and services in smaller settlements that may benefit from higher levels of development. Overall, a **mixed (minor positive and minor negative)** effect is therefore expected in relation to this SA objective.

#### Rural option 2

**D.156** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. Focusing

new development within such settlements could mean that development is delivered near to existing educational facilities, although concentrating development in a smaller number of settlements could also increase pressure on existing facilities unless new supporting infrastructure such as new schools is delivered. The more concentrated nature of this option may also reduce the accessibility of residents in smaller rural settlements to services and facilities, contributing towards inequalities in accessibility in the most isolated settlements, however larger settlements will benefit greatly due to their proximity to existing services and facilities. Overall, a **mixed (minor positive and minor negative) effect** is therefore expected in relation to this SA objective.

#### Rural option 3

**D.157** This option distributes rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. This option by its concentrated nature will mean residents in selected settlements have easy access to an appropriate range of nearby services, thereby reducing the need to travel. Good access to public transport will also benefit rural residents by facilitating access to services and educational facilities for all. However, by restricting development in other locations, the option risks limiting travel options elsewhere. Specifically, a lack of sizeable growth could lessen the opportunity for bus services to be maintained or extended, thereby disadvantaging residents in those places that are not being identified for growth. Taken together, a **mixed effect (minor positive and minor negative)** is therefore identified in relation to this SA objective.

#### Rural option 4

**D.158** This option directs growth away from areas protected as Conservation Areas, or areas that are located within one of the county's two National Landscapes. For these protected areas, the option envisages limited development. As the text surrounding the appraisal of SA objective 2 explains,

there are 11 settlements that fall within the two National Landscapes, and 25 villages that have a Conservation Area covering some or all of their area. The more dispersed development under this option may mean that existing services and educational facilities are less likely to become hugely overloaded, however the more that development is spread, the more limited the individual benefits, particularly in maintaining and providing infrastructure and services in smaller settlements that may benefit from higher levels of development. The limited development in protected areas may also adversely affect the ability of these places to maintain or provide additional services and facilities. Since the option seeks to limit growth on the basis of landscape quality and heritage, there remains the risk that locations otherwise suitable for larger scale development, including those with a fair selection of services and facilities, are excluded from growing. Whilst the promotion of sustainable travel is more likely in areas outside National Landscapes and Conservation Areas, limited development to settlements outside of designated areas, may rule out some settlements with services and public transport links that would otherwise be considered sustainable. Taken together, a mixed (minor positive and minor negative) **effect** is identified in relation to this SA objective.

## SA objective 6: Improve the physical and mental health and wellbeing of residents and reduce health inequalities

#### Rural option 1

**D.159** This option will continue the current strategy and distribute rural growth between the greatest number of settlements. This more dispersed development may mean that existing services and facilities, including healthcare facilities, are less likely to become hugely overloaded. However the more that development is spread, the more limited the individual benefits, particularly in maintaining and providing infrastructure and services in smaller settlements that may benefit from higher levels of development. While some development would take place

at larger settlements where opportunities for walking and cycling day to day are more likely, there would also be some development in smaller settlements where levels of car use are likely to be high, to the detriment of physical activity. Beyond the provision of health care, and the promotion of active travel, it is acknowledged that health and well-being is determined by a number of factors too, including the location, form and design of individual development projects. Overall, a **mixed (minor positive and minor negative) effect** is therefore expected in relation to this SA objective.

#### Rural option 2

**D.160** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. By having a more concentrated approach to development there will be greater opportunities to enhance Herefordshire's natural capital, green infrastructure, and nature recovery networks to ensure good access and proximity to open and wild spaces for residents. Focusing new development within existing settlements could mean that development is delivered near to existing healthcare facilities, although concentrating development in a smaller number of settlements compared to rural option 1 could also increase pressure on existing facilities particularly if new supporting infrastructure such as GP surgeries is not delivered. The more concentrated nature of this option may also reduce the accessibility of residents in smaller rural settlements to important healthcare services, contributing towards existing health inequalities, however development within larger settlements may provide good opportunities for walking and cycling day to day as development is likely to be closely located to jobs, services, and facilities. As with the first option, it is acknowledged that health and well-being is determined by a number of factors, including the location, form and design of individual development projects. Overall, a mixed (minor positive and minor negative) effect is therefore expected in relation to this SA objective.

#### Rural option 3

**D.161** This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. By having a more concentrated approach to development there will be particularly good opportunities to enhance Herefordshire's natural capital, green infrastructure, and nature recovery networks to ensure good access and proximity to open and wild spaces for residents. This option by its concentrated nature will mean residents in selected settlements have easy access to an appropriate range of nearby services, including healthcare. Good access to public transport will also benefit health by facilitating access to healthcare facilities for all, and by reducing car use which can otherwise have adverse impacts on public health through noise and air pollution as well as reduced levels of activity. However, there remains the risk that health facilities will become over-stretched with the concentration envisaged under this option. Similarly, residents living in areas not experiencing concentrated growth are unlikely to benefit. As with the options above, it is acknowledged that health and well-being is determined by a number of factors, including the location, form and design of individual development projects. Overall, a mixed (minor positive and minor negative) effect is therefore identified in relation to this SA objective.

#### Rural option 4

**D.162** As noted above, this option directs growth away from areas protected as Conservation Areas, or areas that are located within one of the county's two National Landscapes. For these protected areas, the option envisages limited development. By limiting development within these protected areas, it encourages and supports the protection of Herefordshire's natural capital, green infrastructure, and open space that is vital to the physical and mental wellbeing of its residents. The limited development in protected areas however may reduce the accessibility of residents in affected rural settlements to important healthcare services, contributing towards existing health inequalities. Whilst the promotion of sustainable travel is more likely in areas outside National

Landscapes and Conservation Areas, limited development may rule out some settlements that are considered sustainable as they have access to services and public transport links. Overall, a **mixed** (**significant positive and minor negative**) **effect** is therefore expected in relation to this SA objective.

## SA objective 7: To support the sustainable growth of the economy

#### Rural option 1

**D.163** This option will continue the current strategy and distribute rural growth between the greatest number of settlements. Spreading development in this way could help to encourage investment and the sustainable growth of the economy. It could help to diversify Herefordshire's rural economy and possibly support the county's ambitions for additional tourism. Specifically, the option may help independent businesses to thrive, boost job opportunities and encourage the creation of hyper-local business identities across rural areas of Herefordshire. However, it is likely that economic growth will continue to be powered by Hereford and the market towns. Appropriate infrastructure will be needed to support growth, and the broad approach to distribution could affect the ability for investments to be pooled. Overall, a **minor positive effect** is therefore expected in relation to this SA objective.

#### Rural option 2

**D.164** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. Due to the larger nature of the settlements considered suitable for growth, these settlements are likely to have a higher level of services and economic opportunities that development will encourage to grow through increased levels of investment. This in turn could help to support the diversification of the rural

economy and possibly support additional rural tourism. Conversely, the option may limit opportunities to encourage or sustain economic investment in the county's rural settlements. Appropriate infrastructure will be needed to help facilitate growth, including access to high-speed broadband. Overall, **a minor positive effect** is expected in relation to this SA objective.

#### Rural option 3

**D.165** This option distributes rural growth to a limited number of key settlements, known as rural hubs. Due to having strong links with sustainable transport networks and services, these settlements are identified for significant proportionate growth. Focussing growth in these areas is likely to encourage investment from new and existing communities, thereby helping to support rural diversification. Under this option however, opportunities to promote small scale economic growth, rural diversification and improved infrastructure provision in smaller settlements will be significantly limited. As with the other two options, investment in infrastructure will be key, including investment in high-speed broadband. Overall, a **mixed (minor positive and minor negative) effect** is therefore expected in relation to this SA objective.

#### Rural option 4

**D.166** As noted above, this option directs growth away from areas protected as Conservation Areas, or areas that are located within one of the county's two National Landscapes. For these protected areas, the option envisages limited development. By limiting development within these protected areas, there is a risk that economic activity is adversely affected. This could challenge the county's broader pursuit of rural diversification and low carbon growth. The importance of tourism across these protected areas could also be challenged, although the constraint upon growth, for the purposes of protecting landscape and character, could potentially improve appeal. This could lead to an increase in visitor numbers and visitor spend.

**D.167** For those settlements located beyond the defined areas of protection, the potential for economic growth could be enhanced. Specifically, additional growth may help independent businesses to thrive, boost job opportunities and encourage the creation of hyper-local business identities across smaller settlements across rural Herefordshire. This will help to rebalance these areas as places people visit for a wide variety of reasons. Overall, a **mixed (minor positive, minor negative) effect** is therefore expected in relation to this SA objective.

# SA objective 8: To deliver and maintain sustainable and diverse employment opportunities and reduce inequality and poverty

#### Rural option 1

**D.168** This option will continue the current strategy and distribute rural growth between the greatest number of settlements. As previously noted, the option suggests a dispersal of growth to 49 settlements. The dispersed nature of this option could help to encourage economic activity in a broader suite of locations, which would help to provide greater accessibility to jobs for those living there. Locational spread could be beneficial in the county's efforts to support economic diversification, as the strategy would help to respond to the specific skills and strengths of the county. This growth, and the local provision of jobs, could help to reduce inequality, address poverty, and help to lessen broader inequalities across the county.

**D.169** Distributing this growth so widely could potentially undermine the ability for clusters and business hubs to develop. There would also be a need for appropriate infrastructure as well. Overall, a **mixed** (**minor positive and minor negative**) **effect** is therefore expected in relation to this SA objective.

#### Rural option 2

**D.170** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth compared to Option 1. Indeed, as previously noted, the option suggests dispersing growth towards 25 settlements. Focussing development at larger settlements would see greater opportunities for employment in areas that can accommodate higher levels of growth, benefitting residents in proximity to these employment areas. These settlements, that have higher levels of existing population, are also likely to have a reasonable level of accessibility, with adequate transport links, providing access to jobs for those without a private vehicle. Notably, settlements experiencing greater growth could expect to see new development that is accompanied by fast and reliable digital connectivity, reducing inequalities by providing new and flexible sources of employment, income, and communication to less connected rural areas of Herefordshire. Overall, **a minor positive effect** is therefore expected in relation to this SA objective.

#### Rural option 3

D.171 This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. As previously noted, the option suggests dispersing growth towards 15 settlements. The option therefore involves additional intensification to that described under the previous option. While the positives of the previous option could be strengthened with this option, it could also deepen potential concerns over parts of the county being left with only limited amounts of development. However, focussing development at larger rural transport hubs will ensure that more people are able to access jobs in the local area, including via sustainable modes of transport through the increased use of public transport. New residents may also have access to sustainable transport links in other locations to access employment opportunities elsewhere. However, this concentrated approach to development would limit job creation in other rural areas. Like rural option 3, settlements experiencing greater growth could expect to see new development that is accompanied by fast and reliable digital connectivity, reducing

inequalities by providing new and flexible sources of employment, income, and communication to less connected rural areas of Herefordshire. Overall, **a minor positive effect** is therefore expected in relation to this SA objective.

#### Rural option 4

**D.172** As noted above, this option directs growth away from areas protected as Conservation Areas, or areas that are located within one of the county's two National Landscapes. For these protected areas, the option envisages limited development. As previously noted, the option suggests dispersing growth towards 20 settlements. For those areas under protection, to which the option envisages only limited amounts of development, the strategy could lead to a stifling of economic activity. This could limit the potential for additional jobs to be created, which could maintain the inequalities that exist across the county. However, given that the option seeks to preserve landscape and heritage, the protected areas might become more appealing for tourists. This may help to retain employment associated with the tourism industry in these protected areas. This option would also benefit smaller settlements outside of the National Landscapes by providing jobs and business opportunities there. This will help to rebalance these areas as places people visit for a wide variety of reasons. Whilst development would be focussed at a broader range of smaller settlements which may offer good opportunities for people in those locations to access jobs in close proximity, where people need to travel further to and from those sites for work, journeys are more likely to be car dependent. Overall, a mixed (minor positive and minor negative) effect is therefore expected in relation to this SA objective.

## SA objective 9: To reduce the need to travel and encourage sustainable and active alternatives to the private car

#### Rural option 1

**D.173** This option will continue the current strategy and distribute rural growth between the greatest number of settlements. As previously noted, the option suggests a dispersal of growth to 49 settlements. This may be detrimental to this objective as a strategy of dispersal can prevent sustainable and active travel and generate a wider spread of rural traffic, particularly in the rural area where there are a number of landscape and biodiversity designations, and a lack of accessible public transport. Overall, **a significant negative effect** is therefore expected in relation to this SA objective.

#### Rural option 2

**D.174** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. As previously noted, the option suggests dispersing growth towards 25 settlements. Due to the larger nature of the settlements identified under this option, these are more likely to have a reasonable level of accessibility with adequate transport links. If not, it is anticipated that larger settlements seeing development come forward would be in a position to provide transport infrastructure, which will support and prioritise active travel and public transport. Focussing development at larger settlements may also provide opportunities to locate new development within walking distance of key services, increasing the use of local active travel. Overall, a **minor positive effect** is therefore expected in relation to this SA objective.

**D.175** This option distributes rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. As previously noted, the option suggests dispersing growth towards 15 settlements. Concentrating growth in areas along sustainable transport corridors will actively encourage the use of alternatives to the private car. This option by its concentrated nature may also mean that residents in those areas have easy access to an appropriate range of nearby services, thereby reducing the need to travel and enhancing quality of life. Overall, **a significant positive effect** is therefore expected in relation to this SA objective.

#### Rural option 4

**D.176** As noted above, this option directs growth away from areas protected as Conservation Areas, or areas that are located within one of the county's two National Landscapes. For these protected areas, the option envisages limited development. As previously noted, the option suggests dispersing growth towards 20 settlements. Under this option, the promotion of sustainable travel would be more likely in areas outside National Landscapes and Conservation Areas. However, by limiting development to settlements outside of designated areas, this may rule out some settlements with services and public transport links that would otherwise be considered sustainable. Overall, a **mixed (minor positive and minor negative) effect** is therefore expected in relation to this SA objective.

#### SA objective 10: To improve air quality

#### Rural option 1

**D.177** This option will continue the current strategy and distribute rural growth between the greatest number of settlements. By allowing for a wider and more even distribution of development across the rural areas of Herefordshire this option has the potential to distribute new development amongst a wider range of settlements, leading to greater dispersal of road traffic, and reducing the cumulative impact on air quality in any one location. Conversely, the rural areas of Herefordshire are the most dependent on private car use, and as such the dispersed nature of this option may encourage private car use over longer distances. Increased traffic flows into Hereford and Leominster, through the use of petrol and diesel vehicles, would place further pressure on the Air Quality Management Areas located in both of these settlements. Overall, a **mixed** (**minor positive and minor negative**) **effect** is therefore expected in relation to this SA objective.

#### Rural option 2

**D.178** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. Whilst these larger settlements may have some sustainable transport links, focussing development amongst a smaller number of larger existing settlements has potential to exacerbate existing congestion problems should residents choose to use private vehicles. As noted above, increased traffic flows into Hereford and Leominster, through the use of petrol and diesel vehicles, would place further pressure on the Air Quality Management Areas located in both of these settlements. Conversely, concentrating most development in more urban settlements has the potential to reduce reliance on private vehicles, by giving residents greater choice of differing modes of transport or providing new infrastructure capable of improving air quality. Overall, **a mixed (minor** 

**negative and minor positive) effect** is therefore expected in relation to this SA objective.

#### Rural option 3

**D.179** This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. This option focuses most development near to sustainable transport hubs which should help to facilitate modal shift and reduce the additional traffic generated by new development. Depending on the location of the identified settlements, and the type of public transport services available, there remains a risk that people will opt to use private cars for travel. As noted above, increased traffic flows into Hereford and Leominster, through the use of petrol and diesel vehicles, would place further pressure on the Air Quality Management Areas located in both of these settlements. Overall, a **minor positive effect** is therefore expected in relation to this SA objective.

#### Rural option 4

**D.180** As noted above, this option directs growth away from areas protected as Conservation Areas, or areas that are located within one of the county's two National Landscapes. As previously noted, the option suggests dispersing growth towards 20 settlements. Effects will be somewhat dependent on the settlements identified for growth. Where public transport is unavailable, growth could lead to the greater use of private transport. Depending on where residents and employers need to travel to, these journeys could place further pressure on the Air Quality Management Areas in Hereford and Leominster, particularly if petrol and diesel vehicles are used.

**D.181** For the protected areas, the option envisages limited development. These designated areas are some of the most sensitive in Herefordshire, and by directing development away from them, their preservation is significantly aided – this includes the improvement of air quality in areas that are prone to

harm. The promotion of sustainable travel is also more likely in areas outside National Landscapes and Conservation Areas, and as such the use of private vehicles may be reduced under this option, contributing to an overall improvement in air quality. Overall, a **mixed (minor negative and minor positive) effect** is therefore expected in relation to this SA objective.

# SA objective 11: To conserve and enhance Herefordshire's biodiversity and geodiversity

#### Rural option 1

D.182 This option seeks to maintain the current strategy and proposes a dispersal of growth to 49 settlements. As the baseline review of Appendix C shows, Herefordshire is rich in terms of its biodiversity and geodiversity. Specifically, across the County, there are 77 Sites of Special Scientific Interest (SSSIs), four Special Areas of Conservation (SACs), seven Local Nature Reserves (LNRs), four National Nature Reserves, and 140 Local Geological Sites. The majority of these protected sites fall across the county's rural areas. It is difficult to assess how these resources might be affected given the broadness at which the option is presented. However, directing growth to a large number of settlements would provide greater scope for these protected sites to be avoided. Furthermore, using a greater number of smaller scale projects could help to avoid the building up of significant negative effects in any one location. However, distributing growth in this way means more areas become affected by development. A broader pattern of development could help to extend the potential for delivering biodiversity net gain across the county. However, using schemes of a smaller scale could potentially limit the potential for significant enhancement at any one location. Although the planning system offers protection to protected sites through development management processes, impacts are also dependent on the location, form and design of

individual development projects. Taken together, a **minor negative uncertain effect** is therefore expected in relation to this SA objective.

#### Rural option 2

**D.183** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. In comparison to rural option 1, this option envisages growth being directed to a lower number of settlements across the county. As noted above, Herefordshire is important in both biodiversity and geodiversity terms, with the county's protected sites falling predominantly across rural areas. By focussing development more narrowly, there will be greater opportunities to enhance and extend Herefordshire's natural capital, green infrastructure and nature recovery networks. However the concentrated nature of this option may lead to intensive development that restricts appropriate site selection to mitigate biodiversity impacts. This is a particular concern due to the lack of brownfield land in Herefordshire, particularly in the county's rural areas. However, as with rural option 1, the significance of impact will be dependent on the location, form and design of development and the extent to which the potential for enhancing biodiversity and geodiversity is advanced. Overall, a minor negative uncertain **effect** is therefore expected in relation to this SA objective.

#### Rural option 3

**D.184** This option focuses rural growth at the smallest number of key settlements with strong links to sustainable transport networks and services. As noted above, the option envisages growth towards 15 settlements. These settlements are not specifically named. Concentrating growth in this way provides an opportunity to direct growth to the least sensitive locations around these selected settlements, assuming that these locations exist. If they do not, the cumulative impact of development around these settlements could be significant, particularly given that undeveloped land will predominantly need to be used. However, by focussing development at the larger settlements, there

will be greater opportunities to enhance and extend Herefordshire's natural capital, green infrastructure and nature recovery networks, with greater opportunities for concentrated place making. Specifically, larger scale projects are likely to offer great potential, and benefit from more favourable viability, with respect to delivering enhancement. However, as noted above, effects will be dependent on the location, form and design of individual development projects. Biodiversity and geodiversity is likely to protected and enhanced in those locations where development is not being envisaged. Overall, a **minor uncertain negative effect** is therefore expected in relation to this SA objective.

#### Rural option 4

**D.185** As noted above, this option directs growth away from areas protected as Conservation Areas, or areas that are located within one of the county's two National Landscapes. As a result of this strategy, the option suggests dispersing growth towards 20 settlements. While the excluded areas are important in landscape and conservation terms, they are not necessarily the most sensitive in biodiversity and geodiversity terms. The 20 settlements that are anticipated to receive growth are not named, so it is difficult to assess impact. However, potential effects will be determined on the basis of the assets that surround these settlements, and the size of potential development projects. While large scale projects can pose a threat to assets, their scale also means that opportunities for enhancement become more viable. As with the other options above, effects will ultimately be dependent on the location, form and design of development projects. Overall, a **minor negative**, **yet uncertain**, **effect** is therefore expected in relation to this SA objective.

# SA objective 12: To conserve and enhance the character and distinctiveness of landscapes and townscapes

#### Rural option 1

**D.186** This option will continue the current strategy and distribute rural growth between the greatest number of settlements (49). By distributing development more evenly, this option provides scope to select sites that avoid the most sensitive landscapes and townscapes. As the baseline review of Appendix C explains, Herefordshire has two National Landscapes which help to define the landscape quality of the county. In townscape terms, there are 64 Conservation Areas which help to manage and protect the special architectural and historic interest of the areas covered. While the National Landscapes extend across the county's rural areas, many of the Conservation Areas are also focused on Herefordshire's villages. Indeed, approximately 40 of the Conservation Areas are focused on the county's rural areas. By spreading development more broadly, there is greater potential to avoid these areas of sensitivity. Distributing development in this way could also avoid significant amounts of development at any one location. However, the spread of development also means that a larger number of areas will be affected by development. While impact will be dependent on the location, form and design of individual schemes, a minor **negative effect** is expected in relation to this SA objective.

#### Rural option 2

**D.187** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth (25 settlements). Whilst the settlements are not named, large-scale greenfield

development is likely to be needed given the limited supply of brownfield land. This may place particular pressure on the distinctiveness of the chosen settlements with respect to the quality of their landscape and townscape. As noted above, this risk is high given that the county supports two National Landscapes and 64 Conservation Areas. While impact will be dependent on the location, form and design of individual development schemes, a **minor negative effect** is expected in relation to this SA objective.

#### Rural option 3

**D.188** This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services (15 settlements). As with two previous options, the settlements are not named. However, as with option 2, this option would require large-scale greenfield development on the edge of the selected settlements because there is limited amounts of brownfield development across the county. This may place particular pressure on the distinctiveness of the chosen settlements in regard to their landscape and townscape, particularly given the two National Landscapes and the large number of Conservation Areas that extend across Herefordshire. Again, impact will be dependent on the location, form and design of individual schemes, but overall, a minor **negative effect** is expected in relation to this SA objective.

#### Rural option 4

**D.189** This option seeks to protect the county's Areas of Outstanding Natural Beauty (AONBs, now National Landscapes) and Conservation Areas by directing growth to 20 settlements located away from either designation. For the settlements that fall across these protected areas, only limited development is envisaged. This limited development could still impact on townscape and landscape quality, but would be dependent on the location, form and design of individual schemes. The 20 settlements are not named, but development in these locations will still have an impact on townscape and landscape quality in

some way. While these settlements are not included within a National Landscape, or have a Conservation Area, the quality and sensitivity of Herefordshire's wider countryside is still high. Consequently, taken together, **mixed (minor positive and minor negative) effect** is expected in relation to this SA objective.

# SA objective 13: To conserve and enhance the historic environment including the setting of heritage features

#### Rural option 1

**D.190** This option will continue the current strategy and distribute rural growth between the greatest number of settlements. Although settlements are not named, it is suggested that development would be directed to 49 settlements. Consequently, growth would be shared across the county, without putting undue pressure on any one location. The dispersed level of development could mean that a large number of heritage assets are affected by development. In addition to having 40 rural-focused Conservation Areas, the county's villages are also home to a sizeable number of Herefordshire's 6,000 listed buildings. While some development could be harmful, other projects could help to enhance heritage, for instance if they help to bring historic buildings back into use. Effects are highly dependent on location, and the form and design of the scheme. However, a **potential minor negative effect, with uncertainty,** is therefore expected in relation to this SA objective.

**D.191** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. In comparison with rural option 1, this option envisages development being directed to some 25 settlements although these are not specifically named. Concentrating development in this way will potentially allow for sensitive areas to be protected. However, restricting development may also affect the ability for un-used historic buildings to be brought back into use. For those areas where development is anticipated, housing is likely to be directed to both developed and undeveloped sites. In terms of the former, development could allow for character to be enhanced or restored, or facilitate the re-use of historic buildings. In terms of directing growth to undeveloped land, the scale of growth might mean that this is focused towards a selection of concentrated areas. However, as with the other options, effects will be largely determined by the location, form and design of individual development projects. Overall, a minor **negative effect, with uncertainty,** is therefore expected in relation to this SA objective.

#### Rural option 3

**D.192** This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. Again settlements are not named, but the option envisages directing growth to approximately 15 settlements. Rural settlements which are public transport hubs or have good access to public transport tend to be in more urban areas where heritage assets are also most densely concentrated, and so the concentrated nature of this option may lead to intensive development that restricts appropriate site selection to mitigate impacts to the historic environment. Similar to rural option 2, there could be greater opportunities to conserve and, where possible, enhance heritage assets through place making, however this will be dependent on the design and layout of specific proposals. Overall, a **potential minor negative effect, with uncertainty,** is therefore expected in relation to this SA objective.

**D.193** As noted above, this option seeks to protect the county's Areas of Outstanding Natural Beauty (AONBs, now National Landscapes) and Conservation Areas by directing growth to 20 settlements located away from either designation. For the settlements that fall across these protected areas, only limited development is envisaged. This limited development could still impact on listed buildings and heritage features, but this would be dependent on the location, form and design of individual schemes. However, as Conservation Areas tend to have the highest concentration of sensitive historic assets, this option will actively direct development away from those areas most at risk. The 20 settlements are not named, but development in these locations could still have an impact, depending on the positioning of listed buildings with respect to development sites. Overall, a **potential but uncertain minor positive effect** is therefore expected in relation to this SA objective.

# SA objective 14A: To manage and reduce flood risk from all sources.

#### Rural option 1

**D.194** As noted above, this option maintains the current strategy of the development plan and envisages distributing development to 49 un-named settlements. Given the wide distribution of development that this option would involve, there is potential to steer growth away from those areas that are at the highest risk of flooding. Similarly, distributing growth in such a way may also lead to development projects of a smaller scale. This would help to save the amount of land being developed at any one location, while limited amounts of development would also control the amount of surface water being generated. However, overall impacts will be dependent on the location, form and design of individual projects. Overall, a **potential but uncertain minor negative effect** is therefore expected in relation to this SA objective.

**D.195** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. In comparison to rural option 1, this option envisages directing growth to 25 unnamed settlements. Concentrating growth in this way would help to offer greater protection to those areas at risk of flooding. It assumed that the selected settlements are those with the lowest levels of flood risk. If they are not, then there is a risk that the more concentrated nature of development that this option would involve could increase flood risk. However, concentrating development could lead to larger scale projects that could assist with the implementation of SuDs into development. Overall, a potential but **uncertain minor negative effect** is therefore expected in relation to this SA objective. The effects of this option on flood risk will largely depend on its specific location however, and as such this effect is **uncertain**.

#### Rural option 3

**D.196** This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. In comparison to the previous option, this option envisages growth being directed to 15 settlements. The points raised above would continue to apply, and could potentially be amplified. In particular, flood risk would be increased if the 15 selected settlements are at risk of flooding. However, the scale of projects is likely to be higher than that envisaged under rural option 1, meaning that the implementation of SuDs becomes more feasible. While overall effects will be dependent on the location, form and design of individual projects, a potential but **uncertain minor negative effect** is therefore expected in relation to this SA objective.

**D.197** As noted above, this option seeks to protect the county's Areas of Outstanding Natural Beauty (AONBs, now National Landscapes) and Conservation Areas, with settlements falling within these areas being envisaged limited development. While these protected areas vary with respect to the flood risk they possess, the low levels of growth being envisaged should help to ensure that flood risk is not accentuated. The 20 settlements are not named so it is difficult to appreciate the level of risk that could be generated by directing growth to these locations. The same points as noted above would apply to these identified places. If existing risk is high, then growth of this scale would be likely to extend risk. However, directing growth to locations not affected by flooding would help to offer greater protection to those locations that are. Similarly, as noted above, a concentrated approach to development could lead to projects of a larger scale that could make the incorporation of Sustainable Urban Drainage more feasible. Located away from either designation. For the settlements that fall across these protected areas, only limited development is envisaged. However, as with the other options, effects will be dependent on the location, form and design of individual development projects. Overall, a potential but uncertain minor negative effect is therefore expected in relation to this SA objective.

# SA objective 14b: To protect the quality and quantity of water resources

#### All options

**D.198** The baseline review of Appendix C identifies significant concerns with respect to water quality across Herefordshire. These issues are county wide. While the provision of additional housing across Herefordshire will place further pressure on water supply, there are areas of the county that are specifically protected for the water resources that they support. Although each of the

options involve different strategies for locating development, with each option involving a different number of settlements that are expected to receive growth, there is a lack of specificity concerning the settlements involved in reach option. It is therefore difficult to assess potential effects. Consequently, for each of the options, a **minor negative effect** is expected in relation to this SA objective.

# SA objective 15: To support efficient use of resources, including land and minerals

#### Rural option 1

**D.199** This option continues the current strategy and distributes rural growth between the greatest number of settlements (49). As a result, there is greater potential to avoid some key constraints, such as the best and most versatile agricultural land, and areas for the safeguarding of minerals. The option prioritises the use of previously developed land, although availability will vary settlement. Given the spread, the size of individual development sites could be lower than the options below where a more concentrated approach to development is being envisaged. The emphasis towards the use of smaller sites could facilitate the use of previously developed land. Where peripheral development is needed, sites will involve the loss of undeveloped land. They might also involve the loss of the best and most versatile agricultural land, or areas that are important for the safeguarding of minerals. The dispersed nature of this option does create the opportunity to mitigate potential impacts, although the interventions proposed maybe be limited where site size is small. While overall impacts will be dependent on the location, form and design of individual projects, a **minor negative effect** is expected in relation to this SA objective.

**D.200** This option would see a higher proportion of growth in and around a smaller number of larger settlements considered suitable for growth. As noted above, the settlements are not named but growth is expected to be directed to approximately 25 settlements. These larger settlements could potentially have more previously developed sites than smaller settlements, but opportunities will vary by settlement. For those settlements with limited capacity, the release of previously un-developed land is likely to be needed This could give rise to further environmental issues, including the potential loss of the best and most versatile agricultural land. As with the options above, impacts will be dependent on the location, form and design of individual projects. However, taken together, a **minor negative effect** is expected in relation to this SA objective.

#### Rural option 3

D.201 This option divides rural growth across the smallest number of key settlements with strong links to sustainable transport networks and services. Effects will be similar to the option above, but will be amplified given that the scale of growth is likely to be higher at the settlements contributing to this option. Again, larger scale development could facilitate the re-use of previously developed land, but opportunities will vary by settlement. Where there is a lack of supply, growth will need to be accommodated in peripheral sites and involve the use of previously undeveloped land. As above, development of this nature could also lead to the loss of the best and most versatile agricultural land. The settlements excluded from this option would benefit from greater protection and could seek to avoid the loss of previously undeveloped land. However, the option may present fewer options to facilitate the re-use of previously developed land. As with the other options, impacts will be dependent on the location, form and design of individual projects. As with the option above, a minor negative effect is therefore expected in relation to this SA objective.

**D.202** Under this option, settlements located within a National Landscape, and those with a Conservation Area, are identified for limited growth. Consequently, both developed and undeveloped land will be largely protected. This will generate environmental benefit, for instance in saving the best and most versatile agricultural land, but it will provide fewer opportunities for the use of previously developed land. As noted above, this option seeks to protect the county's National Landscapes and Conservation Areas, with settlements falling within these areas being envisaged limited development. The option envisages growth being directed to approximately 20 settlements, although these are not named. Undeveloped land is likely to be used if there are inadequate amounts of previously developed land. Effects will be dependent on the location, form and design of individual development projects, but overall, **a minor negative effect** is identified in relation to this SA objective.

#### **Appendix E**

Site Appraisal Criteria

SA objective 1: To mitigate climate change by actively reducing greenhouse gas emissions, and to support climate adaptation

Residential, mixed-use and employment site options

■ **Negligible (0):** The sites are recorded as having negligible effects on this objective as effects will depend largely on the detailed proposals for sites and their design, rather than their location.

SA objective 2: To provide a suitable supply of housing including an appropriate mix of types and tenures to reflect demand and need

Residential and mixed-use site options

■ **Significant positive (++)**: The site would provide more than 100 dwellings.

■ Minor positive (+): The site would provide fewer than 100 dwellings.

#### Employment site options

■ **Negligible (0):** The location of employment sites is not considered likely to affect this objective; therefore the effect for all employment site options is defined as being negligible.

# SA objective 3: To support community cohesion and safety

- Minor positive (+): The site is located within a Lower Super Output Area (LSOA) which is in the 40% most deprived nationally.
- **Negligible (0):** The site is not located within a Lower Super Output Area (LSOA) which is in the 40% most deprived nationally.

# SA objective 4: To support the vitality of Herefordshire's town and retail centres

## Residential, mixed-use and employment site options

- Minor positive (+): The site is located within either Hereford, Bromyard, Kington, Ledbury, Leominster or Ross on Wye.
- **Negligible (0):** The site not located within either Hereford, Bromyard, Kington, Ledbury, Leominster or Ross on Wye.

# SA objective 5: To provide access to services, facilities and education

#### A: Distance to a defined built up area

#### Residential and mixed-use site options

- **Significant positive (++)**: The site is located within 720m of the built-up area of Hereford.
- Minor positive (+): The site is within 720m of the built-up area of either Bromyard, Kington, Ledbury, Leominster or Ross on Wye.
- **Negligible (0):** The site is within 720m of the built-up area of a village.
- Minor negative (-): The site is not located within 720m of the built-up areas of Hereford, Bromyard, Kington, Ledbury, Leominster or Ross on Wye or a village.

#### **Employment site options**

- **Significant positive (++):** The site is within 720m of the built-up area of Hereford.
- Minor positive (+): The site is within 720m of the built-up area of Bromyard, Kington, Ledbury, Leominster or Ross on Wye.
- **Negligible (0):** The site is within 720m of the built-up area of a village.
- Minor negative (-): The site is not within 720m of the built-up areas of Hereford, Bromyard, Kington, Ledbury, Leominster, Ross on Wye or a village.

#### B: Distance to educational facilities

#### Residential and mixed-use site options

- Uncertain significant positive (++?): The site is within 900m of a secondary school and 450m of a primary school.
- Uncertain minor positive (+?): The site is either within 900m of a secondary school or within 450m of a primary school (but not both).
- Uncertain minor negative (-?): The site is more than 900m from a secondary school and 450m from a primary school.

# SA objective 6: To improve the physical and mental health and wellbeing of residents and reduce health inequalities

#### Residential and mixed-use site options

- **Significant positive (++):** The site is within 720m of at least one healthcare facility and an area of open space/sports facility.
- Minor positive (+): The site is within 720m of either at least one healthcare facility or an area of open space/sports facility (but not both).
- **Minor negative (-):** The site is not within 720m of either a healthcare facility or an area of open space/sports facility.
- Potential significant negative (--?): The site contains an area of open space or an outdoor sports facility which may be lost as a result of development.

#### **Employment site options**

- Minor positive (+): The site is within 720m of an area of open space/sports facility or cycle path.
- **Minor negative (-):** The site is not within 720m of an area of open space/sports facility or cycle path.

# SA objective 7: To support the sustainable growth of the economy

#### Residential site options

■ **Negligible (0):** The location of residential sites within Herefordshire will not directly influence sustainable economic growth.

#### Employment and mixed-use site options

- **Significant positive (++):** The site is more than 5ha in size.
- Minor positive (+): The site is less than 5ha in size.

# SA objective 8: To deliver and maintain sustainable and diverse employment opportunities and reduce inequality and poverty

#### Residential site options

■ **Negligible (0):** The location of residential sites within Herefordshire will not directly influence the delivery of employment opportunities.

#### Employment and mixed-use site options

■ **Significant positive (++):** The site is within 1.8km of a train station, or is within 450m of both a bus stop and a cycle path.

■ Minor positive (+): The site is not within 1.8km of a train station, or within 450m of both a bus stop and a cycle path.

# SA objective 9: To reduce the need to travel and encourage sustainable and active alternatives to the private car

a) Distance to rail station / bus stop / cycle route

## Residential, mixed-use and employment site options

- **Significant positive (++):** The site is within 1.8km of a railway station, or is within 450m of both a bus stop and a cycle path.
- Minor positive (+): The site is more than 1.8km from a railway station but is within 450m of a bus stop or cycle path (but not both).
- Minor negative (-): The site is more than 1.8km from a railway station and more than 450m from a bus stop and cycle route.

#### b) Location of site

# Residential, mixed-use and employment site options

■ **Significant positive (++):** The site is located within Hereford.

- **Minor positive (+):** The site is located within Bromyard, Kington, Ledbury, Leominster or Ross on Wye.
- **Negligible (0):** The site is located at a village.
- **Minor negative (-):**The site is not located within Hereford, Bromyard, Kington, Ledbury, Leominster, Ross on Wye or a village.

#### SA objective 10: To improve air quality

- **Negligible (0):** The site is more than 500m from an Air Quality Management Area.
- Minor negative (-): The site is within 500m of an Air Quality Management Area.
- **Significant negative (--):** The site is located within an Air Quality Management Area.

# SA objective 11: To conserve and enhance Herefordshire's biodiversity and geodiversity

- **Negligible uncertain (0?):** The site is rated as 'green' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to biodiversity and geodiversity.
- Minor negative uncertain (-?): The site is rated as 'amber' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to biodiversity and geodiversity.
- Significant negative uncertain (--?): The site is rated as 'red' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to biodiversity and geodiversity.
- Uncertain (?): The site has not been assessed in Herefordshire Council's Housing and Employment Land Availability Assessment.

# SA objective 12: To conserve and enhance the character and distinctiveness of landscapes and townscapes

# Residential, mixed-use and employment site options

- Negligible uncertain (0?): The site is rated as 'green' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to conserving and enhancing the character and distinctiveness of landscapes and townscapes.
- Minor negative uncertain (-?): The site is rated as 'amber' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to conserving and enhancing the character and distinctiveness of landscapes and townscapes.
- Significant negative uncertain (--?): The site is rated as 'red' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to conserving and enhancing the character and distinctiveness of landscapes and townscapes.
- Uncertain (?): The site has not been assessed in Herefordshire Council's Housing and Employment Land Availability Assessment.

# SA objective 13: To conserve and enhance the historic environment

# including the setting of heritage features

- **Negligible uncertain (0?):** The site is rated as 'green' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to conserving and enhancing the historic environment, including the setting of historic features.
- Minor negative uncertain (-?): The site is rated as 'amber' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to conserving and enhancing the historic environment, including the setting of historic features.
- Significant negative uncertain (--?): The site is rated as 'red' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to conserving and enhancing the historic environment, including the setting of historic features.
- Uncertain (?): The site has not been assessed in Herefordshire Council's Housing and Employment Land Availability Assessment.

# SA objective 14A: To manage and reduce flood risk from all sources

- **Negligible uncertain (0?):** The site is rated as 'green' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to flood risk due to the site falling within Flood Zone 1.
- Minor negative uncertain (-?): The site is rated as 'amber' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to flood risk due to the site being partially affected by Flood Zones 2 or 3. However, a reasonable developable area is left in Flood Zone 1.
- Significant negative uncertain (--?): The site is rated as 'red' in Herefordshire Council's Housing and Employment Land Availability Assessment with respect to flood risk due to the site being entirely, or almost entirely, within Flood Zone 2 and / or Flood Zone 3.
- Uncertain (?): The site has not been assessed in Herefordshire Council's Housing and Employment Land Availability Assessment.

# SA objective 14b: To protect the quality and quantity of water resources

## Residential, mixed-use and employment site options

- **Negligible uncertain (0?):** The site does not contain a water body or watercourse and does not fall within a Source Protection Zone.
- Minor negative uncertain (-?): The site does not contain a water body or watercourse but falls partially or entirely within Source Protection Zones 2 and 3.
- Significant negative uncertain (--?): The site contains a water body or water course or falls within, or partially within, Source Protection Zone 1.

# SA objective 15: To support efficient use of resources, including land and minerals

a) Greenfield / brownfield categorisation

- Minor positive (+): The site is located on brownfield land.
- Minor negative (-): The site is located on greenfield land.

### b) Relationship with Mineral Safeguarding Areas

- Negligible (0): The site does not fall within a Minerals Safeguarding Area.
- **Significant negative (--):** The site falls within a Minerals Safeguarding Area.

#### c) Agricultural status of land

- Minor negative (-): The site does not contain any Grade 1 or 2 agricultural land. The site either has no Grade 3 land, or less than 25% of the site is categorised as Grade 3 land.
- **Significant negative (--):** The site contains a significant proportion (more than 25%) of Grade 1 and/or 2 agricultural land.
- Significant negative (--?) uncertain: The site contains a less than significant proportion (<25%) of Grade 1 and/or 2 agricultural land or contains a significant proportion (>=25%) of Grade 3 agricultural land.

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