



Herefordshire Local Plan 2021- 2041: Draft (Regulation 18) Consultation Sustainability Appraisal Report

Herefordshire Council

Final report

Prepared by LUC

March 2024

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Contents

Chapter 1 **9**

Introduction

Context for the Herefordshire Local Plan	9
Sustainability Appraisal and Strategic Environmental Assessment	14
Meeting the Requirements of the SEA Regulations	16
Structure of the SA Report	22

Chapter 2 **24**

Methodology

SA Stage A: Scoping	26
SA Stage B: Developing and refining options and assessing effects	29
SA Stage C: Preparing the Sustainability Appraisal Report	33
SA Stage D: Consultation on the Herefordshire Local Plan and the SA Report	34
SA Stage E: Monitoring Implementation of the Local Plan	34
Appraisal Methodology	34
Difficulties and Data Limitations	36

Chapter 3 **38**

Sustainability Context for Development in Herefordshire

Relationship with Other Relevant Plans or Programmes	38
Policy Context	40
International	40
National	41
Sub National	63
Policy uncertainties	65
Baseline Information	67

Contents

Key Sustainability Issues	69
The SA framework	73
Chapter 4	87
Sustainability Appraisal Findings for the Strategic Options	
Strategic spatial options	87
Conclusions from the appraisal of the county options	107
Overall conclusions	115
Chapter 5	118
Sustainability Appraisal Findings for Site Options	
Site appraisal methodology	118
Sites assessed	119
Limitations	119
SA findings	121
Conclusions	138
Chapter 6	161
Sustainability Appraisal Findings for the Draft (Regulation 18) Local Plan	
Tackling Climate Change	173
Protecting and enhancing the natural, built and historic environment: A high quality Herefordshire	177
Accommodating Future Growth	183
Creating Balanced Communities	193
Creating Healthy and Sustainable Communities	197
Promoting a prosperous economy	205
Rural Areas	284

Contents

Chapter 7 **298** Cumulative Effects

SA Objective 1: To mitigate climate change by actively reducing greenhouse gas emissions, and to support climate adaptation	298
SA Objective 2: To provide a suitable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	300
SA Objective 3: To support community cohesion and safety.	301
SA Objective 4: Support the vitality of Herefordshire's town and retail centres.	302
SA objective 5: To provide access to services, facilities and education.	303
SA Objective 6: Improve the physical and mental health and wellbeing of residents and reduce health inequalities.	305
SA Objective 7: To support the sustainable growth of the economy.	306
SA Objective 8: To deliver and maintain sustainable and diverse employment opportunities and reduce inequality and poverty.	308
SA Objective 9: To reduce the need to travel and encourage sustainable and active alternatives to the private car.	309
SA Objective 10: To improve air quality.	311
SA Objective 11: To conserve and enhance Herefordshire's biodiversity and geodiversity.	312
SA Objective 12: To conserve and enhance the character and distinctiveness of landscapes and townscapes.	315
SA Objective 13: To conserve and enhance the historic environment including the setting of heritage features.	317
SA Objective 14A: To manage and reduce flood risk from all sources.	318
SA Objective 14B: To protect the quality and quantity of water resources.	320
SA Objective 15: To support efficient use of resources, including land and minerals.	321
Spatial effects of the Draft Herefordshire (Regulation 18) Local Plan	322

Chapter 8 **330** Monitoring

Proposed SA Monitoring Framework for the Herefordshire Local Plan	331
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Contents

Chapter 9	340
Conclusions and Next Steps	
Next Steps	341
Appendix A	342
Consultation Responses Received in Relation to the SA Scoping Report (March 2023)	
Appendix B	356
Review of Plans, Policies and Programmes	
National plans and programmes (beyond the NPPF) of most relevance for the Local Plan	356
Surrounding Development Plans	381
Appendix C	384
Baseline Information for Herefordshire	
Crime and Safety	405
Economy	405
Transport	413
Appendix D :	464
Sustainability Appraisal of Spatial Options	
Appendix E	552
Site Appraisal Criteria	

References

566

Table of Tables

Table 2.1: Key to symbols and colour coding used in the SA	35
Table 4.1: Summary of SA findings for the strategic options	89
Table 5.1: SA findings for the reasonable site options: Mixed-use	144
Table 5.2: SA findings for the reasonable site options: Residential	147
Table 5.3: SA findings for the reasonable site options: Employment	159
Table 6.15: Sustainability appraisal of the Rural Areas Policies	286
Table 7.1: Sustainability Appraisal of Strategic Policies	325
Table 7.2: Sustainability Appraisal of Place-Based Policies (HERE1 to LEDB5)	326
Table 7.3: Sustainability Appraisal of Place-Based Policies (LEOM1 to RURA5)	328
Table C.1: Housing Completions in Herefordshire compared to Core Strategy Targets (2022)	388
Table C.2: Affordable Housing Completions in Herefordshire (2022)	389
Table C.3: Employee Jobs in Herefordshire in relation to regional and national averages (2021)	407
Table C.4: Per Capita CO2 Emissions compared to neighbouring authorities	436
Table C.5: Energy consumption in Herefordshire per Sector (2005-2018)	437
Table C.6: Sand and Gravel Quarries in Herefordshire	448
Table C.7: Limestone Quarries in Herefordshire	448
Table C.8: Sandstone Quarries in Herefordshire	448
Table C.9: Coal Quarries in Herefordshire	449
Table C.10: Peak river flow allowances for the River Severn Basin	455

Table of Figures

Figure 1.1: Location of Herefordshire	11
Figure 2.1: Corresponding stages in plan-making and SA	25
Figure 3.1: Local Plan Relationship with other Relevant Plans and Programmes	39
Figure C.1: Open spaces/recreation facilities	397

Contents

Figure C.2: Indices of Multiple Deprivation	404
Figure C.3: Sustainable transport network	415
Figure C.4: Flows of commuters in and out Herefordshire	417
Figure C.5: Designated biodiversity assets	422
Figure C.6: Designated heritage assets	425
Figure C.7: Character Areas as they relate to Herefordshire	428
Figure C.8: Per Capita CO2 Emissions compared to neighbouring authorities	432
Figure C.9: Air Quality Management Areas in Herefordshire	439
Figure C.10: Minerals Safeguarding Areas in Herefordshire	447
Figure C.11: Agricultural land classification in Herefordshire	451
Figure C.12: Watercourses in Herefordshire	454
Figure C.13: Flood risk in Herefordshire	461

Chapter 1

Introduction

1.1 This Sustainability Appraisal Report has been prepared by LUC on behalf of Herefordshire Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the review and update of the Herefordshire Local Plan ('the Local Plan'). This report relates to the Draft (Regulation 18) Local Plan (March 2024) and it should be read in conjunction with that document.

Context for the Herefordshire Local Plan

1.2 Herefordshire is a large, predominantly rural, landlocked county situated in the southwestern corner of the West Midlands region, on the border with Wales. Herefordshire shares boundaries with three English local authorities (the unitary authority of Shropshire Council, together with Malvern Hills and Forest of Dean District Councils within Worcestershire and Gloucestershire). Herefordshire also shares boundaries with three Welsh local authorities (Monmouthshire County Council, Powys County Council, and Bannau Brycheiniog (formerly known as the Bercon Beacons) National Park Authority). Figure 1.1 at the end of this section shows the location of Herefordshire in context.

1.3 The county area covers 217,973 hectares and has a population of 187,000 residents [See reference 1]. High hill ranges, including the Malvern Hills and Black Mountains, encircle much of the county at its perimeter. Away from these areas, the landscape is one of gentle rolling hills, dissected by wide river valleys with lower-lying plains in the centre. River crossing points have provided a natural focus for the development of many settlements, with others dispersed across Herefordshire's rich and diverse landscape.

1.4 The meandering river valley landscape which is the county's principal geographical feature is that of the River Wye. This enters Herefordshire near

the Welsh town of Hay-on-Wye, flowing east to Hereford before leaving the county at the Wye Gorge, downstream of Ross-on-Wye. Herefordshire contains parts of two protected landscapes of national importance: the Wye Valley and Malvern Hills National Landscapes (formerly known as Areas of Outstanding Natural Beauty). Bannau Brycheiniog National Park is located beyond the county's western boundary.

1.5 Hereford City, near the centre of the county, is the main centre for administration, health, education and leisure facilities, shopping and employment. The five market towns of Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye surround the city of Hereford. Outside these urban areas, villages and smaller settlements, farms and other isolated properties characterise much of Herefordshire.

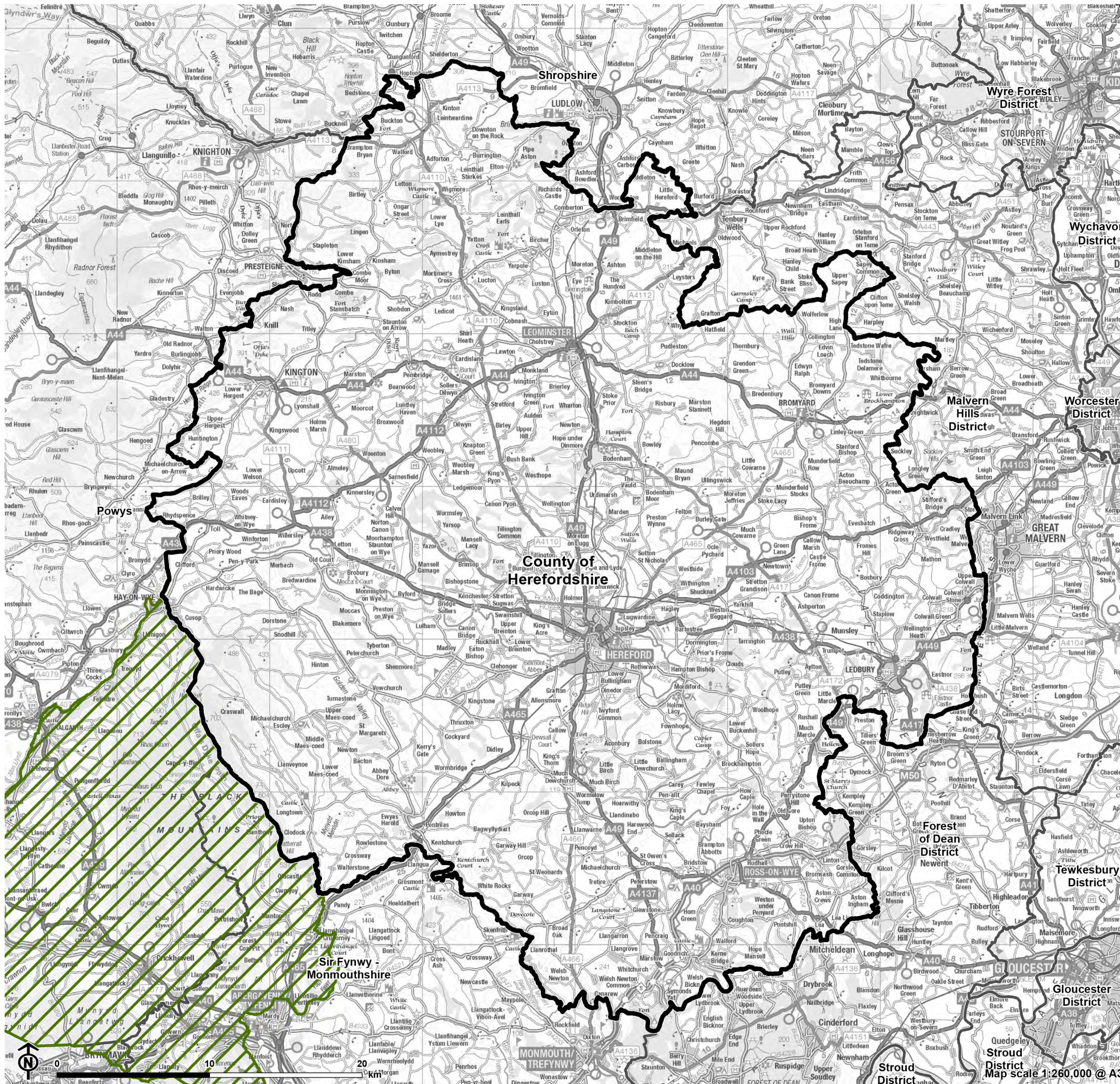





Figure 1.1: Location of Herefordshire

-  County of Herefordshire
-  Neighbouring authority boundary
-  Brecon Beacons / Bannau Brycheiniog National Park

The New Local Plan

1.6 Herefordshire Council adopted its current Local Plan (Core Strategy 2011-2031) in October 2015. The review of the plan commenced in 2020, in line with the Government's expectation that local planning authorities consider every five years whether their Local Plans need to be reviewed. The new Local Plan will again cover the whole administrative area of Herefordshire and will cover the period 2021 - 2041.

1.7 It will set out the spatial policies, guidance, land use designations and site allocations against which all planning applications and development proposals across Herefordshire will be assessed. The Local Plan will set the formal legal framework for sustainable development patterns and will lay the foundations for enabling regeneration and economic growth, while protecting the most valuable built and natural environmental assets.

1.8 The new Local Plan presents a vision for Herefordshire and a set of supporting objectives, as well as setting out strategic and placed-based policies.

1.9 A number of consultations have been carried out to date in relation to the emerging Local Plan as follows:

- Consultation on an initial set of **Spatial Options** for Herefordshire was undertaken between January and February 2022. Questions sought to explore the level of agreement over the vision and supporting objectives that had been presented, and to identify preferences towards where future growth should be directed.
- Consultation on potential **Policy Options** was undertaken between April and May 2022. The consultation sought views on the type of policies to be included in the Local Plan review, with the recognition that these policies would ultimately be used to help determine planning applications across the county.

- Consultation on a set of **Place Shaping Options** was undertaken between June to July 2022. The consultation set out possible options and/or potential strategic development areas for the county. The first part of the consultation questionnaire considered the suitability of developing different land options around Hereford (eight areas), Bromyard (two areas), Kington (three areas), Ledbury (three areas), and Ross-on-Wye (five areas). The second half of the questionnaire focused on the county's rural areas and explored attitudes concerning the distribution of housing, including for settlements within the county's National Landscapes and in those settlements with Conservation Areas. Eight different options were presented through the consultation material.

1.10 The Draft Herefordshire Local Plan, which this SA Report relates to, is being published for Regulation 18 consultation between March and May 2024. The consultation document sets out an overall vision for Herefordshire to 2041 and beyond, accompanied by 27 strategic objectives that extend across environmental, community and economic domains. These objectives set the context for 50 policies that extend through the document. The first group of policies are **strategic** and **thematic** and these seek to:

- Tackle **climate change** (Policy CC1).
- Protect and enhance the **quality of the environment** (Policies EE1 to EE3).
- Accommodate **growth** (Policies AG1 to AG6).
- Create **balanced communities** (Policies BC1 to BC3).
- Create **healthy and sustainable communities** (Policies HSC1 to HSC4).
- Promote a **prosperous economy** (Policies PE1 to PE5).

1.11 The Draft (Regulation 18) Herefordshire Local Plan then sets out policies that are linked to specific areas in the county. These **place-shaping** policies relate to:

- **Hereford** (Policies HERE1 to HERE9).
- **Bromyard** (Policies BROM1 to BROM3).

- **Kington** (Policies KING1 and KING2).
- **Ledbury** (Policies LEDB1 to LEDB4).
- **Leominster** (Policies LEOM1 to LEOM3).
- **Ross-on-Wye** (Policies ROSS1 to ROSS2).
- The county's **rural areas** (Policies RURA1 to RURA5).

Sustainability Appraisal and Strategic Environmental Assessment

1.12 Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004 and is mandatory for Development Plan Documents. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. For these documents it is also necessary to conduct an environmental assessment in accordance with the Strategic Environmental Assessment (SEA) Regulations (as amended) **[See reference 2]**. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA is to provide for a high level protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans.

1.13 The SEA Regulations remain in force post-Brexit and it is a legal requirement for the Herefordshire Local Plan to be subject to SA and SEA throughout its preparation.

1.14 The Levelling Up and Regeneration Act (2023) received royal assent in October 2023 and sets out the direction for planning, making provisions to support the levelling-up agenda. As part of this, it seeks to streamline the planning process, including through a reform of existing EU-generated systems

of SA/SEA, Habitats Regulations Assessment (HRA) and Environmental Impact Assessment (EIA), which will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'. However, secondary legislation is required to introduce the new regime and at present the requirement to undertake SEA remains in force.

1.15 SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. SEA considers only the environmental effects of a plan, while SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. SA should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, so a separate SEA should not be required. An approach which satisfies the requirements for both SA and SEA is advocated in the Government's Planning Practice Guidance (PPG) [See [reference 3](#)]. Practitioners can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken for the Herefordshire Local Plan. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.16 The SA process comprises a number of stages, as shown below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the SA Report.

Stage D: Consulting on the plan and the SA Report.

Stage E: Monitoring the significant effects of implementing the plan.

Habitats Regulations Assessment

1.17 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010 and again in 2012 and 2017 [See reference 4]. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. The separate HRA for the Draft (Regulation 18) Herefordshire Local Plan has been taken into account in this SA Report where relevant.

Meeting the Requirements of the SEA Regulations

1.18 The SEA Regulations [See reference 5] require the responsible authority to prepare, or secure the preparation of, an 'environmental report', which in this case, comprises this SA report. This report is required to identify, describe and evaluate the likely significant effects on the environment of the following (requirements are outlined in the green shaded text boxes; where each requirement is met is provided by the bullets that below):

Environmental Report

Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible Authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2)

and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:

- Implementing the plan or programme; and
- Reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (Regulation 12(1) and (2) and Schedule 2). An outline of the contents and main objectives of the plan or programme, and its relationship with other relevant plans and programmes.
- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- The environmental characteristics of areas likely to be significantly affected.
- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild bird and the Habitats Directive.
- The environment protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

1.19 Covered in Chapters 1 and 3, plus Appendices B and C.

The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary cumulative and synergistic effects, on issues such as:

- Biodiversity;
- Population;

- Human health;
- Fauna;
- Flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage, including architectural and archaeological heritage;
- Landscape; and
- The interrelationship between the issues referred to in sub-paragraphs (a) to (l).

1.20 Covered in Chapters 4, 5, 6 and 7 plus Appendix D and Annex 1.

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

1.21 Covered in Chapters 4, 5, 6 and 7 plus Appendix D and Annex 1.

An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

1.22 Covered in Chapter 2.

A description of the measures envisaged concerning monitoring in accordance with Regulation 17.

1.23 Covered in Chapter 8.

A non-technical summary of the information is provided under paragraphs 1 to 9.

1.24 A separate non-technical summary document will be published alongside the Draft (Regulation 19) Herefordshire Local Plan.

The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:

- Current knowledge and methods of assessment;
 - The contents and level of detail in the plan or programme;
 - The stage of the plan or programme in the decision-making process; and
 - The extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment (Regulation 12(3)).
- The Environmental Report at each stage of the SA will adhere to this requirement.

Consultation

When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies (Regulation 12(5)).

- The SA Scoping Report was produced by LUC on behalf of Herefordshire Council and consulted on between March and April 2023. The responses received are summarised in Appendix A.

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Regulation 13).

- Consultation on the Draft (Regulation 18) Herefordshire Local Plan is taking place between March and May 2024. The consultation document is accompanied by this SA Report.

Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Regulation 14).

- The Herefordshire Local Plan is not expected to have significant effects on other EU Member States.

Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)

Provision of information on the decision

When the plan or programme is adopted, the public and any countries consulted under Regulation 14 must be informed and the following made available to those so informed:

- The plan or programme as adopted;
 - A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
 - The measures decided concerning monitoring.
- To be addressed after the Herefordshire Local Plan is adopted.

Monitoring

The responsible Authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (Regulation 17(1)).

- Chapter 8 proposes indicators for monitoring the likely significant effects of the Herefordshire Local Plan.

Structure of the SA Report

1.25 This chapter has described the background to the production of the Herefordshire Local Plan and the requirement to undertake SA. The remainder of this SA Report is structured into the following sections:

- **Chapter 2:** Describes the approach that is being taken to the Sustainability Appraisal of the Herefordshire Local Plan.
- **Chapter 3:** Describes the relationship between the Herefordshire Local Plan and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of Herefordshire, and identifies the key sustainability issues the county faces. Presents the Sustainability Appraisal framework, complete with objectives and sub-questions.
- **Chapter 4:** Appraises the spatial options considered for inclusion in the Draft (Regulation 18) Herefordshire Local Plan against the objectives and sub-questions of the SA framework.
- **Chapter 5:** Appraises the reasonable alternative site options that have been considered for inclusion in the Draft (Regulation 18) Herefordshire Local Plan against specific criteria that are included in Appendix E.
- **Chapter 6:** Appraises the strategic, thematic and place-based policies included in the Draft (Regulation 18) Herefordshire Local Plan against the objectives and sub-questions of the SA framework.
- **Chapter 7:** Provides an assessment of the likely cumulative effects arising from the Draft (Regulation 18) Herefordshire Local Plan.
- **Chapter 8:** Suggests indicators for monitoring the likely sustainability effects of the Herefordshire Local Plan once adopted.
- **Chapter 9:** Presents the conclusions of the SA and describes the next steps in the production of the Herefordshire Local Plan and the SA.

- **Appendix A:** Presents a record of the consultation comments received in relation to the SA Scoping Report (March 2023) and explains how they have been addressed in this report.
- **Appendix B:** Presents a review of international, national and local plans, policies and programmes of relevance to the SA.
- **Appendix C:** Outlines baseline information for Herefordshire.
- **Appendix D:** Provides the detailed appraisal of spatial options, as summarised in Chapter 4.
- **Appendix E:** Presents the criteria that have been used to assess the sustainability of reasonable alternative site options.
- **Annex 1:** Contains the appraisal proformas for the site options.

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Herefordshire Local Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance (PPG) **[See reference 6]**. This calls for SA to be carried out as an integral part of the plan-making process. Figure 2.1 overleaf sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Figure 2.1: Corresponding stages in plan-making and SA



2.2 The sections below describe the approach that has been taken to the SA of the Herefordshire Local Plan to date and provide information on the subsequent stages of the process.

SA Stage A: Scoping

2.3 The Scoping stage of SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues and using these to inform the SA framework as follows.

Review Other Relevant Policies, Plans and Programmes to Establish Policy Context

2.4 A Local Plan is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental Report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support the attainment of sustainability objectives that have been established at the international, national, and regional/sub-regional levels.

2.5 A review was therefore undertaken of other policies, plans, and programmes at the international, national, regional and sub-regional levels that were considered to be relevant to the scope of the Herefordshire Local Plan. This review was originally presented in the SA Scoping Report [\[See reference 7\]](#) and has been updated as part of the preparation of this current SA report. The updated review of Plans, Policies and Programmes can be found in Appendix B and is summarised in Chapter 3.

Collect Baseline Information to Establish Sustainability Context

2.6 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation.

2.7 Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the plan to understand the likely future sustainability conditions in the absence of the plan.

2.8 The SEA Regulations require the Environmental Report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, allows the SA to report on the likely cumulative effects of the plan, which is another requirement of the SEA Regulations.

2.9 The SEA Regulations require an assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to these SEA topics as well as additional sustainability topics covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA and SEA processes. As part of the preparation of this current SA Report, the baseline information for Herefordshire which was originally presented in the SA Scoping Report has been reviewed and updated where possible. The updated baseline information is presented in Appendix C and is summarised in Chapter 3.

Identify Key Sustainability Issues

2.10 The review of baseline information allows for the identification of existing sustainability issues, including problems as required by the SEA Regulations.

2.11 Key sustainability issues facing Herefordshire and an analysis of their likely evolution without the new Herefordshire Local Plan are detailed in Chapter 3. Key sustainability issues for Herefordshire were originally identified in the SA Scoping Report (March 2023) and a small number of amendments have been made to these in response to consultation comments received.

Develop the SA Framework

2.12 The relevant sustainability objectives identified through the review of other policies, plans, and programmes, together with the key sustainability issues facing Herefordshire identified by the collection and review of baseline information, helped to inform the development of a set of sustainability objectives (the 'SA framework') against which the effects of the Herefordshire Local Plan would be assessed.

2.13 Development of the SA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The SA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of options and policies within a plan.

2.14 The SA framework for the Herefordshire Local Plan is presented in Chapter 3. The SA objectives reflect the analysis of international, national and local policy objectives, the baseline information and the key sustainability issues identified for Herefordshire. The SA framework was originally presented in the Scoping Report and a small number of amendments were made to the framework as a result of consultation comments received.

Consult on the Scope and Level of Detail of the SA

2.15 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

2.16 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England, and Natural England) to be consulted “when deciding on the scope and level of detail of the information that must be included” in the SA Report. The scope and level of detail of the SA is governed by the SA framework. The consultation undertaken on the Scoping Report has therefore incorporated consultation with the statutory consultees on the SA framework. This consultation on the SA Scoping Report was undertaken between March and April 2023.

2.17 Appendix A lists the comments that were received on the scope of the SA during this period of consultation and describes how each one has been addressed in the preparation of this SA report.

SA Stage B: Developing and refining options and assessing effects

2.18 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other ‘reasonable alternatives’ to the options being considered for a plan.

2.19 In relation to the SA report, Part 3 of the SEA Regulations 12 (2) requires that:

“The report must identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”

2.20 Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of:

“(h) an outline of the reasons for selecting the alternatives dealt with.”

2.21 The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are ‘reasonable’, therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF).

2.22 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan. The following sections outline how the reasonable alternative options for the Herefordshire Local Plan, which are appraised in this report, have been identified.

Strategic Options

2.23 Herefordshire Council has identified and considered alternative spatial approaches for the Draft Herefordshire (Regulation 18) Local Plan. These were considered by the Council to be the reasonable alternative options for meeting the need for development identified over the plan period.

2.24 In terms of the amount of development to be delivered, Herefordshire Council has used the Government's standard method to calculate a housing need of around 850 dwellings per year over the plan period (a total of 16,100). With completions and commitments taken into account, this leaves a residual housing requirement of 9,608 up to 2041. The Council does not consider that there are any exceptional circumstances which warrant considering a higher or lower housing figure for the Local Plan. In relation to economic development, the Local Plan seeks to identify land to deliver 182ha of new strategic employment land over the Plan period. This figure is based on the October 2022 Provision of Employment Land Study, with an addition 7ha added for Ledbury.

2.25 The Council has considered alternative options for the distribution of the growth required. These options were identified and developed by the Council as a starting point for discussion about how the required housing might be accommodated.

2.26 The Council has identified four urban options, with option four having three sub-options:

- **Urban option 1:** Housing Need Baseline Option.
- **Urban option 2:** Focus on Market Towns and Rural Based Growth.
- **Urban option 3:** Focus Growth Across Market Towns and Hereford.
- **Urban option 4a:** Leominster as a Growth Town.
- **Urban option 4b:** Ross-on-Wye as a Growth Town.
- **Urban option 4c:** Ledbury as a Growth Town.

- **Urban option 5:** New Rural Settlement with Growth Focused in Leominster and Bromyard.

2.27 The Council has also identified four rural options:

- **Rural option 1:** Current Strategy – dispersed approach across settlements
- **Rural option 2:** Focus on larger settlements
- **Rural option 3:** Focus growth on rural hubs
- **Rural option 4:** Focus growth within settlements outside AONBs (now referred to as National Landscapes) and Conservation Areas

Development Site Options

2.28 The Draft (Regulation 18) Herefordshire Local Plan identifies preferred and reasonable alternative sites for housing, employment and mixed-use development. The preferred sites form the basis of subsequent policies and proposals. The alternative sites are described as being potentially needed should a requirement to deliver additional housing arise. As well as the preferred and reasonable alternative sites identified in the Local Plan, there are some further sites which were considered to be reasonable options in SA terms, and so have been appraised, but which are not identified as either preferred or alternative sites in the Local Plan (these are referred to as 'discounted sites').

2.29 A starting point in the identification of reasonable alternative sites was a call for sites that was published by the Council in August 2020 as part of a Housing and Economic Land Availability Assessment. Landowners, agents or developers with sites of at least 0.25 hectares in size, located within or close to an existing settlement, were invited to present details [See reference 8]. A further call for sites, with the same requirements, was made between June and July 2022 [See reference 9]. Sites were sieved taking into account a number of different factors, to identify sites that the Council considered to be 'reasonable' in SA terms. A call for sites suitable for Gypsies, Travellers and Travelling Show

People has been ongoing since November 2022. However, to date this has only resulted in a small number of site submissions and work is ongoing on the assessment of one potential site to establish its reasonableness. .

Other policy areas

2.30 Reasonable alternative options have also been identified in relation to some of the other topic areas addressed by the Local Plan Review. There are generally fewer reasonable alternatives to consider for non-strategic policies; however where they exist they have been subject to SA alongside the relevant policy approach in Chapter 6.

SA Stage C: Preparing the Sustainability Appraisal Report

2.31 This SA Report describes the process that has been undertaken to date in carrying out the SA of the Herefordshire Local Plan. It sets out the SA findings for the policy approaches and proposed site allocations in the Draft (Regulation 18) Herefordshire Local Plan consultation document, as well as the reasonable alternative options considered. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where relevant.

2.32 The SA findings are set out in Chapters 4 to 7 of this SA Report, along with recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the Herefordshire Local Plan.

SA Stage D: Consultation on the Herefordshire Local Plan and the SA Report

2.33 Information about consultation that has already taken place at earlier stages of plan-making has been provided above. Herefordshire Council is now inviting comments on the Draft (Regulation 18) Herefordshire Local Plan. This SA Report is being published on the Council's website at the same time as the consultation of the plan so that the two documents can be read in parallel. Consultation comments received on this SA Report will be taken into account at the next stage of the SA.

SA Stage E: Monitoring Implementation of the Local Plan

2.34 Draft indicators for monitoring the likely significant social, environmental and economic effects of implementing the Herefordshire Local Plan are included in Chapter 8 of this SA Report and these will be updated as appropriate during later stages of the SA.

Appraisal Methodology

2.35 Reasonable alternative options for the policies and site allocations to be included in the Herefordshire Local Plan have been appraised against the SA objectives in the SA framework (see Chapter 3), with symbols being attributed to each option to indicate its likely effect on each SA objective as shown in **Table 2.1**. Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? Or -?) and the symbol was

colour coded in line with the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

2.36 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown in **Table 2.1**. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

Table 2.1: Key to symbols and colour coding used in the SA

Symbol and Colour Coding	Description
++	Significant positive effect likely.
++/-	Mixed significant positive and minor negative effects likely.
+	Minor positive effect likely.
+/	Mixed minor effects likely.
++/--	Mixed significant effects likely.
-	Minor negative effect likely.
--/+	Mixed significant negative and minor positive effects likely.
	Significant negative effect likely.
0	Negligible effect likely.
?	Likely effect uncertain.

The Use of Site Assessment Criteria

2.37 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, detailed sets of site assessment criteria were developed and applied. The criteria relate specifically to each type of site option (i.e. residential, employment and mixed-use sites) and set out clear parameters within which certain SA effects would be identified, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and heritage designations. The criteria are presented in Appendix E. They were applied mainly through the use of Geographical Information Systems (GIS) data, although a number also draw on the findings of Herefordshire Council's Housing and Employment Land Availability Assessment.

Difficulties and Data Limitations

2.38 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

“...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

2.39 In relation to this SA for the Draft (Regulation 18) Herefordshire Local Plan, challenges have arisen from:

- An **ever-changing policy context**, with a number of documents having been published following the initial scoping of policy in March 2023. Examples include new and emerging strategies for water and air.
- **County-based data limitations**, that have affected the ability to understand certain trends and characteristics in detail. For example, it was difficult to access data surrounding broadband and wireless connectivity.

However, it is noted that additional evidence is currently being compiled by the County Council. These studies include the following:

- A Green Infrastructure Strategy.
- Open Space Study.
- A Landscape Character Assessment.
- A Water Cycle Study.
- Heritage Impact Assessments.
- Strategic Flood Risk Assessment (SFRA) Level 2.
- Economic Viability Assessment.
- **Site-based data limitations**, that have affected the assessment of identified development sites. Specifically, as explained in Chapter 5, a number of data gaps have meant that certain sites could not be assessed against certain criteria.

2.40 The SA findings will be updated as further data and evidence become available during later stages of plan making. Updates will be provided in further iterations of this report.

Chapter 3

Sustainability Context for Development in Herefordshire

3.1 Schedule 2 of the SEA Regulations requires information on the following (numbering relates to the specific numbered list in Schedule 2):

1. “an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes”; and
5. “the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”.

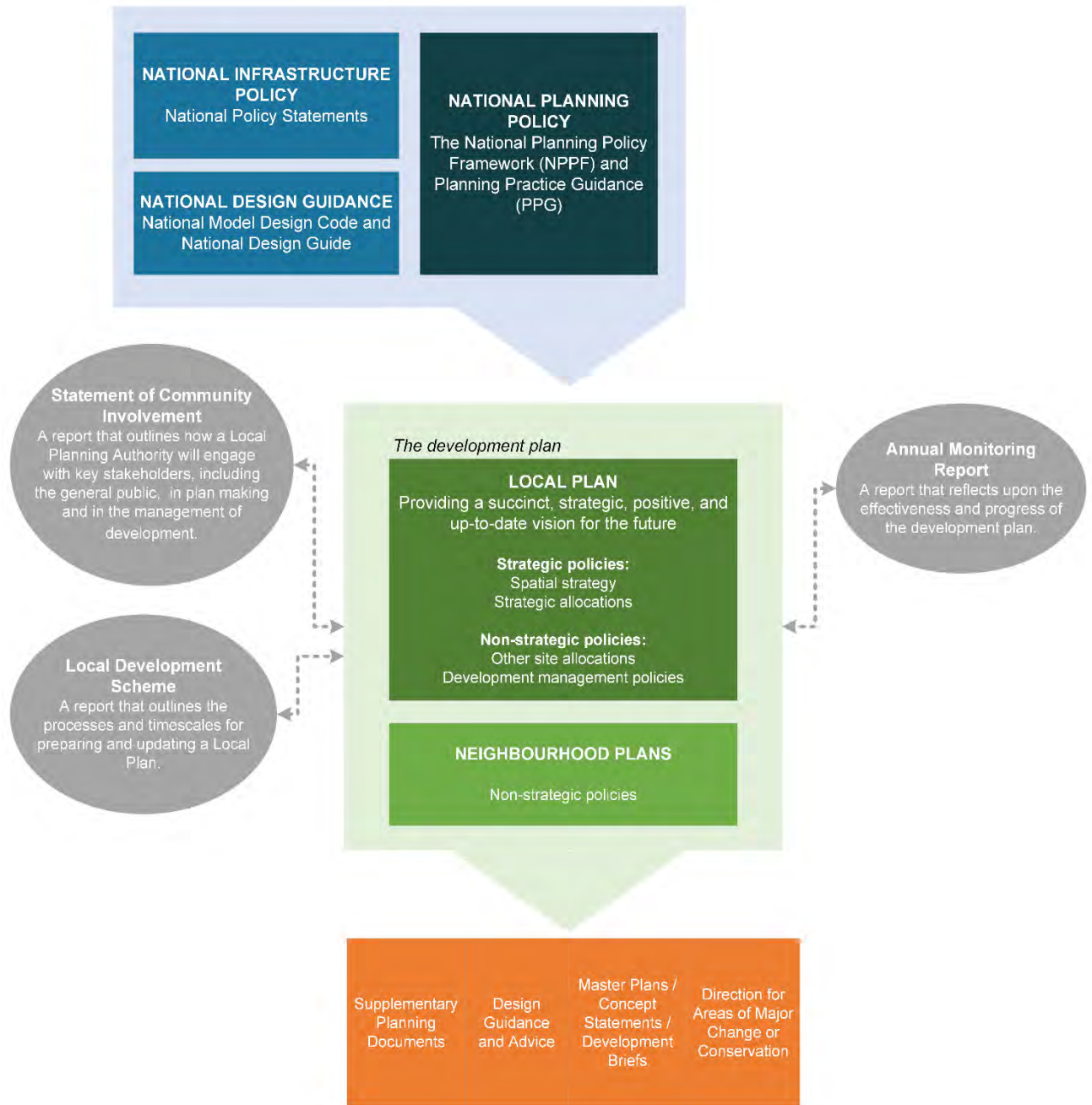
3.2 A description of the Draft (Regulation 18) Herefordshire Local Plan consultation document was provided in Chapter 1. The other reporting requirements are met in this chapter.

Relationship with Other Relevant Plans or Programmes

3.3 The Herefordshire Local Plan is not being prepared in isolation and must be in conformity with a range of international and national plans and programmes as shown below in Figure 3.1. The Local Plan is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents, also

shown in Figure 3.1. Neighbourhood Plans, once made, sit beneath the Local Plans and form part of the statutory development plan.

Figure 3.1: Local Plan Relationship with other Relevant Plans and Programmes



Policy Context

3.4 The Draft (Regulation 18) Herefordshire Local Plan has been prepared against a backdrop of plans and programmes that have been prepared both nationally and internationally. The following sections provide a summary and the full policy review can be found in Appendix B.

International

3.5 Former EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') were transposed into the Strategic Environmental Assessment (SEA) Regulations [See reference 10] and Habitats Regulations [See reference 11]. Following the UK's departure from the EU, these Regulations still apply and require environmental assessment processes to be undertaken in relation to the Herefordshire Local Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

3.6 There were also a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which are transposed into UK law through Acts, Regulations and national-level policy. The UK has now fully left the EU and therefore EU Directives no longer apply to the UK. The relevant Regulations are summarised in Appendix B.

National

3.7 There is an extensive range of national policies, plans and programmes that are of relevance to the Local Plan preparation and SA process. A pragmatic and proportionate approach has been taken with regards to the selection of these, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) of relevance to the Local Plan and the SA is provided below. In addition, the main sustainability objectives of other national plans and programmes which are of most relevance for the Local Plan and the SA are provided in Appendix B.

3.8 There is also a suite of legislation that directs processes within the planning system. Recent relevant legislation includes the Levelling-up and Regeneration Act 2023 [See reference 12]. This includes a series of provisions, with part three focusing on planning, and chapter two focusing on development plans. Schedule seven outlines specific expectations with respect to plan making.

The National Planning Policy Framework and Planning Practice Guidance

3.9 The National Planning Policy Framework (NPPF) [See reference 13] is the overarching planning framework which provides national planning policy and principles for the planning system in England. The NPPF was originally published in March 2012 and has been revised several times since, with the most recent version being published in December 2023. The most recent revisions to the NPPF were made in response to the Levelling-up and Regeneration Act. Recent updates to the NPPF include amendments to urban uplift and Green Belt, although these are not relevant to Herefordshire. Further revisions also include allowing flexibility for local authorities in relation to local housing need; safeguarding local plans from densities that would be out of character; freeing local authorities with up-to-date local plans from annual updates to their five-year housing land supply; and continued support for self-

build, custom-build and community-led housing. The new NPPF also emphasises the role of beauty and placemaking in the planning system.

3.10 The three overarching objectives of the planning system are set out in paragraph 8 of the 2023 NPPF, which should be pursued in mutually supportive ways so that net gains are achieved across each of the different objectives:

- **“an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance the natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

3.11 The Herefordshire Local Plan must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.” **[See reference 14]**

3.12 A local planning authority is also required to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing a Local Plan **[See reference 15]**.

3.13 Paragraph 20 of the 2023 NPPF states the need for strategic policies in plan making, which set out the overall strategy for the pattern, scale and design quality of places, making sufficient provision for:

“a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

3.14 Planning Practice Guidance (PPG) **[See reference 16]** provides guidance for how the Government’s planning policies for England are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

3.15 The overarching nature of the NPPF means that its implications for the SA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the framework and its implications for the plan making process and the SA is provided in more detail below. Sustainability topics are separated into

environmental, social and economic themes below, but consideration of issues often cuts across topics. The summary provided below is not absolutely comprehensive and the NPPF is intended to be read and applied as a whole during plan making.

Environmental and social considerations

3.16 Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure” [See reference 17]. Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

3.17 Section 19 of the Planning and Compulsory Purchase Act 2004 states how development plan documents must include policies designed to secure that the development and use of land in the local planning authority’s area contributes to the mitigation of, and adaptation to, climate change.

3.18 The SA can consider the contribution the alternatives make in terms of their contribution to climate change mitigation as well as climate change adaptation. The SA can also facilitate the delivery of climate resilient places.

3.19 Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy

used by a new development to come from on-site renewable or low carbon technologies. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets.

3.20 The UK Green Building Council has produced a resource pack which is designed to help local authorities improve the sustainability of new homes. The New Homes Policy Playbook [\[See reference 18\]](#) sets out minimum requirements for sustainability in new homes that local authorities should introduce, as well as proposed stretching requirements should local authorities wish to go further. For non-residential uses BREEAM assessments can be used by local authorities to ensure buildings meet sustainability objectives.

3.21 The NPPF promotes healthy, inclusive and safe places which promote social integration, as well as enable and support healthy lifestyles. The Building for a Healthy Life design toolkit [\[See reference 19\]](#) can be used by local authorities to assist in the creation of places that are better for people and nature.

3.22 One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community” [\[See reference 20\]](#). It is identified in the document that “access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change” [\[See reference 21\]](#). Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship is supported. Importantly, Local Plans should also “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible” [\[See reference 22\]](#).

3.23 Additionally, larger scale developments such as new settlements or significant extensions to existing villages and towns are required by the NPPF to be guided by policies set within a vision that looks at least 30 years ahead

[See reference 23]. The need for policies to be reflective of this longer time period is associated with a need to take proper account of the likely timescales for delivery.

3.24 The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The Herefordshire Local Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities. The SA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy approaches that cumulatively improve the wellbeing of local communities.

3.25 The NPPF sets out the approach Local Plans should take in relation to biodiversity, stating that Plans should “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation” [See reference 24]. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies.

3.26 The Herefordshire Local Plan, through its review of the spatial strategy, should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should be inclusive of approaches which are supportive of enhancing the connectivity of green infrastructure and promoting the achievement of biodiversity net gain. The SA process should support the identification and maximisation of potential benefits

through the consideration of alternatives and assessment of both negative and positive significant effects.

3.27 In relation to landscape, the NPPF sets the planning principles of recognising the intrinsic beauty and character of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards to this purpose at National Parks, The Broads and Areas of Outstanding Natural Beauty (AONBs), now referred to as National Landscapes. The NPPF also acknowledges the role of heritage in helping to define landscape character.

3.28 The Local Plan should be supportive of an approach to development which would protect the landscape character of Herefordshire. Where appropriate it should also seek to protect the individual identities of Herefordshire's settlements, taking into account potential issues associated with coalescence. The SA should identify those alternatives which contribute positively to landscape character.

3.29 The NPPF states that in relation to the historic environment, plans should "set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats" [\[See reference 25\]](#). Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place.

3.30 The NPPF places a focus on making 'beautiful' and 'sustainable' places. The use of plans, design policy, guidance and codes are encouraged. The SA provides an opportunity to test alternatives in terms of the contribution they can make to the protection and enhancement of the historic environment.

3.31 The Herefordshire Local Plan can take forward a spatial strategy which helps to limit adverse impacts on designated and non-designated heritage assets, including any potential archaeological finds in line with heritage protection and enhancement plans. The SA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

3.32 The NPPF states that new and existing development should be prevented from contributing to an unacceptable risk from, or being adversely affected by, pollutions including water pollution and air quality. Inappropriate development in areas at risk of flooding should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient infrastructure provision for water supply and wastewater. The Local Plan provides an opportunity to boldly pursue climate change mitigation and adaptation. It also provides an opportunity for improving the quality of air, a goal that is applicable to both urban and natural environments. It should be noted that the impact of air quality on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites is investigated separately through the Habitats Regulations Assessment (HRA).

3.33 Preparing a new Local Plan for Herefordshire presents an opportunity to consider incorporating targets for water efficiency, water consumption and grey water recycling in any new development. The Local Plan also can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The SA process should seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.

3.34 The NPPF states that the planning system should protect and enhance soils in a manner commensurate with their statutory status or quality, while also encouraging the reuse of previously developed land.

3.35 Plans can seek to ensure the appropriate protection of soil quality, including the best and most versatile agricultural land. Further to this, plans should ensure that new development does not conflict with current mineral operations as well as long-term mineral resource plans. The SA process should inform the development of the Local Plan by helping to identify alternatives which would avoid the areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.

Economic Considerations

3.36 The Framework sets out that in terms of economic growth the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation [\[See reference 26\]](#). There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors. Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation” [\[See reference 27\]](#). Local Plans are required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration [\[See reference 28\]](#).”

3.37 The Herefordshire Local Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies, through the review of the spatial strategy. Ensuring that local town centres and services and facilities at settlements in the plan area are maintained and enhanced is also important and will also provide support for local communities.

3.38 The SA process can support the development of the Local Plan to ensure that its policies are considerate of impacts on the economy across Herefordshire. The process can also be used to demonstrate how impacts on the viability of town centres in the area and surrounding areas have been considered.

3.39 The NPPF encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The NPPF also states that the planning system should actively manage growth patterns in support of these objectives.

3.40 Growth is likely to increase traffic on the roads which also has implications for air quality, and the Local Plan and SA process can seek to influence the effects of this through an appropriate spatial strategy, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Local Plan, as supported by the SA, should seek to identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel, therefore reducing emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

Other National Policies, Plans and Programmes

3.41 Numerous other policies, plans and programmes (PPPs) at a national level are of relevance to the new Local Plan and the SA. Unlike the NPPF, most of these are focussed on a specific topic area that the SA will consider. There will be some overlap between SA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance for the SA have been

grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the national PPPs (including the NPPF) for the Local Plan and SA.

Climate change adaptation and mitigation, energy efficiency and waste minimisation

3.42 The relevant national PPPs under this topic are:

- Department for Energy Security and Net Zero, The Energy Security Plan (2023).
- Department for Energy Security and Net Zero, The Net Zero Growth Plan (2023).
- Department for Energy Security and Net Zero, Carbon Budget Delivery Plan (2023).
- Department for Energy Security and Net Zero, Powering up Britain (2023).
- Department for Environment, Food & Rural Affairs (Defra), The Environment Improvement Plan (2023).
- Department for Environment, Food & Rural Affairs (Defra), UK Climate Change Risk Assessment (2022).
- Department for Environment, Food & Rural Affairs (Defra), Climate Change Adaptation: Policy Information (2022).
- Department for Business, Energy & Industrial Strategy (BEIS), British Energy Security Strategy (2022).
- Environment Agency (EA), Flood and Coastal Erosion Risk Management Strategy Roadmap to 2026 (2022)
- BEIS, Net Zero Strategy: Build Back Greener (2021).
- HM Government, The Energy Performance of Buildings Regulations (2021).

- Department for Transport, Decarbonising Transport: Setting the Challenge (2020).
- EA, National Flood and Coastal Erosion Risk Management Strategy for England (2020).
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018).
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018).
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018).
- Defra, UK Climate Change Risk Assessment (2017).
- HM Government, The Clean Growth Strategy (2017).
- Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014).
- Defra, Waste Management Plan for England (2013).
- The Energy Efficiency Strategy (2012)
- Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England (2011)
- Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2011).
- The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)
- Department of Energy and Climate Change, The UK Renewable Energy Strategy (2009)

Implications for the Local Plan and SA: The review of the Herefordshire Local Plan should consider setting out policies to achieve climate change adaptation while also encouraging development which would help to minimise carbon emissions. This can be done through siting development allocations in areas where sustainable transport patterns can be best achieved and encouraging development to make use of more sustainable sources of energy, potentially through the delivery of renewable energy development. The local planning authority should consider setting out approaches in the Local Plan to encourage appropriate use of SuDS to minimise flood risk and handling of waste in line with the waste hierarchy.

In 2015, planning laws relating to renewable energy were changed to give local planning authorities greater powers in decision making for the permission of onshore renewable development [See reference 29]. The planning restrictions mean that councils can only grant permission for a new wind farm if they meet two requirements, which are that they must be in a suitable location as identified in a local or neighbourhood plan and that all planning impacts identified by local people must have been addressed and there must be community backing. The recent increases in the wholesale price of gas have prompted calls for these planning rules on onshore wind to be relaxed.

The SA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual site options can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in terms of promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Health and well-being

3.43 The relevant national PPPs under this topic are:

- Natural England, Green Infrastructure Framework (2023).
- Department for Levelling Up, Housing and Communities (DLUHC) [formerly the Ministry of Housing, Communities and Local Government], National Design Guide (2021).
- DLUHC, National Model Design Code (2021).
- HM Government, The Levelling Up the United Kingdom White Paper (2022).
- HM Government, The Levelling Up and Regeneration Bill (2022).
- Cabinet Office and the Department of Health and Social Care, Build Back Better: Our Plan for Health and Social Care (2021).
- Department of Health and Social Care and Cabinet Office, COVID-19 mental health and wellbeing recovery action plan (2021).
- Public Health England (PHE), Using the planning system to promote healthy weight environments (2020), Addendum (2021).
- DLUHC, Planning for the Future White Paper (2020).
- PHE, PHE Strategy 2020-25 (2020).
- Homes England, Homes England Strategic Plan 2018 to 2023 (2018).
- DLUHC, Planning Policy for Traveller Sites (2015).
- HM Government, Fair Society, Healthy Lives (2011).
- HM Government, Laying the foundations: housing strategy for England (2011).

Implications for the Local Plan and SA: The Local Plan needs to consider the need for infrastructure as this has the potential to have a significant impact on the environment and it should be prepared to ensure

that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the increased population. This should include healthcare, education and open space. The Covid-19 pandemic has highlighted the necessity of access to adequate green space to support mental health and facilitate physical recreation. Local Plans offer the opportunity to maximise the well-being benefits of well-designed local green spaces. Development allocations should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Local planning authorities should consider setting out approaches in the Local Plan to facilitate the supply of healthy local food. The provision of an appropriate level of housing over the plan period will help address issues of disparity in terms of access to decent housing in the plan area. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Travellers.

Policy options considered for the Local Plan can be tested through the SA in relation to the contributions they make towards these aims. The SA should also appraise the contribution individual site options can make to health and wellbeing. This should be considered through the site's ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. It may be necessary to consider the capacity of existing facilities when considering individual site options. Consideration should also be given to the capacity of sites to deliver new homes, including affordable homes.

Environment (biodiversity/geodiversity, landscape and soils)

3.44 The relevant national PPPs under this topic are:

- Department for Environment, Food & Rural Affairs, Biodiversity Net Gain (Collection) (2024),
- Department for Environment, Food & Rural Affairs and Natural England, Nature Recovery Network (2024).
- Department for Environment, Food & Rural Affairs, The Environment Improvement Plan (2023).
- Department for Environment, Food & Rural Affairs, Air Quality Strategy for England (2023).
- The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023).
- Natural England, Green Infrastructure Framework (2023).
- Department for Environment, Food & Rural Affairs and Natural England, Biodiversity Metric: Calculate the Biodiversity Net Gain of a Project or Development (2023).
- HM Government, The Environment Act (2021).
- Natural England, The Biodiversity Metric 3.1 (2021).
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- HM Government, The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019).
- Defra, Biodiversity Offsetting in England Green Paper (2013).
- Defra, Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011)
- Defra, Safeguarding our Soils – A Strategy for England (2009)

- Defra, England Biodiversity Strategy Climate Change Adaptation Principles (2008)

Implications for the Local Plan and SA: The Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The plan area provides the setting for the Malvern Hills and the Wye Valley National Landscapes. Bannau Brycheiniog National Park lies adjacent to the county's western boundary. Herefordshire contains a number of internationally and nationally important biodiversity sites which will need to be protected through planning policy, including three National Nature Reserves (NNRs), four Special Areas of Conservation (SACs) and 79 Sites of Special Scientific Interest (SSSIs). The plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of wider ecological network. The plan also presents opportunities to promote the achievement of net gain in biodiversity, which will become mandatory from later in 2023, and support the goals of the county's Wildlife Trust for delivering a 'Wilder Herefordshire' [See reference 30]. Similarly the Local Plan can also contribute to supporting the Nature Recovery Plan for the Malvern Hills National Landscape [See reference 31]. In terms of the location of development, the Local Plan can encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by directing development to less sensitive locations. The allocation of new sites for development and updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure and the requirement for biodiversity net gain (which became mandatory in England from February 2024).

It will be role of the SA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as value landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. Site options should be considered in these terms also, making use of the findings of the HRA and landscape character assessment work where appropriate.

Historic environment

3.45 The relevant national PPPs under this topic are:

- Historic England, Corporate Plan 2022-2023 (2022).
- Historic England, Climate Change Strategy (2022).
- Historic England, Heritage at Risk Register (2022).
- Historic England, Future Strategy (2021).
- Historic Environment Forum, Strategic Framework for Collaborative Action 2020-2025 (2020).
- Historic England, Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016).
- Historic England, Climate Change Adaptation Report (2016).
- Historic England, GPA1: The Historic Environment in Local Plans (2015) and HEAN 3: Site Allocations (2015).
- Historic England, Listed Building Consent (2021).
- HM Government, Marine and Coastal Access Act (2009).
- HM Government, Planning (Listed Buildings & Conservation Areas) Act (1990).
- HM Government, Ancient Monuments & Archaeological Areas Act (1979).

3.46 In addition to the titles above, Historic England provides a full suite of guidance and advice from its website [[See reference 32](#)]. This covers a range of topics, from the identification and designation of assets to their subsequent management and maintenance.

Implications for the Local Plan and SA: The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings should also inform the preparation of the Local Plan. The review of the Herefordshire Local Plan should set out a positive strategy for conserving, enhancing and enjoying heritage assets and their settings, including wider historic townscapes, landscapes and seascapes. The Local Plan can help to realise the wider benefits of historic environment enhancements which include contributions to tourism and wellbeing and addressing the climate and biodiversity emergencies. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level). Local planning authorities should consider setting out approaches in the Local Plan to address these issues, and site options should be considered with regard to the potential for related issues.

The SA should appraise both policy and site options in terms of the potential for effects on the historic environment. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment, as informed by heritage impact assessment work for the Local Plan. Furthermore, the SA process should help the Local Plan maximise opportunities for enhancing the significance of, and public access to, heritage assets. At a later stage of the design process, the use of Heritage Impact Assessments can help to identify and manage sensitivities and to maximise site opportunities.

Water and air

3.47 The relevant national PPPs under this topic are:

- Department for Environment, Food & Rural Affairs, Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023).
- Department for Environment, Food & Rural Affairs, Air Quality Strategy (2023).
- Department for Environment, Food & Rural Affairs, Establishing the Best Available Techniques for the UK (2022).
- HM Government, The Waste (Circular Economy) (Amendment) Regulations (2020).
- Defra, Clean Air Strategy (2019).
- HM Government, The Road to Zero (2018).
- Defra, Our Waste, Our Resources: A strategy for England (2018).
- The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017).
- Environment Agency, Managing Water Abstraction (2016).
- Department for Environment, Food & Rural Affairs, Water White Paper (2012).
- Department for Environment, Food & Rural Affairs, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007).

Implications for the Local Plan and SA: Local planning authorities are directed to consider setting out approaches in their Local Plan to promote the efficient use of water and limit all types of pollution including water and air pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for development should take account of areas which have highest sensitivity in

relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the plan period, local planning authorities should consider setting out approaches in the Local Plan to factor in the contribution specific site options can make to achieving modal shift and limiting the need for residents to travel. The contribution policy options can make to achieving these aims can be tested through the SA.

Economic growth

3.48 The relevant national PPPs under this topic are:

- Department for Science, Technology and Innovation, UK Wireless Infrastructure Strategy (2023).
- HM Government, The Growth Plan (2022).
- HM Government, Levelling Up the United Kingdom (2022).
- HM Government, Build Back Better: Our Plan for Growth (2021).
- HM Government, UK Industrial Strategy: Building a Britain fit for the future (2018).
- HM Government, Industrial Strategy: building a Britain fit for the future (2017).
- LEP Network, LEP Network response to the Industrial Strategy Green Paper Consultation (2017).
- HM Government, National Infrastructure Delivery Plan 2016-2021 (2016).
- Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016-2021 (2016).

Implications for the Local Plan and SA: The Herefordshire Local Plan should allocate land to support the projected level of economic growth required over the plan period. The NPPF directs how local planning authorities should consider setting out approaches in Local Plan policies to promote sustainable economic and employment growth to benefit all members of the community in order to reduce disparities across the plan area. This should include support for the infrastructure required for the economy to function successfully. Local economic growth should be considered in the light of wider economic growth of the local LEPs. Employment sites should be located to enable local people to be able to access the new employment opportunities. Local planning authorities should consider setting out approaches in the Local Plan to promote the viability of Town Centres as well as Local Centres.

The SA can test individual site and policy options in relation to the contribution they can make to achieving these aims. Employment site options should be appraised in terms of the contribution they can make to meeting the employment land requirements of Herefordshire as well as the access residents would have to the employment opportunities delivered.

Transport

3.49 The relevant national PPPs under this topic are:

- HM Government, Levelling Up White Paper (2022).
- DfT / HM Government, The Cycling and Walking Investment Strategy Report to Parliament (2022).
- Department for Transport (DfT) Decarbonising Transport: A Better, Greener Britain (2021).
- DfT / HM Government, The Road to Zero (2018).

- DfT, Transport Investment Strategy (2017).
- Highways England, Sustainable Development Strategy and Action Plan (2017).

Implications for the Local Plan and SA: The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the Herefordshire Local Plan and its site allocations. The Herefordshire Local Plan can also be supportive of more sustainable modes of transport. This may include support for the infrastructure necessary for electric vehicles. Furthermore, the selection of site options for development should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes and specific highways capacity issues. The selection of individual site options should also be informed by their proximity to essential services and facilities which is likely to reduce the need for residents to regularly travel long distances.

The SA should be used to test policy and site options in terms of the contribution they can make to making transport choices more sustainable in the county. As well as testing site options in terms of limiting the need to travel in Herefordshire, policy options should be tested with regard the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Sub National

3.50 Below the national level there are further plans, policies and programmes which are of relevance for the Local Plan and SA process. These plans and programmes sit mostly at the sub-regional and county level. Details of those

plans and programmes which are of most relevance at this level are provided in Appendix B.

Surrounding Development Plans

3.51 Development in Herefordshire will not be delivered in isolation from those areas around it. Given the interconnection between Herefordshire and the surrounding areas there is potential for cross-boundary and in-combination effects where development is proposed through development plans in neighbouring authorities. As such, a summary of the following adopted and emerging plans for local authority areas which surround Herefordshire is also provided in Appendix B.

- Shropshire Council: Core Strategy (adopted 2011)
- Shropshire Council: Site Allocations and Management of Development (adopted 2015)
- Shropshire Council: Pre-Submission Draft of the Shropshire Local Plan (published December 2020). This is currently being examined for soundness.
- Malvern Hills: The South Worcestershire Development Plan (SWDP) (adopted February 2016)
- Malvern Hills: The South Worcestershire Development Plan Review (SWDPR) Regulation 19 Publication Document (November 2022). The Local Plan was submitted for examination in September 2023.
- Forest of Dean: Core Strategy (adopted in 2012). A replacement Local Plan, covering the period to 2041, is being prepared. Second preferred options were published for consultation in August 2022. A draft Local Plan is expected to be published for consultation in Spring 2024.
- Forest of Dean: Allocations Plan (adopted in 2018)
- Forest of Dean: Quarter Area Action Plan (adopted in 2012)
- Monmouthshire: The Monmouthshire County Council Local Development Plan (LDP) (adopted in 2014)

- Monmouthshire: The Monmouthshire County Council Local Development Plan Review (LDPR) Preferred Strategy (published December 2022)
- Powys: The Powys LDP (adopted April 2018). Work has now started on a Replacement Local Development Plan (2022 - 2037) which is intended to come into effect by March 2026.
- Bannau Brycheiniog National Park: Local Development Plan (adopted 2013).

3.52 Appendix B also includes a summary of relevant transport, minerals and waste plans which are relevant to Herefordshire.

Neighbourhood Plans

3.53 Across Herefordshire, 92 neighbourhood plans have been formally 'made' and now form part of the development plan for Herefordshire (as of February 2024). Two neighbourhood plans have been submitted for examination, and a further two plans are set to be considered via a referendum [\[See reference 33\]](#).

Policy uncertainties

3.54 It should be noted that the policy context is inherently uncertain as the current framework outlined here is likely to change in response to a number of key factors:

- **Climate change** – In February 2022, the Intergovernmental Panel on Climate Change (IPCC) reported how over 40% of the world's population are "highly vulnerable" to climate change. The report also noted how many of the impacts arising with global warming are now 'irreversible' [\[See reference 34\]](#). There is also evidence that the situation is worsening. For instance, since 2020, the World Meteorological Organisation (WMO) has been giving an estimate of the chances of the world breaking the 1.5C

threshold in any one year. Back in 2020 the WMO predicted a 20% chance of breaking 1.5C in the five years ahead. However, in May 2023, the WMO identified how there is a 66% likelihood that the annual average near-surface global temperature between 2023 and 2027 will be more than 1.5°C above pre-industrial levels for at least one year [See reference 35]. With this ongoing exposure to the seriousness of climate change, it is possible that UK and sub-national climate change policy may change. For instance, at a local level, a number of local authorities have declared a climate emergency, including Herefordshire Council [See reference 36].

- **Political instability** – The invasion of Ukraine by Russia in February 2022 has generated a multitude of humanitarian and economic challenges. While communities across the UK have taken in Ukrainian families who have become displaced as a result of the conflict, the war has also placed further challenges upon the cost of living, with energy and food costs particularly affected. Inflation has also grown at an exponential rate, leading to a rise in domestic interest rates and rises in the cost of borrowing. Local housing markets have been impacted in response.
- **COVID-19** – The World Health Organisation has officially declared an end to the COVID-19 health emergency [See reference 37] which has claimed nearly 7 million lives globally. However, the long-term effects of the virus are still being felt across the UK. Some elements of everyday life have returned to pre-pandemic levels, such as attitudes, and levels of activity, with respect to travel and tourism. However, some other effects of the pandemic, such as the trend towards home working and internet shopping, have been maintained post-pandemic. Society also seems to have a higher awareness of, and a commitment to maximise, personal health and well-being.
- **Brexit** – Four years have passed since the withdrawal of the UK from the European Union (EU). Following the end of a year-long transition period, EU law no longer applies to the UK. For the most part, EU law has been transposed into UK law, although there are moves to change the nature of this legislation moving forward, such as the proposals to move towards a new system of Environmental Outcomes Reporting.
- **The Levelling Up and Regeneration Act** [See reference 38] – This legislation was granted Royal Assent in October 2023. The legislation,

which was sponsored by the Department for Levelling Up, Housing and Communities (DLUHC), includes measures for streamlining the planning process while attaching greater weight to development plans. It also includes mechanisms for improving infrastructure delivery and its financing, and includes measures for improving the alignment between plans with a new flexible alignment test to address cross-boundary issues. The legislation also allows for the Secretary of State to bring forward national development management policies. Section 15 of Schedule 7 (on plan making) relates to design codes. This states that each local planning authority must have a design code, but that this code does not necessarily need to cover every type of development or every aspect of design. The legislation also includes mechanisms for replacing the existing EU-generated systems of Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), and the Habitats Regulations Assessment (HRA) with 'Environmental Outcomes Reports' (EORs).

Baseline Information

3.55 Baseline information provides the context for assessing the sustainability of proposals in the Herefordshire Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. Baseline data must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records that are sufficient to identify trends.

3.56 Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

(3) The environmental characteristics of areas likely to be significantly affected.”

3.57 Schedule 2(6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the inter-relationship between these. As an integrated SA and SEA is being carried out, baseline information relating to other ‘sustainability’ topics has also been included, for example, information about housing, social inclusiveness, transport, energy, waste and economic growth.

3.58 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan’s effects can be assessed in the SA and monitored during the plan’s implementation. Baseline information can also be combined with an understanding of the drivers of change that are likely to persist regardless of the Herefordshire Local Plan to understand the likely future sustainability conditions in the absence of the local plan.

3.59 SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline, or reports not yet published, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data are published.

3.60 The baseline information for Herefordshire Local Plan is presented in Appendix C.

Key Sustainability Issues

3.61 Key sustainability issues for Herefordshire were originally identified in the SA Scoping Report (March 2023). These issues have been reviewed in light of the Scoping consultation responses received and are summarised below.

3.62 It is also a requirement of the SEA Directive that consideration is given to the likely evolution of the environment in the plan area if the Herefordshire Local Plan was not to be implemented. This analysis is also presented below in relation to each of the key sustainability issues.

The environment

3.63 Key sustainability issues include:

- A need to mitigate and adapt to climate change including protecting communities from extreme weather events, and the associated risk of flooding.
- A need to protect and enhance the county's habitats, and to provide for improved biodiversity across Herefordshire's urban and rural areas.
- A need to protect and enhance water quality, in particular in the catchment of the River Wye.
- A need to protect and enhance the county's historic and heritage assets, particularly through development.

3.64 The Herefordshire Local Plan provides an opportunity to present an updated strategy for directing the county's approach to managing the effects of the changing climate and associated weather events. Similarly, the plan provides an opportunity to contribute further to mitigate the potential effects of any flooding. This flooding can be generated by rivers and water courses, but it can also be generated from groundwater and reservoir flooding. The Herefordshire Local Plan can help to protect and enhance existing habitats

across the county and provide scope for new nature-rich locations to be created where the opportunity exists. The Herefordshire Local Plan also provides an opportunity to ensure that the county's natural assets are not lost or compromised by future growth by prioritising the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile. The Herefordshire Local Plan can also help to protect and improve water quality in Herefordshire's rivers and water courses.

3.65 Without the Herefordshire Local Plan, there is a risk that the county's ambitions surrounding climate change adaptation and mitigation will be compromised. Development management decisions can rely on national policy to help protect Herefordshire's environment, but having up to date and locally specific policies are likely to be more beneficial.

Housing and communities

3.66 Key sustainability issues include:

- High demand for housing, while the affordability of housing in relation to incomes, remains poor.
- A need to deliver a wide variety of homes, in terms of size, type and tenure.
- A need to respond to specific housing needs, such as those requiring accessible accommodation.
- Pockets of high deprivation in Hereford City and in some of the market towns.
- Inequalities, with respect to housing access, wealth, and health.
- Ensuring that infrastructure is responding to existing demands and can be suitably extended and upgraded as the population of Herefordshire grows.

3.67 The Herefordshire Local Plan provides an opportunity to ensure that housing need across Herefordshire is met, and that housing sites are brought

forward in the most sustainable locations. The plan also provides scope to deliver growth and investment across the county, including those areas that have high levels of deprivation. Continued population growth and demographic change will place additional demand on key services and facilities such as housing, health and education. The Herefordshire Local Plan can help to identify, and manage, these arising pressures.

3.68 There is a risk that without the Herefordshire Local Plan, an inadequate amount of housing will be provided across the county. This will place further pressure on local housing markets and potentially restrict the ability for people to find affordable homes. The lack of a plan may also result in the development of less sustainable sites, or schemes that contain an inadequate mix of house types and tenures. The ability to coordinate development activity with infrastructure provision is also likely to become more challenging in the absence of a local plan. A lack of appropriate infrastructure will impact on well-being and potentially lead to increased travel if residents need to travel to elsewhere.

The economy and high streets

3.69 Key sustainability issues include:

- A need to diversify and invest in Herefordshire's economic infrastructure to help increase salaries and to raise the value of the economy.
- Challenges facing Hereford and the market towns' high streets from restricted spending and the consequences of internet shopping.

3.70 By allocating sites and identifying infrastructure needs, the Herefordshire Local Plan can help to support a strong economy and provide for continued growth. The plan can help to generate new jobs and new businesses across the county. The Herefordshire Local Plan offers an opportunity to build a land use strategy that can help to generate greater prosperity across Herefordshire's urban and rural areas. The plan can help to support the diversification of the economy by providing for a mix of development types. The plan can also help to sustain and revitalise the county's towns and high streets by helping to improve

the attractiveness and accessibility of Herefordshire's key settlements. In order to ensure that Herefordshire is able to respond to new economic opportunities, an appropriate focus is needed in order that residents and businesses can access skills and training.

3.71 In the absence of the Herefordshire Local Plan, Herefordshire may be less effective in its ability to deliver for growth and greater economic resilience. Without appropriate direction, development could also occur in peripheral and inaccessible locations, leading to greater congestion and a reduction in activity across the central areas of Herefordshire's towns.

Transport and infrastructure

3.72 Key sustainability issues include:

- A need to provide equitable access to education and high-speed broadband.
- Poor coverage and frequency of public transport services in Herefordshire's rural areas.
- Over-reliance on the private car in some parts of the county, leading to congestion and air quality challenges.
- Higher than average level of retired people, posing implications for the economy, service provision, accommodation and health.

3.73 The Herefordshire Local Plan can help to prioritise active forms of travel and promote the use of public transport. By ensuring that development sites are located in the most sustainable locations, the need to use private petrol and diesel vehicles can be lessened. This will help to check congestion levels and provide scope for improving local air quality. Variability in broadband and wireless connectivity can also be addressed, thereby helping to resolve existing inequalities. The Herefordshire Local Plan can also help to deliver improved access to training and education.

3.74 Without the Herefordshire Local Plan, there is a risk that there would be a continued focus on private car use, although it is likely that changes in technology will mean that the use of electric cars will grow throughout the plan period.

The SA framework

3.75 As described in Chapter 2, the relevant objectives established via the review of plans, policies, and programmes, and the key sustainability issues identified by the baseline review, have helped to inform the development of a Sustainability Appraisal framework (the 'SA framework'). This framework comprises of sustainability objectives, together with assessment sub-questions. The SA framework that has been used to appraise the Herefordshire Local Plan is presented below. Appendix E presents the criteria that have been used to ensure consistency in the appraisal of site options against each SA objective.

3.76 The context for the appraisal of options for the Herefordshire Local Plan against each of the SA objectives is set by the sub-objectives or decision-making criteria presented under each 'headline' SA objective. These sub-questions provide a guide for the appraisal of options, identifying issues relating to the SA objective that should be considered where relevant. Given the large number of issues relating to each SA objective, it is not possible to list all those that are related and relevant and therefore the decision-making criteria should not be considered to be prescriptive or exhaustive. In effect the criteria act as a starting point for the identification of effects and the appraisal work considers wider issues as appropriate.

3.77 As a result of the Scoping consultation, a small number of changes have been made to some of the SA objectives in the SA framework since it was presented in the Scoping Report. These are detailed in Appendix A. The most significant of these changes has involved a decision to split SA objective 14 into two parts. While the version included in the Scoping Report combined flood risk and water quality into a single objective, it was decided to split into two.

Consequently, as shown below, SA objective 14A is now focused on flood risk, while SA objective 14B is focused on the quantity and quality of water.

3.78 The final set of objectives, and supporting questions, are as follows:

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

Appraisal questions

- Will the policy/option support or enable the mitigation and/or adaptation measures needed to address the climate change impacts on natural and urban environments?
- Will the policy/option promote energy efficiency?
- Will the policy/option promote the generation of clean, low carbon, decentralised and renewable electricity and heat?
- Will the policy/option promote the use of energy efficient design and sustainable construction materials?
- Will the policy/option promote and facilitate the use of electric cars and sustainable and active modes of transport?

Relevant SEA Topics

- Climatic Factors

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

Appraisal Questions

- Will the policy/option support the supply of an appropriate quantity of housing to satisfy demand?
- Will the policy/option support the supply of an appropriate mix of types and tenures of properties in relation to the respective levels of need and demand?
- Will the policy/option contribute to addressing the housing needs of older people and other groups with specific needs, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?
- Will the policy/option support the provision of specialist accommodation for those with disabilities?
- Will the policy/option support provision of homes that can be adapted to support independent living for older and disabled people?
- Will the policy/option help to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople?

Relevant SEA Topics

- Population
- Human Health
- Material Assets

SA Objective 3: To support community cohesion and safety.

Appraisal Questions

- Will the policy/option help facilitate the integration of new neighbourhoods with existing neighbourhoods?
- Will the policy/option help to meet the needs of specific groups in Herefordshire, including those with protected characteristics and those in more deprived areas?
- Will the policy/option promote developments that will benefit and will be used by both existing and new residents in Herefordshire, particularly within the most deprived areas?
- Will the policy/option help to deliver cohesive neighbourhoods with high levels of pedestrian activity/outdoor interaction, which will allow for informal interaction between residents?
- Will the policy/option help to reduce levels of crime, anti-social behaviour and the fear of crime?

Relevant SEA Topics

- Population
- Human Health

SA Objective 4: Support the vitality of Herefordshire's town and retail centres.

Appraisal Questions

- Will the policy/option help to enhance the vitality and vibrancy of town and retail centres?
- Will the policy/option support the retention of town centre commercial and retail uses and encourage the flexible use of space?
- Will the policy/option promote regeneration across Herefordshire?

Relevant SEA Topics

- Population
- Material Assets

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

Appraisal Questions

- Will the policy/option help to deliver new services and facilities to provide for the needs of existing and new residents?
- Will the policy/option provide for development that is well linked to existing services and facilities (e.g., shops, post offices, GPs, schools, broadband, wireless connectivity) and employment areas?
- Will the policy/option contribute to improving educational levels of the population of working age, including by improving access to educational facilities?

Relevant SEA Topics

- Population
- Human Health
- Material Assets

SA Objective 6: Improve the physical and mental health and wellbeing of residents and reduce health inequalities.

Appraisal Questions

- Will the policy/option enable people to be adequately served by key healthcare facilities, regardless of socio-economic status?
- Will the policy/option improve access to healthcare and provide new or enhanced local health services to support new and growing communities?
- Will the policy/option improve access to range of high quality open spaces and green infrastructure that will promote health and well-being by connecting people with nature?
- Will the policy/option avoid impacts on existing green infrastructure assets?
- Will the policy/option contribute to narrowing health inequalities?
- Will the policy/option help to avoid noise and light pollution?

Relevant SEA Topics

- Population
- Human Health

- Material Assets

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

Appraisal Questions

- Will the policy/option allow for the delivery of land and infrastructure to meet Herefordshire's projected economic needs?
- Will the policy/option support the prosperity and diversification of Herefordshire's rural economy?
- Will the policy/option promote the achievement of a circular, low carbon economy?
- Will the policy/option support the development of sustainable tourism?

Relevant SEA Topics

- Population
- Material Assets

SA Objective 8: To deliver and maintain sustainable and diverse employment opportunities and reduce inequality and poverty.

Appraisal Questions

- Will the policy/option contribute to meeting Herefordshire's employment needs?
- Will the policy/option provide opportunities for local people to access employment and skills?
- Will the policy/option support equality of opportunity for young people and job seekers, in addition to opportunities for the expansion and diversification of businesses?

Relevant SEA Topics

- Population
- Human Health
- Material Assets

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

Appraisal Questions

- Will the policy/option help to improve public transport links to key facilities across Herefordshire?
- Will the policy/option help to reduce reliance on private vehicles?
- Will the policy/option help to promote and facilitate the use of electric cars and sustainable modes of transport?
- Will the policy/option help to promote compact, mixed-use development, which encourages active travel including walking and cycling?
- Will the policy/option protect and enhance public rights of way and access?

Relevant SEA Topics

- Air
- Climatic Factors
- Population
- Human Health

SA Objective 10: To improve air quality.

Appraisal Questions

- Will the policy/option encourage improvements in air quality, including within the Air Quality Management Areas (AQMAs)?
- Will the policy/option minimise and contribute to reductions in air pollution caused by traffic and commercial uses?
- Will the policy/option help to minimise the number of people exposed to poor air quality?

Relevant SEA Topics

- Air

SA Objective 11: To conserve and enhance Herefordshire's biodiversity and geodiversity.

Appraisal Questions

- Will the policy/option help to conserve and enhance designated and undesignated ecological assets within and outside Herefordshire, including measurable biodiversity net gain?
- Will the policy/option help to conserve and enhance ecological networks, including not compromising future improvements in habitat connectivity?

Relevant SEA Topics

- Biodiversity

- Human Health

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

Appraisal Questions

- Will the policy/option promote visually attractive development with high quality design, layout and appropriate and effective landscaping?
- Will the policy/option allow for Herefordshire's designated heritage assets, and their settings, to either individually or cumulatively conserve and enhance the landscape and the character and distinctiveness of the local environment?'
- Will the policy/option allow for Herefordshire's non-designated heritage assets, and their settings, to either individually or cumulatively conserve and enhance the landscape and the character and distinctiveness of the local environment?'

Relevant SEA Topics

- Landscape

SA Objective 13: To conserve and enhance the historic environment including the setting of heritage features.

Appraisal Questions

- Will the policy/option help to conserve and enhance Herefordshire’s designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?’
- Will the policy/option help to conserve and enhance Herefordshire’s non-designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?’
- Will the policy/option help to ensure the management and enhancement of Herefordshire’s heritage assets, including bringing assets back into appropriate use, with particular consideration for heritage at risk?’
- Will the policy/option promote access to, enjoyment and understanding of the historic environment for residents and visitors of Herefordshire?’
- Will the policy/option be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change?’

Relevant SEA Topics

- Cultural Heritage

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

Appraisal Questions

- Will the policy/option limit the amount of development in areas of high flood risk and areas which may increase flood risk elsewhere, taking into account the impacts of climate change?
- Will the policy/option reduce the flood risk facing existing and new development?

Relevant SEA Topics

- Water
- Biodiversity

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

- Will the policy/option promote the use of sustainable urban drainage systems (SUDs) and other flood resilient design?
- Will the policy/option improve the water quality and achieve nutrient neutrality of Herefordshire's rivers and inland waters?
- Will the policy/option help to minimise inappropriate development in Source Protection Zones?
- Will the policy/option help to support efficient use of water, including greywater recycling in new developments?

Relevant SEA Topics

- Water
- Biodiversity

SA Objective 15: To support efficient use of resources, including land and minerals.

Appraisal Questions

- Will the policy/option promote the re-use of previously development land?
- Will the policy/option help to avoid development on the best and most versatile agricultural land?
- Will the policy/option protect or provide for the sustainable management of soils?
- Will the policy/option promote the achievement of the waste hierarchy?
- Will the policy/option help to ensure that sterilisation of mineral resources is prevented unless development can be justified at locations where this would result?

Relevant SEA Topics

- Soil
- Material Assets

Chapter 4

Sustainability Appraisal Findings for the Strategic Options

4.1 This chapter presents the SA findings for the strategic policy options that have been considered to date. These options were initially identified by the Council in the Spatial Options consultation document (January 2022) [See reference 39]. The document outlined five county-wide options and four options for Herefordshire’s rural areas. Each of these options described alternative ways to accommodate and distribute the county’s growth.

4.2 These options were developed by a Place Shaping Options consultation document that was published in June 2022 [See reference 40]. This document considered options in a greater level of detail, with consideration being given to different development locations around Hereford city and the county towns. More specific options were also presented for Herefordshire’s rural areas.

4.3 Herefordshire Council considers these to be the reasonable alternatives for meeting development need over the plan period.

Strategic spatial options

4.4 The Spatial Options consultation document considered five options for delivering growth across the whole county, with each of these ‘county options’ involving a different pattern and scale of development. Option four, which relates to the potential designation of a Growth Town, is divided into three sub-options. The county-wide options comprise:

- **County option 1:** Housing Need Baseline
- **County option 2:** Focus on Market Towns and Rural Based Growth

- **County option 3:** Focus Growth Across Market Towns and Hereford
- **County option 4a:** Leominster as a Growth Town
- **County option 4b:** Ross-on-Wye as a Growth Town
- **County option 4c:** Ledbury as a Growth Town
- **County option 5:** New Rural Settlement with Growth Focused in Leominster and Bromyard.

4.5 Herefordshire Council also considered four options for delivering growth across the county's rural areas. The options comprise:

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

SA findings for the growth options

4.6 The SA findings for the growth options are summarised in **Table 4.1** overleaf. The detailed appraisal findings are presented in Appendix D.

Table 4.1: Summary of SA findings for the strategic options

SA Objective	County-wide option - Option 1: Housing Need Baseline Option	County-wide option - Option 2: Focus on Market Towns and Rural Based Growth	County-wide option - Option 3: Focus Growth Across Market Towns and Hereford	County-wide option - Option 4a: Leominster as a Growth Town	County-wide option - Option 4b: Ross-on-Wye as a Growth Town	County-wide option - Option 4c: Ledbury as a Growth Town	County-wide option - Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard	Rural option - Option 1: Current Strategy – dispersed approach across settlements	Rural option - Option 2: Focus on larger settlements	Rural option - Option 3: Focus growth on rural hubs	Rural option - Option 4: Focus growth within settlements outside AONBs and Conservation Areas
SA objective 1: Climate Change	0	0	0	0	0	0	0	0	0	0	0
SA objective 2: Housing	++	++	+/	+/	+/	+/	+	+	+	+	+
SA objective 3: Community Cohesion and Safety	0	0	0	0	0	0	0	0	0	0	0

Chapter 4 Sustainability Appraisal Findings for the Strategic Options

SA Objective	County-wide option - Option 1: Housing Need Baseline Option	County-wide option - Option 2: Focus on Market Towns and Rural Based Growth	County-wide option - Option 3: Focus Growth Across Market Towns and Hereford	County-wide option - Option 4a: Leominster as a Growth Town	County-wide option - Option 4b: Ross-on-Wye as a Growth Town	County-wide option - Option 4c: Ledbury as a Growth Town	County-wide option - Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard	Rural option - Option 1: Current Strategy – dispersed approach across settlements	Rural option - Option 2: Focus on larger settlements	Rural option - Option 3: Focus growth on rural hubs	Rural option - Option 4: Focus growth within settlements outside AONBs and Conservation Areas
SA objective 4: Town and Retail Centres	+	+	++/	+/	+/	+/	/+	0	0	0	0
SA objective 5: Access to services, facilities and education	+	+	++/-	+	+	+	+	+/	+/	+/	+/
SA objective 6: Physical and Mental Health and Wellbeing	++	++	+	+/	+/	+/	+/	+/	+/	+/	++/-

Chapter 4 Sustainability Appraisal Findings for the Strategic Options

SA Objective	County-wide option - Option 1: Housing Need Baseline Option	County-wide option - Option 2: Focus on Market Towns and Rural Based Growth	County-wide option - Option 3: Focus Growth Across Market Towns and Hereford	County-wide option - Option 4a: Leominster as a Growth Town	County-wide option - Option 4b: Ross-on-Wye as a Growth Town	County-wide option - Option 4c: Ledbury as a Growth Town	County-wide option - Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard	Rural option - Option 1: Current Strategy – dispersed approach across settlements	Rural option - Option 2: Focus on larger settlements	Rural option - Option 3: Focus growth on rural hubs	Rural option - Option 4: Focus growth within settlements outside AONBs and Conservation Areas
SA objective 7: Economy	+/	--/+	+/	+/	+/	+/	--/+	+	+	+/	+/
SA objective 8: Employment and reducing inequality and poverty.	+/ ?	--/+?	+/	+/	+/	+/	--/+	+/	+	+	+/
SA objective 9: Travel	?+	--/+	+/	+	+	+	+/		+	++	+/
SA objective 10: Air Quality	++/-	--/+	+/	+/	+/	+/	+/	+/	+/	+	+/

Chapter 4 Sustainability Appraisal Findings for the Strategic Options

SA Objective	County-wide option - Option 1: Housing Need Baseline Option	County-wide option - Option 2: Focus on Market Towns and Rural Based Growth	County-wide option - Option 3: Focus Growth Across Market Towns and Hereford	County-wide option - Option 4a: Leominster as a Growth Town	County-wide option - Option 4b: Ross-on-Wye as a Growth Town	County-wide option - Option 4c: Ledbury as a Growth Town	County-wide option - Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard	Rural option - Option 1: Current Strategy – dispersed approach across settlements	Rural option - Option 2: Focus on larger settlements	Rural option - Option 3: Focus growth on rural hubs	Rural option - Option 4: Focus growth within settlements outside AONBs and Conservation Areas
SA objective 11: Biodiversity and Geodiversity	-?	-?	-?	?	?	?	?	-?	-?	-?	-?
SA objective 12: Landscapes and Townscapes	-	-	-	-				-	-	-	+/-
SA objective 13: Heritage	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	+?

Chapter 4 Sustainability Appraisal Findings for the Strategic Options

SA Objective	County-wide option - Option 1: Housing Need Baseline Option	County-wide option - Option 2: Focus on Market Towns and Rural Based Growth	County-wide option - Option 3: Focus Growth Across Market Towns and Hereford	County-wide option - Option 4a: Leominster as a Growth Town	County-wide option - Option 4b: Ross-on-Wye as a Growth Town	County-wide option - Option 4c: Ledbury as a Growth Town	County-wide option - Option 5: New Rural Settlement with Growth Focused in Leominster and Bromyard	Rural option - Option 1: Current Strategy – dispersed approach across settlements	Rural option - Option 2: Focus on larger settlements	Rural option - Option 3: Focus growth on rural hubs	Rural option - Option 4: Focus growth within settlements outside AONBs and Conservation Areas
SA objective 14A: Flooding	-	-	-	-	-	-	-	-?	-?	-?	-?
SA objective 14B: Water	-	-	-	-	-	-	-	-	-	-	-
SA objective 15: Resources	/+	/+	+/					-	-	-	-

4.7 It should be noted that a negligible effect (0) was identified for all spatial options with respect to SA objective 1 (climate change and adaptation). 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. While there would be effects linked to transport patterns, the extent to which the options would result in increased car use, with the associated emissions, is considered separately under SA objective 9 (travel), and the extent to which the options would result in reduced or improved air quality is considered under SA objective 10 (air quality). Repeating these effects in relation to SA objective 1 would therefore result in these effects being double counted.

4.8 Similarly, a negligible effect (0) was also identified for all of the spatial options in relation to SA objective 3 (community cohesion). Effects on this SA objective will depend on factors other than the overall spatial strategy.

County-wide option 1: Housing Need Baseline

4.9 This option involves distributing development according to a strategy similar to that included in the adopted development plan. Specifically, it would direct growth on the basis of need and evidence, such as the Herefordshire Housing Market Needs Assessment 2021 (HMANA). The option involves directing medium scale growth towards Hereford, Leominster, Bromyard, Ross-on-Wye, with Ledbury and Kington being identified for low scale growth. Less than half of the county's housing need is directed to Herefordshire's rural areas. In considering this option against the objectives of the SA framework, the option could:

- Deliver housing growth, and affordable housing, across a large selection of settlements. A **significant positive effect** is therefore identified for SA objective 2 (housing).

- Support the ongoing role of Hereford and the market towns, thereby helping to improve their prosperity. While other areas of the county will receive some growth, this might not be enough to reverse existing inequalities. A **minor positive effect** is therefore identified for SA objective 4 (town and retail centres).
- Place further pressure on existing services and facilities in the areas being developed, if these resources are not sufficiently upgraded. The option could also challenge the ability for services and facilities to be provided in areas where they are currently lacking, given the wide distribution of development. However, the broad distribution of growth would help to manage pressures in certain locations. The option could potentially challenge the ability to deliver new infrastructure, given that potential development sites could be smaller (in contrast to a smaller number of large scale proposals). Overall, a **minor positive effect** is therefore identified for SA objective 5 (access to services, facilities and education).
- Direct development at locations where medical facilities, and green and blue infrastructure, is available. The spread of development may also help existing resources from becoming over-used and over-whelmed. A **significant positive effect** is therefore identified for SA objective 6 (physical and mental health and wellbeing).
- Enable rural businesses to grow, as a result of the option allowing for higher levels of growth in the county's villages and rural areas. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 7 (economy). A **mixed (minor positive and minor negative) effect** is also identified for SA objective 8 (employment and reducing inequality and poverty).
- Place development in locations that are well-served by public transport and contain good opportunities for active and sustainable travel. However, by spreading development across multiple locations, there might also be an increase traffic levels across Herefordshire, particularly with respect to the use of private petrol and diesel vehicles. Overall, a **minor positive effect** is identified for SA objective 9 (travel). Associated with this, a **significant positive and minor negative effect** is also identified for SA objective 10 (air quality).

- Continue development in locations that might be sensitive to change, for example, with respect to biodiversity, air quality and landscape setting. Extending the spread of development across county would help to lessen impacts in certain locations. However, the option might also facilitate the delivery of biodiversity net gain, and additional tree cover, in all developments across the county, rather than just a small number of locations. Overall a **minor negative effect, with uncertainty**, is identified for SA objective 11 (biodiversity and geodiversity).
- Place further pressure on the county's historic environments, given that development is directed to multiple locations. **Minor negative effects, with uncertainty**, are also identified for SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).
- Direct development to locations that are already at risk of flooding, and have sensitivities surrounding the supply and quality of water resources. **Minor negative effects** are therefore identified for SA objective 14A (flood risk) and SA objective 14 (water quality and quantity).
- Facilitate the re-use of previously developed (brownfield) land, but also to the loss of previously undeveloped (greenfield) land. Some of this land is also likely to involve the loss of the best and most versatile agricultural land. A **significant negative and positive effect** is identified for SA objective 15 (resources)

4.10 Negligible effects are identified for SA objective 1 (climate change) and SA objective 3 (community cohesion and safety).

County-wide option 2: Focus on Market Towns and Rural Based Growth

4.11 This option involves a different configuration of growth across Herefordshire's five market towns and rural areas. Under this option, over half of the county's housing needs would be directed to Herefordshire's rural areas. Large scale growth would be directed to Leominster, Bromyard, and Ross-on-Wye, with Kington being identified for medium scale growth. The level of

housing to be delivered in Hereford City is lower than the comparable amount envisaged under option 1, although Ledbury continues to be identified for low scale growth. In considering this option against the objectives of the SA framework, the option could, amongst other things:

- Help to deliver more housing, including affordable housing, at a broader number of locations, including the county's rural areas. A **significant positive effect** is therefore identified for SA objective 2 (housing).
- Could encourage additional retail activity in Leominster, Bromyard and Ross-on-Wye, thereby strengthening the vibrancy and vitality of the high streets in these settlements. A **minor positive effect** is therefore identified for SA objective 4 (town and retail centres).
- Reduce development activity in Hereford, thereby helping to reduce pressures on Hereford's existing services, facilities, and transport infrastructure. The option could also help to retain, and enhance, service provision in the county's other market towns, and across the county's rural areas. A **minor positive effect** is therefore identified for SA objective 5 (access to services, facilities and education).
- Help to manage the pressure being placed upon the health facilities, and the green and blue infrastructure, within the settlements identified for growth. Directing growth to rural areas could help to stimulate additional provision in these areas. A **significant positive effect** is identified for SA objective 6 (physical and mental health and wellbeing).
- Support measures for rural diversification, and to support the provision of services and facilities in rural areas. The option could help to address existing imbalances between the county's rural and urban areas, thereby helping to respond to inequalities across the county. Lowering the level of growth to be directed to Hereford could limit the ability to maximise the city's economic strengths. Overall **significant negative effects, with minor positive effects**, are identified for SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty).
- Lead to additional traffic movements since large-scale developments would be directed to areas beyond Hereford, a city that is an important hub for employment and the provision of services and facilities. Additional traffic in rural areas would be generated if employment and necessary

services and facilities are not available close by. A **significant negative, with minor positive effect**, is therefore identified for SA objective 9 (travel). A **significant negative, with minor positive effect**, is also identified for SA objective 10 (air quality).

- Allow for Hereford's environmental constraints to be safeguarded. Reducing the focus of Hereford could help to improve air quality in the city. Lead to development being directed to sensitive locations involving the use of un-developed agricultural land if there are few sites in the centres of each identified settlement. Conversely, there may be greater opportunity to avoid sensitive sites on the basis that a broader suite of settlements have been identified for development. A **minor negative effect** is therefore identified for SA objective 12 (landscapes and townscapes). **Minor negative effects, with uncertainty**, are therefore identified for SA objective 11 (biodiversity and geodiversity) and SA13 (heritage).
- Direct development to locations that are already at risk of flooding, and have sensitivities surrounding the supply and quality of water resources. **Minor negative effects** are therefore identified for SA objective 14A (flood risk) and SA objective 14 (water Quality and quantity).
- Facilitate the re-use of previously developed (brownfield) land but the option is likely to require significant peripheral development that will involve the loss of greenfield land. Given the characteristics of the county, this land is also likely to represent the best and most versatile agricultural land. A **significant negative, with minor positive effect**, is therefore identified for SA objective 15 (resources).

4.12 Again, negligible effects are identified for SA objective 1 (climate change) and SA objective 3 (community cohesion and safety).

County-wide option 3: Focus Growth Across Market Towns and Hereford

4.13 This option involves directing a larger share of the county's development needs towards Hereford and the county's market towns. Less development is

envisaged for rural areas (less than quarter of the county's housing needs). Leominster, Bromyard and Ross-on-Wye are identified for large scale growth, with Hereford, Ledbury and Kington being identified for medium scale growth. In considering this option against the objectives of the SA framework, we believe the option could, amongst other things:

- Deliver a sizeable amount of housing to Hereford and the market towns, which is likely to vary in type, size and tenure. However, the option would involve less housing in rural areas. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 2 (housing).
- Maintain and enhance the retail offer of Hereford and the market towns. However limiting growth in the county's rural areas could adversely impact upon the retailing available across Herefordshire's villages. Overall, a **significant positive, with minor negative effect**, is identified for SA objective 4 (town and retail centres).
- Maintain the primacy of Hereford and support of the enhancement of employment, and the provision of key services and facilities, within the city. The emphasis given to directing growth to the county's other market towns would also help to retain and enhance service provision in these other settlements as well. However, with less growth in rural areas, service provision could suffer. A **significant positive, with minor negative effect**, is therefore identified for SA objective 5 (access to services, facilities and education).
- Encourage an upgrade in medical facilities and green and blue infrastructure across Hereford and the market towns as a result of additional development. However, if these facilities are not provided, existing resources could become overwhelmed. The low level of development envisaged for rural areas will be unable to address existing inadequacies in rural areas. Overall, a **minor positive effect** is identified for SA6 (physical and mental health and wellbeing).
- Extend and protect the economic activity of Hereford and the market towns. However, the ability to generate rural jobs, and to diversify the rural economy, could be compromised given limited amounts of growth that would be directed to Herefordshire's countryside. **Mixed (minor positive and minor negative) effects** are therefore identified for SA objective 7

(economy) and SA objective 8 (employment and reducing inequality and poverty).

- Accentuate existing pressures in Hereford, such as congestion levels and air quality challenges. Intensification in Hereford could lead to a worsening of these issues if sustainable transport options are not encouraged with any new development. However, the option could also help to encourage the use of public and active travel choices since the locations identified for development already support necessary infrastructure. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 9 (travel). A **significant negative with minor positive effect**, is identified for SA objective 10 (air quality).
- A **minor negative effect** is therefore identified for SA objective 12 (landscapes and townscapes). Re-using previously developed (brownfield) land might help to improve townscape quality and facilitate the re-use of historic sites and buildings. Consequently, **minor negative effects with uncertainty** are identified for SA objective 11 (biodiversity and geodiversity) and SA objective 13 (heritage).
- Encourage town-centre development involving the use of previously developed (brownfield) land. Directing development towards towns might lessen the need to use greenfield land on peripheral sites. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 15 (resources).

4.14 Again, negligible effects are identified for SA objective 1 (climate change) and SA objective 3 (community cohesion and safety).

County-wide option 4: Defining Leominster (4a), Ross-on-Wye (4b) and Ledbury (4c) as potential Growth Towns

4.15 This option involves directing development towards a defined market town that will then become a Growth Town and receive an additional 2,000 dwellings.

Ledbury, Leominster and Ross-on-Wye are named as potential candidates. For each option, different levels of growth are directed to Hereford and the market towns. Under 4a, beyond the direction of large scale growth towards Leominster, medium scale growth is highlighted for Hereford and Ross-on-Wye. Bromyard and Ledbury are identified for low scale growth. In comparison, under option 4b, Hereford and Leominster are identified for medium scale growth, beyond the identification of Ross-on-Wye for large scale growth. The settlements of Bromyard and Ledbury are identified for low scale growth. Lastly, under option 4c, Ledbury is identified for large scale development via its role as a Growth Town, while Leominster, Hereford and Ross-on-Wye are identified for medium scale growth. Again the settlements of Bromyard and Ledbury are identified for low scale growth. Kington is identified for low-scale growth across all of the sub-options.

4.16 The county's rural areas would receive a lower level of development than the existing strategy of the adopted development plan (approximately 3,300 dwellings or just over a quarter of the county's growth). In considering this option against the objectives of the SA framework, we believe the option could, amongst other things:

- Deliver significant amounts of housing, of varying size, type and tenure, to those settlements identified for medium or large scale growth. However, the low share of growth to rural areas, would be expected to challenge the delivery of rural affordable housing. **Mixed (minor positive and minor negative) effects** are identified for all sub-options in relation to SA objective 2 (housing).
- Adversely affect the retention and/or performance of rural services and facilities. The option could also adversely affect rural job creation and the diversification of the county's rural economy.
- Encourage the regeneration and renewal of the towns and retail areas within the settlements identified for large or medium scale growth, and particularly the settlement defined as the Growth Town. The option would also maintain Hereford's role as a service centre. However, there is a risk that the primacy given to the selected Growth Town could limit growth elsewhere and be at the expense of delivering vibrancy across the county's other market towns. Rural areas could also suffer given the focus

to the county's urban areas. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 4 (town and retail centres)

- Help to retain, extend, and deliver greater accessibility to a range of services and facilities (including education) for those areas identified for large and medium scale growth. Benefits are likely to be particularly significant for the settlement identified as the Growth Town, since the settlement will be able to benefit from a channelling of development activity and funds. The ability to retain, and enhance, service provision in rural areas is likely to be compromised by the low levels of growth targeted towards Herefordshire's rural areas. Overall, a **minor positive effect** is identified for SA objective 5 (access to services, facilities and education).
- Support additional investment in health facilities and green and blue infrastructure, particularly for those settlements identified for growth. However, if investment fails to occur, existing facilities could become overwhelmed. The scale of growth envisaged for rural areas is unlikely to reverse existing challenges. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 6 (physical and mental health and wellbeing).
- Encourage economic development, and job growth, at the settlements identified for medium and large scale growth. The identified Growth Town would be expected to receive particular investment. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty).
- Facilitate opportunities for non-car based modes of transport, since the settlements identified for medium and large scale growth should enable some growth to be located in places that are well-served by public transport or that are well-connected to active travel connections. However, this may not be the case for developments at the periphery, although large scale projects should provide scope for transport investment. The low level of growth that would be directed to rural areas could compromise sustainable travel options for those living in villages and the surrounding countryside. Overall, a **minor positive effect** is identified for SA objective 9 (travel). Associated with these potential travel impacts, **mixed (minor**

positive and minor negative) effects are also identified for SA objective 10 (air quality).

- Lead to the development of sensitive sites, particularly if there is an inadequate supply of appropriate sites at the selected Growth Town. The intensification of development activity could also place further pressure on the environmental constraints within the settlements identified for medium and large scale growth. A **significant negative effect, with uncertainty**, is therefore identified for SA objective 11 (biodiversity and geodiversity). Similarly, **minor negative effects, with uncertainty**, are identified for SA objective 13 (heritage).
- Adversely affect the adjoining Areas of Outstanding Natural Beauty in both Ross-on-Wye and Ledbury. Consequently, **significant negative effects** are identified for SA objective 12 (landscapes and townscapes). While Leominster does not have such a designation close by, large scale development will inevitably generate an impact so **a minor negative effect** is identified for SA objective 12 (landscapes and townscapes).
- Direct development to locations that are already at risk of flooding, and have sensitivities surrounding the supply and quality of water resources. **Minor negative effects** are therefore identified for SA objective 14A (flood risk) and SA objective 14 (water Quality and quantity).
- Facilitate the use of previously developed (brownfield) land in those settlements that possess urban capacity. However, the option is also likely to require the significant use of previously un-developed (greenfield) land around the peripheries of those towns identified for medium and large scale growth. This will be particularly so for the settlement identified as the Growth Town. Development beyond the urban area will also lead to the loss of the best and most versatile agricultural land. Consequently, **significant negative effects** are identified for each sub-option in relation to SA objective 15 (resources).

4.17 Again, negligible effects are identified for SA objective 1 (climate change) and SA objective 3 (community cohesion and safety).

Countywide option 5: Rural Settlement with Growth Focused in Leominster and Bromyard.

4.18 This option involves the possibility of a directing large scale growth towards a new settlement that would be located in a rural part of the county. Under this option, large scale growth would also be directed to Leominster and Bromyard, with medium scale growth being directed to Kington, Hereford and Ross-on-Wye. Ledbury would receive a low scale of growth.

4.19 The use of un-developed greenfield land would need to be used to deliver the option, particularly with regards to the new settlement. Although the consultation document refers to a number of necessary pre-conditions for any new settlement, the document does not prescribe an optimum size. Instead, it notes how settlements of varying size would be able to support differing levels of services and facilities.

4.20 In considering this option against the objectives of the SA framework, we believe the option could, amongst other things:

- Provide a significant amount of housing at a single location, allowing for variety in size, type and tenure. A new settlement could also generate a significant amount of affordable housing, but the scale of the scheme would mean that provision is unlikely to be deliverable in the short-term. The settlement would also help to address rural housing need in a way that avoids widespread, and potentially intensive, development in the county's rural areas. However, medium scale growth at Kington, Hereford and Ross-on-Wye may not be sufficient at responding to housing need at these settlements. Overall, a **minor positive effect** is identified for SA objective 2 (housing).
- Limit the benefits that can be directed to Hereford and some of the market towns as developing a new settlement could lead to the generation of a new, competing retail centre. Retailing in Leominster and Bromyard will be supported by the large scale growth being directed to these centres.

Overall, a **significant negative, with minor positive, effect** is identified for SA objective 4 (town and retail centres).

- Allow for the delivery of modern services and facilities within the new settlement, although a focus will be needed with respect to viability and phasing. Assuming these are optimally located, these services and facilities can help to encourage the use of public transport and active forms of travel. However, the option does little to help retain services and facilities within existing rural villages. Overall a **minor positive effect** is identified for SA objective 5 (access to services, facilities and education)
- A new settlement would be expected to deliver new services and facilities, including health facilities and green and blue infrastructure. However, if these are not provided, or delivered late in the project, then pressure could be applied on existing facilities. Areas not receiving growth are unlikely to be able to upgrade their facilities. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 6 (physical and mental health and wellbeing).
- Weaken the ability of the new development to enhance and extend the existing economies of Hereford and the other market towns. Similarly, it may offer limited scope for addressing inequalities. However, the new settlement could provide an opportunity for Herefordshire's economy to be rebalanced, and for new high-tech facilities to be provided. Overall, **mixed (minor positive and minor negative) effects** are identified for SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty).
- Lead to increases in travel, if the new settlement is poorly located to existing areas of employment, or where services and facilities are unavailable. However, developing a new settlement offers scope for creating a layout, and including design features, that can encourage active and sustainable travel. Developing a large settlement could also be conducive to supporting new public transport networks. Overall, **mixed (minor positive and minor negative) effects** are identified for SA objective 9 (travel). **Mixed (minor positive and minor negative) effects** are also identified for SA objective 10 (air quality). Developing away from Hereford would lessen the potential impact upon the city's Air Quality Management Area, assuming that the residents of the new settlement can

satisfy their day to day needs without travelling. However, large scale growth is directed to Leominster that also has an Air Quality Management Area.

- Generate a significant landscape impact given the scale of development that a new settlement would entail. Landscape impacts would also be probable at the other locations identified for growth. However, by limiting development in rural areas, the option would help to protect environmental integrity in other parts of the county. The option would also help to retain the character of rural areas given the reduced level of additional growth that the option envisages. Overall, however, a **significant negative effect** is identified for SA objective 12 (landscapes and townscapes). A **significant negative effect, with uncertainty**, is also identified for SA objective 11 since the scale of development means that adverse impacts are likely to be unavoidable. Similarly, a **minor negative effect, with uncertainty**, is also identified for SA objective 13 (heritage).
- Allow for any new settlement to build in optimum solutions for encouraging sustainable design, from the provision of sustainable urban drainage to the provision of green infrastructure. However, development at this scale would increase flood risk since the scheme would need to use previously undeveloped (greenfield) land. A **minor negative effect** is therefore identified for SA14A (flood risk). Large scale development in a new location could also generate pressures with respect to water supply, and apply further challenge to Herefordshire's existing water systems. A **minor negative effect** is therefore identified for SA14B (water quantity and quality).
- Lead to the significant loss of previously developed (greenfield) land, which is also likely to comprise some of the county's best and most versatile agricultural land. A **significant negative effect** is therefore identified in relation to SA objective 15 (resources).

4.21 Again, negligible effects are identified for SA objective 1 (climate change) and SA objective 3 (community cohesion and safety).

Conclusions from the appraisal of the county options

4.22 Option 1 has the highest number of ‘significant positives’ and ‘minor positives’ (five), followed by option 2 (four). Both of these options have the same number of ‘significant positives (two). In terms of ‘significant negative effects’, options 4b, 4c and 5 have three each.

4.23 As noted above, the Spatial Options consultation document also included options for the rural parts of the county. The appraisal findings for these options are summarised below and are presented in full in Appendix D.

Rural option 1: Current Strategy – dispersed approach across settlements

4.24 This option involves dispersed housing growth across the largest selection of the county’s rural settlements, with the level of growth being proportionate to the size of each named settlement. A graphic included with the Spatial Options Consultation of January 2022 suggests how growth would be directed towards 49 settlements [See reference 41]. These settlements are those identified as supporting key services and have a good level of accessibility. In considering this option against the objectives of the SA framework, we believe the option could, amongst other things:

- Deliver a range of housing at the settlements being defined, although the quantum at each might limit the potential for a mix of types, sizes and tenures to be provided. The option could also adversely affect the delivery of housing, and rural affordable housing in particular, at un-defined settlements. The housing sites at the defined villages may also be too small to viably provide affordable housing. Overall, **a minor positive effect** is identified for SA objective 2 (housing).

- Spread the pressure that is placed upon the county's services and facilities, although the scale of growth being directed to each settlement might not be adequate enough to retain or enhance existing services and facilities. A **mixed (minor positive and minor negative) effect** is identified for SA objective 5 (access to services, facilities and education).
- A **mixed (minor positive and minor negative) effect** is identified for SA objective 6.
- Facilitate rural diversification since the option distributes growth around the county. This economic development could be potentially significant in and around the named rural settlements. A **minor positive effect** is therefore identified for SA objective 7 (economy). The option could also stimulate rural employment growth but spreading development, but the option is unlikely to reduce inequalities across the county. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 8 (employment and reducing inequality and poverty).
- Maintain existing travel flows and provide limited scope for supporting the use of public transport and encouraging modes of active travel. While some development is likely to occur at settlements where the opportunity for walking and cycling day is considered to be more viable, development in smaller settlements is likely to remain car dependent. A **significant negative effect** is therefore identified in relation to SA objective 9 (travel). Spreading development around the county could potentially help to avoid further build-up at congestion hot-spots and limit increases in emissions. However, as noted above, the option could also lead to greater usage in private vehicles. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 10 (air quality).
- Help to protect sensitive environments by widely distributing development pressure. However, the option would also distribute development around Herefordshire's rural, and sensitive, areas. **Minor negative effects** are therefore identified for SA objective 11 (biodiversity and geodiversity), SA objective 12 (landscapes and townscapes), and SA objective 13 (heritage).
- Place further pressure on the rivers and water courses that extend throughout the county. The loss of previously undeveloped (greenfield)

land would also lead to the loss of natural flood storage. A **minor negative effect** is identified for SA objective 14A (flood risk), but with some uncertainty, given that the option does not prescribe specific locations. The development may place further pressure on the quality of the county's water courses, leading to a **minor negative effect** in relation to SA objective 14B.

- Lead to the loss of previously undeveloped greenfield land, which could also be some of the county's best and most versatile agricultural land. However, given the scale of growth being directed to rural areas, development sites are likely to be relatively small. A **minor positive effect** is therefore identified for SA objective 15 (resources).

4.25 Negligible effects are identified for SA objective 1 (climate change), SA objective 3 (community cohesion and safety), and SA objective 4 (town and retail centres).

Rural option 2: Focus on larger settlements

4.26 The second rural option involves developing at a smaller number of settlements than envisaged through option 1 above. A graphic included with the Spatial Options Consultation of January 2022 suggests how the option would see development being directed to 25 settlements **[See reference 42]**. These settlements are those with a reasonable level of accessibility, together with services and facilities with adequate transport links. In considering this option against the objectives of the SA framework, we believe the option could, amongst other things:

- Lead to the delivery of a mix of homes, in relation to size, type and tenure, on the basis that development sites at the defined settlements will be larger. However, the option could limit the potential for housing, and affordable housing, at the settlements that are not identified for growth. This could potentially lead to the stagnation of those settlements not defined. Overall, a **minor positive effect** is therefore identified for SA objective 2 (housing).

- Protect and extend the range of services and facilities on offer, particularly at the settlements identified for growth. However, those settlements receiving limited or no development are likely to further stagnate. Consequently, a **mixed (minor positive and minor negative) effect** is identified for SA objective 5 (access to services, facilities and education).
- A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 6 (physical and mental health and wellbeing).
- Provide support towards rural diversification and employment growth, with the concentration of growth allowing for the clustering of economic activity to occur. **Minor positive effects** are therefore identified for SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty).
- Provide a greater focus for the provision of public transport and active travel on the basis that investment can be channelled towards to a defined list of settlements. While this could help to positively tackle inequalities where investment is being made, the reverse could occur in those locations receiving limited growth. Overall, a **minor positive effect** is identified for SA objective 9 (travel). Similar justification is likely to lead to a **mixed (minor positive and minor negative) effect** in relation to SA objective 10 (air quality).
- Introduce further pressure on sensitive landscapes. Consequently, as with the option above, **minor negative effects** are identified for SA objective 11 (biodiversity and geodiversity), SA objective 12 (landscapes and townscapes), and SA objective 13 (heritage). The first and third of these are identified with uncertainty.
- Place further pressure on the rivers and water courses that extend throughout the county. The loss of previously undeveloped (greenfield) land would also lead to the loss of natural flood storage. A **minor negative effect** is identified for SA objective 14A (flood risk), but with some uncertainty, given that the option does not prescribe specific locations. The development may place further pressure on the quality of the county's water courses, leading to a **minor negative effect** in relation to SA objective 14B.

- Result in the loss of previously undeveloped (greenfield) land and the possible loss of the best and most versatile agricultural land in the county. However, given spread of development, the size of each loss should hopefully be quite small. However, a minor positive effect is identified for SA objective 15 (resources).

4.27 Again, negligible effects are identified for SA objective 1 (climate change), SA objective 3 (community cohesion and safety), and SA objective 4 (town and retail centres).

Rural option 3: Focus growth on rural hubs

4.28 This option directs growth to the smallest number of key settlements, with those being selected having the strongest links to sustainable transport networks and services. While these places are described as rural hubs, the option does not identify specific settlements. However, a graphic included with the Spatial Options Consultation of January 2022 suggests how growth would be directed to 15 settlements [See reference 43]. In considering this option against the objectives of the SA framework, we believe the option could, amongst other things:

- Provide a mix of homes at the settlements identified for growth, including affordable housing. The option may not be able to respond to housing needs in other rural areas of Herefordshire. A **minor positive effect** is identified for SA objective 2 (housing).
- Support the retention and provision of key services and facilities in the settlements being defined for growth, benefitting both new and existing residents. The option could also facilitate the delivery of infrastructure, since larger schemes are likely to be more capable at releasing funds for improving local provision. However, the option could place pressure on existing infrastructure if schemes fail to deliver the improvements being envisaged. In addition, limited growth elsewhere in the county could limit the ability for other key services and facilities to be retained and enhanced. A **mixed (minor positive and minor negative) effect** is identified for SA 5 (access to services, facilities and education).

- A **mixed (minor positive and minor negative) effect** is therefore identified for SA 6 (physical and mental health and wellbeing).
- Generate economic benefit for the rural settlements being identified for growth, with greater opportunities for rural diversification and employment. Inequalities between the identified settlements and Hereford and the market towns could also be narrowed. However, those areas that are not being targeted for growth could suffer. A **mixed (minor positive and minor negative) effect** is therefore identified for SA 7 (economy), with a **minor positive effect** for SA 8 (employment and reducing inequality and poverty).
- Facilitate a modal shift towards active and public transport, and potentially reduce congestion around the county, since development will be directed to those settlements that have established transport connections. Directing development close to existing transport hubs will help users to maximise the use of the transport options available. In addition, extra development could also encourage the provision of further services and the creation of new sustainable links. However, the option could also accentuate local levels of congestion, since the option directs development towards existing transport corridors. In addition, it is recognised that the identified rural settlements will have less established connections than either Hereford or the market towns. Limiting development in other parts of Herefordshire is likely to maintain existing traffic patterns and modal choices. However, on balance, a significant positive effect is identified for SA objective 9 (travel). A **minor positive effect** is also identified for SA objective 10 (air quality).
- Adversely impact the environment, since development is likely to go around the peripheries of each identified settlement. **Minor negative effects** are therefore identified for SA objective 11 (biodiversity and geodiversity), SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage). Uncertainties are suggested for the first and last of these effects since exact effects will be dependent on the location, form and design of individual schemes.
- Place further pressure on the rivers and water courses that extend throughout the county, as noted above. A **minor negative effect** is identified for SA objective 14A (flood risk), but with some uncertainty, given that the option does not prescribe specific locations. The

development may place further pressure on the quality of the county's water courses, leading to a **minor negative effect** in relation to SA objective 14B.

- Place pressure to use sensitive sites in greenfield locations, particularly if there is a lack of suitably sized brownfield sites to accommodate the development being envisaged. The option is expected to involve larger development sites, but in fewer locations. Given the nature of the county, development schemes are also likely to lead to the loss of the best and most versatile agricultural land. However, by concentrating development across the county, impacts elsewhere can be minimised. A **minor negative effect** is therefore identified for SA objective 15 (resources).

Rural option 4: Focus growth within settlements outside AONBs and Conservation Areas

4.29 This option gives greater protection to Herefordshire's two Areas of Outstanding Natural Beauty (AONBs), now known as National Landscapes, and its network of over 40 rural-based conservation areas. For these areas, only limited rates of growth are envisaged, with the county's housing needs being directed to areas beyond these protected areas. A graphic included with the Spatial Options Consultation of January 2022 suggests how rural development, under this option, would be directed to 25 settlements [\[See reference 44\]](#).

4.30 In considering this option against the objectives of the SA framework, we believe the option could, amongst other things:

- Help to deliver additional housing to areas beyond the protected areas. However, the option would also place further pressure to the housing markets within these protected areas since a lack of additional supply will lead to higher prices. The problem could be exacerbated in those areas where holiday lets dominate. On balance, a **minor positive effect** is identified for SA objective 2 (housing).
- Retain, and possibly extend, service provision in the settlements identified for growth beyond the protected areas. However, the option would offer

limited scope for the services and facilities within protected areas to be sufficiently improved. Conversely, the option could avoid existing services and facilities within these protected areas from becoming overwhelmed from more development. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 5 (access to services, facilities and education).

- Support growth in tourism, since the character and quality of the most historic and attractive parts of the county would be protected, making these more attractive places for tourists to visit. This could help rural job creation and support rural diversification. However, limiting housing growth in the protected areas could have a limiting effect. Settlements beyond the protected areas, that will receive more growth, are likely to prosper. **Mixed (minor positive and minor negative) effects** are identified for SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty).
- Maintain existing transport patterns, and possibly existing challenges associated with congestion and air quality. Beyond the protected areas, the option envisages development being directed to a range of locations. The extent to which these locations are served by public transport, and support green and active travel, will vary. This variation is also likely to extend across the settlements that fall within the protected areas. If some of these settlements are well-connected, then the strategy of directing growth to other locations could limit the potential for these links to be used. There is therefore a risk that development is steered away from locations that would otherwise be desirable for expansion. Overall, a **mixed (minor positive and minor negative) effect** is identified for SA objective 9 (transport). A **mixed (minor positive and minor negative) effect** is also identified for SA objective 10 (air quality).
- Help to protect areas of sensitivity by directing development to other parts of the county. This could increase the attractiveness of these protected areas to visit, or to live and work within. The option would help to preserve and enhance historic and natural character within the areas being protected. However, landscape and townscape quality will be impacted by the development being directed to locations beyond the protected areas.

Overall, a **mixed (minor positive and minor negative) effect** for SA objective 12 (landscapes and townscapes).

- Adversely affect the environments of other locations that are sensitive, but not formally protected in any way.

Conclusions from the appraisal of the rural options

4.31 None of the rural options have any significant positive effects aligned to them, but rural option two has the highest number of minor positive effects (four). This is then followed by option three that has three minor positive effects. Options one and four have two minor positive effects each.

Overall conclusions

4.32 As noted above, the options that have been appraised were initially presented in the Spatial Options Consultation Document that was published in January 2022 [See reference 45]. For the county options, the document presented different combinations for delivering growth between Hereford, the market towns, and the county's rural areas. The rural options centred upon delivering growth between varying numbers of settlements.

4.33 For the county options, Option 1 was appraised as being the best performing. While this option represents a continuing of current strategy, it also gives a significant proportion of the necessary growth to Hereford. This additional development will help to maintain the city's current status, and provide scope for extending the economic activity, and services and facilities, that Hereford supports today. Beyond distributing growth between the market towns, the option also directs a significant number of new homes to rural areas (the second highest figure after Option 2).

4.34 The option therefore sits at a mid-point between the rural-focused strategy of Option 1, and the urban-focused strategy of Option 3. While both of these two options have merit, the appraisal identifies potential concerns. For example, while Option 2 would help to balance growth across the county, and potentially help to protect and enhance the economies, services and facilities of rural communities, the option may lead to increased travel (and higher emissions) if day to day needs cannot be locally met. It is likely that these travel patterns would gravitate towards Hereford and the market towns, placing further pressure existing congestion and air quality challenges. Option 3, with its emphasis on urban growth, would potentially help to reduce commuting from rural communities, but directing large scale growth towards Hereford and the market towns could also generate congestion if residents do not take up the public transport and green travel options available. Given the amount of previously developed land available, it is likely that development will come via schemes at the periphery of each settlement. These large scale projects could help to deliver a range of housing, and facilitate the delivery of infrastructure, but they would also generate environmental impacts too.

4.35 Despite the relative strength of Option 1, it will be important to ensure that service and infrastructure provision keeps aligned with growth to help ensure existing pressures are not amplified. It will also be important to ensure that rural growth is properly located and is accessible to public transport and green and active travel.

4.36 Similar arguments also apply to the optimum rural option, Option 2. This strategy follows the same preference towards directing growth to the settlements where services, facilities and transport are likely to be more frequent. While it does protect rural areas from adverse forms of development, it could also lead to rural communities becoming stagnated. Thought will therefore be needed about the type of development that these communities could appropriate accommodate.

4.37 The options considered above have since been developed and refined through the Place Shaping Consultation that took place during the summer of 2022. The areas and options underpinning this consultation are not appraised here, but they are considered through Chapter 6 as part of the context for the

Chapter 4 Sustainability Appraisal Findings for the Strategic Options

place shaping policies that are included within the Draft (Regulation 18) Herefordshire Local Plan.

Chapter 5

Sustainability Appraisal Findings for Site Options

5.1 This chapter sets out the SA findings for the reasonable alternative site options that have been considered to date for allocation in the new Local Plan. Information about how the reasonable alternative site options were identified by Herefordshire Council was provided in Chapter 2. A total of 60 residential, eight employment and nine mixed-use site options have been appraised.

Site appraisal methodology

5.2 Herefordshire Council provided LUC with a list of reasonable alternative site options to appraise. The sites are listed in Annex 1, which also includes site plans and summary proformas for each assessed site option. Each of the site options was appraised using the sustainability criteria presented in Appendix E, with these linking back to the objectives of the SA framework presented in Chapter 3. Some of the effects were identified using Geographic Information System (GIS) data to determine the proximity of site options to the constraints and features underpinning the site assessment criteria. Other effects were determined drawing from the findings of Herefordshire Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA provides details concerning the characteristics of each site, its size and potential development capacity, and its sensitivity in relation to a number of environmental factors (including ecology, landscape and flood risk).

5.3 Table 5.1 at the end of this chapter provides a summary of the SA findings for all of the residential, mixed-use and employment site options that have been appraised. To support the appraisal of the sites, it was necessary to refine three of the SA objectives in order to enable distinct effects to be identified for the

individual components of each objective. The following objectives were sub-divided:

- **Objective 5** (access to services, facilities and education) was divided into two parts. Effects on Part A are determined on the basis of whether the site is within 720 metres of either Hereford, a market town (Bromyard, Kington, Ledbury, Leominster or Ross on Wye) or a village. Effects on Part B are determined by the distances to secondary and primary schools.
- **Objective 9** (travel) was split into two parts. The effect on Part A is calculated on the basis of the site's accessibility to a rail station, a bus stop or a cycle route. The effect on Part B is calculated on the basis of whether the site is within Hereford, Bromyard, Kington, Ledbury, Leominster, Ross on Wye or a village.
- **Objective 15** (resources) was split into three parts. Part A makes a distinction between whether the site comprises greenfield or brownfield land, while Part B relates to whether the site falls within a minerals Safeguarding Area. Effects on Part C are identified based on the agricultural classification of the land contained within the site.

Sites assessed

5.4 As noted above, a total of 77 site options have been assessed. There are 60 residential site options, eight employment site options, and nine mixed-use site options. Geographically, there are 21 site options in Hereford, 11 in Ledbury, 10 in Ross-on-Wye, 9 in Leominster, six in Kington and five in Bromyard. There are also 15 rural site options, with these being distributed across the centres of Bartestree (3), Bodenham (3), Canon Pyon (3), Colwall (3), and Weston under Penyard (3). Maps showing the location, and boundaries, of these site options are presented in Annex 1.

Limitations

5.5 A number of limitations were encountered through the appraisal of the sites:

- Some of the sites were not able to be assessed against certain SA objectives due to corresponding HELAA assessments being absent or incomplete. The gaps extend across a number of fields, including the classification of the site as either greenfield or brownfield, site capacity, and the HELAA ratings for ecological and landscape sensitivity, and identified flood risk. The annotation 'N/A' shows where data was absent.
- Effects in relation to SA objectives 5 (access to services, facilities and education) and 9 (travel) were identified on the basis of where the site is located with respect to Hereford, the county's market towns, and Herefordshire's villages. Settlement boundaries were provided by the Council to facilitate this, although a settlement boundary was not available for Bromyard. For this settlement, distances were measured manually. In terms of identifying villages, reference has been made to the 65 settlements listed within Table 4 of the Draft (Regulation 18) Herefordshire Local Plan: Spatial Strategy and Strategic Policies. Again the Council provided settlement boundaries for these, but data was not available for the following:
 - Bridstow/Wilton
 - Credenhill
 - Holme Lacy
 - Moreton on Lugg
 - Much Dewchurch
 - Staunton on Wye
 - Sutton St Nicholas
 - Wormbridge

5.6 However, none of the sites that are appraised below are in proximity to these villages.

SA findings

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

5.7 All of the sites are recorded as having a **negligible effect** 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.

5.8 A total of 29 of the residential site options are recorded as having a **significant positive effect** on this objective as development would involve the construction of 100 or more homes. This size of scheme makes it more achievable to deliver a greater range of house types, and to offer a broader suite of tenures to meet demand. There is no particular geographical pattern to the sites that perform well against this objective as effects are determined only by site size.

5.9 A further 17 site options are recorded as having a **minor positive effect** on the objective as development would lead to the construction of 0-99 homes. No data was available for 14 of the sites.

5.10 Of the mixed-use site options, eight are recorded as having a **significant positive effect** on this objective (HLAA/154/001/002; HLAA/769/001;

O/Ross/004; O/Ross/005; Bur32a; Bur09a; HLAA/203/001a; and HLAA/197/004). There was no data available for one of the site options.

5.11 All of the eight employment site options are recorded as having a **negligible effect** as these sites will not deliver housing and so make no contribution to the achievement of this objective.

SA objective 3: To support community cohesion and safety.

5.12 A total of 18 residential site options are recorded as having a **minor positive effect** due to being located within a Lower Super Output Area (LSOA) classified as being in the 40% most deprived nationally. The most deprived areas across Herefordshire are located in south Hereford, Leominster, Bromyard and Ross-on-Wye; therefore it is the site options in those areas which will have minor positive effects for this reason. The remaining 42 residential site options do not fall within the most deprived areas and are therefore recorded as having a **negligible effect** in relation to this objective.

5.13 One of the mixed use site options is recorded as having a **minor positive effect**, again as a result being located within a LSOA classified as being in the 40% most deprived nationally (HLAA/203/001a). This site option relates to land at Lower Bullingham. The seven other mixed use site options were recorded as having a negligible effect in relation to this objective.

5.14 Three of the employment site options are recorded as having a **minor positive effect**, again for the same reasons as above. One of the site options ((NDP/Broc/008) is located at Hodgepatch Manor beyond the eastern boundary of Bromyard, immediately south of the A44. The second site option (HLAA/825/001), which is also in Bromyard, relates to land west of the Linton Trading Estate. Finally, the third site relates to an Enterprise Zone Extension in Hereford (HLAA/733/001). The five other employment site options are recorded as having a negligible effect in relation to this objective.

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

5.15 A total of 28 residential site options are recorded as having a **minor positive effect** since the sites fall within either Hereford, or the market towns of Bromyard, Kington, Ledbury, Leominster or Ross on Wye. The remaining 32 sites are recorded as having a **negligible effect** on the basis that these sites do not fall within either Hereford or one of the five market towns.

5.16 Eight of the mixed-use site options are recorded as having a **minor positive effect**, again on the basis that the sites fall within either Hereford, or a defined market town. The sites include HLAA/769/001, O/Ross/004, and O/Ross/005 at Ross-on-Wye and HLAA/751/001, Bur32a, Bur09a, HLAA/203/001a and HLAA/197/004 (at Hereford). The remaining three mixed-use site options are recorded as having a negligible effect, for the same reasons as noted above.

5.17 Five of the employment site options are recorded as having a **minor positive effect** for the same reasons as given above. The sites comprise W461/4ZPP (at Ross-on-Wye); Housing Area 6 and HLAA/821/001 (at Ledbury); and sites HLAA/733/001 and HLAA/802/001 (at Hereford). The remaining three employment site options are recorded as having a **negligible effect**, for the same reasons as noted above.

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

5.18 Distances from a defined place were used to assess accessibility to key services and facilities. In terms of the residential site options, 14 are recorded as having a **significant positive effect** since these sites are located within 720m of the built-up area of Hereford. These sites comprise HLAA/703/001; HLAA/248/001a; Stm01; O/Her/007a; Thr23; HLAA/637/001; Hol12b; Hol13a;

HLAA/451/003; Thr19; Thr26a; Bur30; Bur31 and HLAA/666/002. A further 23 site options are recorded as having a **minor positive effect** since these sites are located within 720m of the built-up area of either Bromyard, Kington, Ledbury, Leominster or Ross on Wye. For example, in Ross-on-Wye, residential site options HLAA/769/001, O/Ross/004 and O/Ross/005 are located to the east of the town centre and can access the primary and secondary schools available at Three Crosses. A **negligible effect** was recorded against 13 residential sites since, whilst not being close to Hereford or one of the five market towns, they are within 720m of one of Herefordshire's defined villages. The remaining 10 sites are recorded as having a **minor negative effect** since these sites neither fall within 720m of Hereford, the five market towns, or a defined village.

5.19 In terms of the mixed-use site options, five are recorded as having a **significant positive effect** since, again, these sites are located within 720m of the built-up area of Hereford. Three mixed-use site options are recorded as having a **minor positive effect**, since these sites are located within 720m of the built-up area of either Bromyard, Kington, Ledbury, Leominster or Ross on Wye. Lastly, one of the site options (HLAA/154/001/002) is recorded as having a **minor negative effect**.

5.20 For the same reasoning as above, two of the employment site options are recorded as having a **significant positive effect**. A further four employment site options are recorded as having a **minor positive effect**, with the final two options being recorded as having a **minor negative effect**.

5.21 For the 69 residential and mixed-use sites, the likely effects were also determined based on the distance of these sites from educational facilities. Some 11 residential site options (HLAA/759/001; HLAA/770/001; HLAA/088/001; HLAA/451/003; HLAA/016/001; K/15; HLAA/054/002; K12-K13; SS/BY2 (a); SS/BY2 (b) and HLAA/759/001a) and one mixed-use site option (HLAA/197/004) are recorded as having a potential but **uncertain significant positive effect**, since these sites are within 900m of a secondary school and 450m of a primary school. A further 15 residential site options and five mixed-use site options are recorded as having a potential but **uncertain minor positive effect**, since these sites are within 900m of a secondary school or within 450m of a primary school (but not both). Lastly, 34 residential site

options and three mixed-use site options are recorded as having a potential but **uncertain minor negative effect**, since these sites are more than 900m from a secondary school and more than 450m from a primary school. In all cases, effects are uncertain as they will depend on capacity at existing schools to accommodate new pupils, which is not known.

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

5.22 With respect to this objective, consideration was given to the accessibility of site options to healthcare facilities, open space and sports facilities. Overall, 20 residential site options are recorded as having a **significant positive effect**, since these sites are located within 720m of at least one healthcare facility and an area of open space or a sports facility. These options comprise HLAA/62/1; HLAA/827/1; HLAA/756/001; HLAA/758/001; O/Leo/019a; HLAA/770/001; HLAA/728/001; O/Col/003; W499; HLAA/637/001; HLAA/016/001; O/K/034; K/15; HLAA/054/002; HLAA/016/004; HLAA/145/003/4/5; K12-K13; HLAA/186/001; and O/Col/007a; and HLAA/759/001a. A further 25 residential site options are recorded as having a **minor positive effect**, on the basis that these sites are located within 720m of either at least one healthcare facility or an area of open space/sports facility (but not both).

5.23 One site option is recorded as having a **minor negative effect** since this site option is not within 720m of either a healthcare facility or an area of open space/sports facility. Lastly, 14 sites are recorded as having a potential but **uncertain significant negative effect** on the basis that the sites seem to contain an area of open space or an outdoor sports facility which could be lost as a result of development.

5.24 In terms of the mixed-use options, six are recorded as having a **significant positive effect**, one is recorded as having a **minor positive effect**, and two

site options as having an **uncertain significant negative**. The criteria used to appraise the residential site options were used once again here.

5.25 For the employment sites, all eight are recorded as having a **minor positive effect** since all are located within 720m of an area of open space, sports facility or cycle path.

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

5.26 Only the eight employment and nine mixed-use site options were assessed against this objective, with site size being the determinant in the effect recorded. A total of 16 site options, comprising an equal mix of both employment and mixed-use site options, are recorded as having a **significant positive effect** since these sites are more than 5ha in size. These sites comprise HLAA/154/001/002; HLAA/769/001; O/Ross/004; O/Ross/005; Bur32a; Bur09a; HLAA/203/001a; HLAA/197/004; W461/4ZPP; NDP/Broc/008; Housing Area 6; HLAA/822/001; HLAA/825/001; HLAA/821/001; HLAA/733/001; and HLAA/802/001. A further site (HLAA/751/001), a mixed-use site option, is recorded as having a **minor positive effect** as it is smaller in size.

5.27 All 60 residential site options are recorded as having a **negligible effect** since their location will not directly influence sustainable economic growth.

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

5.28 Again, only the 17 employment and mixed-use site options were assessed against this objective, with the effects being dependent on the accessibility of the sites to a train station, bus stop or cycle path. Five employment site options and eight mixed-use site options are recorded as having a **significant positive effect** since these sites are located within 1.8km of a train station, or are located within 450m of both a bus stop and a cycle path. The sites comprise HLAA/751/001; HLAA/769/001; O/Ross/004; O/Ross/005; Bur32a; Bur09a; HLAA/203/001a; HLAA/197/004; W461/4ZPP; Housing Area 6; HLAA/822/001; HLAA/821/001; and HLAA/733/001.

5.29 The remaining three employment site options, and the other single mixed-use site option, are recorded as having a **minor positive effect** against this objective. Although these sites are positioned beyond the distance thresholds that are identified above, minor positive effects would still be expected given the nature of the proposed development.

5.30 As for SA objective 7 (economy) above, all 60 residential sites are recorded as having a **negligible effect** since the location of residential sites within Herefordshire will not directly influence the delivery of employment opportunities.

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

5.31 All residential, mixed-use, and employment sites were appraised against this SA objective, with effects being recorded in two parts. The first part assessed the distance of the sites to a rail station, bus stop or cycle route. The second part involved an assessment of the site's general location. With regards to the first part, the assessment only considered distances for accessing the transport link. Service frequencies were not able to be taken into account.

5.32 In terms of the first part of the assessment, 31 residential site options are recorded as having a **significant positive effect** since these sites are those that are within 1.8km of a railway station, or are within 450m of both a bus stop and a cycle path. Sites in proximity to the county's principal railway stations, at Ledbury, Leominster and Hereford, benefit in this regard. These sites comprise HLAA/703/001; HLAA/248/001a; Stm01; HLAA/121/001/001a; O/Led/006; HLAA/62/1; HLAA/198/1; HLAA/827/1; HLAA/759/001; HLAA/756/001; HLAA/758/001; O/Leo/019a; HLAA/770/001; O/Col/003; W499; HLAA/637/001; Hol12b; Hol13a; HLAA/016/001; K/15; HLAA/755/001; HC/Ross/002; HC/Ross/001; Thr19; HLAA/054/002; HLAA/016/004; K12-K13; O/Col/007a; HLAA/759/001a; Bur30; and Bur31.

5.33 A further 28 residential sites are recorded as having a **minor positive effect** since these sites are located more than 1.8km from a railway station but are located within 450m of a bus stop or cycle path (but not both). Only a single site option is recorded as having a **minor negative effect** (HLAA/153/001/003) as it is located more than 1.8km from a railway station and more than 450m from a bus stop and cycle route. If this site option is taken forward as an allocation it will be particularly important to ensure that sustainable transport infrastructure is incorporated into the development if an increase in car use is to be avoided.

5.34 Eight of the mixed-use site options were recorded as having a **significant positive effect** for the same reasons presented above. These sites comprise HLAA/751/001; HLAA/769/001; O/Ross/004; O/Ross/005; Bur32a; Bur09a; HLAA/203/001a; and HLAA/197/004. The final mixed-use site option (HLAA/154/001/002) is recorded as having a **minor positive effect** for the same reasons as listed for the housing site options.

5.35 Five of the eight employment site options are recorded as having a significant positive effect. These comprise site options W461/4ZPP in Ross-on-Wye; Housing Area 6 in Ledbury; HLAA/822/001 in Leominster; HLAA/821/001 in Ledbury; and HLAA/733/001 in Hereford. The three remaining site options were recorded as having a **minor positive effect**.

5.36 In terms of the second part of the assessment, 13 residential site options are recorded as having a **significant positive effect** as the sites fall within Hereford. A further 15 of the site options fall within one of the five county market towns (Bromyard, Kington, Ledbury, Leominster or Ross on Wye) and are recorded as having a **minor positive effect**. Nine of the sites are recorded as having a **negligible effect** since these are located within one of Herefordshire's defined villages. Lastly, 23 site options are recorded as having a **minor negative effect** since these are not located within either Hereford, the market towns or one of the county's villages. With regards to the mixed-use options, five of the site options are recorded as having a **significant positive effect** because they are at Hereford, with three of the site options being recorded as having a **minor positive effect** because they are located at one of the market towns. A single site (HLAA/154/001/002), occupying land to the south of Bromyard, is recorded as having a minor negative effect.

5.37 Lastly, in terms of the employment site options, two options (HLAA/733/001 and HLAA/802/001) are located at Hereford and so are recorded as having a **significant positive effect** (W461/4ZPP; Housing Area 6; and HLAA/821/001), with a further three sites being recorded as having a **minor positive effect**. Finally, three sites are recorded as having a minor negative effect.

SA objective 10: To improve air quality.

5.38 All of the 77 sites were assessed in terms of their proximity to the county's Air Quality Management Areas (AQMAs). All of the site options were recorded as having a **negligible effect** since all are located more than 500m from the declared AQMAs in Leominster and Hereford .

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

5.39 All of the residential, mixed-use and employment sites were appraised, with effects being dependent on the ratings that were given for 'biodiversity and geodiversity' within Herefordshire Council's Housing and Employment Land Availability Assessment (HELAA). In all cases, effects are uncertain as they will depend on the detailed proposals for developments that may come forward.

5.40 Of the residential site options, 24 are recorded as having a potential but **uncertain negligible effect** as they were awarded a 'green' rating in the HELAA. These sites comprise Stm01; HLAA/827/1; O/Leo/019a; HLAA/771/001; HLAA/728/001; O/Col/003; Thr23; HLAA/016/001; O/K/034; K/15; HLAA/177/001; Thr19; Thr26a; P842/2; SS/BY2 (a); SS/BY2 (b); O/Bart/006; HLAA/186/001; HLAA/631/001; O/Col/007a; HLAA/823/001; Bur30; Bur31; and HLAA/666/002.

5.41 A further 20 residential site options are identified as having a potential but **uncertain minor negative effect** since these were awarded a 'amber' rating in the HELAA. Lastly, one residential site option, covering land to the south of Bromyard, was recorded as having an **uncertain significant negative effect** (HLAA/563/001). Some 15 site options have yet to be assessed in the HELAA with respect to biodiversity and geodiversity. In terms of the mixed-use site options, five are recorded as having an **uncertain negligible effect**. These sites comprise HLAA/154/001/002; Bur32a; Bur09a; HLAA/203/001a; and HLAA/197/004. Again, these sites were given a 'green' rating for biodiversity in

the HELAA. Three sites are recorded as having a **minor negative effect** since these were awarded an 'amber' rating in the HELAA. One of the site options has yet to be assessed in the HELAA with respect to biodiversity and geodiversity (O/Ross/005).

5.42 In terms of the eight employment site options, one option (HLAA/802/001) is recorded as having an **uncertain negligible effect**. Again, this site was given a 'green' rating for biodiversity in the HELAA. A further site is recorded as having a **minor negative effect**, while site option HLAA/733/001 is recorded as having an **uncertain significant negative** against the objective. Five of the site options have yet to be assessed in the HELAA with respect to biodiversity and geodiversity.

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

5.43 Again, all of the residential, mixed-use and employment sites were appraised against the same criteria. The recorded effects align with the ratings that were given for conserving and enhancing the character and distinctiveness of landscapes and townscapes within Herefordshire Council's Housing and Employment Land Availability Assessment (HELAA). All effects are again uncertain as they will depend on the detailed proposals for development at each site, including the scale and design of built development.

5.44 Seven of the residential site options (HLAA/771/001; HLAA/625/001; HLAA/105/001; K/15; Thr19; Thr26a; and HLAA/196/003) are recorded as having a potential but **uncertain negligible effect** since these sites are recorded as having a 'green' rating in the HELAA. A further 16 residential site options are recorded as having a potential but **uncertain minor negative effect** since these were given an 'amber' rating in the HELAA. Six sites are recorded as having a potential but **uncertain significant negative effect** as these were given a 'red' rating in the HELAA. These sites comprise HLAA/703/001;

HLAA/728/001; HLAA/451/003; HC/Ross/001; P842/2; and HLAA/666/002. A total of 31 of the site options have yet to be assessed in the HELAA with respect to landscape and townscape impact.

5.45 For the mixed-use sites, four of the options are recorded as having a potential but **uncertain minor negative effect** since these were given an 'amber' rating in the HELAA. These options comprise Bur32a; Bur09a; HLAA/203/001a; and HLAA/197/004. One of the options is recorded as having a potential but **uncertain significant negative** as these were given a 'red' rating for landscape impact in the HELAA. Four of the site options have yet to be assessed in the HELAA with respect to landscape and townscape impact.

5.46 Lastly, for the employment site options, one option (HLAA/802/001) is recorded as having a potential but **uncertain negligible effect** since this site is recorded as having a 'green' rating in the HELAA for landscape impact. A further site is recorded as having potential but **uncertain minor negative effect** since it was given an 'amber' rating in the HELAA. Six of the site options have yet to be assessed in the HELAA with respect to landscape and townscape impact.

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

5.47 All of the residential, mixed-use and employment sites were also appraised for their impact on heritage against the same criteria. The recorded effects align with the ratings that were given for conserving and enhancing the historic environment, including the setting of historic features, within Herefordshire Council's Housing and Employment Land Availability Assessment (HELAA). All effects are again uncertain, depending on the detailed development proposals that may come forward.

5.48 Of the 60 residential site options, 22 are recorded as having a potential but **uncertain negligible effect**, as these were given a 'green' rating in the HELAA for heritage. These sites comprise HLAA/703/001; O/Leo/019a; HLAA/191/001b; HLAA/728/001; HLAA/625/001; HLAA/105/001; O/Her/007a; HC/Ross/002; Thr19; Thr26a; HLAA/054/002; HLAA/196/003; P842/2; O/Led/002/003; O/Bart/006; HLAA/186/001; HLAA/631/001; O/Col/007a; HLAA/823/001; HLAA/759/001a; Bur31; and HLAA/666/002. Ten of the residential options are recorded as having a potential but **uncertain minor negative effect** as these were given an 'amber' rating in the HELAA for heritage. Three of the residential site options are recorded as having a potential **significant negative effect** as these were given a 'red' rating in the HELAA for heritage. A total of 25 site options have yet to be assessed in the HELAA with respect to heritage.

5.49 For the nine mixed-use site options, three are recorded as having an **uncertain negligible effect** as, again, these were given a 'green' rating in the HELAA for heritage. A further six sites are recorded as having **potential minor negative effects**, since these sites were given an 'amber' rating in the HELAA for heritage.

5.50 Lastly, for the employment site options, two site options (W461/4ZPP and HLAA/733/001) are recorded as having potential **uncertain negligible effects**. As with the previous types of sites, these were given a 'green' rating in the HELAA for heritage. The remaining six employment site options have yet to be assessed in the HELAA with respect to heritage.

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

5.51 All residential, mixed-use, and employment sites were assessed against the same criteria, with effects dependent on the flood rating given to sites within Herefordshire Council's Housing and Employment Land Availability Assessment (HELAA). As the baseline data in Appendix C shows, Flood Zone 3 extends across the county, with flood risk being significant at a number of settlements.

For example, Flood Zone 3 extends around the north and south of Hereford, around the north, east and south of Leominster, to the east of Bromford and to east of Ledbury. For Ross-on-Wye it extends to the west of the town.

5.52 A total of 43 residential site options are recorded as having a potential but **uncertain negligible effect** since these sites were given a 'green' rating in the HELAA with respect to flood risk. This rating was applied due to the sites falling within Flood Zone 1. Fourteen sites are recorded as having a potential but **uncertain minor negative effect**, as these sites were given an 'amber' rating in the HELAA. This rating had been applied due to the site being partially affected by Flood Zones 2 or 3. However, a reasonable developable area is still left in Flood Zone 1. Site option HLAA/758/001, which is located to the east of Leominster, is recorded as having a potential but **uncertain significant negative effect**, as this site was given a 'red' rating in the HELAA. Although the site option is located to the west of the A49, Zone 3 Flood Plain extends beyond the road to the east. Lastly, two sites have yet to be assessed in the HELAA with respect to flood risk.

5.53 In terms of the mixed-use site options, three site options are recorded as having an **uncertain negligible effect** (HLAA/154/001/002; Bur32a; and Bur09a) for the same reasons as stated above. Four of the site options were recorded as having potential **uncertain minor negative effects**, with a further site (HLAA/751/001) being recorded as having a **potential but uncertain significant negative effect**. This site option, which equates to land to the north of Yazor Brook in north west Hereford, has areas of Flood Zone 3 within the boundaries of the site to the east and west. A further site (HLAA/197/004) has yet to be assessed in the HELAA with respect to flood risk.

5.54 In terms of the eight employment site options, six sites are recorded as having a potential **uncertain negligible effects** (W461/4ZPP; NDP/Broc/008; HLAA/825/001; HLAA/821/001; HLAA/733/001; and HLAA/802/001), with site option HLAA/822/001 being recorded as having a potential **uncertain minor negative effect**. For example, site option HLAA/822/001, which equates to land south of Little Marcle Road in Ledbury, is largely free from flood risk, with the exception of its eastern edge. The same rationale, as described above, was

used in raising these judgements. One site option (Housing Area 6) has yet to be assessed in the HELAA with respect to flood risk.

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

5.55 Effects were assessed for all residential, mixed-use and employment sites against the same criteria, with judgements made on the basis of whether the site contains a water body or watercourse, and whether it falls within a Source Protection Zone (SPZ).

5.56 Some 40 of the 60 residential site options are recorded as having a potential but **uncertain negligible effect**, since these sites do not contain a water body or watercourse and do not fall within a Source Protection Zone. Five residential site options are recorded as having a potential but **uncertain minor negative effect** since these sites do not contain a water body or watercourse but the site falls partially or entirely within SPZ 2 and 3. These site options comprise LAA/703/001; O/Her/007a; HC/Ross/002; Thr19; and Thr26a). Lastly, 15 residential sites are recorded as having a potential but **uncertain significant negative effect** since these sites either contain a water body or water course or the site falls within, or is partially within, SPZ1. These sites comprise HLAA/121/001/001a; O/Led/006; HLAA/756/001; HLAA/106/001; HLAA/758/001; HLAA/770/001; O/Col/003; HLAA/625/001; Thr23; HLAA/637/001; Hol12b; Hol13a; HLAA/451/003; HLAA/016/001; and HC/Ross/001.

5.57 Six of the nine mixed-use site options are recorded as having a potential but **uncertain negligible effect** (HLAA/154/001/002; HLAA/769/001; O/Ross/004; O/Ross/005; Bur32a; and Bur09a). Three further site options are recorded as having potential **uncertain significant negative effects** (HLAA/751/001; HLAA/203/001a; and HLAA/197/004).

5.58 With regards to the eight employment site options, half are recorded as having a potential for **uncertain negligible effects** (NDP/Broc/008; Housing Area 6; HLAA/822/001; HLAA/825/001). The other half are recorded as having potential for **uncertain significant negative effects** (W461/4ZPP; HLAA/821/001; HLAA/733/001; and HLAA/802/001). The same criteria, as described above, was used to identify the likely effects.

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

5.59 Three different factors contributed to the effects that were recorded in relation to this objective. The first effect is dependent on whether the site comprises previously undeveloped (greenfield) land, or previously developed (brownfield land). All employment, mixed-use and residential sites were assessed in the same way. Only one residential site option (HLAA/827/1) was recorded as having a **minor positive effect** since it involves the redevelopment of a previously developed site (a police station). The other 59 residential site options are recorded as having a **minor negative effect** since these sites involve previously undeveloped land. For the mixed-use site options, all nine are recorded as also having a **minor negative effect** since, again, these sites involve previously undeveloped land. Only one of the eight employment site options was recorded as having a **minor positive effect** since development would involve the use of previously developed land (Housing Area 6). The other seven site options are recorded as having a **minor negative effect** since, again, these sites involve previously undeveloped land.

5.60 The second part of the effect is dependent on whether the site falls within a Minerals Safeguarding Area (MSA). There are a number of MSAs across Herefordshire, with these offering protection towards sand and gravel, limestone and brick clay. Again, all 77 employment, mixed-use and residential sites were assessed in the same way.

5.61 A total of 37 of the residential site options are recorded as having a **negligible effect** since these sites do not fall within a Minerals Safeguarding

Area. A further 23 sites are recorded as having a **significant negative effect** since these sites do fall within such an area. In terms of the mixed-use site options, six are recorded as having a **negligible effect** since these sites do not fall within a Minerals Safeguarding Area. The remaining three sites (Bur32a; Bur09a; and HLAA/197/004) are recorded as having a **significant negative effect** since these sites do fall within such an area.

5.62 In terms of the mixed-use site options, six are recorded as having a negligible effect since these sites do not fall within a MSA. The three remaining sites do fall within such an area. These comprise sites Bur32a; Bur09a and HLAA/197/004, all of which are located in Hereford.

5.63 With regards to the employment site options, six of the eight are recorded as having a negligible effect since, again, these sites do not fall within a Minerals Safeguarding Area. The remaining two sites, HLAA/822/001 in Leominster and HLAA/802/001 in Hereford, are recorded as having a significant negative effect since these sites do fall within a MSA.

5.64 The third part of the effect is dependent on the agricultural classification of the land. Again, all residential, mixed-use and employment sites were appraised in the same way.

5.65 Of the residential site options, six are recorded as having **minor negative effects**, since these site does not contain any Grade 1 or 2 agricultural land (K/15; HLAA/016/001; W499; HLAA/827/1; HLAA/198/1; O/Led/001a). Furthermore, these sites either has no Grade 3 land, or less than 25% of the site is categorised as Grade 3 land. A further 45 site options are recorded as having a **significant negative** effect since these sites contain a significant proportion (more than 25%) of Grade 1 and/or 2 agricultural land. Lastly, 9 sites are recorded as having an **uncertain significant negative effect**, since these sites contain 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.

5.66 Of the mixed-use site options, one site is recorded as having a **minor negative effect (HLAA/751/001)**, while six sites are recorded as having **significant negative effects**. The two remaining sites (Bur32a and Bur09a) are identified as having **uncertain significant negative effects**. The same rationale that was applied for the residential sites was used for these mixed-use sites too.

5.67 Lastly, for the employment sites, half are recorded as having a **significant negative effect** (Housing Area 6; HLAA/822/001; HLAA/821/001; and HLAA/802/001), with the other half having **uncertain significant negative effects** (HLAA/733/001; HLAA/825/001; W461/4ZPP; and NDP/Broc/008).

Conclusions

5.68 The appraisal above has helped to identify how the 77 site options perform against the SA objectives. Notwithstanding the point that some sites have yet to be fully assessed via the HELAA process which affects some elements of the SA findings, the following sites had at least six minor positive/significant positive effects recorded against them:

Hereford

- Stm01: Land north of Redhill Cottages, Hereford (7)
- Hol12b: Land east of Bullingham Lane, Hereford (7)
- Hol13a: Grafton Lane Phase 2, Hereford (7)
- HLAA/248/001a: Land at Merryhill Farm, Hereford (6)
- O/Her/007a: Kings Acre, Hereford (6)
- HLAA/637/001: Land to the north and south of Broomy Hill (western expansion of Hereford), Hereford (6)
- Thr26a: Land at Huntington, Hereford (6)
- Bur31: Part of Burcott Farm, Hereford(6)

- HLAA/666/002: Land at Almshall west of A49, Hereford (6)

Ledbury

- O/Led/002/003: Land to the south of Ledbury, Ledbury (6)
- HLAA/755/001: Land south of Leadon Way (west of Ledbury), Ledbury (6)
- O/Led/006: Land at Hereford Road, Ledbury(6)
- HLAA/827/1: Police Station, Worcester Road, Ledbury (6)

Leominster

- HLAA/759/001a: Land south of Leominster Primary School, Leominster (7)
- HLAA/757/001: Land at Ebnal Farm, Cholostrey Road, Leominster (6)
- O/Leo/019a: Land at Ginhall Lane, Leominster (6)
- HLAA/759/001: Land to the south west of Leominster, Leominster (6)

Ross-on-Wye

- HLAA/770/001 0: Land north of Ross-on-Wye, Ross-on-Wye (6)
- HLAA/177/001 0: Lower Cleeve Farm, Archenfield Road, Ross-on-Wye (6)

5.69 In comparison, the following sites had the fewest number of combined minor positive / significant positive scores. Again, this should be considered in the context of some of the sites not yet being assessed through the HELAA process:

- O/Led/001a: Land east of Ledbury Road, Ledbury (3)
- HLAA/153/001/003: Land north of Cholostrey Road, Leominster (3)
- HLAA/771/001: Land south west of Ross-on-Wye, Ross-on-Wye (3)
- HLAA/088/001: Land at Bartestree (3)
- HLAA/563/001: Land at Canon Pyon (3)

- HLAA/625/001: Land at Weston under Penyard (3)
- O/K/0340: Area north of Medical Centre, Kington (3)
- HLAA/054/002 HLAA/45/1: Land south of Newburn Lane, Kington (3)
- HLAA/016/004: Land south of Elizabeth Road, Kington (3)
- HLAA/196/003: Land north of St James Close, Bartestree (3)
- P842/2: Land at Canon Pyon (land east of the A4110) (3)
- HLAA/145/003/4/5: Land at Bodenham (3)
- SS/BY2 (a/b) Land at Hardwick Bank, Bromyard (3)
- O/Bart/006: Land adjoining Nursery Cottages, Bartestree (3)
- HLAA/186/001: Land south of Chapel Lane, Bodenham (3)
- HLAA/631/001: Land north of Size Brook, Canon Pyon (3)
- O/Col/007a: Land west of Colwall Primary School (3)
- HLAA/728/001: Land at Bodenham (2)
- O/Col/003: Land at Colwall (east of Mathon Road) (2)
- W499: Land at Colwall (north of Walwyn Road), Colwall (2)
- HLAA/105/001: Land at Weston under Penyard (2)
- HLAA/823/001: Land opposite playing fields, Weston under Penyard (2)

5.70 In terms of the mixed-use site options, the combined number of minor positive/significant positive effects compares as follows, although the same caveat about the lack of HELAA data applies again:

- HLAA/203/001a: Lower Bullingham (9)
- HLAA/769/001: Land to the east of Ross on Wye (8)
- O/Ross/004: Land to the east of Ross on Wye (8)
- O/Ross/005: Land to the east of Ross on Wye (8)
- Bur32a: Holmer North (8)

- Bur09a: Holmer North (8)
- HLAA/197/004 : Three Elms (7)
- HLAA/751/001: Land north of Yazor Brook, Hereford (6)
- HLAA/154/001/002: Land south of Bromyard (5)

5.71 Finally, the combined number of minor positive/significant positive effects compare as follows, again caveated by the lack of HELAA data for some sites:

- Housing Area 6: Lower Road Trading Estate, Ledbury (8)
- HLAA/733/001: Hereford Enterprise Zone Extension (8)
- HLAA/821/001: Land south of Little Marcle Road (7)
- HLAA/802/001: Land east of Cattle Market (7)
- W461/4ZPP: Broadmeadows/Tanyard Lane (7)
- HLAA/822/001: Land south of Leominster Enterprise Park (5)
- NDP/Broc/008: Land at Hodgepatch Manor (5)
- HLAA/825/001: Land west of Linton Trading Estate (5)

5.72 While quantifying the number of positive and negative effects resulting from each site provides a helpful starting point for comparison, this is not an appropriate way of drawing the ultimate conclusions about which sites should be taken forward in the Local Plan. A negative effect in relation to one SA objective could be so significant, and so difficult to mitigate, that it could reasonably outweigh other, more positive effects from the site.

5.73 All of the above sites would involve the loss of previously undeveloped (greenfield) land. While arising impacts would be dependent on the location, form and design of a particular scheme, the appraisal identifies the potential for adverse effects with respect to landscape, ecology and/or heritage. Should the Council wish to pursue the allocation and development of these sites, the associated policies should seek to provide direction over the parts of the site

that require protection and include appropriate prompts for both mitigation and enhancement.

5.74 The appraisal has also helped to identify the least performing sites, with the following options having fewer ‘significant positive’ or ‘minor positive’ effects.

- HLAA/106/001: Cursneh Hill
- HLAA/771/001: Land south west of Ross on Wye
- HLAA/563/001: Land at Canon Pyon
- HLAA/625/001: Land at Weston under Penyard
- O/K/034: Area north of Medical Centre, Kington
- HLAA/016/004: Land south of Elizabeth Road, Kington
- O/Bart/006: Land adjoining Nursery Cottages, Bartestree
- HLAA/186/001: Land south of Chapel Lane, Bodenham
- HLAA/631/001: Land north of Size Brook, Canon Pyon
- HLAA/153/001/003: Land north of Cholostrey Road
- HLAA/728/001: Land at Bodenham

5.75 The lower performing employment and mixed-use options comprise the following:

- NDP/Broc/008: Land at Hodgepatch Manor
- HLAA/825/001: Land west of Linton Trading Estate
- HLAA/751/001: Land north of Yazor Brook, Hereford
- HLAA/154/001/002: Land south of Bromyard

5.76 Should the Council be minded to allocate these sites, careful regard will be required to respond to the potential issues observed. Applying appropriate mitigation could be used to help resolve some of the identified challenges, for

instance by avoiding development of the best and most versatile agricultural land. However, other issues may be more challenging to address, such as where a site is physically isolated from a defined settlement and the services and facilities that it offers.

5.77 Tables 5.1-5.3 overleaf provides a summary of the SA findings for the mixed-use, residential and employment site options that have been appraised. As noted above, Annex 1 provides corresponding proformas and plans for each of the 77 sites. Across **Tables 5.1-5.3**, the code 'N/As' refers to an element of the HELAA record that has 'not been assessed'. The code 'N/Ap' refers to an element of the appraisal that is 'not applicable'.

Table 5.1: SA findings for the reasonable site options: Mixed-use

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/769/001 (M)	0	++	0	+	+	+?	++	++	++	++	+	0	-?	N/A s	-?	-?	0?	-	0	
O/Ross/004 (M)	0	++	0	+	+	+?	++	++	++	++	+	0	-?	N/A s	-?	-?	0?	-	0	
O/Ross/005 (M)	0	++	0	+	+	+?	++	++	++	++	+	0	N/A s	N/A s	-?	-?	0?	-	0	
Bur09a (M)	0	++	0	+	++	-?	++	++	++	++	++	0	0?	-?	-?	0?	0?	-		?

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geo diversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
Bur32a (M)	0		0	+	++	-?	++	++	++	++	++	0	0?	-?	-?	0?	0?	-		?
HLAA/203/001a (M)	0	++	+	+	++	-?	+	++	++	++	++	0	0?	-?	0?	-?	?	-	0	
HLAA/197/004 (M)	0	++	0	+	++	++?	?	++	++	++	++	0	0?	-?	0?	N/A s	?	-		
HLAA/751/001 (M)	0	N/A s	0	+	++	++?	?	+	++	++	++	0	-?	N/A s	-?	?	?	-	0	-

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA 5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geo diversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/154/001/002 (M)	0	++	0	0	-	+?	++	++	+	+	-	0	0?	?	0?	0?	0?	-	0	

Table 5.2: SA findings for the reasonable site options: Residential

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA 5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
K12-K13 (H)	0	+	+	0	-	++?	++	0	0	++	-	0	-?	-?	-?	0?	0?	-	0	
SS/BY2 (a) (H)	0	++	+	0	-	++?	?	0	0	+	-	0	0?	N/A s	N/A s	0?	0?	-	0	
SS/BY2 (b) (H)	0	++	+	0	-	++?	?	0	0	+	-	0	0?	N/A s	N/A s	0?	0?	-	0	
O/Led/02/003 (H)	0	++	0	+	+	+?	+	0	0	+	+	0	-?	-?	0	0?	0	-	0	
O/Bart/006 (H)	0	+	0	0	0	-?	+	0	0	+	-	0	0?	-?	0	0?	0	-		

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b: Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b: Resources (Minerals)	SA15c: Resources (Agricultural land)
HLAA/186/001 (H)	0	+	0	0	-	-?	++	0	0	+	-	0	0?	-?	0?	0?	0?	-		
HLAA/631/001 (H)	0	+	0	0	0	-?	+	0	0	+	0	0	0?	-?	0?	0?	0?	-		
O/Col/007a (H)	0	+	0	0	0	+	++	0	0	++	0	0	0?	-?	0?	0?	0?	-	0	?
HLAA/823/001 (H)	0	+	0	0	0	+	?	0	0	+	0	0	0?	-?	0?	0?	0?	-	0	
HLAA/759/001a (H)	0	++	+	+	+	N/A p	++	0	0	++	+	0	-?	N/A s	0?	0?	0?	-		

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
Bur30 (H)	0	++	0	+	++	-?	?	0	0	++	++	0	0?	N/A s	N/A s	0?	0?	-	0	?
Bur31 (H)	0	++	0	+	++	-?	+	0	0	++	++	0	0?	N/A s	0?	0?	0?	-	0	?
HLAA/666/002 (H)	0	++	0	+	++	-?	+	0	0	+	++	0	0?	?	0?	0?	0?	-	0	?
HLAA/703/001 (H)	0	++	0	0	++	-?	+	0	0	++	-	0	-?	?	0?	0?	-?	-		
HLAA/248/001a (H)	0	++	+	+	++	-?	?	0	0	++	++	0	N/A s	N/A s	N/A s	0?	0?	-	0	

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
Stm01 (H)	0	++	+	+	++	+?	+	0	0	++	++	0	0?	N/A s	-?	0?	0?	-		
O/Led/001a (H)	0	N/A s	0	0	+	+?	+	0	0	+	-	0	N/A s	N/A s	N/A s	N/A s	0?	-	0	-
HLAA/121/001/001a (H)	0	++	0	+	+	-?	?	0	0	++	+	0	-?	-?	?	-?	?	-	0	
O/Led/006 (H)	0	++	0	+	+	-?	+	0	0	++	+	0	-?	N/A s	N/A s	-?	?	-	0	
HLAA/267/001 (H)	0	+	0	0	+	-?	+	0	0	+	-	0	-?	N/A s	N/A s	-?	0	-	0	

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/062/001 (H)	0	++	0	0	+	-?	++	0	0	++	-?	0	N/A s	N/A s	N/A s	0?	0?	-		
HLAA/198/001 (H)	0	+	0	+	+	+		0	0	++	+	0	N/A s	N/A s	N/A s	0?	0?	-	0	-
HLAA/827/001 (H)	0	N/A s	0	+	+	+	++	0	0	++	+	0	0?	N/A s	N/A s	0?	0?	+	0	-
HLAA/759/001 (H)	0	++	+	+	+	++?	?	0	0	++	+	0	-?	N/A s	-?	-?	0?	-		
HLAA/756/001 (H)	0	N/A s	+	0	+	-?	++	0	0	++	-	0	N/A s	N/A s	N/A s	-?	?	-		

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/106/001 (H)	0	N/A s	+	0	+	-?	+	0	0	+	-	0	N/A s	N/A s	N/A s	0?	?	-	0	?
HLAA/153/001/003 (H)	0	N/A s	+	0	+	-?	+	0	0	-	-	0	N/A s	N/A s	N/A s	0?	0	-	0	?
HLAA/757/001 (H)	0	N/A s	+	+	+	-?	+	0	0	+	+	0	N/A s	N/A s	N/A s	0?	0?	-	0	
HLAA/758/001 (H)	0	N/A s	+	0	+	+	++	0	0	++	-	0	-?	N/A s	N/A s	?	?	-		?
O/Leo/019a (H)	0	++	0	+	+	-?	++	0	0	++	+	0	0?	N/A s	0?	0?	0	-	0	

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b: Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b: Resources (Minerals)	SA15c: Resources (Agricultural land)
HLAA/770/001 (H)	0	++	0	+	+	++?	++	0	0	++	+	0	-?	N/A s	N/A s	-		-		
HLAA/771/001 (H)	0	++	0	0	+	-?	?	0	0	+	-	0	0?	0?	?	-?	0?	-	0	
HLAA/191/001b (H)	0	++	0	+	+	-?	?	0	0	+	+	0	-?	N/A s	0?	0?	0?	-	0	
HLAA/088/001 (H)	0	+	0	0	0	++?	+	0	0	+	0	0	N/A s	-?	-?	0	0	-	0	
HLAA/728/001 (H)	0	N/A s	0	0	-	-?	++	0	0	+	-	0	0?	?	0?	0?	0?	-	0	

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/563/001 (H)	0	+	0	0	0	-?	+	0	0	+	-	0	?	-?	-?	0	0	-	0	
O/Col/003 (H)	0	N/A s	0	0	0	-	++	0	0	++	0	0	0?	N/A s	N/A s	0?	?	-	0	?
W499 (H)	0	N/A s	0	0	0	-?	++	0	0	++	0	0	N/A s	N/A s	N/A s	0?	0?	-		-
HLAA/625/001 (H)	0	+	0	0	0	-?	+	0	0	+	-	0	-?	0?	0?	0?	?	-	0	
HLAA/105/001 (H)	0	N/A s	0	0	0	+	+	0	0	+	0	0	N/A s	0?	0?	0?	0?	-	0	

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
O/Her/007a (H)	0	++	0	+	++	+?	+	0	0	+	++	0	-?	N/A s	0?	0?	-?	-		
Thr23 (H)	0	++	0	+	++	+?	?	0	0	+	++	0	0?	-?	-?	0?	?	-		
HLAA/637/001 (H)	0	++	0	+	++	-?	++	0	0	++	++	0	-?	N/A s	N/A s	-?	?	-		
Hol12b (H)	0	N/A s	+	+	++	+?	+	0	0	++	++	0	-?	-?	-?	-?	?	+	0	
Hol13a (H)	0	++	+	+	++	+?	+	0	0	++	++	0	-?	-?	N/A s	0?	?	-		
HLAA/451/003 (H)	0	++	0	+	++	++?	?	0	0	+	++	0	-?	?	-?	-?	?	-		

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b: Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/016/001 (H)	0	+	+	0	-	++?	++	0	0	++	-	0	0?	-?	-?	-?	?	-	0	-
O/K/034 (H)	0	+	0	0	-	-?	++	0	0	+	-	0	0?	N/A s	-?	-?	0?	-	0	
K/15 (H)	0	+	+	0	-	++?	++	0	0	++	-	0	0?	0?	?	0?	0?	-	0	-
HLAA/755/001 (H)	0	++	0	+	+	+	+	0	0	++	+	0	-?	N/A s	N/A s	0?	0?	-	0	
HLAA/177/001 (H)	0	++	0	+	+	-?	+	0	0	+	+	0	0?	-?	N/A s	-?	0?	-	0	
HC/Ross /002 (H)	0	+	0	+	+	-?	?	0	0	++	+	0	N/A s	-?	0?	0?	-?	-	0	

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HC/Ross /001 (H)	0	++	0	+	+	-?	?	0	0	++	+	0	N/A s	?	N/A s	N/A s	?	-	0	
Thr19 (H)	0	++	0	+	++	-?	-	0	0	++	++	0	0?	0?	0?	0?	-?	-		
Thr26a (H)	0	++	0	+	++	-?	+	0	0	+	++	0	0?	0?	0?	0?	-?	-		
HLAA/054/002 (H)	0	N/A s	+	0	-	++?	++	0	0	++	-	0	-?	N/A s	0?	0?	0?	-	0	?
HLAA/016/004 (H)	0	N/A s	+	0	-	-?	++	0	0	++	-	0	N/A s	N/A s	N/A s	N/A s	0?	-	0	?

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/196/003 (H)	0	+	0	0	0	+	+	0	0	+	0	0	-?	0?	0?	0?	0?	-		
P842/2 (H)	0	+	0	0	0	-?	+	0	0	+	0	0	0?	?	0?	0?	0?	-		
HLAA/145/003/4/5 (H)	0	++	0	0	0	-?	++	0	0	+	-	0	N/A s	N/A s	N/A s	-?	?	-		

Table 5.3: SA findings for the reasonable site options: Employment

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA 5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b: Travel (site location)	SA10 : Air quality	SA11 : Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HLAA/822/01 (E)	0	0	0	0	-	N/Ap	+	++	++	++	-	0	N/As	N/As	N/As	-?	0?	-		
HLAA/825/01 (E)	0	0	+	0	-	N/Ap	+	++	+	+	-	0	N/As	N/As	N/As	0?	0?	-	0	?
HLAA/821/01 (E)	0	0	0	+	+	N/Ap	+	++	++	++	+	0	N/As	N/As	N/As	0?	0?	-	0	
HLAA/733/01 (E)	0	0	+	+	++	N/Ap	+	++	++	++	++	0	?	-?	0?	0?	?	-	0	?

Chapter 5 Sustainability Appraisal Findings for Site Options

SA Objective	SA1 : Climate change	SA2 : Housing	SA3 : Community cohesion and safety	SA4 : Towns and retail centres	SA5 a: Distance to built-up area)	SA5b: Access to services (education)	SA6 : Health	SA7 : Economy	SA8 : Employment	SA9 a: Travel (Distance to transport)	SA9 b : Travel (site location)	SA10 : Air quality	SA11: Biodiversity and geodiversity	SA12: Landscape and townscape character	SA13: Heritage	SA14a: Flood risk	SA14b: Water quantity and quality	SA15a: Resources (Land type)	SA15b : Resources (Minerals)	SA15c : Resources (Agricultural land)
HCAA/802/001 (E)	0	0	0	+	++	N/A p	+	++	+	+	++	0	0?	0?	N/As	0?	?	-		
W461/4ZPP (E)	0	0	0	+	+	N/A pp	+	++	++	++	+	0	-?	N/As	0?	0?	?	-	0	?
NDP/Broc/008 (E)	0	0	+	0	-	N/A pp	+	++	+	+	-	0	N/As	N/As	N/As	0?	0	-	0	?
Housing Area 6 (E)	0	0	0	+	+	N/A pp	+	++	++	++	+	0	N/As	N/As	N/As	N/As	0	+	0	

Chapter 6

Sustainability Appraisal Findings for the Draft (Regulation 18) Local Plan

6.1 This chapter presents the SA findings for the vision, objectives and policies in the Draft (Regulation 18) Herefordshire Local Plan. Consideration is also given to the reasonable alternative policy options that have been identified by the Council. For some of the policies, the ‘no policy’ option was identified by the Council as a possible approach. However, this option is not suitable for appraisal as it would represent an appraisal of existing policy such as the NPPF, which would not be appropriate for this SA.

6.2 In line with the requirements of the SEA Regulations, consideration has been given to whether effects would be long, medium or short-term, and permanent or temporary. Unless stated otherwise, effects from the Local Plan are considered to be long-term and permanent.

6.3 The likely **cumulative effects** of the Draft (Regulation 18) Herefordshire Local Plan as a whole are summarised in Chapter 7.

Vision

6.4 The Draft (Regulation 18) Herefordshire Local Plan is underpinned by an overarching vision for Herefordshire at 2041 which covers the county’s environment, community and economy. **Table 6.1** assesses this vision against the objectives in the SA framework. Unsurprisingly given its aspirational nature, the vision is expected to have broadly positive effects against the SA objectives.

**Table 6.1: SA findings for the Draft Herefordshire Local Plan
(Regulation 18) Vision**

SA Objective	Vision
SA objective 1: Climate Change	+
SA objective 2: Housing	+
SA objective 3: Community Cohesion and Safety	0
SA objective 4: Town and Retail Centres	+
SA objective 5: Access to services, facilities and education	+
SA objective 6: Physical and Mental Health and Wellbeing	+
SA objective 7: Economy	+
SA objective 8: Employment and reducing inequality and poverty.	+
SA objective 9: Travel	+
SA objective 10: Air Quality	+
SA objective 11: Biodiversity and Geodiversity	+
SA objective 12: Landscapes and Townscapes	+
SA objective 13: Heritage	+
SA objective 14A: Flooding	0
SA objective 14B: Water Quality and Quantity	0
SA objective 15: Resources	0

6.5 The vision refers to the intention for Herefordshire to become carbon neutral by 2041, and other dimensions of the vision are likely to support this, for instance, through the promotion of sustainable travel. There are no specific references to either climate change adaptation or mitigation, or to measures for generating clean, low carbon, decentralised and renewable electricity and heat; however the vision is high level and this is not necessarily expected. The vision does not explicitly prioritise the use of energy efficient design or the use of sustainable construction materials. A **minor positive effect** is therefore expected for SA objective 1 (climate change).

6.6 Providing good quality and affordable housing is prioritised through the vision, although their does not go into detail regarding the quantum of development or housing mix including housing for older people, or other groups with specific needs. While acknowledging that the vision is high-level, no specific support is given to providing specialist accommodation for those with disabilities. Consequently, a **minor positive effect** is expected for SA objective 2 (housing).

6.7 The vision identifies Herefordshire as a prosperous place where everyone is able to thrive. It also refers to how the health and wellbeing of the county's residents will be enhanced, although no specific reference is made to reducing deprivation. The vision does not refer to reducing levels of crime, anti-social behaviour or the fear of crime. Consequently, a **negligible effect** is expected for SA objective 3 (community cohesion and safety).

6.8 The vision refers to how the county's market towns will be thriving centres, while reference is also made to Hereford becoming nationally recognised as a green and pioneering university city. There is no specific reference to enhancing the vitality and vibrancy of town and retail centres, or to encouraging the flexible use of space. However, given the vision is intended to be high-level, a **minor positive effect** is expected for SA objective 4 (town and retail centres). A **minor positive effect** is also expected for SA objective 5 (access to services, facilities and education). Although the vision refers to making communities better connected, the vision does not refer to the delivery of new services and facilities.

6.9 Promoting the health and well-being of the county's residents is set as a clear goal, with the provision of good quality affordable housing being identified as an important facilitator to this. The vision also refers to how the provision of inclusive infrastructure will help the residents of Herefordshire to live active and healthy lives. A **minor positive effect** is therefore expected for SA objective 6 (physical and mental health and wellbeing).

6.10 In terms of the economy, the vision seeks to make Herefordshire more prosperous, with an inclusive, diverse, and sustainable economy in both urban and rural areas. In addition, the vision envisages Herefordshire as an innovative place where creative businesses can invest and thrive. Consequently, a **minor positive effect** is expected for SA objective 7 (economy). Job growth is not specifically mentioned but higher levels of employment would be expected. The commitment to making Herefordshire more connected should help to give better access for those looking for objective employment. Providing jobs will help to tackle inequality and poverty, but arising benefits may not be immediate since poverty and inequality may also be arising in response to other factors that sit beyond the scope of the Herefordshire Local Plan. **A minor positive effect** is therefore expected for SA objective 8 (employment and reducing inequality and poverty).

6.11 The vision seeks to deliver more sustainable travel options to help ensure the county is well-connected. It also supports the delivery of appropriate infrastructure to ensure people are able to live active and healthy lives. A **minor positive effect** is therefore expected for SA objective 9 (travel). While the provision of public and active travel should contribute to a modal shift towards the use of public and active travel in the longer term, residents may continue to have a dependency on the use of private diesel and petrol cars in the short-term. A shift towards the use of more sustainable travel modes should help to reduce emissions and improve local air quality. Consequently, a **minor positive effect** is expected for SA objective 10 (air quality).

6.12 A **minor positive effect** is expected for SA objective 11 (biodiversity and geodiversity) since the vision envisages a county that is nature rich. The vision refers to how green and blue infrastructure will be protected and enhanced in

broad terms, but it does not explicitly refer to creating additional ecological assets or improving habitat connectivity.

6.13 The vision envisages beautifully designed communities and commits to delivering an exceptional quality of life. Cultural heritage, together with the county's distinctive landscapes, are identified for protection and enhancement for the benefit of all. Although the vision does not specifically refer to heritage assets, **minor positive effects** are expected for SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.14 The vision seeks to ensure that the county's environment is protected and enhanced, delivering an exceptional quality of life for all residents. The vision also refers to how the county will be resilient and be net zero in terms of its carbon use. Although the vision refers to how green and blue infrastructure will be protected and enhanced, there is no specific reference to flood risk or water quality as the vision is high-level. **Negligible effects** are expected for SA objective 14A (flooding) and SA objective 14B (water). Similarly, the vision does not specifically refer to brownfield sites being prioritised for development, nor does it refer to avoiding development on the best and most versatile agricultural land. The vision does not commit to the sustainable management of soils, the achievement of the waste hierarchy, or protecting against the sterilisation of mineral resources. Again, these omissions are a consequence of the vision being high-level, but a **negligible effect** is also expected for SA objective 15 (resources).

Objectives

6.15 The vision is supported by 27 objectives that are intended to reflect the type of issues that the plan is seeking to address. Nine of the objectives relate to the environment, eight to social concerns and the remaining ten relate to the economy. The objectives form the basis for the strategic policies of the Draft (Regulation 18) Herefordshire Local Plan which are appraised separately.

6.16 As **Table 6.2** overleaf shows, the broad coverage of the objectives underpinning the Draft (Regulation 18) Herefordshire Local Plan mean that there is good alignment with the objectives that form the SA framework. Collectively, the Local Plan objectives are expected to have positive effects against all 15 SA objectives.

6.17 The appraisal does identify three areas where minor negative or mixed effects are expected:

- Local plan objective one seeks to reduce energy use across Herefordshire and to increase the amount of energy being generated from renewable sources. While effects will be dependent on the location, form and design of specific energy projects, the objective could have a negative effect in relation to the aims of protecting the county's landscape and townscape quality.
- Local plan objective four seeks to protect the Wye Valley and Malvern Hills National Landscapes. This objective could conflict with the aims of SA objective 2: housing SA objective 7: economy which could promote growth.
- The Draft (Regulation 18) Herefordshire Local Plan includes proposals to meet the development needs of the county. While the Local Plan, supported by this SA, can seek to direct growth to the most sustainable locations and incorporate mitigation as appropriate, there will be inevitable impacts as a result of that growth. Consequently, for those objectives where an element of growth is implied, minor negative or mixed effects are identified on environmental SA objectives in particular.

Table 6.2: Sustainability Appraisal of the Herefordshire Local Plan objectives

SA Objective	SA objective 1: Climate change	SA objective 2: Housing	SA objective 3: Community cohesion and Safety	SA objective 4: Town and retail centres	SA objective 5: Access to services, facilities and education	SA objective 6: Physical and mental health and wellbeing	SA objective 7: Economy	SA objective 8: Employment and reducing inequality and poverty.	SA objective 9: Travel	SA objective 10: Air quality	SA objective 11: Biodiversity and geodiversity	SA objective 12: Landscapes and townscapes	SA objective 13: Heritage	SA objective 14 A: Flood risk	SA objective 14B: Water quality and quantity	SA objective 15: Resources
LPO 1	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LPO 2	++	0	0	0	0	0	0	0	0	0	0	0	0	++	0	0
LPO 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0
LPO 4	0	0	0	0	0	0	0	0	0	0	+	++	+	0	0	0
LPO 5	+	0	0	0	0	0	0	0	0	+	++	++	+	+	+	+

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18) Local Plan

SA Objective	SA objective 1: Climate change	SA objective 2: Housing	SA objective 3: Community cohesion and Safety	SA objective 4: Town and retail centres	SA objective 5: Access to services, facilities and education	SA objective 6: Physical and mental health and wellbeing	SA objective 7: Economy	SA objective 8: Employment and reducing inequality and poverty.	SA objective 9: Travel	SA objective 10: Air quality	SA objective 11: Biodiversity and geodiversity	SA objective 12: Landscapes and townscapes	SA objective 13: Heritage	SA objective 14A: Flood risk	SA objective 14B: Water quality and quantity	SA objective 15: Resources
LPO 6	+	0	0	+	0	0	0	0	0	0	0	++	++	0	0	0
LPO 7	0	0	0	+	0	0	0	0	0	0	0	++	++	0	0	0
LPO 8	0	0	0	0	0	0	+	0	0	0	+	0	0	0	0	++
LPO 9	0	0	0	0	0	++	0	0	0	++	+	0	0	0	0	0
LPO 10	0	+	++	+	++	+	0	+	+	0	0	0	0	0	0	0

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18) Local Plan

SA Objective	SA objective 1: Climate change	SA objective 2: Housing	SA objective 3: Community cohesion and Safety	SA objective 4: Town and retail centres	SA objective 5: Access to services, facilities and education	SA objective 6: Physical and mental health and wellbeing	SA objective 7: Economy	SA objective 8: Employment and reducing inequality and poverty.	SA objective 9: Travel	SA objective 10: Air quality	SA objective 11: Biodiversity and geodiversity	SA objective 12: Landscapes and townscapes	SA objective 13: Heritage	SA objective 14A: Flood risk	SA objective 14B: Water quality and quantity	SA objective 15: Resources
LPO 11	0	++	++	0	0	++	0	+	0	0	0	0	0	0	0	0
LPO 12	+	0	+	+	++	+	+	+	++	+	0	0	0	0	0	0
LPO 13	0	+	+	+	+	0	+	+	0	0	0	++	+	0	0	0
LPO 14	+	0	+	0	++	++	0	0	++	+	0	0	0	0	0	0
LPO 15	0	0	+	0	++	0	++	++	0	0	0	0	0	0	0	0

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18) Local Plan

SA Objective	SA objective 1: Climate change	SA objective 2: Housing	SA objective 3: Community cohesion and Safety	SA objective 4: Town and retail centres	SA objective 5: Access to services, facilities and education	SA objective 6: Physical and mental health and wellbeing	SA objective 7: Economy	SA objective 8: Employment and reducing inequality and poverty.	SA objective 9: Travel	SA objective 10: Air quality	SA objective 11: Biodiversity and geodiversity	SA objective 12: Landscapes and townscapes	SA objective 13: Heritage	SA objective 14A: Flood risk	SA objective 14B: Water quality and quantity	SA objective 15: Resources
LPO 16	++	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0
LPO 17	0	0	0	+	+	+	+	+	0	0	0	+	++	0	0	0
LPO 18	-	0	0	+	+	0	++	++	0	0	-?	-?	-?	-?	-?	+/-
LPO 19	0	+	+	++	++	0	++	++	+	0	-?	+/-	+/-	-?	0	+/-
LPO 20	0	+	+	++	++	0	++	++	+	0	-?	+/-	+/-	-?	0	+/-

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18) Local Plan

SA Objective	SA objective 1: Climate change	SA objective 2: Housing	SA objective 3: Community cohesion and Safety	SA objective 4: Town and retail centres	SA objective 5: Access to services, facilities and education	SA objective 6: Physical and mental health and wellbeing	SA objective 7: Economy	SA objective 8: Employment and reducing inequality and poverty.	SA objective 9: Travel	SA objective 10: Air quality	SA objective 11: Biodiversity and geodiversity	SA objective 12: Landscapes and townscapes	SA objective 13: Heritage	SA objective 14A: Flood risk	SA objective 14B: Water quality and quantity	SA objective 15: Resources
LPO 21	0	0	+	0	++	0	++	++	0	0	+/	+/	+/	-?	0	+/
LPO 22	0	0	+	0	++	0	++	++	+	0	0	0	0	0	0	0
LPO 23	+	0	0	0	+	0	++	++	0	0	-?	+/	+/	-?	0	+/
LPO 24	0	0	+	+	+	0	++	++	0	0	-?	+/	+/	-?	0	+/
LP0 25	0	0	0	0	0	0	++	++	0	0	0	0	0	0	0	0

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18) Local Plan

SA Objective	SA objective 1: Climate change	SA objective 2: Housing	SA objective 3: Community cohesion and Safety	SA objective 4: Town and retail centres	SA objective 5: Access to services, facilities and education	SA objective 6: Physical and mental health and wellbeing	SA objective 7: Economy	SA objective 8: Employment and reducing inequality and poverty.	SA objective 9: Travel	SA objective 10: Air quality	SA objective 11: Biodiversity and geodiversity	SA objective 12: Landscapes and townscapes	SA objective 13: Heritage	SA objective 14A: Flood risk	SA objective 14B: Water quality and quantity	SA objective 15: Resources
LPO 26	0	0	0	+	+	0	++	++	0	0	0	+/	+/	-?	0	+/
LPO 27	0	0	+	+	+	0	++	++	0	0	0	0	0	0	0	0

Strategic and thematic policies

6.18 The Draft (Regulation 18) Herefordshire Local Plan includes 22 strategic and thematic policies under the themes of:

- Tackling climate change
- Protecting and enhancing the natural, built and historic environment: A high quality Herefordshire
- Accommodating future growth
- Creating balanced communities
- Creating healthy and sustainable communities.
- Promoting a prosperous economy

6.19 The sections below present the SA findings for the policies in each section of the Local Plan. In coming to judgements about the likely effects identified, regard has been given to the wording of the SA objectives together with the supporting sub-questions.

Tackling Climate Change

6.20 This section presents the appraisal of the following Herefordshire Local Plan policy:

- **Policy CC1:** A Carbon Neutral Herefordshire.

Table 6.3: Sustainability Appraisal of Policy CC1

SA Objective	Policy CC1
SA objective 1: Climate Change	++
SA objective 2: Housing	0
SA objective 3: Community Cohesion and Safety	0
SA objective 4: Town and Retail Centres	0
SA objective 5: Access to services, facilities and education	+
SA objective 6: Physical and Mental Health and Wellbeing	+
SA objective 7: Economy	+
SA objective 8: Employment and reducing inequality and poverty.	+
SA objective 9: Travel	++
SA objective 10: Air Quality	+
SA objective 11: Biodiversity and Geodiversity	+
SA objective 12: Landscapes and Townscapes	0?
SA objective 13: Heritage	0
SA objective 14A: Flooding	++
SA objective 14B: Water Quality and Quantity	++
SA objective 15: Resources	+

Policy CC1: A carbon neutral Herefordshire

6.21 A **significant positive effect** is likely in relation to SA objective 1 (climate change) as the overall purpose of the policy is to achieve climate change mitigation and adaptation, including by reducing energy consumption, increasing renewable energy generation and supporting battery energy storage systems. While the policy refers to the development of a new eastern link road, this is part of an overall strategy to reduce congestion in Hereford and the focus of the policy is still encouraging modal shift and reducing car use. For the same reason, a **significant positive effect** is likely in relation to SA objective 9 (travel). The aspiration to encourage sustainable and active travel will also benefit the health of local residents and air quality, as will the reduction in congestion associated with the Hereford relief road; therefore **minor positive effects** are identified for SA objective 6 (physical and mental health and wellbeing) and SA objective 10 (air quality). **Minor positive effects** are also expected for SA objective 5 (access to services, facilities and education) and SA objective 8 (employment and reducing inequality and poverty) as the policy encourages reductions in the need to travel.

6.22 A minor positive effect is likely in relation to SA objective 7 (economy) as the policy supports a circular economy and a low carbon economy, and encourages commercial developments to be located close to active travel routes, which will improve access to jobs for more people.

6.23 The development of further energy infrastructure across Herefordshire could potentially impact upon the county's landscapes and townscapes. However, the policy does promote the incorporation of appropriate mitigation, with specific measures being dependent on location. The policy also refers to how large-scale renewable energy schemes, as well as the diversification of renewable energy schemes with other uses, will be supported where there are no 'significant landscape/environmental impacts'. Consequently, with appropriate mitigation built-in, the policy is likely to result in a probable but **uncertain negligible effect** in relation to SA objective 12 (landscapes and townscapes).

6.24 A minor positive effect is expected for SA objective 11 (biodiversity and geodiversity) as the policy supports the delivery of high quality, interconnected and multifunctional green and blue infrastructure. In addition, improvements in air quality as a result of reduced congestion should mitigate the potential impacts of poor air quality on habitats and species. While the development of a new link road may have impacts on local biodiversity, this would be assessed as part of any planning application and cannot be assessed as part of this SA.

6.25 Significant positive effects are likely in relation to SA objective 14A (flood risk) and SA objective 14B (water quality and quantity) as the policy seeks to improve water quality and reduce flood risk. The policy limits the amount of development in areas of high flood risk and promotes the use of natural flood management features in new developments. It also requires residential and non-residential developments to achieve specified water efficiency targets.

6.26 A minor positive effect is likely for SA objective 15 (resources) as the policy promotes the transition to a circular economy, stating that development proposals must minimise waste, maximise the reuse of materials, and prioritise low embodied carbon materials.

Reasonable alternative options

6.27 The Policy Options Consultation Document (April 2022) presented three alternative policy options for tackling climate change:

- The retention of an overarching strategic climate change policy.
- A new cross-policy approach.
- A combination of options 1 and 2.

6.28 These options are not considered appropriate for meaningful appraisal, given their theoretical nature.

Protecting and enhancing the natural, built and historic environment: A high quality Herefordshire

6.29 This section presents the appraisals of the following policies in the Draft (Regulation 18) Herefordshire Local Plan:

- **Policy EE1:** Protecting and enhancing the quality of the natural environment.
- **Policy EE2:** Protecting and enhancing the quality of the historic environment and its setting.
- **Policy EE3:** Enhancing the quality of the built environment.

Table 6.4: Sustainability Appraisal of policies EE1 – EE3

SA Objective	Policy EE1	Policy EE2	Policy EE3
SA objective 1: Climate Change	+	0	+
SA objective 2: Housing	0	0	0
SA objective 3: Community Cohesion and Safety	0	0	+
SA objective 4: Town and Retail Centres	0	0	0
SA objective 5: Access to	0	0	0

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18)
Local Plan

SA Objective	Policy EE1	Policy EE2	Policy EE3
services, facilities and education			
SA objective 6: Physical and Mental Health and Wellbeing	+	0	+
SA objective 7: Economy	0	+	+
SA objective 8: Employment and reducing inequality and poverty.	0	0	0
SA objective 9: Travel	0	0	+
SA objective 10: Air Quality	+	0	0
SA objective 11: Biodiversity and Geodiversity	++	0	0
SA objective 12: Landscapes and Townscapes	+?	+	++?
SA objective 13: Heritage	+?	++	+?
SA objective 14A: Flooding	+	0	0

SA Objective	Policy EE1	Policy EE2	Policy EE3
SA objective 14B: Water Quality and Quantity	+	0	0
SA objective 15: Resources	+	0	0

Policy EE1: Protecting and enhancing the quality of the natural environment

6.30 A **minor positive effect** is likely in relation to SA objective 1 (climate change) as the policy encourages the provision of green space to help mitigate and reverse the effects of climate change. The policy also recognises the importance of the natural environment in terms of climate change mitigation. Measures to improve air quality, as promoted by the policy, may also benefit climate change, for example if they promote modal shift and reduce emissions from traffic. A **minor positive effect** is also likely in relation to SA objective 14A (flooding) as the policy includes various measures that will help to mitigate flood risk, for example tree planting and restoring riparian habitats, as well as requiring proposals to implement water management schemes.

6.31 The overall purpose of the policy is to protect and enhance the quality of the natural environment in Hereford; therefore a **significant positive effect** is likely in relation to SA objective 11 (biodiversity and geodiversity). The policy requires development proposals to protect, conserve and enhance statutory and locally designated ecological and geological sites and to protect and conserve priority habitats and protected species. In particular, the policy specifies that proposals will not result in an adverse impact on the integrity of any National Site Network Site through additional nutrient and pollution pathways, and specific criteria are detailed that will apply where Nutrient Neutrality is in place.

In addition, measures to protect and enhance air and water quality will benefit biodiversity.

6.32 A minor positive effect is likely in relation to SA objective 10 (air quality) and SA objective 14 B (water quality and quantity) as the policy seeks to avoid and minimise water and air pollution. Since the policy refers to the protection of agricultural soils, a **minor positive effect** is also likely in relation to SA objective 15 (resources).

6.33 A minor positive effect is likely in relation to SA objective 6 (health) as the policy should result in improved access to open spaces and green infrastructure that will promote health and well-being by connecting people with nature. The measures to mitigate flood risk may also have indirect positive effects on peoples' physical and mental health.

6.34 A minor positive effect is likely in relation to SA objective 13 (heritage) as the policy seeks to conserve and enhance Herefordshire's designated heritage assets.

6.35 A minor positive effect is likely in relation to SA objective 12 (landscapes and townscapes) as the policy stipulates that all development proposals should have special regard to the Malvern Hills and Wye Valley National Landscapes in the county, valuing their distinctive ecology, character, tranquillity, and landscape character. It also requires proposals to help increase canopy cover in both urban and rural settlements which will benefit townscapes.

Reasonable alternative options

6.36 The Policy Options Consultation Document (April 2022) presented three alternative policy options for enhancing the quality of the natural environment:

- To maintain the existing policy but with an update reflect the adoption of Biodiversity Net Gain (BNG) in line with national planning policy.

- To establish a new approach towards a biodiversity and geodiversity policy.
- To devolve policy on local biodiversity and geodiversity to Neighbourhood Development Plans and/or design codes.

6.37 These options are not considered appropriate for meaningful appraisal, given their theoretical nature.

Policy EE2: Protecting and enhancing the quality of the historic environment and its setting

6.38 The overall purpose of the policy is to protect and enhance the quality of the historic environment in Hereford; therefore a **significant positive effect** is likely in relation to SA objective 13 (heritage). The policy is also expected to have **minor positive effects** on SA objective 12 (landscapes and townscapes) as the policy requires development proposals to preserve and enhance the character and appearance of Conservation Areas. A **minor positive effect** is identified for SA objective 7 (economy) since a protected and enhanced historic environment is likely to help encourage visitors, leading to increased footfall and spending.

Reasonable alternative options

6.39 The Policy Options Consultation Document (April 2022) presented two alternative policy options for protecting and enhancing the quality of the historic environment:

- To continue with existing policy, but update supporting text.
- To redevelop the policy.

6.40 These options are not considered appropriate for meaningful appraisal, given their theoretical nature.

Policy EE3: Enhancing the quality of the built environment

6.41 This policy is expected to have a **minor positive effect** on SA objective 1 (climate change) as the policy states that development proposals should strive to be carbon neutral and where possible use adaptation measures such as low carbon principles in their design, materials and placement. The policy also states that development proposals should be designed to require less energy through the orientation and siting of buildings.

6.42 A **minor positive effect** is likely in relation to SA objective 3 (community cohesion) as the policy states that development proposals should deliver safe communities by designing out crime through considered design and maximising opportunities for natural surveillance.

6.43 A **minor positive effect** is likely in relation to SA objective 9 (transport) as the policy states that development proposals should provide connected footpaths and cycle routes. This could support opportunities for residents to make healthy lifestyle choices by choosing active travel options, as well as contributing to improved air quality. Therefore, **minor positive effects** are also expected for SA objective 6 (physical and mental health and wellbeing) and SA objective 10 (air quality).

6.44 This policy is expected to have a **significant positive effect** on SA objective 12 (landscapes and townscapes) as the policy will support development proposals which contribute towards the county's distinctiveness, including its settlement pattern and landscape. The policy stipulates that the townscape should connect and fit into the natural landscape setting.

6.45 A **minor positive effect** is likely for SA objective 13 (heritage) as the policy seeks to enhance the quality of the built environment by ensuring that development proposals contribute towards the county's distinctiveness in relation to heritage assets.

6.46 A **minor positive effect** is identified for SA objective 7 (economy) since a high quality built environment is likely to help encourage visitors, leading to increased footfall and spending.

Reasonable alternative options

6.47 In terms of alternatives, the Policy Options Consultation Document (April 2022) presented four options for enhancing the quality of the built environment:

- To amend the current policy approach and add to the supporting text.
- To include separate Townscape policy and Landscape Policy.
- To integrate townscape into an overarching design policy.
- To include a dark skies policy to retain and enhance the landscape and light quality in the countryside.

6.48 These options are not considered appropriate for meaningful appraisal, given their theoretical nature.

Accommodating Future Growth

6.49 This section presents the appraisals of the following Herefordshire Local Plan policies:

- **AG1:** Accommodating housing growth
- **AG2:** Strategic rural housing distribution
- **AG3:** Rural housing growth in Hubs and Service Settlements

- **AG4:** Rural settlement exceptions for affordable housing, entry level homes, affordable, self and custom build housing, Community Land Housing and small scale affordable traveller sites.
- **AG5:** Open countryside
- **AG6:** Gypsies, Travellers and Travelling Show People

Table 6.5: Sustainability Appraisal of Policies AG1 - AG6

SA Objective	Policy AG1	Policy AG2	Policy AG3	Policy AG4	Policy AG5	Policy AG6
SA objective 1: Climate Change	+	-	+	+	0	0
SA objective 2: Housing	++	++	++	+	0	++
SA objective 3: Community Cohesion and Safety	0	0	+	0	0	0
SA objective 4: Town and Retail Centres	+	0	0	0	0	0
SA objective 5: Access to services, facilities and education	+	+/	+	+	0	0
SA objective 6: Physical and Mental Health and Wellbeing	+	0	+	+	0	0
SA objective 7: Economy	0	0	0	0	0	0
SA objective 8:	0	0	0	0	0	0

SA Objective	Policy AG1	Policy AG2	Policy AG3	Policy AG4	Policy AG5	Policy AG6
Employment and reducing inequality and poverty.						
SA objective 9: Travel	+	-	+	+	0	0
SA objective 10: Air Quality	+	-	+	+	0	0
SA objective 11: Biodiversity and Geodiversity		-	0	0	+	0
SA objective 12: Landscapes and Townscapes	+/?	-	+	0	+	0
SA objective 13: Heritage	+/?	-	0	0	0	0
SA objective 14A: Flooding	-	0	0		0	0
SA objective 14B: Water Quality and Quantity	0	0	0	-?	0	0
SA objective 15: Resources	+/?	-	+	0	0	0

AG1: Accommodating housing growth

6.50 Significant positive effects are expected in relation to SA objective 2 (housing) as the policy seeks to identify suitable land to deliver a total of 16,100

new homes over the plan period to meet the need for both market and affordable housing.

6.51 Minor positive effects are expected in relation to SA objective 5 (access to services) and SA objective 9 (travel) as development will be mainly focussed at Hereford and the Market Towns, where access to services and facilities will be generally good and there may be opportunities to use sustainable modes of transport day to day. In rural areas, development will be focussed at locations which are considered to be the most sustainable, including considering their range of services and infrastructure.

6.52 The scale of development coming forward at Hereford and the market towns should help to increase footfall in the respective retail centres and help to support the businesses there. **A minor positive effect** is therefore expected for SA objective 4 (town and retail centres).

6.53 Minor positive effects are also likely for SA objective 1 (climate change), SA objective 6 (physical and mental health and wellbeing) and SA objective 10 (air quality) as the policy seeks to facilitate the use of sustainable travel options through the location and density of new development, which could encourage a modal shift in transportation from the private car to active travel, improve air quality and contribute towards reduced carbon emissions.

6.54 Mixed uncertain effects are identified in relation to SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage) as development will be focused away from settlements in National Landscapes and those with Conservation Areas. However, the overall scale of the development being proposed means that the policy is likely to have some negative effects. At this stage the effects are uncertain as they will depend on the final design, scale and layout of development.

6.55 The scale of housing development to be delivered, together with the position that much of the development will involve the loss of previously undeveloped (greenfield) land, suggests that a **significant negative effect** is likely with respect to SA objective 11 (biodiversity and geodiversity). This loss of

greenfield land will also result in the loss of natural storage for water, thereby generating a minor negative effect with respect to SA objective 14A (flood risk).

6.56 Mixed uncertain effects are identified in relation to SA objective 15 (resources) as the scale of development will inevitably result in resource consumption and the loss of previously undeveloped (greenfield) land. However, the policy does promote the use of previously developed (brownfield) land where this is available.

Reasonable alternative options

6.57 The Spatial Options Consultation Document (January 2022) presented five options for accommodating housing growth, with option four including three variants linked to Leominster, Ross-on-Wye, and Ledbury. Further options for growth, including the delineation of potential development areas, were presented in the Place Shaping Options Consultation suite of documents that were published in June 2022. The spatial options that were presented in January 2022 are appraised in Chapter 4 of this report, with further detail being provided in Appendix D.

AG2: Strategic rural housing distribution

6.58 The policy provides for 5,320 new dwellings in rural areas of Herefordshire which will meet the need for housing outside of Hereford and the Market Towns; therefore a **significant positive effect** is likely in relation to SA objective 2 (housing).

6.59 The scale of growth means that a loss of previously un-developed (greenfield) is likely, thereby creating a **minor negative effect** with respect to SA objective 15 (resources). Similarly, the use of this land is likely to generate **minor negative effects** in relation to SA objective 11 (biodiversity and geodiversity), SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.60 Mixed effects are identified in relation to SA objective 5 (access to services, facilities and education) since housing in rural areas is less likely to be well-positioned in relation to services and facilities. However, housing development in rural areas may also help to stimulate new provision or maintain the viability of existing rural services and facilities.

6.61 Rural development is likely to lead to higher levels of private car use, particularly if residents need to travel far to access jobs, education or necessary services and facilities. A **minor negative effect** is therefore identified for SA objective 9 (travel). This car use is also likely to adversely impact upon air quality, particularly in the short-term with the use of petrol and diesel powered vehicles. A minor negative effect is therefore identified for SA objective 10 (air quality).

Reasonable alternative options

6.62 The Spatial Options Consultation Document (January 2022) presented four options for accommodating housing growth in rural areas. These options were appraised in Chapter 4 and Appendix D. As noted above, additional options for accommodating rural growth were also presented through the Place Shaping Options Consultation suite of documents that were published in June 2022.

AG3: Rural housing growth in Hubs and Service Settlements

6.63 A **significant positive effect** is expected in relation to SA objective 2 (housing) as the policy states that Neighbourhood Development Plans will allocate land for new housing using indicative growth targets. This is likely to support new housing developments in rural areas.

6.64 A **minor positive effect** is also identified for SA objective 3 (community cohesion and safety) since the policy refers to how consideration will be given

to outstanding commitments and cumulative impacts. This may help with the cohesion of community if a small village is not overloaded with new development.

6.65 A minor positive effect is likely in relation to SA objective 5 (access to services, facilities and education) as the policy promotes community-based services and facilities as part of new development. Locating development in accordance with the settlement hierarchy will ensure that more people have reasonable access to services and will support the sustainability of existing services.

6.66 Minor positive effects are expected for SA objective 9 (travel) as new development will be located in accordance with the county's settlement hierarchy, reducing the need to travel. Reducing the need to travel may improve air quality and contribute towards reduced carbon emissions, meaning that **minor positive effects** are likely in relation to SA objective 1 (climate change), SA objective 6 (physical and mental health and wellbeing) and SA objective 10 (air quality).

6.67 A minor positive effect is also identified for SA objective 12 (landscapes and townscapes) as the policy requires proposals where there is no Neighbourhood Development Plan to be adjacent to, or within, the built form of settlement. Reference to considering cumulative effects also – assume this includes landscape/townscape impacts.

Reasonable alternative options

6.68 As noted above, the Spatial Options Consultation Document (January 2022) presented four options for accommodating rural growth. These were refined through the rural paper of the Place Shaping Options Consultation (June 2022). These options have been appraised in Chapter 4 and Appendix D.

AG4: Rural settlement exceptions for affordable housing, entry level homes, self and custom build housing and community led housing

6.69 This policy states that in settlements outside of the Rural Settlement Hierarchy, the provision of sites for affordable housing, affordable self and custom build housing will only be supported within Neighbourhood Development Plans (NPD) which meet the specified criteria. Criteria are presented to help identify appropriate sites, with these focusing on the site's accessibility to services and facilities, the site's likelihood to encourage private car travel, and the settlement's positioning with respect to identified flood risk. A **minor positive effect** is therefore expected in relation to SA objective 2 (housing) - while the policy provides scope for the provision of housing, the policy is restrictive since housing sites need to be identified in NDPs, and meet the criteria specified.

6.70 Minor positive effects are expected for SA objective 5 (access to services, facilities and education) as the policy states that new development of the types covered by the policy must have at least three key services and facilities within 1km of the centre. **Minor positive effects** are also likely in relation to SA objective 1 (climate change), SA objective 6 (physical and mental health and wellbeing), SA objective 9 (travel) and SA objective 10 (air quality) as promoting sustainable travel options could encourage a modal shift in transportation from the private car to a choice of modes of travel, improve air quality and contribute towards reduced carbon emissions.

6.71 With respect to SA objective 14A (flood risk), the second criterion of the policy states how settlements in which potential sites might be found, should not be 'wholly' located within Flood Zone 3. It also states how the settlement should not be affected by the significant flooding of the settlement road. While these measures do offer protection against flood risk, development on or adjacent to Flood Zone 3 land is likely to increase flood risk. A **minor negative effect** is

therefore considered likely. Any development across Herefordshire is likely to place further pressure on the quality of the county's water courses (SA objective 14B: water quality and quantity) but the scale of development envisaged under this policy is likely to be **negligible**.

Reasonable alternative options

6.72 In terms of alternative approaches, the Spatial Options Consultation Document (January 2022), as well as the Place Shaping Options Consultation (June 2022) presented different options for distributing growth across Herefordshire's villages. The spatial options for the rural areas were considered in Chapter 4, with Appendix D providing further detail.

AG5: Open countryside

6.73 A **minor positive effect** is expected for SA objective 12 (landscape and townscapes) as the policy classifies areas outside of a settlement boundary or the built form as 'open countryside'. This classification will help provide greater protection to the countryside. A **minor positive effect** is also expected in relation to SA objective 11 (biodiversity and geodiversity) since protecting undeveloped land from development will help to conserve sensitive habitats.

Reasonable alternative options

6.74 As noted above, the need to protect open countryside was considered in relation to the spatial options considered through the Spatial Options Consultation Document (January 2022), and again through the Place Shaping Options Consultation Document (June 2022). However, there were no specific options relating to the use of land in open countryside.

AG6: Gypsies, Travellers and Travelling Show People

6.75 As this policy safeguards existing traveller sites from other forms of development and will support for proposals for new pitches for gypsies and travellers and travelling showpeople in line with their saved policy H4 and the 2022 GTAA, a **significant positive effect** is predicted for SA objective 2 (housing).

Reasonable alternative options

6.76 The need to respond to different housing demands was a central theme in considering the spatial options outlined through the Spatial Options Consultation Document (January 2022), and again through the Place Shaping Options Consultation Document (June 2022). Three Gypsy and Traveller policy options were presented through the Policy Options Consultation Document (April 2022). The first option (GT1) involved saving the existing policies and allocated undeveloped sites in the existing Development Plan Document, and allocating further sites and yards in the Local Plan in order to meet demand, as outlined via an updated Gypsy and Traveller Accommodation Assessment (GTAA). The option also considered negotiating stopping places for temporary stays. The second option (GT2) proposed a review of existing policy, and to incorporate Gypsy and Traveller needs into a single, housing-focused policy. Again, the option envisaged carrying-over undeveloped sites, allocating additional sites and yards, and giving consideration to the use of negotiated stopping places for temporary stays. The third option (GT3) considered the possibility of providing pitches or plots within strategic urban extensions/ strategic developments, as to be identified in the Local Plan.

Creating Balanced Communities

6.77 This section presents the appraisals of the following Herefordshire Local Plan policies:

- **BC1:** Housing mix and range
- **BC2:** Affordable housing – thresholds and targets
- **BC3:** Diversity of housing delivery

Table 6.6: Sustainability Appraisal of Policies BC1 - BC3

SA Objective	Policy BC1	Policy BC2	Policy BC3
SA objective 1: Climate Change	0	0	+
SA objective 2: Housing	++	++	++
SA objective 3: Community Cohesion and Safety	+	+	+
SA objective 4: Town and Retail Centres	0	0	0
SA objective 5: Access to services, facilities and education	+	0	0
SA objective 6: Physical and Mental Health and Wellbeing	+	0	0
SA objective 7: Economy	0	0	0
SA objective 8: Employment and reducing inequality and poverty.	0	0	+

SA Objective	Policy BC1	Policy BC2	Policy BC3
SA objective 9: Travel	0	0	0
SA objective 10: Air Quality	0	0	0
SA objective 11: Biodiversity and Geodiversity	0	0	+
SA objective 12: Landscapes and Townscapes	0	0	0
SA objective 13: Heritage	0	0	0
SA objective 14A: Flooding	0	0	0
SA objective 14B: Water Quality and Quantity	0	0	0
SA objective 15: Resources	0	0	0

BC1: Housing mix and range

6.78 A **significant positive effect** is expected for SA objective 2 (housing) as the policy seeks to ensure that housing developments provide a mix and range of housing types to provide for a range of household sizes and incomes to meet identified housing needs across Herefordshire. The policy also refers to the creation of balanced and inclusive communities, meaning that a **minor positive effect** is also likely for SA objective 3 (community cohesion and safety). The policy refers specifically to meeting the housing needs of students, which will be beneficial to those in education. A **minor positive effect** is therefore identified with respect to SA objective 5 (access to services, facilities and education).

6.79 The policy will also have a **minor positive effect** on SA objective 6 (physical and mental health and wellbeing) as the policy states that all homes

should accord with healthy homes principles, resulting in better quality housing options which can have a positive effect on people's health and wellbeing. The policy also requires proposals to consider the requirement for and respond to the need for specialist accommodation which provides for older people and those with additional care needs.

Reasonable alternative options

6.80 In terms of alternatives, the Policy Options Consultation Document (April 2022) set out two alternative approaches for achieving the policy goal:

- To retain the existing policy approach.
- To provide a more prescriptive mix/range of housing.

6.81 However, these are not considered appropriate for assessment due to their theoretical nature.

BC2: Affordable housing – thresholds and targets

6.82 The overall purpose of the policy is to promote the provision of affordable housing as part of open market housing proposals, thereby contributing to meeting identified needs. Therefore a **significant positive effect** is likely in relation to SA objective 2 (housing). A **minor positive effect** is also identified in relation to SA objective 3 (community cohesion and safety) since the provision of affordable housing will help to keep residents (including younger people and families), who require affordable housing, in the local area.

6.83 The policy does have different trigger points for the provision of affordable housing, with sites located in Designated Rural Areas and the Wye Valley and Malvern Hills National Landscapes having a lower threshold (five dwellings) than those that are not (10 dwellings or larger than 0.5 hectares). This should

prove beneficial to the high cost National Landscape areas, but the scale of development provided by this policy is unlikely to adversely affect the qualities underpinning the designation. A **negligible effect** is therefore identified in relation to SA objective 12 (landscapes and townscapes).

Reasonable alternative options

6.84 In terms of alternatives, the Policy Options Consultation Document (April 2022) set out three alternative approaches in relation to the provision of affordable housing:

- To undertake a basic update of the existing policy approach.
- To revise the affordable housing threshold within Areas of Outstanding Natural Beauty.
- To reflect possible future designation of parishes as 'rural areas' and ensure there is sufficient flexibility within policy to lower the affordable housing threshold in such circumstances.

6.85 However, these are not considered appropriate for assessment due to their theoretical nature.

BC3: Diversity of housing delivery

6.86 A **significant positive effect** is likely for this policy in relation to SA objective 2 (housing) as the policy supports a greater variety of ways of delivering housing, such as through self and custom build site and community led housing schemes, including by setting thresholds for these types of housing on certain sites. A **minor positive effect** is also likely in relation to SA objective 1 (climate change), SA objective 8 (employment and reducing inequality and poverty) and SA objective 11 (biodiversity and geodiversity) as the policy could support small scale employment units, renewable energy schemes and open space in standalone sites or within a larger housing scheme where there is opportunity.

6.87 A **minor positive effect** is identified for SA objective 3 (community cohesion and safety) since delivering a mix of housing will allow for the housing needs of a community to be met and will allow for residents to remain in the area.

Reasonable alternative options

6.88 No alternatives were identified for this policy. The suggestion of being more prescriptive with respect to the mix and range of housing, including the role for self-build, was one of the two ‘mix and range’ options that was included in the Policy Options Consultation Document of April 2022. However, these options were not considered appropriate for appraisal due to their theoretical nature.

Creating Healthy and Sustainable Communities

6.89 This section presents the appraisals of the following Herefordshire Local Plan policies:

- **HSC1:** Promoting health and wellbeing
- **HSC2:** Infrastructure delivery
- **HSC3:** Green and Blue Infrastructure
- **HSC4:** Herefordshire and Gloucestershire Canal.

Table 6.7: Sustainability Appraisal of policies HSC1 - HSC4

SA Objective	Policy HSC1	Policy HSC2	Policy HSC3	Policy HSC4
SA objective 1: Climate Change	+	+	+	+

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18)
Local Plan

SA Objective	Policy HSC1	Policy HSC2	Policy HSC3	Policy HSC4
SA objective 2: Housing	0	0	0	0
SA objective 3: Community Cohesion and Safety	++	0	0	+
SA objective 4: Town and Retail Centres	0	0	0	0
SA objective 5: Access to services, facilities and education	++	++	0	0
SA objective 6: Physical and Mental Health and Wellbeing	++	+	++	+
SA objective 7: Economy	0	+	0	0
SA objective 8: Employment and reducing inequality and poverty.	+	+	0	0
SA objective 9: Travel	+	+	+	+
SA objective 10: Air Quality	+	+	+	+
SA objective 11: Biodiversity and Geodiversity	+	0	++	++
SA objective 12: Landscapes and Townscapes	+	0	++	++
SA objective 13: Heritage	0	0	+	++

SA Objective	Policy HSC1	Policy HSC2	Policy HSC3	Policy HSC4
SA objective 14A: Flooding	0	0	+	+
SA objective 14B: Water Quality and Quantity	0	0	+	+
SA objective 15: Resources	0	0	0	0

HSC1: Promoting health and wellbeing

6.90 A **significant positive effect** is expected in relation to SA objective 3 (community cohesion and safety) as the policy requires development proposals to be accessible and inclusive to different needs and sets out a wide range of measures to support community cohesion and resilience. The policy also promotes community food growing through provision of allotments, community orchards and local markets to support healthy diets and community cohesion. The policy also states that development proposals must use appropriate lighting to minimise crime and a fear of crime.

6.91 A **significant positive effect** is also expected in relation to SA objective 5 (access to services, facilities and education) as the policy states that development proposals must protect against the loss of existing facilities and use developer contributions to strengthen, refurbish and/or extend existing facilities, where the need is created by new development. Proposals must seek to retain and provide new community and health facilities where required, including enhancing access to pre-school, primary, secondary and higher education. As the policy seeks to improve education and training provision, a **minor positive effect** is likely in relation SA objective 8 (employment and reducing inequality and poverty). This is likely to be seen in the short to medium term.

6.92 A **significant positive effect** is also expected in relation to SA objective 6 (physical and mental health and wellbeing) as the policy requires development proposals to contribute to better health outcomes for all residents through measures such as encouraging improved access to open space, exercise facilities and cycling routes. It also safeguards sports facilities from development, emphasises the long-term management of open spaces, and stipulates that where on-site facilities cannot be provided, off-site alternatives must be actively considered. The policy also stipulates that that main living areas and bedrooms must access to natural light; provide year-round thermal comfort and are safe in relation to the risk of fire and minimise unsafe levels of indoor or outdoor pollution. Similarly, promotion of healthy food environments through community food growing will improve diets and people's connection to nature and their community.

6.93 The provision of open space with biodiversity net gain will also be beneficial to SA objective 11 (biodiversity and geodiversity) and SA objective 12 (landscapes and townscapes) depending on the location, form and design of any scheme. Biodiversity could also be enhanced by the policy's commitment towards avoiding light pollution. **Minor positive effects** to SA objectives 11 (biodiversity and geodiversity) and SA12 (landscapes and townscapes) are therefore identified.

6.94 A **minor positive effect** is likely in relation to SA objective 9 (travel) as the policy supports the improved access to walking, cycling and wheeling routes within the county as well as battery powered modes of travel. **Minor positive effects** are also expected in relation to SA objective 1 (climate change) and SA objective 10 (air quality) as these active travel measures are likely to contribute towards improved air quality and reduced emissions.

Reasonable alternative options

6.95 In terms of alternatives, the Policy Options Consultation Document (April 2022) presented three variants relating to the delivery of community facilities:

- To include an over-arching strategic policy addressing health issues and an additional policy addressing health, social and community facilities issues.
- To retain social and community facilities policy and address health issues through other policies of the plan with a cross cutting approach.
- To include a social and community facilities policy and a separate health policy. However, these were not considered appropriate for assessment.

6.96 However, these are not considered appropriate for assessment due to their theoretical nature.

HSC2: Infrastructure delivery

6.97 This policy identifies how the Council will work with relevant stakeholders to ensure that infrastructure is delivered, in the right place, at the right time, to meet the needs of the county. Although not stated in the wording of the policy, the explanatory text refers to social and physical infrastructure and lists a wide range of potential interventions and projects.

6.98 A **significant positive effect** is likely in relation to SA objective 5 (access to services, facilities and education) as the policy requires the provision of new infrastructure for existing and new residents, which is taken to include things like healthcare and education facilities. **Minor positive effects** are therefore also likely for SA objective 6 (physical and mental health and wellbeing) and SA objective 8 (employment and reducing inequality and poverty).

6.99 Since potential works are described to include those relating to highway and transport infrastructure, including measures designed to support walking and cycling and electric vehicle charging, **minor positive effects** are identified for SA objective 9 (travel) and SA objective 1 (climate change). Since the potential works described could also relate to open space, green infrastructure, flood prevention and water supply, **minor positive effects** are also identified for

SA objective 11 (biodiversity and geodiversity), SA objective 14A (flood risk), and SA objective 14B (water quality and supply).

6.100 A **minor positive effect** is also likely in relation to SA objective 7 (economy) as the policy promotes the timely delivery of infrastructure to meet the needs of the county and to facilitate the delivery of development. This development includes that necessary for supporting economic growth. The positive effects of this policy are therefore likely to be seen in the medium to long term, due to the length of time it will take to deliver county wide infrastructure projects.

Reasonable alternative options

6.101 No alternatives to this policy were presented, with the Policy Options Consultation Document (April 2022) referring to potential government reforms surrounding the financing of infrastructure.

HSC3: Green and Blue Infrastructure

6.102 The overall purpose of the policy is to promote and enhance green and blue infrastructure within new developments, including tree planting, biodiversity enhancement and green space provision. There is specific emphasis given to minimising the adverse impacts on the River Wye and Wye Valley Woodlands SACs. Therefore, a **significant positive effect** is likely in relation to SA objective 11 (biodiversity and geodiversity).

6.103 A **minor positive effect** is expected in relation to SA objective 1 (climate change) as the policy seeks to reduce flood risk by promoting the use of nature-based solutions to minimise surface-water runoff such as multifunctional SuDS. **Minor positive effects** are also likely in relation to SA objective 14A (flood risk) and SA objective 14B (water quality and quantity) as the policy requires new development to use blue infrastructure where applicable in new proposals for surface and foul water drainage.

6.104 A significant positive effect is likely in relation to SA objective 6 (physical and mental health and wellbeing) given the wide ranging benefits that green and blue infrastructure can give rise to, from providing opportunities for sport to places where people can relax and unwind. A **minor positive effect** is also identified for SA objective 9 (travel) as the policy supports the provision of active travel networks and states that these should be located within easy walking distance of green space wherever possible. **Minor positive effects** are also expected in relation to SA objective 10 (air quality) as active travel measures are likely to contribute towards improved air quality, and this reinforces the minor positive effect already identified above in relation to SA objective 1 (climate change).

6.105 A significant positive effect is likely in relation to SA objective 12 (landscapes and townscapes) as the policy states that development proposals must help provide better links between urban and rural landscapes. This could enhance the character of the landscape. Similarly, a minor positive effect is identified for SA objective 13 (heritage) if improvements to green and blue infrastructure can help to enhance heritage features and their settings.

Reasonable alternative options

6.106 In terms of alternatives, the Policy Options Consultation Document (April 2022) presented three variants relating to the delivery of green and blue infrastructure:

- To update the policy to reflect new evidence and guidance.
- To devolve policy to local areas and facilitate delivery through Neighbourhood Development Plans and Design Codes.
- To include a new specific policy on trees and hedgerows.

6.107 However, these are not considered appropriate for assessment due to their theoretical nature.

HSC4: Herefordshire and Gloucestershire Canal

6.108 This policy's overall aim is to safeguard the historic route of the Herefordshire and Gloucestershire Canal. The overarching long-term goal is to re-establish the navigable waterway as well as restore the canal's infrastructure, buildings, towpath and features. A **significant positive effect** is therefore expected for both SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.109 A **significant positive effect** is also expected for SA objective 11 (biodiversity and geodiversity) as the policy seeks to enhance the route's potential as a green corridor. It requires new developments to allocate land to canal restoration and pose no unacceptable risk to the waterbody's ecological health, flood risk or water quality. For this reason, a **minor positive effect** has been identified for SA objectives 14A (flood risk) and 14B (water quality and quantity). Additionally, a **minor positive effect** is likely for SA objective 1 (climate change) as the policy supports nature based solutions to address the need for climate change adaptation.

6.110 A **minor positive effect** is likely for SA objective 3 (community cohesion and safety) due to the canal's recreational and active travel route potential which could increase outdoor social interactions and safety along the pedestrian walkways. A **minor positive effect** is expected for SA objective 6 (physical and mental health and wellbeing) as the policy will improve access and connectivity to green infrastructure assets which are known to reduce stress through connection with nature and encourage exercise and active travel.

6.111 A **minor positive effect** is therefore also identified for SA objective 9 (travel) and similarly for SA objective 10 (air quality) due to the provision of a green corridor for walking and cycling.

Reasonable alternative options

6.112 The Herefordshire and Gloucestershire Canal corridor was considered in the context of three policy options relating to tourism. These were outlined via the Policy Options Consultation Document (April 2022). Specifically, under option TM3, consideration was given as to whether the canal should be safeguarded via a policy associated with tourism, or be safeguarded by identifying the canal as important asset to the county’s Green and Blue Infrastructure. The merits of considering the canal as a tourism resource have not been considered via this appraisal but the effects, and the protection, are considered comparable.

Promoting a prosperous economy

6.113 This section presents the appraisals of the following Herefordshire Local Plan policies:

- **PE1:** Accommodating economic growth
- **PE2:** Principles for economic growth
- **PE3:** Enhancing town centre vitality
- **PE4:** Sustainable Tourism
- **PE5:** Supporting a strong Rural Economy

Table 6.8: Sustainability Appraisal of Policies PE1 - PE5

SA Objective	Policy PE1	Policy PE2	Policy PE3	Policy PE4	Policy PE5
SA objective 1: Climate Change	-	+/-	+	0	+/-
SA objective 2: Housing	0	+	+	+	0

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18)
Local Plan

SA Objective	Policy PE1	Policy PE2	Policy PE3	Policy PE4	Policy PE5
SA objective 3: Community Cohesion and Safety	0	0	0	0	0
SA objective 4: Town and Retail Centres	0	0	++	++	0
SA objective 5: Access to services, facilities and education	0	+	+	0	0
SA objective 6: Physical and Mental Health and Wellbeing	0	0	0	0	+/
SA objective 7: Economy	++	++	++	++	++
SA objective 8: Employment and reducing inequality and poverty	++	++	+	+	++
SA objective 9: Travel	+/	0	+	+/	-
SA objective 10: Air Quality	-?	0	+	+/	-
SA objective 11: Biodiversity and Geodiversity	-?	0	0	+	--/+
SA objective 12: Landscapes and Townscapes	-?	0	+?	+?	+?
SA objective 13: Heritage	-?	0	+?	+?	0

SA Objective	Policy PE1	Policy PE2	Policy PE3	Policy PE4	Policy PE5
SA objective 14A: Flooding	-?	0	0	0	0
SA objective 14B: Water Quality and Quantity	0	0	0	0	+/
SA objective 15: Resources	-	+	+	+/	+?

PE1: Accommodating economic growth

6.114 The overall purpose of the policy is to accommodate economic growth through the provision of a total of 182 hectares of employment land. As such, **significant positive effects** are likely in relation to SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty). The positive effects of the policy in relation to the economy are likely to be experienced in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.115 The use of land for economic development is likely to involve the use of previously undeveloped (greenfield) land, and potentially the best and most versatile agricultural land. Although effects will be dependent on the location and general form of development sites, a **minor negative effect** is therefore identified in relation to SA objective 15 (resources). The use of greenfield land is also expected to result in a **minor negative effect** in relation to SA objective 14A (flood risk) since areas for the natural storage of water will be lost. Similarly, the use of greenfield land could also give rise to **minor negative effects, with uncertainty**, with respect to SA objective 11 (biodiversity and geodiversity), SA objective 12 (landscapes and townscapes), and SA objective 13 (heritage). The uncertainty arises as a consequence of the policy identifying land need per settlement, rather than identifying specific sites.

6.116 Sites that are well-located to employees will assist in the promotion of sustainable travel options but sites that are reliant on the use of private petrol and diesel cars could be detrimental to air quality. **Mixed effects** are therefore identified for SA objective 9 (travel), while a **minor negative effect (with uncertainty)** is identified in relation to SA objective 10 (air quality). Increased traffic generation, together with the impact of the economic development itself, is expected to generate a **minor negative effect** with respect to SA objective 1 (climate change).

Reasonable alternative options

6.117 In terms of alternatives, the Policy Options Consultation Document (April 2022) presented three alternative options:

- To provide employment land on the basis of updated needs and goals, e.g. to help attract green and renewable energy industries to Herefordshire.
- To protect employment land by being more prescriptive in terms of the use classes permitted (and the type of changes of use allowed).
- To consider the policy options surrounding home-based employment. Three sub-options were presented, from developing a specific policy, to not having a policy, to amending housing design policies to help recognise and facilitate home working practices.

6.118 However, these are not considered appropriate for assessment due to their theoretical nature.

PE2: Principles for economic growth

6.119 Significant positive effects are likely in relation to SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty) as the policy seeks to strengthen and diversify the economy of the county through measures such as safeguarding the Hereford Enterprise Zone

and encouraging additional employment allocations within Neighbourhood Development Plans. The positive effects of the policy in relation to the economy are likely to be experienced in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities. Since the policy refers to a commitment to encourage economic development in association with local educational institutions, a **minor positive effect** is identified for SA objective 5 (access to services, facilities and education).

6.120 This policy is expected to have a **mixed (minor positive and minor negative) effect** in relation to SA objective 1 (climate change) as it supports the strengthening, and diversification, of the county's economy to encourage sustainable growth. While this may increase resilience and self-sufficiency to climate change and expand green economies, it is also likely that the impact of additional employment allocations and economic growth itself will have a negative effect. A **minor positive effect** is likely for SA objective 15 (resources) as the policy promotes the release of poor quality and underused employment sites for other purposes, and so should result in the development of brownfield land. Since these other purposes could include housing, a minor positive effect is also identified for SA objective 2 (housing).

Reasonable alternative options

6.121 No alternatives were identified for this policy. However, as noted above, alternative options were presented in the Policy Options Consultation Document (April 2022) with respect to the protection and release of employment land.

PE3: Enhancing town centre vitality

6.122 This policy is expected to have a **significant positive effect** on SA objective 4 (town and retail centres) as its overall purpose is to enhance the vitality and viability of all retail centres within the county through widening the range of uses whilst maintaining a strong retail character. Measures such as requiring retail impact assessments will help to safeguard town centres and

ensure their viability. Similarly, a **significant positive effect** is also expected in relation to SA objective 7 (economy) since the policy is focused on enhancing the vitality and viability of all retail centres and their associated economies. A **minor positive effect** is also identified for SA objective 8 (employment and reducing inequality and poverty) since the creation of jobs in town centres will be accessible to a range of people, including those without cars.

6.123 The policy encourages residential development in town centres, including through the conversion of upper floors (where it is appropriate in conservation terms). Residents who occupy these homes would be able access a wide range of other town centre uses, generating a **minor positive effect** with respect to SA objective 5 (access to services, facilities and education).

6.124 Vibrant town centres will help to limit the pressures for out of centre retail and leisure developments that tend to involve high levels of car use. This will generate **minor positive effects** for SA objective 1 (climate change), SA objective 9 (travel), and SA objective 10 (air quality). The policy seeks to enhance the vitality and viability of retail centres by maintaining the character of the historic core and diversifying use of the commercial centre. Based on the intention, a **minor positive effect with uncertainty** is identified for SA objective 12 (landscapes and townscapes). SA 12 should also be enhanced through the use and conversion of upper floors in retail units. A **minor positive effect with uncertainty** is also identified in relation to SA objective 13 (heritage) as the policy promotes the enhancement of the historic fabric of the respective building when conversions are being progressed. The uncertainties noted above are generated on the basis that effects will be dependent on the location, form and design of specific developments. Although enhancements could potentially be beneficial to safety (thereby supporting SA objective 3, community cohesion and safety) or local biodiversity (thereby supporting SA objective 11, biodiversity and geodiversity), a negligible effect is identified. Ultimately, effects will be dependent on the location, form and design of specific interventions.

6.125 A **minor positive effect** is likely in relation to SA objective 2 (housing) as the policy promotes the development of residential units in historic centres,

including residential conservation above ground floor retail units. The policy also encourages a mix of tenures and accommodation sizes.

Reasonable alternative options

6.126 In terms of alternatives, the Policy Options Consultation Document (April 2022) presented three variants for the pursuit of the policy goal:

- To continue with existing policy, but update in line with recent national policy changes.
- To review the role of town centres and primary shopping areas within the Local Plan / Market Town Neighbourhood Development Plans.
- To include an additional policy relating to the use of permitted development in the upper floors of town centres.

6.127 However, these are not considered appropriate for assessment.

PE4: Sustainable Tourism

6.128 This policy supports proposals that would deliver sustainable tourism for the local communities and businesses of Herefordshire, provided that they would meet a range of criteria. As a result, a **significant positive effect** is expected for SA objective 4 (town and retail centres) and SA objective 7 (economy) and a minor positive effect is likely for SA objective 8 (employment). While jobs may be generated in the tourism industry, these are likely to be low-paid and seasonal opportunities.

6.129 The policy includes mitigation relating to the potential impacts of tourism proposals on the landscape, heritage and biodiversity, requiring proposals to have no detrimental impact on the county's natural, landscape and heritage assets or on the overall character and quality of the environment. Particular reference is made to the protection of National Landscapes. **Minor positive**

effects as therefore expected in relation to SA objectives 11 (biodiversity), 12 (landscapes and townscapes) and 13 (heritage) although these are currently uncertain as the ultimate effect will be dependent on the design, form and utility of individual tourism developments.

6.130 The policy supports change of use from hotel to other class uses where no demand for hotels can be demonstrated which is likely to unlock housing units across the county, thus having a **minor positive effect** on SA objective 2 (housing).

6.131 A **minor positive effect** is likely for SA objective 3 (community cohesion and safety) and SA objective 8 (employment and reducing inequalities and poverty) as the policy should add vitality, footfall and cultural and recreational assets to local urban and rural areas.

6.132 A **mixed effect** is expected for SA objective 9 (travel) and SA 10 (air quality). Although the policy promotes safely accessible sites which are accessible by a range of transport modes, increased tourism particularly in the countryside for glamping, caravanning and camping will increase dependency on private cars.

6.133 SA objective 15 (resources) is also likely to have a **mixed effect** due to the positive impact that permittance of hotel change on use will have on better utilising central brownfield sites but the negative impact likely caused by caravan, glamping and camping holiday accommodation on soil health, waste generation and development on versatile agriculture land.

Reasonable alternative options

6.134 Three options relating to tourism were outlined via the Policy Options Consultation Document (April 2022). One of these related to the possibility of pursuing greater diversification within visitor accommodation (TM1), while another considered the role of the Herefordshire and Gloucestershire Canal corridor (TM3, as noted above). Policy option TM2 was specifically aligned to

'defining a sustainable location for tourist accommodation and attractions. Two options were provided in support of this. The first option considered developing a policy to strictly focus significant new tourism development for accommodation and facilities in Hereford and the market towns to maximise sustainable transport opportunities and to protect environmental amenity. The second option considered developing a more flexible policy, which could define clear parameters for what constitutes a sustainable location, for instance by setting scale thresholds on proposals, or restricting proposals to those defined as sustainable settlements under the revised Rural Settlement Hierarchy. Given the conceptual nature of these options, neither has been appraised via this document.

PE5: Supporting a strong Rural Economy

6.135 This policy supports the growth, viability and vitality of Herefordshire's rural economy. The policy supports developments which aid agricultural operations and functional needs, diversify agricultural businesses into non-agricultural activities, and expand intensive livestock practices, buildings and polytunnels. As a result, the policy is expected to have a **significant positive effect** on SA objective 7 (economy) and SA objective 8 (employment and reducing inequalities and poverty).

6.136 A mixed (**minor positive and minor negative**) effect is likely for SA objective 1 (climate change) as the promotion of agricultural and rural activities, in particularly intensive livestock units, will increase greenhouse gas emissions. However, the policy recommends that proposals should be carbon neutral where applicable. Furthermore, increased transport requirements will have a **minor negative effect** on SA objective 9 (travel) and SA objective 10 (air quality).

6.137 A mixed (**significant negative and minor positive**) effect is expected for SA objective 11 (biodiversity and geodiversity). The policy is likely to have positive effect through its promotion of best practice for nutrient neutrality (where applicable), reference to Policy EE1 (Protecting and enhancing the

quality of the natural environment) and requirement that agricultural diversification poses no adverse impact to local environment. However, the expansion of agricultural practices and diversification across rural land is likely to significantly negatively impact ecological networks, harming the habitat connectivity for local species. Noise, light and chemical pollution from increased rural activity could also negatively impact biodiversity and geodiversity. Due to similar considerations, a **mixed effect** is likely for SA objective 6 (physical and mental health and wellbeing). Moreover, a **mixed effect** is also likely for SA objective 14B (water quality and quantity) as the mitigation of harmful agricultural runoff and extent of water consumption will vary by proposal type.

6.138 A **minor positive effect with uncertainty** has been identified for SA objective 15 (resources) as the policy promotes the avoidance of loss of the best and most versatile agricultural land and also alternative use of redundant agricultural buildings. However, there is scope for soil pollution.

6.139 A **minor positive effect with uncertainty** has also been identified in relation to SA objective 12 (landscapes and townscapes) as the policy promotes consideration of the cumulative effects of multiple units on landscape character. It ensures that the siting, design and scale of developments is in keeping with its location and setting in the landscape. Uncertainty is cited due to the strength of policy wording in ensuring that independent developments abide by these considerations.

Reasonable alternative options

6.140 Three options for the rural economy were presented via the Policy Options Consultation Document (April 2022). The first was centred upon updating the rural economy policy to reflect changes to national policy (RE1). The second option (RE2) suggested updating the rural economy policy as in option RE1, but to include specific criteria for agricultural developments. The third option (RE3) was centred upon updating the rural economy policy as in option RE1, and to include a new separate policy specifically for large scale agricultural and land based developments. Given the conceptual nature of these options, they have not been formally considered through this appraisal.

Place-based policies

6.141 The following sections present the appraisal of the policies for Hereford, and the five market towns of Bromyard, Kington, Ledbury, Leominster and Ross-on-Wye, as well as the Rural Areas policies.

Hereford

6.142 Herefordshire Council's Spatial Options consultation, that was published in January 2022, presented different spatial options for distributing growth across the county. Each of these options gives rise to different effects, as shown by the appraisal included in Chapter 4. In June 2022 Herefordshire Council published a suite of Place Shaping Options consultation documents [See reference 46]. For Hereford, eight areas for potential development were identified:

- **Area 1:** Land to the North
- **Area 2:** Land to the North West (with identified potential for mixed use development)
- **Area 3:** Land to the West
- **Area 4:** City Centre
- **Area 5:** Potential land west of city centre
- **Area 6:** Land to the East (with identified potential for mixed use development)
- **Area 7:** Land to the South (with identified potential for mixed use development)
- **Area 8:** Land to the south west

6.143 The consultation document considered the strengths and weaknesses of all eight areas [See reference 47].

6.144 The Draft (Regulation 18) Herefordshire Local Plan builds upon these previous rounds of consultation and includes the following policies that are associated with Hereford. This section presents the appraisals of the following Herefordshire Local Plan policies:

- **HERE1:** Strategic development for Hereford
- **HERE2:** Supporting the vitality of Hereford city centre
- **HERE3:** Supporting jobs in Hereford
- **HERE4:** Supporting movement in and around Hereford
- **HERE5:** Sustainable urban expansion at Homer North
- **HERE6:** Sustainable urban expansion at Three Elms
- **HERE7:** Sustainable urban expansion at Lower Bullingham.
- **HERE8:** Supporting education and community facilities in Hereford
- **HERE9:** Supporting greening of the city in Hereford

Table 6.9: Sustainability Appraisal of the Hereford policies

SA Objective	Policy HERE 1	Policy HERE 2	Policy HERE 3	Policy HERE 4	Policy HERE 5	Policy HERE 6	Policy HERE 7	Policy HERE 8	Policy HERE 9
SA objective 1: Climate Change	0	+	0	+	+/	+	+		+?
SA objective 2: Housing	++	++	0	0	++	++	++	0	+

SA Objective	Policy HERE 1	Policy HERE 2	Policy HERE 3	Policy HERE 4	Policy HERE 5	Policy HERE 6	Policy HERE 7	Policy HERE 8	Policy HERE 9
SA objective 3: Community Cohesion and Safety	0	+	0	0	++	++	++	+	+?
SA objective 4: Town and Retail Centres	+	+	0	0	0	0	0	+?	+
SA objective 5: Access to services, facilities and education	+	+	0	0	+	+	+	++	+
SA objective 6: Physical and Mental Health and Wellbeing	0	+	0	+	+	+	+	+	+?
SA objective 7: Economy	++	+	++	0	+	0	+	+?	+?

SA Objective	Policy HERE 1	Policy HERE 2	Policy HERE 3	Policy HERE 4	Policy HERE 5	Policy HERE 6	Policy HERE 7	Policy HERE 8	Policy HERE 9
SA objective 8: Employment and reducing inequality and poverty.	+	++	++	0	+	++	++	+?	+?
SA objective 9: Travel	-	+/	0	++	+/	+/	+/	0	+?
SA objective 10: Air Quality	-	-	0	++	+/	+/	+/	0	+?
SA objective 11: Biodiversity and Geodiversity	-	0	0	+	-	-	-	0	+?
SA objective 12: Landscapes and Townscapes	+/	+	0	0	-	-	-	0	+?
SA objective 13: Heritage	-	-	0	0	-	-	-	0	+?
SA objective 14A: Flooding				0				0	+?

SA Objective	Policy HERE 1	Policy HERE 2	Policy HERE 3	Policy HERE 4	Policy HERE 5	Policy HERE 6	Policy HERE 7	Policy HERE 8	Policy HERE 9
SA objective 14B: Water Quality and Quantity	-?	-?	0	0	-?	-?	-?	0	+
SA objective 15: Resources	+/	+	0	0				0	+

HERE1: Strategic development for Hereford

6.145 This policy will have a **significant positive effect** on SA objective 2 (housing) as it will result in the delivery of a minimum of 5,600 homes at Hereford within the plan period. Four strategic development areas are identified, with the anticipation that these can collectively provide approximately 3,650 homes. Three of the sites are on the city’s edge, while the city centre represents the fourth. A total of 800 homes is identified for the city centre.

6.146 The provision of housing will help to respond to identified needs. The scale of housing proposed should also allow for a mixed of homes to be provided. A **significant positive effect** is therefore identified for SA objective 2 (housing). Delivering significant growth across the city should also prove beneficial to the vitality and viability of Hereford’s central areas, generating a **positive minor effect** in relation to SA objective 4 (town and retail centres).

6.147 A **minor positive effect** is likely in relation to SA objective 5 (services and facilities) as residents of the new homes to be provided at Hereford will benefit from Hereford’s range of existing services and facilities, and the delivery of new homes will likely provide additional services and facilities to existing and new residents.

6.148 A **negligible effect** is also identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy does not specifically refer to the provision of sports and health facilities, or to the provision of green and blue infrastructure.

6.149 A **significant positive effect** is also likely in relation to SA objective 7 (economy) as the policy states that a sufficient supply of employment land will continue to be provided to allow a range of new and existing businesses to set up and grow in the city. A **minor positive effect** is expected in relation to SA objective 8 (employment) as the continued provision of employment land will contribute towards meeting Herefordshire's employment needs, and the provision of housing at Hereford will provide new residents with access to the job opportunities that are concentrated at the city. The positive effects of the policy in relation to the economy and employment are likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.150 Providing homes close to jobs and other key services and facilities will help to minimize the need to travel, but some impact is inevitable given the scale of growth proposed. A **minor negative effect** is therefore identified for SA objective 9 (travel). Beyond congestion, an increase in traffic could also impact upon air quality, particularly in terms of that part of the covered by an Air Quality Management Area (AQMA). This extends north to south through the city and is aligned with the A49 corridor. A **minor negative effect** is therefore identified for SA objective 10 (air quality).

6.151 A **minor negative effect** is expected in relation to SA objective 11 (biodiversity and geodiversity) as many of the identified strategic residential development sites are in close proximity to a SSSI (Lugg and Hampton Meadows or River Wyre). There is therefore some potential for impact, but the application of appropriate mitigation could help to minimise adverse effects. Although the need to provide mitigation, and to facilitate biodiversity net gain, is addressed elsewhere through the Draft Herefordshire (Regulation 18) Local Plan, the wording of the policy could be strengthened in this regard.

6.152 Mixed effects are identified for SA objective 12 (landscapes and townscapes) as the city-centre focused development will help to revitalise under-used parts of Hereford city. **Mixed effects** are also identified for SA objective 15 (resources) as while the city centre development will allow for the re-use of previously developed land, development at the edge will involve the loss of undeveloped and agricultural land. A **negative minor effect** is likely in relation to SA objective 13 (heritage) as all of the identified strategic residential development sites are either in or adjacent to a Conservation Area, an Area of Archaeological Importance or a Scheduled Monument. Potential adverse effects can be limited through the application of sensitive and creative design at the project scale. Despite this, there are no mitigation measures present in the policy.

6.153 A significant negative effect is likely in relation to SA objective 14A (flood risk) as all of the identified strategic residential development sites are either fully or partly in Flood Zone 3. Despite this, there are mitigation measures present in the policy. A **minor negative effect** is also identified for SA objective 14B (water quality and water resources) as the collective developments will place further pressure on water supply and potentially have an impact on water quality in the already sensitive water courses.

Reasonable alternative options

6.154 Broad strategic options relating to the amount of development Hereford should receive in the context of the county's other settlements were considered in the Spatial Options Consultation Document that was published in January 2022. As noted above, further areas for developing in Hereford were also considered in the Place Shaping Options Consultation Document that was published in June 2022. While strategic options were considered in Chapter 4, reasonable alternatives to the strategic sites included in Policy HERE1 were appraised in Chapter 5.

HERE2: Supporting the vitality of Hereford city centre

6.155 This policy will have a **significant positive effect** on SA objective 2 (housing) as it will result in the delivery of around 800 new homes in the city centre during the plan period, including student housing. Delivering a mix of housing will help to respond to different needs and help to retain people in the city. Enhancements in the city centre could also prove beneficial to community safety. A **minor positive effect** is therefore identified for SA objective 3 (community cohesion and safety).

6.156 A **minor positive effect** is likely in relation to SA objective 4 (town centres) as the policy promotes the provision of live-work uses, which enable living and work arrangements to be co-located in the city centre. The co-location of city centre facilities is also likely to result in a **minor positive effect** in relation to SA objective 1 (climate change) since the need to travel should be reduced. The policy could help to reduce car reliance and encourage active travel amongst residents, while the policy could also help to discourage out of town developments that tend to be more car orientated. However, the provision of 800-900 additional homes will contribute to existing congestion levels. **Mixed effects** are therefore identified for SA objective 9 (travel). An increase in traffic could also have an adverse impact on air quality, particularly given the AQMA that extends through the centre of Hereford. A **minor negative effect** is therefore identified for SA objective 10 (air quality).

6.157 A **minor positive effect** is expected in relation to SA objective 5 (access to services) as the delivery of new homes in the city centre will mean that residents have good access to the existing services and facilities in that area and the new development pay stimulate the provision of new services. The policy also supports proposals for the redevelopment of the country bus station site to include visitor parking and key worker accommodation. However, the provision of additional services is likely to be in the longer term once developments are advanced.

6.158 A **minor positive effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure (associated with Castle Green) that, in addition to being beneficial to nature, is also beneficial to health. The policy does not specifically refer to the provision of health facilities or to sports facilities.

6.159 **Minor positive effects** are likely in relation SA objective 7 (economy) as the policy supports the enhancement of the city centre's night time economy and independent food and drink markets. The policy also promotes proposals that enhance visitor appeal to the centre of the city centre which may increase footfall levels. A significant positive effect is therefore identified in relation to SA objective 8 (employment and reducing inequality and poverty). Improving the public realm is also likely to result in a **minor positive effect** in relation to SA objective 12 (landscapes and townscapes), assuming that the arising scheme is appropriate given the context of the area.

6.160 A **minor negative effect** is likely in relation to SA objective 13 (heritage) as the area within the city centre boundary falls into the Hereford Central Area Conservation Area, however no mitigation has been proposed to manage the impacts that development could have on it. While effects will be dependent on the location, form and design of each project, the policy involves the application of change to existing heritage.

6.161 A **significant negative effect** is expected in relation to SA objective 14A (flood risk) as much of the city centre falls into Flood Zone 3, however no mitigation has been proposed to manage the impacts that development will have on it. A **minor negative effect** is also identified for SA objective 14B (water quality and water resources) as the collective developments will place further pressure on water supply and potentially have an impact on water quality in the already sensitive water courses.

6.162 A **minor positive effect** is expected in relation to SA objective 15 (resources) as the policy promotes development on brownfield land which represents a more efficient use of land.

Reasonable alternative options

6.163 No alternatives to this policy were identified.

HERE3: Supporting jobs in Hereford

6.164 The overall purpose of the policy is to support the creation of a diverse range of employment in Hereford through increased provision of employment land supply (including the extension of the Hereford Enterprise Zone); therefore **significant positive effects** are likely in relation to SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty). The positive effects of the policy in relation to the economy and employment are likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.165 A **negligible effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy does not specifically refer to the provision of sports and health facilities, or to the provision of green and blue infrastructure.

6.166 A **significant negative effect** is expected in relation to SA objective 14A (flood risk) as the Hereford Enterprise Zone and the 15 hectare employment site next to the Three Elms urban expansion are adjacent to Flood Zone 3, however no mitigation has been proposed to manage the impacts that development could have on it.

6.167 While the provision of new employment land could have negative environmental effects, the likely effects of the strategic site allocations at Hereford are considered separately below as these allocations are not the main focus of this policy.

Reasonable alternative options

6.168 No alternatives to this policy were identified.

HERE4: Supporting movement in and around Hereford

6.169 This policy presents a package of measures for increasing the options for moving through and around the city. Specific proposals include a multi-modal transport interchange centred on the railway station; multi-storey parking provision on the site of the current bus station; and improvements to public realm and green infrastructure corridors that can act as pedestrian and cycle routes. The policy also refers to establishing a western corridor for developing strategic road infrastructure in to support the planned growth of the city. This infrastructure is outlined to include a western relief road, an investment that the policy identifies will need to be delivered in phases, with developer contributions and other sources of public funding. The policy acknowledges that additional detailed technical studies will be necessary in order to determine the road's alignment. Beyond these specific measures, the policy also states how new development in Hereford must ensure accessibility to the city centre, public transport services and other key destinations, through a choice of travel options, including through the provision of active travel links.

6.170 Given the policy's overall focus, a **significant positive effect** is expected in relation to SA objective 9 (transport). A **minor positive effect** is also likely in relation to SA objective 6 (health) as the policy seeks to support opportunities for residents to choose healthy lifestyle choices by choosing active travel options.

6.171 Significant positive effects are likely in relation to SA objective 1 (climate change) and SA objective 10 (air quality) as the policy promotes sustainable travel options which could contribute to improving air quality and

reducing carbon emissions. This is particularly important in Hereford where existing levels of congestion are high.

6.172 A **minor positive effect** is expected in relation to SA objective 11 (biodiversity) as the policy promotes improvements to green infrastructure corridors that act as pedestrian and cycle routes.

Reasonable alternative options

6.173 No alternatives to this policy were identified.

HERE5: Sustainable urban expansion at Holmer North

6.174 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of housing sites in and around the city. Housing Area One broadly corresponds with the land that accompanies Policy HERE5. The site also corresponds with two of the residential site options that were considered in Chapter 5 (Bur09a and Bur32a). The appraisal of these options was taken as the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy HERE5.

6.175 The policy provides scope for delivering approximately 950 homes. This will provide a **significant positive effect** in relation to SA objective 2 (housing), while the scale of development proposed will allow for a mix of homes to be provided. The policy also includes a commitment for delivering affordable housing (35%). Consequently, the development provides scope for a range of residents to be accommodated, providing opportunities for community cohesion. The policy also promotes the development of community facilities and encourages the creation of shared spaces. Consequently, a **significant positive effect** is identified for SA objective 3 (community cohesion and safety).

6.176 A minor positive effect is expected in relation to SA objective 5 (access to services, facilities and education) as the policy proposes the development of small scale neighbourhood shops and amenities as part of the new development. The policy also requires contributions towards a new primary school.

6.177 The policy promotes the construction of an access road linking up the A49 and A4110. This road seeks to facilitate walking, cycling and wheeling. The policy also outlines a need for a linking bus service. While these interventions would be helpful in the context of climate change and air quality, the development is still likely to generate car movements and contribute to road congestion. Consequently **mixed minor negative and positive** effects are likely in relation to SA objective 9 (transport), SA objective 1 (climate change) and SA objective 10 (air quality).

6.178 A minor positive effect is likely in relation to SA objective 6 (health) as sustainable transport provision will encourage active travel and the provision of open space will benefit public health. There is no specific reference to the provision of health facilities.

6.179 Minor positive effects are likely in relation to SA objective 7 (economy) and SA objective 8 (employment) as the policy promotes the inclusion of employment land on the eastern side of the scheme off the A49 (subject to discussions with the landowner). The positive effects of the policy in relation to the economy are likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.180 There are no specific biodiversity or geodiversity designations across the site and options. Bur09a and Bur32a were also awarded green ratings (the best) in the assessment for biodiversity, as included in the Council's Housing and Economic Land Availability Assessment (HELAA). However, the development of this scale will inevitably have an impact. The policy outlines a need for appropriate ecological assessments across the site, and gives emphasis to the need to provide green and blue infrastructure. Specifically the

policy seeks to build on extending green infrastructure corridors to the south of the site as well as conserving and enhancing new open space. The policy also requires the site to deliver 20% Biodiversity Net Gain. The policy also promotes the incorporation of open space into the scheme and seeks to link up green infrastructure corridors from areas outside of the allocation area such as at Ayles Brook. However, overall, a **minor negative effect** is identified in relation to SA objective 11 (biodiversity and geodiversity).

6.181 The policy states how the setting and architectural distinctiveness of the Grade I listed Church of St Bartholomew, and its detached Grade II listed Bell Tower in the south-eastern part of the allocation, will need to be considered with any new development. It is likely that a development of this scale will generate adverse impacts, and the policy does not specifically refer to the type of mitigation that might be needed. Although effects will be influenced by the form and design of the scheme, a **minor negative effect** is identified for SA objective 13 (heritage). For similar reasons, a **minor negative effect** is also identified for SA objective 12 (landscapes and townscapes), although it is noted that the policy limits the height of structures and requires a landscape buffer and tree screening to the east of the site.

6.182 A **significant negative effect** is expected in relation to SA objective 14A (flood risk) as part of the site falls into Flood Zone 3, however no mitigation has been proposed to manage the impacts that development will have on it. A **minor negative effect** is also identified for SA objective 14B given the sensitivities of the water courses surrounding Hereford. Land to the east of the A49 is also safeguarded for the supply of drinking water.

6.183 Lastly, a **significant negative effect** is also identified for SA objective 15 (resources) since the site involves a loss of previously developed (greenfield) land. All of the land across the site is classified as being Grade 3 in terms of agricultural land quality. The south west corner of the site is also falls within a safeguarding area for minerals.

Reasonable alternative options

6.184 As noted above, the site is one of three strategic and peripheral development sites that are allocated in Hereford. Reasonable alternative options for site allocations were appraised in Chapter 5. As noted above, different areas of the city were also assessed through the Place Shaping Options Consultation of June 2022.

HERE6: Sustainable urban expansion at Three Elms

6.185 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of housing sites in and around the city. Mixed Used Area Two broadly corresponds with the land that accompanies Policy HERE6. The policy also aligns with site option HLAA/197/004 that was appraised in Chapter 5. The appraisal of that site option has been taken as the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy HERE6.

6.186 As with Policy HERE5, a **significant positive effect** is expected for SA objective 2 (housing) as the policy will result in the delivery of around 950 new homes during the plan period, including 35% affordable housing. Given this volume of development, a mix of homes is likely to be possible. This will help to respond to a mix of housing needs and provide scope for greater community cohesion. A **significant positive effect** is also identified for SA objective 3 (community cohesion and safety).

6.187 Mixed effects are expected for SA objective 1 (climate change), SA objective 9 (travel) and SA objective 10 (air quality) as the policy promotes sustainable travel options which could encourage modal shift from the private car to active travel, improve air quality and contribute towards reduced carbon emissions. However, a development of this scale will inevitably generate an

impact and potentially accentuate the congestion and air pollution that Hereford currently suffers with.

6.188 A **minor positive effect** is identified for SA objective 5 (access to services) as the policy supports the provision of contributions to new (or extensions to) education, community or recreational facilities where a need is identified. It also requires the site to provide a local centre with small scale shops and amenities. These facilities and services are likely to generate some impact on the economy (SA objective 7), and the policy requires around 8ha of employment land to be delivered at the site. A **significant positive effect** is there identified in relation to SA objective 8 (employment).

6.189 A **minor positive effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure that, in addition to being beneficial to nature, is also beneficial to health. The policy does not specifically refer to the provision of health facilities or to sports facilities. However, the policy does include a commitment to carry out a Health Impact Assessment, to ensure that the health and wellbeing of future residents is maximized.

6.190 Development of this scale will inevitably generate disruption and impact upon site ecology. However there are no specific biodiversity or geodiversity designations across the site and option HLAA/197/004 was also awarded a green rating (the best) in the assessment for biodiversity, as included in the Council's Housing and Economic Land Availability Assessment (HELAA). The policy does supports the retention of a "green corridor" around the Yazor Brook which runs through the site for the purposes of nature conservation. The policy also states how residential development must deliver 20% Biodiversity Net Gain. While effects will be dependent on the form and design of the overall scheme, a **minor negative effect** is identified for SA objective 11 (biodiversity and geodiversity).

6.191 Similarly, the scale of the development is likely to generate **minor negative effects** in relation to SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage). The policy does state that any development

must be carefully designed to avoid any adverse effects upon the setting of Huntington conservation area and its grade II listed church. However, while effects will depend on the final design, scale and layout of development, the setting of the area will be changed by virtue of the site being developed. The policy also includes some landscape related mitigation, including a landscape buffer between Huntington Village and the site and limiting the height of structures; however the overall effect on the landscape is considered to remain minor negative given the overall scale of the development proposed.

6.192 A significant negative effect is identified for SA objective 14A (flood risk) as Yazor Brook to the south of the site creates a band of flood zone 3 that runs close to the site's south western corner. The policy states how the development must include design measures and appropriate mitigation in response. A **minor negative effect** is also identified for SA objective 14B given the sensitivities of the water courses surrounding Hereford. Land in this part of the city is also safeguarded for the supply of drinking water.

6.193 Lastly, a **significant negative effect** is identified for SA objective 15 (resources) since developing the site would lead to a loss of previously undeveloped (greenfield). Although part of the site is shown as being urban under the Agricultural Land Classification, land on the western side is shown as being of grade 2 in nature. Part of the site also falls within a Minerals Safeguarding Area.

Reasonable alternative options

6.194 As noted above, the site is one of three strategic development sites that are allocated in Hereford. Reasonable alternative options for site allocations were appraised in Chapter 5.

HERE7: Sustainable urban expansion at Lower Bullingham

6.195 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of development sites in and around the city. Mixed Use Area Seven broadly corresponds with the land that accompanies Policy HERE7. The site is also the option that is referred to as option HLAA/203/001a in Chapter 5. The appraisal of that option has been taken as the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy HERE7.

6.196 As with the previous two policies, a **significant positive effect** is expected for SA objective 2 (housing) as this policy will result in the delivery of around 1,000 new homes during the plan period, including 35% affordable housing. The volume of housing will help to provide a mix of housing options. This will be beneficial in efforts to promote community cohesion, a goal that will also be supported by the emphasis that the policy gives to the delivery of community facilities, including a neighbourhood community hub, sports and play facilities, community orchards and allotments. The policy also states how land should be safeguarded for a three form entry primary school and early years provision. Consequently, a **significant positive effect** is identified for SA objective 3 (community cohesion and safety). **Minor positive effects** are also expected for SA objective 5 (access to services) as the policy promotes the provision of a range of services including sports and play facilities, open space, pre-school facilities and small-scale convenience retail.

6.197 The emphasis given to play and recreation suggests a **minor positive effect** in relation to SA objective 6 (physical and mental health and wellbeing). The policy also refers to the provision of a country park. However, the policy does not specifically refer to the provision of health or sports facilities. Again, the policy includes a commitment to carry out a Health Impact Assessment, to ensure that the health and wellbeing of future residents is maximized.

6.198 As with the two policies above, **mixed effects** are identified for SA objective 9 (travel) and SA objective 10 (air quality) as the policy promotes sustainable travel options which could increase opportunities for active travel, , improve air quality and contribute towards reduced carbon emissions. However, the policy envisages large scale growth that will inevitably place pressure on existing areas of congestion and potentially challenge efforts at improving air quality.

6.199 Policy HERE7 is likely to have a **minor positive effect** on SA objective 7 (economy) as the policy will deliver employment land as an extension to the Hereford Enterprise Zone. However the policy does not specify an amount. This positive effect is likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities. Consequently, a **minor positive effect** is identified is SA objective 8 (employment).

6.200 As with the previous two sites, development of this scale will inevitably generate disruption and impact upon site ecology. However there are no specific biodiversity or geodiversity designations across the site and option HLAA/203/001a was also awarded a green rating (the best) in the assessment for biodiversity, as included in the Council's Housing and Economic Land Availability Assessment (HELAA). The policy does include elements of potential mitigation, although the impact of these will be dependent on the form and design of the overall scheme. As with the other expansion sites, the policy also states how residential development must deliver 20% Biodiversity Net Gain. Overall a **minor negative effect** is identified for SA objective 11 (biodiversity and geodiversity).

6.201 Similarly, the scale of the development is likely to generate **minor negative effects** in relation to SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage). The policy does identify potential areas for mitigation, for instance to help avoid adverse effects on the setting of the nearby village of Bullinghope and its church. However the potential to offset these impacts will be dependent on the design, scale and layout of development. The policy restricts the height of structures, including at the edge of the site, which

will help to minimise landscape impacts; however an overall minor negative effect on that objective remains likely.

6.202 Much of the land to the north west of the site corresponds with flood plain. In terms of the site, the northern edge of the site falls within Flood Zone 3. A strand of Flood Zone 3 also extends across the site diagonally. A **significant negative impact** is therefore identified for SA objective 14A (flood zone). The loss of this undeveloped site would also lead to the loss of natural flood storage that could increase flood risk.

6.203 A **minor negative effect** is also identified for SA objective 14B given the sensitivities of the water courses surrounding Hereford. Land in this part of the city is also safeguarded for the supply of drinking water.

6.204 Lastly, a **significant negative effect** is identified for SA objective 15 (resources) since developing the site would lead to a loss of previously undeveloped (greenfield). Much of the site also falls within Grades 2 and 3 of the Agricultural Land Classification meaning that some of the best and most versatile agricultural land would be lost.

Reasonable alternative options

6.205 As noted above, the site is one of three strategic development sites that are allocated in Hereford. Reasonable alternative options for site allocations were appraised in Chapter 5.

HERE8: Supporting education and community facilities in Hereford

6.206 This policy identifies how development proposals will be required to contribute to a co-ordinated approach to the delivery of educational and community facilities. The policy safeguards 1 hectare of land for the expansion

of Whitecross High School. The policy also supports the continuing growth of further education provision; supports the provision of special educational needs facilities; supports the provision of any required health care provision; offers support for local service centres within existing neighbourhoods; and safeguards land for the future expansion of Hereford Cemetery.

6.207 Potential effects will be dependent on the form of the infrastructure provision, and the details of where the infrastructure is being directed. However, by its focus, the policy is expected to have a **significant positive effect** with respect to SA objective 5 (access to services, facilities and education). The nature of the infrastructure is also expected to generate a **minor positive effect** for SA objective 3 (community cohesion and safety). Similarly, given the nature of the projects, a **minor positive effect** would also be expected for SA objective 6 (physical and mental health and wellbeing).

6.208 The policy does not refer to transport infrastructure so a **negligible effect** is expected for SA objective 9 (travel). Similarly, while the policy will help to respond to the infrastructure demands of new and existing residents, a **negligible effect** is also expected for SA objective 2 (housing).

6.209 If the infrastructure projects are located in town and retail centres, there could be a **minor positive effect (with uncertainty)** with regards to SA objective 4 (town and retail centres). The infrastructure projects might also be expected to benefit SA objective 7 (economy) and SA objective 8 (employment and tackling inequalities), so again a **minor positive effects (with uncertainty)** are also identified.

6.210 Providing additional infrastructure through this policy has the potential to give rise to negative environmental impacts effects ; however these will depend on specific proposals.

Reasonable alternative options

6.211 Matters surrounding infrastructure delivery were considered through the Policy Options consultation document that was published in June 2022. However, given the uncertainties surrounding infrastructure planning at the time, no formal policy options were presented.

HERE9: Supporting greening of the city in Hereford

6.212 This policy identifies how development proposals will be supported to enhance opportunities to increase and improve the natural environment of the city. The policy refers to typical projects, such as proposals to create greener urban neighbourhoods; to increase the city's tree canopy; and the creation of green and blue infrastructure. No specific locations are stated for some projects, but there is a greater specificity through references to the Essex Arms wetland and the creation of wetlands at Bartonsham Meadows. The role for the Herefordshire and Gloucestershire Canal, as an important green corridor, is also recognised (with links being made to Policy HSC4).

6.213 Given the focus of the policy, a wide range of **minor positive effects** are expected, but the lack of certainty concerning the form and location of certain projects means that the effects are presented with **uncertainty**. These minor positive effects, with uncertainty, would be relevant to SA objective 1 (climate change); SA objective 3 (community cohesion and safety); SA objective 6 (physical and mental health and wellbeing); SA objective 7 (economy); SA objective 8 (employment and inequalities); SA objective 9 (transport); SA objective 10 (air quality); SA objective 11 (biodiversity and geodiversity); SA objective 12 (landscapes and townscapes); SA objective 13 (heritage); SA objective 14A (flooding); SA objective 14B (water quality and quantity); and SA objective 15 (resources).

6.214 Depending on their form and nature, projects could also generate **minor positive effects** for SA objective 5 (access to services, facilities and education). Projects could also improve the attractiveness and success of housing schemes (supporting SA objective 2, housing) or town and retail centres (thereby supporting SA objective 4 that relates to town and retail centres).

Reasonable alternative options

6.215 Green infrastructure was considered through the Policy Options consultation document that was published in June 2022. Three policy options were presented. The first was focused on creating an update to the adopted policy of the Local Plan to reflect new evidence and guidance (Option GI1). The second option was focused on devolving GI policy to local areas, to help achieve small scale upgrades (Option GI2). The third option involved considering a new specific policy on trees and hedgerows (Option GI3). These policy options are all considered to have positive effects in relation to the delivery of GI.

Bromyard

6.216 As noted above, Herefordshire Council's Spatial Options consultation of January 2022 presented different spatial options for distributing growth across the county. Each of these options give rise to different effects, as shown by the appraised included in Chapter 4. In June 2022 Herefordshire Council published a suite of Place Shaping Options consultation documents **[See reference 48]**. For Bromyard, the document identified three options for delivering growth:

- **Option 1:** To the north and west of Bromyard. As an accompaniment, the option also includes an area for mixed-use development to the north west of the town, and an area of housing to the west of the town.
- **Option 2:** To the south of Bromyard. This option comprises three housing sites to the south of the town, plus a further mixed use site further south.

6.217 The Place Shaping Options consultation document considered the strengths and weaknesses of both options [\[See reference 49\]](#).

6.218 The Draft (Regulation 18) Herefordshire Local Plan builds upon these previous rounds of consultation and includes the following policies for Bromyard:

- **BROM1:** Strategic development for Bromyard
- **BROM2:** Land at Hardwick Bank
- **BROM3:** Land west of Linton Trading Estate

Table 6.10: Sustainability Appraisal of the Bromyard policies

SA Objective	Policy BROM1	Policy BROM2	Policy BROM3
SA objective 1: Climate Change	+	+	-
SA objective 2: Housing	++	++	0
SA objective 3: Community Cohesion and Safety	++	++	0
SA objective 4: Town and Retail Centres	+	0	0
SA objective 5: Access to services, facilities and education	+	+	0
SA objective 6: Physical and Mental Health and Wellbeing	+	+	0
SA objective 7: Economy	++	0	++

SA Objective	Policy BROM1	Policy BROM2	Policy BROM3
SA objective 8: Employment and reducing inequality and poverty.	++	0	++
SA objective 9: Travel	+/	+/	-
SA objective 10: Air Quality	+/	+/	-
SA objective 11: Biodiversity and Geodiversity	-	-	-
SA objective 12: Landscapes and Townscapes	-	-	-
SA objective 13: Heritage	-	-	-
SA objective 14A: Flooding	-	-	-
SA objective 14B: Water Quality and Quantity	-?	-?	-?
SA objective 15: Resources			-

BROM1: Strategic development for Bromyard

6.219 Policy BROM1 outlines the provision of a minimum of 750 homes over the plan period and identifies a single housing site allocation at the town (the specific site allocation policies are appraised separately further ahead in this section). The policy also identifies a requirement for around 4 hectares of employment land.

6.220 A significant positive effect is expected for SA objective 2 (housing) as the policy will result in the delivery of a minimum of 750 new homes during the plan period. With this quantum of development, a mix of homes is expected which will also prove beneficial to supporting greater levels of community cohesion. Given this, and the prompt included in the policy that new development can help provide for new or improved community facilities, a **minor positive effect** is identified for SA objective 3 (community cohesion and safety).

6.221 Mixed effects are expected for SA objective 1 (climate change), SA objective 9 (travel) and SA objective 10 (air quality). With respect to positives, the policy promotes sustainable travel options which could encourage a modal shift in transportation from the private car to active travel, improve air quality and contribute towards reduced carbon emissions. However, the proposed level of development will create new demands for travel and possibly lead to increased congestion and adversely impact on air quality. The policy does seek to promote alternatives to the private car, but Bromyard has limited bus services and no railway station. Indeed, the nearest railway station is Malvern Link, approximately nine miles away.

6.222 A minor positive effect is likely for SA objective 4 (town centres) as the policy seeks to protect and enhance the vitality and vibrancy of the town centre. The policy also states that development proposals should accommodate live/work units in employment sites within in and around the town which may promote small scale regeneration. The policy's commitment towards identifying needs for new or improved community facilities will help to deliver a minor positive effect in relation to SA objective 5 (access to services, facilities and education).

6.223 A minor positive effect is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure that, in addition to being beneficial to nature, is also beneficial to health. However, the policy does not specifically refer to the provision of health facilities or to sports facilities.

6.224 Significant positive effects are expected in relation to SA objective 7 (economy) and SA objective 8 (employment) as the policy states that around four hectares of new employment land will be accommodated in and around Bromyard. The positive effects from the policy are therefore likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.225 While the number of homes being proposed is less than the corresponding number for Hereford, the scale of development is still significant given the size of Bromyard. There are no significant nature conservation designations in and around Bromyard, and the policy seeks to provide for the sustainable conservation and enhancement of Bromyard's green infrastructure and natural environmental resources. However, despite this commitment, the level of growth envisaged is still expected to generate a **minor negative effect** in relation to SA objective 11 (biodiversity and geodiversity). Similarly, the scale of the development is likely to generate **minor negative effects** in relation to SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.226 The River Frome surrounds Bromyard to the north, east and south, with a corridor of Zone 3 Flood Plain following the alignment of the corridor. The proposed development will lead to increased surface run-off, while the loss of previously undeveloped (greenfield) land will impact upon natural flood storage. The policy states how development will need to take account of the ability of existing and proposed infrastructure, including foul drainage, water supply and water resources. However a **minor negative effect** is identified for SA objective 14A (flood risk). The policy states that there must be no adverse impacts on water quality in the River Frome, but a **minor negative effect** is identified in relation to SA objective 14B (water quality and quantity). A lot of the land surrounding Bromyard is protected for providing drinking water.

6.227 The policy presents a commitment for enhancing the vitality of Bromyard which could help to facilitate the re-use of land and buildings. However, it acknowledges that the majority of the settlement's needs will be met through the allocation of strategic sites. These are appraised below but a **significant negative effect** is identified for SA objective 15 (resources) given the limited amounts of previously developed land available and the inevitable need to use

green land. Much of the peripheral land surrounding Bromyard is also classified as Grade 2 under the Agricultural Land Classification. However, there are no areas close by for the safeguarding of minerals.

Reasonable alternative options

6.228 Reasonable alternatives for strategic sites in around Bromyard were considered through the Place Shaping Options Consultation Document (June 2022), as noted above. Other site options were appraised in Chapter 5.

BROM2: Land at Hardwick Bank

6.229 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of development sites in and around Bromyard. Housing Area One broadly corresponds with the land that accompanies Policy BROM2. The allocation under BROM2 also aligns with the site options SS/BY2 (a) (Phase 1) and SS/BY2 (b) (Phase 2) that were appraised in Chapter 5. The appraisal of these options has been taken as the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy BROM2.

6.230 A **significant positive effect** is expected for SA objective 2 (housing) as the policy will result in the delivery of 500 new homes (250 in the first half of the plan period and another 250 in the second half). The policy also includes a target that 35% of the new homes will be affordable. This level of housing will help to deliver a mix of homes, while the inclusion of affordable housing will help to support community cohesion. By providing additional homes in Bromyard, development can be located alongside the jobs, services and facilities of the town. The policy also states that the provision of, and contributions towards, any identified need for new/improved community facilities will be determined by more detailed needs assessment. A **significant positive effect** is therefore expected for SA objective 3 (community cohesion and safety).

6.231 Being located to the north of the settlement, development in this location would enable residents to access the services and facilities available within the town. Additional development might also help to retain, and extend the mix, of the services and facilities available. Although provision is less than Hereford, a **minor positive effect** is still expected for SA objective 5 (access to services, facilities and education).

6.232 A **minor positive effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure that, in addition to being beneficial to nature, is also beneficial to health. There is reference to the provision of sports facilities but not to health facilities. The policy also includes a commitment for a Health Impact Assessment, to ensure that the health and wellbeing of future residents is maximised;

6.233 The policy promotes sustainable travel and active travel links, and states how the development should be given suitable vehicular access onto the A44. It also states how a residential road link should be used to connect with the local highway network. It also requires access for pedestrians/cyclists to be provided to the school expansion land to instil good travel habits and encourage walking and cycling from the outset of the development. Linkages of cycleways through hedge/tree lined areas is also encouraged. These interventions should help to provide safe and efficient access, and the emphasis on active travel should help to deliver positives with respect to health and emissions. However the development is a large one and it is likely that the scheme will lead to an increase in traffic and potentially congestion. **Mixed effects** are therefore identified in relation to SA objective 9 (travel), SA objective 1 (climate change) and SA objective 10 (air quality).

6.234 There are no specific nature conservation designations across the sites, although there is a local wildlife site close by. Furthermore, both of the site options (SS/BY2 (a) and SS/BY2 (b)) were also awarded green ratings (the best) in the assessment for biodiversity, as included in the Council's Housing and Economic Land Availability Assessment (HELAA). The policy requires new development to provide amenity green space and to use a high standard of design and layout which respects the green infrastructure of the area. As with

the other strategic sites, the policy includes a requirement for 20% Biodiversity Net Gain. However, as a major development, it is considered inevitable that a **minor negative effect** will be generated in relation to SA objective 11 (biodiversity and geodiversity).

6.235 The site is located away from the conservation area and collection of listed buildings that occupy Bromyard's central areas. The policy also states that new development must demonstrate a high standard of design and layout, with this being responsive to local townscape, landscape and green infrastructure. Similarly, the policy also states how the new development should undertake an evaluation of the area's archaeological importance. Despite these measures, the scale of the development is significant meaning that a **minor negative effect** is identified for SA objective 13 (heritage). **Minor negative** effects are also identified for SA objective 12 (landscapes and townscapes).

6.236 The policy states how a comprehensive sustainable urban drainage system should be included as part of the scheme, with this including measures such as rain gardens and swales to manage ground and surface water drainage. The features are also intended to safeguard against any increased flood risk. As noted above, the River Frome wraps around the northern edge of Bromyard and lies to the north of the site. Its nearest point is in the north eastern corner of the site. Given that the bulk of the town's flood plain is located to the east of the town, a **minor negative effect** is likely in relation to SA objective 14A (flood risk). Since Bromyard has water supply issues, a minor negative effect is identified for SA objective 14B (water quality and quantity).

6.237 Development of this site would lead to the development of previously undeveloped (greenfield) land. In terms of the best and most versatile agricultural land, much of the land to the north of Bromyard is Grade 2 under the Agricultural Land Classification. There are no areas for the safeguarding of minerals either close to Bromyard or this particular site. However, a **significant negative effect** is identified for SA objective 15 (resources).

Reasonable alternative options

6.238 Reasonable alternative options for site allocations at Bromyard were appraised in Chapter 5. Reasonable alternatives for strategic sites in around Bromyard were considered through the Place Shaping Options Consultation Document (June 2022), as noted above.

BROM3: Land west of Linton Trading Estate

6.239 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of development sites in and around Bromyard [See reference 50]. The land west of the Linton Trading Estate was one of the options considered. The allocation under BROM3 also aligns with site option HLAA/825/001 that was appraised in Chapter 5. The appraisal of this option has been taken as the starting point for the appraisal of this allocation policy. However, the appraisal that follows reflects the specific wording of Policy BROM3.

6.240 A **significant positive effect** is likely in relation to SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty) as the policy seeks to provide over six hectares of employment land. The positive effects arising from this policy are likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.241 The land is situated beyond the urban boundary of Bromyard and the policy does not make any reference to measures for improving its accessibility by public transport and active travel. There is therefore a risk that employers will be required to use their cars to access the site. A **minor negative effect** is therefore expected for SA objective 9 (travel). Reliance on the use of private cars is also likely to generate **minor negative effects** for SA objective 1 (climate change) and SA objective 10 (air quality).

6.242 A **negligible effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy does not specifically refer to the provision of sports and health facilities, or to the provision of green and blue infrastructure.

6.243 There are no specific nature conservation designations in or immediately adjacent to the site. There are two Local Wildlife Sites beyond the boundary of the site to the north and north east, but these two habitats are separated by the railway line that enters Bromyard from the west. Hodgebatch Coppice, an area of ancient woodland, is located beyond the site's western boundary. A Local Geological Site is located beyond the site's south eastern corner. Given the scale of the development, the scheme is likely to impact this greenfield site. A **negative effect** is therefore identified for SA objective 11 (biodiversity and geodiversity).

6.244 A **minor negative effect** is expected for SA objective 12 (landscapes and townscapes) as the site is located in close proximity to Bromyard Downs. The policy proposes a number of mitigation principles for new development - it supports development where it includes mitigation measures that aim to minimise impacts on the significance of any heritage or landscape assets close to the site, and states that development will be supported where it complements the gradient of the site with the heights, massing, design, materials and location of buildings. It also requires an LVIA assessment. However, the scheme is still likely to impact the local landscape.

6.245 The site is located away from the Bromyard Conservation Area but Down Lodge, a grade II listed building, is located opposite the site in the north eastern corner of the development site. A **minor negative effect** is therefore identified for SA objective 13 (heritage).

6.246 The site is not directly affected by flooding, but land 600 metres to the west of the site falls within zone 3 floodplain. Development of this site would lead to the loss of natural water storage leading to a **minor negative effect** in relation to SA objective 14A (flood risk). Since Bromyard has water supply

issues, a **minor negative effect** is identified for SA objective 14B (water quality and quantity).

6.247 Development of the site would involve the loss of previously undeveloped (greenfield) which is categorised as Grade 3 under the Agricultural Land Classification. There are no areas for the safeguarding of minerals either close to the site or to Bromyard more generally. A **minor negative effect** is there identified for SA objective 15 (resources).

Reasonable alternative options

6.248 Reasonable alternative options for site allocations at Bromyard were appraised in Chapter 5. Reasonable alternatives for strategic sites in around Bromyard were considered through the Place Shaping Options Consultation Document (June 2022), as noted above.

Kington

6.249 As noted above, Herefordshire Council's Spatial Options consultation of January 2022 presented different spatial options for distributing growth across the county. Each of these options give rise to different effects, as shown by the appraised included in Chapter 4. In June 2022 Herefordshire Council published a suite of Place Shaping Options consultation documents **[See reference 51]**. For Kington, three options for accommodating development were identified:

- **Option 1:** A single area of housing to the south of Kington, beyond the River Arrow.
- **Option 2:** Distributing housing over a number of smaller potential sites, with five separate housing areas being identified.
- **Option 3:** Development at all sites. Essentially this third option involves a combination of options 1 and 2, but with lower densities.

6.250 The consultation document considered the strengths and weaknesses of all three options [See reference 52]. The Draft (Regulation 18) Herefordshire Local Plan builds upon these previous rounds of consultation and includes the following two proposals.

- KING1: Strategic development for Kington
- KING2: Land east of Kingswood Road

Table 6.11: Sustainability Appraisal of the Kington policies

SA Objective	Policy KING1	Policy KING2
SA objective 1: Climate Change	+/	+/
SA objective 2: Housing	++	+
SA objective 3: Community Cohesion and Safety	+	+/
SA objective 4: Town and Retail Centres	+	+
SA objective 5: Access to services, facilities and education	+	+
SA objective 6: Physical and Mental Health and Wellbeing	0	+
SA objective 7: Economy	+	+
SA objective 8: Employment and reducing inequality and poverty.	+	+

SA Objective	Policy KING1	Policy KING2
SA objective 9: Travel	+/	+/
SA objective 10: Air Quality	+/	+/
SA objective 11: Biodiversity and Geodiversity	-	+/
SA objective 12: Landscapes and Townscapes	-	-
SA objective 13: Heritage	-	-
SA objective 14A: Flooding		
SA objective 14B: Water Quality and Quantity	-?	-?
SA objective 15: Resources	-	-

KING1: Strategic development for Kington

6.251 A **significant positive effect** is expected in relation to SA objective 2 (housing) as the policy will result in the delivery of 150 new homes. A third of these homes are directed to land to the east of Kingswood Road which is identified as having potential for up to 50 dwellings. This site is the subject of Policy KING2 which is appraised separately below. Remaining housing need is expected to be delivered on non-strategic sites through the Kington Neighbourhood Development Plan. The policy explains that in the absence of a settlement boundary, development within or adjacent to the existing built form of Kington will be supported. A **minor positive effect** is identified for SA objective 3 (community cohesion and safety) as while the level of housing will help to

deliver a mix of housing, and will help to retain those looking for housing in the town, the scale of development is less than that being proposed elsewhere.

6.252 Overall, development is likely to increase footfall and spending in Kington, helping to generate a **minor positive effect** in relation to SA objective 4 (town and retail centres). **Minor positive effects** are also likely for SA objective 7 (economy) and SA objective 8 (employment) as existing employment sites in Kington are expected to be retained and enhanced.

6.253 A **minor positive effect** is also identified for SA objective 5 (access to services, facilities and education) as the provision of additional development will help to protect and possibly enhance the provision of services and facilities available within Kington. This will be important given that Kington is the smallest of Herefordshire's five market towns; extra footfall will help to promote greater viability in footfall.

6.254 New development in and around Kington will allow residents to access existing facilities using active travel modes. This will help to reduce emissions and be beneficial with respect to air quality. However, if residents need to access the kind of jobs, education or services and facilities that are currently unavailable in Kington, they will need to travel. Given the poor transport links that Kington has, including the lack of a railway station, residents are likely to have to use their cars and travel elsewhere. If these cars are fuelled by either petrol or diesel, emissions will increase and air quality will worsen. Overall, **mixed effects** are identified for SA objective 9 (travel), as well as SA objective 1 (climate change) and SA objective 10 (air quality).

6.255 A **negligible effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy does not specifically refer to the provision of sports and health facilities, or to the provision of green and blue infrastructure.

6.256 There are no significant nature conservation designations in or around immediately around Kington but the development proposed will involve the loss of previously undeveloped (greenfield) land which is likely to have value in

ecological terms. There is a large Local Geological Site to the north east of Kington although the A44 creates physical separation. Overall, a **minor negative effect** is therefore identified for SA objective 11 (biodiversity and geodiversity).

6.257 The scale of growth is moderate compared to that proposed for the other market towns of Herefordshire. However, a large part of the town is protected as a Conservation Area, within which, a large number of listed buildings are located. A registered park and garden (Hergest Croft) also adjoins the town's western boundary. The policy does provide an element of mitigation, such as by ensuring that all development proposals are reflective and are in keeping with the special character and distinctiveness of Kington, and align with the Kington Design Code. However, some impact is considered inevitable, leading to the generation of **minor negative effects** for SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.258 This policy is expected to have a **significant negative effect** for SA objective 14A (flood risk) as Kington is adjacent to Flood Zone 3 while development is likely to involve the loss of previously developed (greenfield) land. Development at Kington is likely to result in an increased risk of flooding. There are also no mitigation measures included in the policy. Kington is located outside of a Nitrate Vulnerable Zone, that extends over much of Herefordshire, and there are no Source Protection Zones close by. However the River Lugg catchment area has an identified issue with respect to phosphates. Given this, and the proximity of water courses around Kington, a **minor negative effect** is identified for SA objective 14B (water quality and quantity).

6.259 Finally, while a third of the housing provision is directed to a previously undeveloped (greenfield) site (KING2), the location of the remaining two-thirds is unclear. The Kington Neighbourhood Development Plan will help to provide some definition, and some sites are likely to come forward in central areas and use previously developed land. However, it is likely that peripheral development will be needed and this will require the use of previously undeveloped (greenfield) land. Land surrounding Kington varies in terms of its categorisation under the Agricultural Land Classification, but there is a mix of grade 2 and

grade 3 land. Consequently, a **minor negative effect** is identified for SA objective 15 (resources).

Reasonable alternative options

6.260 Reasonable alternatives for the strategic site allocation at Kington were appraised in Chapter 5. Reasonable alternatives for strategic sites in around Bromyard were considered through the Place Shaping Options Consultation Document (June 2022), as noted above.

KING2: Land east of Kingswood Road

6.261 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of development sites in and around Kington [See reference 53]. The land east of Kingswood Road was one of the options considered (Housing Area 6). The allocation under KING2 also aligns with site option K12-K13 that was appraised in Chapter 5. The appraisal of this option has been taken as the starting point for the appraisal of this allocation policy. However, the appraisal that follows reflects the specific wording of Policy KING2.

6.262 A **minor positive effect** is expected for SA objective 2 (housing) as the policy will result in the delivery of up to 50 new homes during the plan period. The scale of development is lower than other sites across Herefordshire so the range and mix of homes will be less extensive. However, the development site includes a target of 15% affordable housing which will be helpful for those in housing need. Housing provision in Kington will also help to keep local house hunters within the town. This will therefore be beneficial in attempts to promote community cohesion. Although community cohesion could be affected by the loss of play space to help create a new access road (off Old Eardisley Road), new multi-functional open space will be provided as compensation. This may facilitate informal interaction between residents. Overall a **minor positive effect** is identified for SA objective 3 (community cohesion and safety).

6.263 While of a moderate scale, the development will help to increase footfall and spending in Kington, providing a **minor positive effect** for SA objective 4 (town and retail centres). A **minor positive effect** is also likely for SA objective 5 (access to services, facilities and education) as the policy seeks to improve pedestrian linkages to Kington Medical centre and requires the site to make financial contributions towards education provision. The site is also in walking distance of Kington's centre that offers a range of services and facilities. While moderate in scale, the development will help to retain and enhance the range of services and facilities currently available.

6.264 A **minor positive effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy requires developers to provide a Health Impact Assessment in support of any planning application to ensure that the health and wellbeing of future residents is maximised.

6.265 The policy requires the construction of a new access road onto Old Eardisley Road, and identifies the need for safe crossing facilities for those walking, wheeling and cycling. While at a localised level, development of the site can support active travel, and can help to limit emissions and improve air quality, the range of available services and facilities is less than Herefordshire's other market towns. In addition, the provision of public transport is poor meaning that private transport is likely to be required if residents need to access jobs, education or services and facilities available beyond Kington. Travel by private petrol and diesel vehicles would impact on measures to reduce emissions and air quality. Consequently, **mixed effects** are expected in relation to SA objective 1 (climate change), SA objective 9 (travel), and SA objective 10 (air quality).

6.266 A **mixed (minor positive and minor negative) effect** is expected in relation to SA objective 11 (biodiversity and geodiversity) as the policy requires new development to maximise opportunities for greening, including the development of a woodland buffer between the road and expansion site, as well as deliver measurable Biodiversity Net Gains of 20%. However, as a large scale development, there is still likely to be an impact upon the biodiversity and geodiversity of the site.

6.267 A **minor negative effect** is likely for SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage). The policy does seek to provide some mitigation by stating how any new development must demonstrate that the siting, scale, massing, layout and materials are sympathetic to the special character and distinctiveness of Kington's landscape, historic centre and townscape. However, the policy still involves large scale development in a sensitive location meaning that adverse effects are likely to be unavoidable. The exact effects will be dependent on the final design, scale and layout of development.

6.268 A **significant negative effect** is expected in relation to SA objective 14A (flood risk) as although the policy requires new development to provide comprehensive sustainable urban drainage system to mitigate against flood risk, Flood Zone 3 land exists to the north and east. Development at this site could therefore increase flood risk. As noted above, the River Lugg catchment area has an identified issue with respect to phosphates. Given this, and the proximity of water courses in and around Kington, a **minor negative effect** is identified for SA objective 14B (water quality and quantity).

Reasonable alternative options

6.269 Reasonable alternative options for site allocations at Kington were appraised in Chapter 5. Reasonable alternatives for strategic sites in around Kington were considered through the Place Shaping Options Consultation Document (June 2022), as noted above.

Ledbury

6.270 As noted above, Herefordshire Council published a suite of Place Shaping Options consultation documents in June 2022, building upon the previous consultation that was held in January 2022. For Ledbury, the

document presents three options for strategic development, with each of these comprising a number of different sites:

- **Option 1:** Land to the south east of Ledbury. Alongside this strategic housing development, six other development sites are also identified. Two areas are identified for mixed use development. One of these areas is located in the town centre, with the other being located to the north of the town centre. Four sites for residential development are also identified, to the east, to the south, to the south west, and to the north west of the town centre.
- **Option 2:** Land to the south west of Ledbury. Again, development at this location comprises six other companion sites, with these being the same as those that are listed under option 1 above.
- **Option 3:** Land to south east and south west of Ledbury. This option comprises a combination of the two strategic housing sites presented under options 1 and 2 above, but without the six accompanying development sites.

6.271 The consultation document considered the strengths and weaknesses of both options [See reference 54]. The Draft (Regulation 18) Herefordshire Local Plan builds upon these previous rounds of consultation and includes the following policies:

- **LEDB1:** Strategic development for Ledbury
- **LEDB2:** Land to the south of Ledbury
- **LEDB3:** Land south of Little Marcle Road
- **LEDB4:** Lawnside and Market Street regeneration area

Table 6.12: Sustainability appraisal of the Ledbury policies

SA Objective	Policy LEDB1	Policy LEDB2	Policy LEDB3	Policy LEDB4
SA objective 1: Climate Change	+/-	+	0	+

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18)
Local Plan

SA Objective	Policy LEDB1	Policy LEDB2	Policy LEDB3	Policy LEDB4
SA objective 2: Housing	++	++	0	+
SA objective 3: Community Cohesion and Safety	+	+	0	+
SA objective 4: Town and Retail Centres	+	+	++	++
SA objective 5: Access to services, facilities and education	+	+	+	+
SA objective 6: Physical and Mental Health and Wellbeing	+	+	+	+
SA objective 7: Economy	++	0	++	+
SA objective 8: Employment and reducing inequality and poverty.	++	0	++	+
SA objective 9: Travel	+/	+	+	+/
SA objective 10: Air Quality	+/	+	+	+
SA objective 11: Biodiversity and Geodiversity	-	-	-	0
SA objective 12: Landscapes and Townscapes	-	-	-	+/
SA objective 13:	-	-	-	+/

SA Objective	Policy LEDB1	Policy LEDB2	Policy LEDB3	Policy LEDB4
Heritage				
SA objective 14A: Flooding		-	-	-
SA objective 14B: Water Quality and Quantity	-?	-	-	-
SA objective 15: Resources	-	-	-	+

LEDB1: Strategic development for Ledbury

6.272 This policy provides for a minimum of 1,700 dwellings over the plan period. A strategic site south of Leadon Way, adjacent to Gloucester Road, is allocated and this is appraised under Policy LEDB2 below. To help provide a balance against the proposed supply of homes, the policy refers to a commitment of delivering 22 hectares of new employment land. The policy refers to how the majority of this employment land will be concentrated to the west of Ledbury just south of Little Marcle Road. This site aligns with LUC18 that was appraised in Chapter 5. There is no additional policy for this site beyond what is presented through Policy LEDB1. The land at Little Marcle Road, together with the other sites around the town, were also considered through the Place Shaping Options Consultation Document for Ledbury [\[See reference 55\]](#)

6.273 A **significant positive effect** is expected for SA objective 2 (housing) as the development would result in the delivery of at least 1,700 new homes in Ledbury during the plan period. This scale of growth will allow for a range of homes to be provided, including affordable housing, and will allow for local housing need to be met within the town. This will be beneficial to SA objective 3 (community cohesion and safety), an objective that will also be supported by the policy's commitment towards promoting good connections to community

facilities and services for residents. A **significant positive effect** is therefore expected for SA3.

6.274 Minor positive effects are expected for SA objective 4 (town and retail centres) as the policy seeks to strengthen and safeguard the vibrancy and viability of Ledbury town centre by identifying the boundary in the new Neighbourhood Plan and stating that future retail outside the town centre boundary will be subject to a retail impact assessment to determine any adverse effects. Ledbury offers a good range of services and facilities so development in and around the town will allow residents to access these, particularly since the policy seeks to increase the strength of these connections. The scale of development will also help to maintain and enhance the range of services and facilities on offer. A **minor positive effect** is therefore identified for SA objective 5 (access to services, facilities and education).

6.275 A minor positive effect is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure that, in addition to being beneficial to nature, is also beneficial to health. The policy does not specifically refer to the provision of health facilities or to sports facilities.

6.276 Significant positive effects are likely for SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty) as the policy will support the delivery of 22 hectares of new employment land in Ledbury to support future employment needs. As such, the positive effects from this policy will be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.277 Mixed effects are expected for SA objective 1 (climate change), SA objective 9 (travel) and SA objective 10 (air quality) as the policy promotes sustainable travel options and seeks to ensure that development supports local transport networks and does not exacerbate congestion and increase air quality conditions. While a modal shift towards the greater use of active travel would help to improve air quality and contribute towards reduced carbon emissions, the level of development proposed suggests that an increase in car use will be

inevitable. As noted above, the policy provides for employment development on land to the south of Little Marcle Road. This site is located to the west of Ledbury, beyond the A417, and would be accessible by foot by those living on the western side of the town. For other residents, and for those employees who live away from Ledbury, the dominant form of transport is likely to be the private car.

6.278 A **negative minor effect** is expected for SA objective 11 (biodiversity and geodiversity) as although the policy seeks to safeguard, enhance and extend access to green and blue infrastructure networks across the town, development of this scale is likely to have an adverse impact upon biodiversity. As noted below, the strategic employment site at Little Marcle Road includes an area of sizeable woodland. Should development occur to the east of Ledbury, schemes could potentially impact upon the Upper Hall Farm Quarry and Grassland SSSI, as well as areas of replanted woodland which are adjacent.

6.279 The policy states how development proposals should reflect, and be sympathetic, to the special character and distinctiveness of Ledbury's historic town centre, conservation area and wider urban area. However, the town is sensitive, with part of the town being protected as a Conservation Area. Land beyond the eastern boundary of the town coincides with the Malvern Hills National Landscape. Consequently, given that impacts are considered unavoidable, **minor negative effects** are identified for SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.280 The River Leadon runs adjacent to the western edge of Ledbury and creates a band of land falling in Flood Zone 3 that extends north to south. Development in the centre of Ledbury, and on this western edge, could increase existing levels of flood risk. Policy LEDB1 also provides no mitigation in relation to reducing flood risk. Overall, a **significant negative effect** is expected in relation to SA objective 14A (flood risk). A **minor negative effect** is also likely in relation to SA objective 14B (water quality and quantity) given the proximity of water courses to the town and the potential risk of contamination.

6.281 As noted above, the policy refers to two strategic sites, land to the south of Ledbury (Policy LEDB2) and land to the south of Marcle Road (Policy LEDB3). The former of these sites is appraised separately below but both will involve the loss of previously developed land. Agricultural land around the town varies with respect to its quality, but land to the south of Marcle Road comprise a mix of Grade 1 and Grade 2 Agricultural land. Consequently, **a minor negative effect** is identified for SA objective 15 (resources).

Reasonable alternative options

6.282 Reasonable alternative options for site allocations at Ledbury were appraised in Chapter 5. Reasonable alternatives for development sites in and around the town were considered through the Place Shaping Options Consultation Document for Ledbury that was published in June 2022.

LEDB2: Land to the south of Ledbury

6.283 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of development sites in and around Ledbury [See reference 56]. The land south of Ledbury coincided with two areas (land to the south west of Ledbury and land to the south east of Ledbury). The allocation under LEDB2 aligns with site O/Led/002/003 that was appraised in Chapter 5. The appraisal of this option has been taken as the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy LEDB2.

6.284 A **significant positive effect** is expected for SA objective 2 (housing) as it will result in the delivery of a minimum of 450 new homes during the plan period, 35% of which will be affordable. The development will therefore help to offer a mix of housing, including that which is affordable, which will be beneficial in creating balanced communities and promoting community cohesion.

6.285 Minor positive effects are expected for SA objective 1 (climate change), SA objective 6 (physical and mental health and wellbeing), SA objective 9 (travel) and SA objective 10 (air quality) as the policy promotes active travel options which could encourage a modal shift in transportation from the private car to active travel, improve air quality and contribute towards reduced carbon emissions. The policy also places an obligation on applicants to prepare a Health Impact Assessment to ensure that the health and wellbeing of future residents is maximised.

6.286 SA objective 3 (community cohesion and safety) will also be supported on the basis that the policy states that new development on the site will need to deliver a new sustainable community facility as well as an area of semi-natural green space which could facilitate interaction between residents. Overall, a **minor positive effect** is identified for SA3.

6.287 A **minor positive effect** is identified for SA objective 4 (retail and town centres) as the development of this strategic site should help to increase the number of people using the centre of Ledbury, thereby helping to improve the vitality and viability of its central areas. The town centre of Ledbury is approximately 1km north of the site's most northern edge so the site would be in walking distance for the majority of residents. Residents would therefore be able to access existing services and facilities, but the scale of the development proposed would hopefully help to retain and enhance existing supply. The policy also states how new development on the site will need to deliver a new sustainable community facility as well as an area of semi-natural green space which could facilitate interaction between residents. The policy also requires contributions towards the expansion of nursery/educational facilities. A **minor positive effect** is therefore identified for SA objective 5 (access to services and facilities).

6.288 A **minor positive effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure that, in addition to being beneficial to nature, is also beneficial to health. There is reference to providing a community hub but it is unclear whether this includes health provision.

6.289 There are no nature conservation designations across the site but land beyond the A449 / A417 to the east includes ancient woodland and a Site of Special Scientific Interest (Mayhill Wood). Some mitigation is provided through the policy in its identification of the need to provide an area of semi-green space, green infrastructure corridors, and a 20% net gain in biodiversity. However, given the scale of development, a **minor negative effect** is identified for SA objective 11 (biodiversity and geodiversity).

6.290 The site is located away from the town's Conservation Area and sits outside of the Malvern Hills National Landscape that is located beyond the A449 / A417 to the east. There are no listed buildings close to the site. The policy recognises the sensitivities of the site and requires development proposals to respect the landscape setting, including minimising any impact on the National Landscape. The policy also states that proposals must provide a strong edge to the development in order to maintain separation from Parkway. Although these measures would protect and enhance the landscape through high quality design, an adverse effect on the quality of the landscape is considered unavoidable. **Minor negative effects** are therefore identified in relation to SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage). The policy places an obligation on developers to assess the archaeological significance of the area to safeguard heritage assets and inform development proposals.

6.291 Zone 3 Flood Plain is located approximately 250 metres to the west of the site, although the B4216 provides a linear divide between the boundary of the proposed development and the River Leadon. Development of this significant undeveloped site would remove a large area of natural storage. A **minor negative effect** is therefore identified in relation to SA objective 14A (flood risk). A **minor negative effect** is also likely in relation to SA objective 14B (water quality and quantity) given the scale of the development and the fact that the whole of Ledbury falls within a Nitrate Vulnerable Zone. A large Source Protection Zone is located approximately 2.5km to the south of the site. There is no reference to any mitigation included within the policy.

6.292 The development would involve the loss of previously undeveloped (greenfield) land and Grade 2 agricultural land. A **negative minor effect** is identified in relation to SA objective 15 (resources).

LEDB3: Land south of Little Marcle Road

6.293 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of options for supporting employment development. The allocation under LEDB3 aligns with employment site option HLAA/821/001 that was appraised in Chapter 5. The appraisal of this option has been taken as the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy LEDB3.

6.294 A **negligible effect** is expected for SA objective 2 (housing) since the allocation involves employment development rather than housing. A **negligible effect** is also expected for SA objective 3 (community cohesion and safety). A **minor positive effect** is identified for SA objective 4 (retail and town centres) since the activity on the site, and its proximity to Ledbury, is expected to support spending in the town. **Minor positive effects** are also expected for SA objectives 5 (access to services and facilities) and 6 (physical and mental health and wellbeing). Given the nature of the proposed development, and the expectation for both job growth and investment, **significant positive effects** are expected for both SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty). The site is in close proximity to Ledbury, enabling future workers to take advantage of active travel opportunities. The site is also close to Ledbury's road network. **Minor positive effects** are also identified for SA objective 9 (travel), and SA objective 10 (air quality).

6.295 There are no nature conservation designations across the site but there is a Local Wildlife Site to the north of the site. Given the scale of development, a **minor negative effect** is identified for SA objective 11 (biodiversity and geodiversity). The site option was not assessed in the HELAA for either

landscape or heritage matters, but the scale of the development means that some impact is inevitable. The policy does recognise this by directing applicants to complement the setting of the site by taking a sensitive approach to building heights, massing, design, materials and the location of buildings. The policy also requires the provision of appropriate tree and landscape planting, and seeks to ensure that external lighting is appropriately designed to minimise the effect on the settings of Malvern Hills National Landscape and Wall Hills Camp. With regards to heritage, the policy also directs that an assessment of the area's archaeological significance be undertaken. However, given the nature and scale of the development, some impact is likely to be unavoidable. Consequently, **minor negative effects** are identified for SA objective 12 (landscape and townscape) and SA objective 13 (heritage).

6.296 Land designated as Flood Zone 3 is located to the east of this industrial area, although the site was given a green rating in the HELAA assessment. The policy seeks to safeguard against any risk by requiring developers to provide a Flood Risk Assessment for any planning application relating to the site. Despite these safeguards, development of this undeveloped site would remove a large area of natural storage. A **minor negative effect** is therefore identified in relation to SA objective 14A (flood risk). A **minor negative effect** is also likely in relation to SA objective 14B (water quality and quantity) given the scale of the development and the fact that the whole of Ledbury falls within a Nitrate Vulnerable Zone.

6.297 The development would involve the loss of previously undeveloped (greenfield) land and Grade 2 agricultural land. A **minor negative effect** is there identified in relation to SA objective 15 (resources).

LEDB4: Lawnside and Market Street regeneration area

6.298 This 4-hectare area is prioritised for development and regeneration. The policy outlines a need for a high quality mix of retail, health and housing in order

to enhance the opportunity for people to live, work and visit the town and its wider area

6.299 Given the policy's focus, it is expected to have a **minor positive effect** for SA objective 2 (housing) since it is expected to contribute towards the improvement and redevelopment of housing within the area. The policy will therefore help to increase the number, and range, of homes with central Ledbury, although the mix maybe less than some of the larger strategic schemes being proposed across the county. The policy does not specifically refer to the opportunity for creating affordable housing.

6.300 Minor positive effects are expected in relation to SA objective 3 (community cohesion and safety) as the policy will promote the growth of community resources in the area. Uncertain effects are identified as the policy does not specify which community services will be delivered as part of new development.

6.301 Significant positive effects are likely for SA objective 4 (town and retail centres) as the policy encourages the provision of a high quality mix of retail, health, housing and employment that will enhance the opportunity for people to live, work and visit the town. Development in this location will allow residents to access a range of services and facilities, and an increase in footfall and spending will help to protect and extend current provision. Development will also help to stimulate economic development. **Minor positive effects** are therefore identified in relation to SA objective 5 (access to services, facilities and education), SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty).

6.302 The policy will deliver development in a very accessible location which already possess a good range of services and facilities. This proximity will help to encourage and prioritise active travel over the use of private cars. The policy also states that development proposals will be required to provide enhanced pedestrian and wheeling links to the town centre, thereby providing further encouragement to sustainable modes of travel. **Minor positive effects** are therefore expected for SA objective 1 (climate change), SA objective 6 (physical

and mental health and wellbeing), SA objective 9 (travel) and SA objective 10 (air quality). In relation to SA objective 6 (physical and mental health and wellbeing), the policy refers to the promotion of green and blue infrastructure as well as health-related town centre uses (although it is unclear whether these are public facing).

6.303 The policy also promotes public realm improvements which are guided by good design and place making principles. The regeneration area coincides with part of Ledbury's Conservation Area, which includes a number of listed buildings. Focusing development in this area could facilitate the use of vacant and under-used sites, which could enhance the overall feel and appeal of Lawnside and the Market Area as a destination. However, the area is a sensitive one so outcomes could vary with respect to their impact. Consequently, **mixed effects** are identified in relation to SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.304 A **negligible effect** is expected in relation to SA objective 11 (biodiversity and geodiversity). There are no specific designations across the area, and the site is largely urbanised. The policy also promotes the integration of existing open space and green infrastructure networks to and from the Lawnside and Market Street Regeneration Area as part of public realm improvements.

6.305 The site is not close to land protected as Flood Zone 3. However, the further development of open sites could lead to the loss of natural storage land. Flood risk in broader Ledbury is also a matter of concern. Consequently, a **minor negative effect** is identified in relation to SA objective 14A (flood risk). Since the whole of Ledbury falls within a Nitrate Vulnerable Zone, a **minor negative effect** is identified for SA objective 14B.

6.306 A **minor positive effect** is likely for SA objective 15 (resources) as the policy promotes the re-use of underutilised buildings and brownfield land.

Leominster

6.307 Following on from the Spatial Options consultation of January 2022, the Place Shaping Options consultation of June 2022 presented two options for strategic development:

- **Option 1:** A sustainable urban extension to the south of Leominster. Alongside this strategic development, two areas for mixed-use development are shown. These are located to the north of the town centre. There are also two accompanying housing sites, with these being located in the town centre, and an area to the north of the town centre.
- **Option 2:** Distribution of strategic housing development across four housing sites, located in the town centre, and to the south and north west of the town centre.

6.308 The consultation document considered the strengths and weaknesses of both options [\[See reference 57\]](#).

6.309 The Draft (Regulation 18) Herefordshire Local Plan builds upon these previous rounds of consultation and includes the following policies and proposals:

- **LEOM1:** Strategic development for Leominster
- **LEOM2:** Land south of the primary school
- **LEOM3:** Land south of Leominster Enterprise Park

Table 6.13: Sustainability Appraisal of the Leominster policies

SA Objective	Policy LEOM1	Policy LEOM2	Policy LEOM3
SA objective 1: Climate Change	+/-	+/-	0
SA objective	++	++	0

Chapter 6 Sustainability Appraisal Findings for the Draft (Regulation 18)
Local Plan

SA Objective	Policy LEOM1	Policy LEOM2	Policy LEOM3
2: Housing			
SA objective 3: Community Cohesion and Safety	0	0	0
SA objective 4: Town and Retail Centres	+	+	+
SA objective 5: Access to services, facilities and education	+	+	+
SA objective 6: Physical and Mental Health and Wellbeing	0	+	+
SA objective 7: Economy	++	+	++
SA objective 8: Employment and reducing inequality and poverty.	++	+	++
SA objective 9: Travel	+/	+/	+
SA objective 10: Air Quality	+/	+/	+
SA objective 11: Biodiversity and Geodiversity	-	-	-
SA objective 12: Landscapes	-	-	-

SA Objective	Policy LEOM1	Policy LEOM2	Policy LEOM3
and Townscapes			
SA objective 13: Heritage	-	-	-
SA objective 14A: Flooding	-	-	-
SA objective 14B: Water Quality and Quantity	-?	-	-
SA objective 15: Resources	-	-	-

LEOM1: Strategic development for Leominster

6.310 Significant positive effects are expected for SA objective 2 (housing), SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty) as the policy provides for a minimum of 800 new homes and 20 hectares of employment land during the plan period. Of the 800 new homes, 200 will be provided on a strategic housing site to the south of the town. This site is the subject of Policy LEOM2 which is appraised separately below. The policy refers to how the remaining new homes will be delivered through existing commitments, future windfall developments and non-strategic allocations in the Leominster Neighbourhood Development Plan.

6.311 The scale of development being proposed will help to improve the vitality and vitality of Leominster's town centre, although the policy does not specifically refer to this potential outcome. However, a **minor positive effect** is expected for SA objective 4 (town and retail centres). Similarly, although not stated as a specific goal of the policy, development in and around the town will allow residents to access a range of opportunities, from employment and education to key services and facilities. A **minor positive effect** is therefore identified for SA objective 5 (access to services, facilities and education).

6.312 Development in and around Leominster should help to minimise the need to travel by car, particularly where sites are in close enough to support active forms of transport. The policy does not seek to extend these opportunities for sustainable travel, but it does make it clear that development across Leominster, as a whole, should not lead to an increase traffic congestion, and should not exacerbate air pollution levels within the Air Quality Management Area that has been declared at Bargates. It also emphasises that development proposals should minimise impacts upon local transport networks through careful consideration of location and design and offer access to a range of transport modes. A **mixed (minor positive and minor negative) effect** is therefore identified for SA objective 9 (travel). **Mixed effects (minor positive and minor negative)** are also expected for SA objective 1 (climate change) and SA objective 10 (air quality) since while the use of sustainable modes of travel will limit the need for car use and associated emissions, new housing and employment land could generate the opposite effects.

6.313 A **negligible effect** is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy does not specifically refer to the provision of sports and health facilities, or to the provision of green and blue infrastructure.

6.314 The River Lugg, a Site of Special Scientific Interest, flows through the town. There are also Local Wildlife Sites and Local Geological Sites close to the periphery of the town. Given the scale of development proposed, a **minor negative effect** is expected in relation to SA objective 11 (biodiversity and geodiversity).

6.315 Leominster has Conservation Areas that covers the core of the town centre and extends westwards along Bargates. As noted above, a quarter of the town's development needs are to be directed to a strategic housing site to the south of the town. Development within Leominster's central areas may be beneficial to the urban fabric and could facilitate the re-use of vacant (and unsightly) land and buildings. The policy seeks to support this by identifying how development proposals must be sympathetic to the special character and distinctiveness of Leominster, and align with the Leominster design code. However, the policy does not provide any specific mitigation measures to

account for the Leominster Conservation Area or Scheduled Monument that is located to the north of the protected area. Overall, despite the opportunities, the policy is likely to generate **minor negative effects** in relation to SA objective 12 (townscapes and landscapes) and SA objective 13 (heritage).

6.316 A **significant negative effect** is expected in relation to SA objective 14A (flood risk) as the policy does not provide any mitigation to account for Leominster's town centre being in close proximity to Flood Zone 3 where development will likely increase flood risk in the area. **Minor negative uncertain effects** are likely in relation to SA objective 14B (water quality and quantity) as construction activities relating to development on the site could result in the contamination of flooded water.

6.317 The policy does facilitate the re-use of previously developed (brownfield) land. However, the majority of development is directed to previously undeveloped (greenfield land), which is some of the best and most versatile agricultural land. Consequently, a **minor negative effect** is identified for SA objective 15 (resources).

Reasonable alternative options

6.318 Broad options with respect to the different amounts of development that Hereford and the market towns could take were appraised through the consideration of options included in Chapter 4. As noted above, the potential for developing different areas across Leominster were considered through the Place Shaping Options Consultation Document. Alternative site options for Leominster were considered through Chapter 5. .

LEOM2: Land south of the primary school

6.319 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of development sites in and around Leominster [**See reference 58**]. .

6.320 The allocation under LEOM2 aligns with site option HLAA/759/001a that was appraised in Chapter 5. The appraisal of this site has been taken as the starting point for the appraisal of this allocation policy. However, the appraisal that follows reflects the specific wording of Policy LEOM2.

6.321 A Significant positive effect is expected for SA objective 2 (housing) as the policy states that development of the site would result in the delivery of 200 new homes in the plan period, 15% of which will be affordable housing. This number of new homes will help to respond to wide ranging housing needs. The amount of affordable housing is less than some of the other allocations included in the plan but will still deliver a reasonable number of units.

6.322 Development of this site should help to increase footfall and spend in Leominster, thereby helping to improve the vitality and viability of the town centre. A **minor positive effect** is therefore expected in relation to SA objective 4 (town and retail centres). A **minor positive effect** is also identified for SA objective 5 (access to services, facilities and education) as the location of the development would provide an opportunity for people to access the town centre via sustainable modes, at least for those who are unable to do so. Increased development, and the additional spending that this could give rise to, could help to sustain and extend the range of services and facilities currently offered. In terms of the site itself, the policy requires financial contributions to education provision.

6.323 A minor positive effect is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure that, in addition to being beneficial to nature, is also beneficial to health. The policy also makes reference to the promotion of walking, wheeling and cycling.

6.324 Minor positive effects are likely for SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty) as the policy promotes small scale employment to meet demand in the form of use class B1 and live/work units. The extension of the enterprise park opposite generates further opportunities.

6.325 Mixed effects (minor positive and minor negative) are expected in relation to SA objective 9 (travel) as the development promotes walking, wheeling and cycling, but the scale of the development means that some negative impact is likely in areas surrounding the development in terms of increased car use. These same arguments are also likely to generate **mixed effects** in relation to SA objective 1 (climate change), and SA objective 10 (air quality).

6.326 There are no specific nature conservation designations across the site but there is a Local Geological Site to the north west of the site. The policy identifies the need for appropriate planting and also prescribes a Biodiversity Net Gain target of 20%. Nevertheless, the scale of the development proposed means that some form of impact is likely to be unavoidable. A **minor negative effect** is therefore expected in relation to SA objective 11 (biodiversity and geodiversity).

6.327 Similarly, a **minor negative effect** is expected in relation to SA objective 12 (landscapes and townscapes) given the scale of the development proposed, although the policy does support the retention of the highly sensitive landscape on site.

6.328 The site does not have any specific heritage designations across it and the policy states that development proposals must evaluate the archaeological importance of the area in order to ensure appropriate protection of heritage assets. The policy also identifies a need for appropriate design based mitigation measures to ensure that the settings of nearby heritage assets are safeguarded. However, given the scale of the development, a **minor negative effect** is identified in relation to SA objective 13 (heritage).

6.329 The site is not shown to be at risk of flooding, with the site receiving a green rating for flooding in the HELAA assessment. The policy also includes safeguards relating to flood risk, such as a requirement to present a sustainable urban drainage system. Despite these provisions, the nature and scale of the site means that a **minor negative effect** is identified for SA objective 14A (flood risk). Similarly, even though the policy requires new development proposals to

demonstrate nutrient neutrality, the scale of development means that a **minor negative effect** is expected in relation to SA objective 14B (water quality and quantity).

6.330 Lastly, as noted above, developing the site will involve the loss of previously undeveloped greenfield land. The site also involves the loss of agricultural land. A **minor negative effect** is therefore identified for SA objective 15 (resources).

Reasonable alternative options

6.331 Broad options with respect to the different amounts of development that Hereford and the market towns could take were appraised through the consideration of options included in Chapter 4. As noted above, the potential for developing different areas across Leominster were considered through the Place Shaping Options Consultation Document. Alternative site options for Leominster were considered through Chapter 5.

LEOM3: Land south of Leominster Enterprise Park

6.332 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of options for supporting employment development. The allocation under LEOM3 aligns with employment site option HLAA/822/001 that was appraised in Chapter 5. The appraisal of this option has been taken as the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy LEOM3.

6.333 A **negligible effect** is expected for both SA objective 1 (climate change) and SA objective 2 (housing) since the allocation involves employment development rather than housing. A **negligible effect** is also expected for SA

objective 3 (community cohesion and safety). A **minor positive effect** is identified for SA objective 4 (retail and town centres) since the activity on the site, and its proximity to Leominster, is expected to support spending in the town. **Minor positive effects** are also expected for SA objectives 5 (access to services and facilities) and 6 (physical and mental health and wellbeing). Given the nature of the proposed development, and the expectation for both job growth and investment, **significant positive effects** are expected for both SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty). The site is in close proximity to Leominster, enabling future workers to take advantage of active travel opportunities. The site is also well-positioned to the town's road network. **Minor positive effects** are also identified for SA objective 9 (travel), and SA objective 10 (air quality).

6.334 There are no nature conservation designations across the site but given the scale of development, a **minor negative effect** is identified for SA objective 11 (biodiversity and geodiversity). The policy does not make any specific reference to tree or landscape planting. Given the nature and scale of the development, some impact is likely to be unavoidable. This also extends to matters relating to landscape, townscape and heritage. However, the policy does include a requirement for appropriate design based mitigation measures to ensure that the settings of nearby heritage assets are safeguarded. The policy also requires that an applicant undertakes initial detailed desk-based assessment to establish the potential for archaeological remains and further assessment. Overall, **minor negative effects** are identified for SA objective 12 (landscape and townscape) and SA objective 13 (heritage).

6.335 The site is largely surrounded by Flood Zone 3. The policy seeks to safeguard against any risk by requiring developers to provide a Flood Risk Assessment for any planning application relating to the site. Despite these safeguards, development of this undeveloped site would remove a large area of natural storage. A **minor negative effect** is therefore identified in relation to SA objective 14A (flood risk). A **minor negative effect** is also likely in relation to SA objective 14B (water quality and quantity) given the scale of the development.

6.336 The development would involve the loss of previously undeveloped (greenfield) land and agricultural land. A **minor negative effect** is there identified in relation to SA objective 15 (resources).

6.337 .

Reasonable alternative options

6.338 Broad options with respect to the different amounts of development that Hereford and the market towns could take were appraised through the consideration of options included in Chapter 4. As noted above, the potential for developing different areas across Leominster were considered through the Place Shaping Options Consultation Document. Alternative site options for Leominster were considered in Chapter 5.

6.339

Ross-on-Wye

6.340 As noted above, the Place Shaping Options consultation of June 2022 developed the options that were initially presented through the Spatial Options consultation of January 2022. In doing so, five areas for potential housing development are identified. Three of these are of a strategic scale and are located to the east of the town (to the north east, to the east and to the south east of the town centre). The consultation document considered the strengths and weaknesses of these area options **[See reference 59]**.

6.341 The Draft (Regulation 18) Herefordshire Local Plan builds upon these previous rounds of consultation and includes the following policies:

- **ROSS1:** Strategic development for Ross-on-Wye
- **ROSS2:** Land to the East of Ross-on-Wye.

Table 6.14: Sustainability Appraisal of Ross-on-Wye policies

SA Objective	Policy ROSS1	Policy ROSS2
SA objective 1: Climate Change	+/	+/
SA objective 2: Housing	++	++
SA objective 3: Community Cohesion and Safety	+	++
SA objective 4: Town and Retail Centres	+	+
SA objective 5: Access to services, facilities and education	+	+
SA objective 6: Physical and Mental Health and Wellbeing	+	++
SA objective 7: Economy	+?	++
SA objective 8: Employment and reducing inequality and poverty.	+?	++
SA objective 9: Travel	+/	+/
SA objective 10: Air Quality	+/	+/
SA objective 11: Biodiversity and Geodiversity	-	-

SA Objective	Policy ROSS1	Policy ROSS2
SA objective 12: Landscapes and Townscapes	-	-
SA objective 13: Heritage	-	-
SA objective 14A: Flooding		
SA objective 14B: Water Quality and Quantity	-?	-
SA objective 15: Resources	-	-

ROSS1: Strategic development for Ross-on-Wye

6.342 This overarching policy for Ross-on-Wye will generate a **significant positive effect** in relation to SA objective 2 (housing) since it will facilitate the delivery of a minimum of 1,800 new homes over the plan period. Development activity is directed to a strategic mixed used site to the east of the town where 1,000 new homes will be provided. Alongside the delivery of homes, the policy refers to how a minimum of 35 hectares of new employment land will be expected to be delivered over the plan period. The policy outlines an intention to strengthen and safeguard the vitality and viability of Ross-on-Wye town centre as a retail and leisure destination, and to ensure accessibility to the town centre and available community facilities. Consequently, a **significant positive effect** is also identified in relation to SA objective 3 (community cohesion and safety).

6.343 **Minor positive effects** from the policy are expected in relation to SA objective 4 (town and retail centres) as the policy, as noted above, seeks to maintain and enhance the vitality and viability of the town centre as a retail and

leisure destination. The scale of development, and the footfall and spending it creates, will hopefully extend the range and quality of the town's offer. Beyond developing at the strategic site, appraised below, the remainder of the required housing is intended to be delivered across the central areas of Ross-on-Wye. Residents occupying these new homes will be able to access the services and facilities currently available in the town. Overall the policy is likely to have **significant positive effects** on SA objective 5 (access to services, facilities and education).

6.344 Significant positive effects are likely in relation to SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty) as the policy requires development on the site to allocate 35 hectares of employment land during the plan period with the majority of the employment land (33 hectares) to be concentrated at Land to the east of Ross-on-Wye. As such, the positive effects from this policy are likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.345 Development at this scale will lead to an increase in journeys and possibly to an increase in the use of private cars. This could lead to road congestion and possibly to a worsening of air quality across the town. The policy does promote the provision of safe and active travel corridors. In addition, a new link road seeks to provide better connectivity and alleviate congestion hotspots. However the link road, which will connect the Traveller's Rest roundabout to the northwest of the town with the A40 to the east of Hildersley, could encourage car use, discourage a modal shift and contribute to increased emissions. Overall, a **mixed effect (minor positive and minor negative)** is expected for SA objective 9 (travel), as well as SA objective 1 (climate change) and SA objective 10 (air quality).

6.346 Facilitating the use of active travel will be beneficial with respect to health. Overall, a **minor positive effect** is identified for SA objective 6 (physical and mental health and wellbeing).

6.347 The town is sensitive with respects to its habitats, with the River Wye, that extends along the western edge, being protected as both a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation. There is also a Local Wildlife Site, an Area of Replanted Ancient Woodland and a Local Nature Reserve (Penyard Park). Land to the north of the town is also safeguarded for minerals. The policy seeks to enhance and extend green and blue infrastructure across the town with urban greening and tree planting, but overall, a **minor negative effect** is expected for SA objective 11 (biodiversity and geodiversity).

6.348 The landscape and townscape of Ross-on-Wye is equally sensitive, with the bulk of the town falling within an Area of Outstanding Natural Beauty and a defined Conservation Area. The policy requires development proposals to reflect and be sympathetic to the special character and distinctiveness of Ross-on-Wye. The policy also promotes good design and states how development must be in accordance with any Ross-on-Wye design code. Nevertheless, the policy does not provide any mitigation measures for Ross-on-Wye's historic environment. Although the strategic sites are located away from these key designations, some kind of impact is considered unavoidable. A **minor negative effect** is there identified for both SA objective 12 and SA objective 13 (heritage).

6.349 Significant negative effects are expected in relation to SA objective 14A (flood risk) as the town adjoins an area of Flood Zone 3 associated with the River Wye. The policy also provides no mitigation measures for managing flood risk. **Minor negative uncertain effects** are likely in relation to SA objective 14B (water quality and quantity) as construction activities relating to development on the site could result in the contamination of flooded water. The River Wye also has sensitivities concerning its water quality.

6.350 Lastly, in addition to involving the loss of previously undeveloped land, much of the land surrounding the town is regarded as some of the best and most versatile. There are areas being safeguarded for minerals to the north and west of Ross-on-Wye, but these areas are not expected to be developed. Nevertheless, a **minor negative effect** is identified in relation to SA objective 15 (resources).

Reasonable alternative options

6.351 In terms of alternatives, potential site options at Ross-on-Wye were considered in Chapter 5.

ROSS2: Land to the east of Ross-on-Wye

6.352 As noted above, the Place Shaping Options Consultation Document, that was published in June 2022, identified a number of development sites in and around Ross-on-Wye [See reference 60]. The land associated with ROSS2 aligns with Mixed Use Area 2.

6.353 The allocation under ROSS2 also aligns with three site options, namely HLAA/769/001, O/Ross/004, and O/Ross/005. The appraisal of these site options has been the starting point for the appraisal of this allocation policy. However the appraisal that follows reflects the specific wording of Policy ROSS2.

6.354 Significant positive effects are expected for SA objective 2 (housing) as the policy will deliver a minimum of 1,000 new homes via a comprehensively planned sustainable urban extension. The policy identifies how 35% of the total number of dwellings must be affordable homes and 5% of all residential plots should be allocated for self and custom build properties. Encouragement is also given to the inclusion of housing for the elderly. The size of the scheme, and its projected mix, should therefore help to deliver a **significant positive effect** in relation to SA objective 3 (community cohesion and safety).

6.355 The scale of the development should help to increase footfall in Ross-on-Wye and help to support the vitality and vibrancy of the town centre. The policy will therefore generate a **minor positive effect** in relation to SA objective 4 (town and retail centres). The policy seeks to develop effective links between the scheme and the town centre which offers a range of services and facilities. The policy also identifies how the scheme should provide a new multi-purpose

facility for use by the community. This facility is described to have potential for including new healthcare facilities, and small-scale neighbourhood retail facilities. The policy also proposes a community garden and on-site open space as part of the development. In terms of education, the policy outlines a need to safeguard sufficient land for a one form entry primary school with early years provision, and to deliver that school or make additional contributions towards education provision. Consequently, a **minor positive effect** is also identified in relation to SA objective 5 (access to services, facilities and education).

Providing a range of facilities will also help to promote community cohesion, generating extra support towards SA objective 3.

6.356 A significant positive effect is identified in relation to SA objective 6 (physical and mental health and wellbeing) since the policy makes reference to the promotion of green and blue infrastructure that, in addition to being beneficial to nature, is also beneficial to health. The policy also makes reference to provision of health facilities and to the provision of sports facilities.

6.357 The policy requires the provision of good quality and attractive active travel links towards the town centre, employment sites and surrounding countryside. These links should help to provide attractive alternatives to use of the private car. The policy also identifies potential challenges to movement, such as the A40, and identifies a need to deliver improvements. The policy promotes the development of a road link at the Traveller's Rest roundabout, to the north-west of the town, to connect with the A40 to the west of Hildersley. Although the road link is intended to facilitate the development of the site, and provide it with safe access, it could also result in increased car use, discourage a modal shift and contribute to increased emissions. However, the policy does state how provision should be made for segregated cycle and pedestrian routes as part of the road's design. Overall, **mixed effects (minor positive and minor negative)** are identified in relation to SA objective 9 (travel), as well as SA objective 1 (climate change) and SA objective 10 (air quality).

6.358 Significant positive effects are likely in relation to SA objective 6 (physical and mental health and wellbeing) as the policy seeks to provide new healthcare and sport facilities and open space. The policy also commits to

carrying out a Health Impact Assessment to ensure that the health and wellbeing of future residents is maximised.

6.359 This policy is likely to have a **significant positive effect** in relation to SA objective 7 (economy) and SA objective 8 (employment and reducing inequality and poverty). The policy seeks to deliver a minimum of 33 hectares of employment land which could potentially provide work opportunities for those living onsite or elsewhere in the town. The positive effects of this policy are also likely to be seen in the medium to long term due to the length of time it will take to bring forward employment land and generate job opportunities.

6.360 Development of the site will involve the loss of previously undeveloped (greenfield) land. This land, together with the water course that extends centrally through the site, is likely to have value in biodiversity terms. The policy does, however, refer to a need for the scheme to be landscape-led, and identifies how the scheme should include high quality green and blue infrastructure for the benefit of residents and wildlife. However, some impact is likely to be unavoidable, meaning that a **minor negative effect** is identified for SA objective 11 (biodiversity and geodiversity). Despite acknowledging the sensitivity of the adjoining National Landscape and including some specific mitigation in relation to the historic environment, **minor negative effects** are also identified for SA objective 12 (landscapes and townscapes) and SA objective 13 (heritage).

6.361 The developable area is split by a water course that extends east to west at a mid-point in the site. While this feature generates a significant band of Flood Zone 3 land across the site, much of the site's western half also coincides with Flood Zone 3. The policy does make provision for natural flood management with the use of SuDS, but development of the site is still likely to increase flood risk. A **significant negative effect** is therefore identified in relation to SA objective 14A (flood risk). A **minor negative effect** is also identified in relation to SA objective 14B (water quality and quantity) as construction activities relating to development on the site could result in the contamination of flooded water. Uncertain effects are identified as this will depend on the final design and scale of development.

6.362 Lastly, as noted already, the proposed development involves the use of previously undeveloped (greenfield) land. Much of this land also corresponds with the best and most versatile agricultural land (Grade 2 and 3). A **minor negative effect** is consequently identified for SA objective 15 (resources).

Reasonable alternative options

6.363 Reasonable alternative site options at Ross-on-Wye were considered in Chapter 5.

Rural Areas

6.364 As with the settlements considered above, the Place Shaping Options consultation document of June 2022 presented a series of options for Herefordshire's rural areas. The general direction of these followed the broader spatial options that were published by Herefordshire Council in January 2022. The options comprised the following:

- **Option 1a:** Directing housing to the most sustainable settlements in the county. The document identifies fifty one (51) settlements that would be appropriate for development. As the consultation document explains, “these are the settlements with the largest range of services and facilities, the least environment constraints and the greatest access to infrastructure such as public transport and access to main roads”.
- **Option 1b:** Directing housing to the most sustainable settlements, as defined by Housing Market Areas (HMA). The consultation document refers to seven different HMAs, with these linked to Bromyard, the Golden Valley, Hereford, Kington, Ledbury, Leominster and Ross-on-Wye. In total, fifty (50) settlements are identified.
- **Option 2a:** Directing growth away from the county AONB's and conservation areas, and instead, identifying thirty seven (37) settlements that would be appropriate for development.

- **Option 2b:** Directing growth away from the county AONB's and conservation areas, and instead focusing development to the same HMAs listed above. In total, thirty nine (39) settlements are identified.
- **Option 3a:** Directing growth to the most sustainable settlements (as outlined through option 1a), whilst allowing for affordable housing, self-build and custom build housing at an undefined number of other locations.
- **Option 3b:** Directing growth to the most sustainable settlements (as outlined through option 1a), whilst allowing for neighbourhood plans, outside of these areas, to bring forward sites for affordable housing, self-build and custom build housing.

6.365 The consultation document also presents two options regarding the amount of development the identified settlements would receive:

- **Option 4a:** Proportioning the allocation of growth based on the size of the existing settlement. In other words, larger settlements would receive more housing than smaller settlements.
- **Option 4b:** Dividing the required level of housing growth by the number of settlements identified. In other words, all of the settlements would receive an equal share.

6.366 The consultation document considered the strengths and weaknesses of these areas [[See reference 61](#)].

6.367 The Draft (Regulation 18) Herefordshire Local Plan builds upon these previous rounds of consultation and includes the following policies:

- **RURA1:** Housing growth within Rural Hubs
- **RURA2:** Housing growth within Service Settlements
- **RURA3:** Strategic site allocations in the rural areas
- **RURA4:** Rural strategic transport
- **RURA5:** Rural strategic mitigation schemes.

Table 6.15: Sustainability appraisal of the Rural Areas Policies

SA Objective	Policy RURA1	Policy RURA2	Policy RURA3	Policy RURA4	Policy RURA5
SA1: Climate change	0	0	0	+	0
SA2: Housing	+	+	++	0	0
SA3: Community cohesion and safety	+	+	+	0	0
SA4: Town and retail centres	0	0	0	0	0
SA5: Access to services, facilities and education	+	+	+	0	0
SA6: Physical and mental health and wellbeing	0	0	0	+	0
SA7: Economy	0	0	0	0	0
SA8: Employment and reducing inequality and poverty.	0	0	0	0	0
SA9: Travel	0	0	-	++	0

SA Objective	Policy RURA1	Policy RURA2	Policy RURA3	Policy RURA4	Policy RURA5
SA10: Air quality	0	0	-	+	0
SA11: Biodiversity and geodiversity	-?	-?	-	0	+
SA12: Landscapes and townscapes	-?	-?	-	0	0
SA13: Heritage	-?	-?	0	0	0
SA14A: Flood risk	-?	-?	-	0	0
SA14B: Water quality and quantity	-?	-?	-	0	++
SA15: Resources	-?	-?	-	0	0

RURA1: Housing growth within rural Hubs

6.368 This policy directs housing growth towards 22 different settlements, which are defined as rural hubs. The policy states how settlement boundaries will be designated within reviewed and updated Neighbourhood Development Plans (NDPs), taking into account the existing level of commitments within the Hub and Second tier Hubs. The largest level of growth, at Credenhill, requires the distribution of up to 175 homes. Explanatory text summarises housing provision across the settlements, and refers to allocations included in NDPs as well as in

subsequent sections of the Draft (Regulation 18) Herefordshire Local Plan. The allocated sites of the Local Plan are considered below.

6.369 Although housing provision varies across the defined settlements, the policy is expected to deliver a **minor positive effect** in relation to SA objective 2 (housing). Schemes of a larger size would be expected to deliver a mix of housing, including affordable housing. This will help to satisfy local housing need and help to keep those looking for homes within each local area. A **minor positive effect** is therefore identified in relation to SA objective 3 (community cohesion and safety).

6.370 As the explanatory text to the policy explains, the settlement hubs provide vital roles to their immediate settlement as well as their rural hinterland, together with the smaller settlements that are found within them. The hubs vary in terms of the services and facilities they offer. However, additional growth at the hubs would help to retain and extend the existing offer. A **minor positive effect** is therefore identified for SA objective 5 (access to services, facilities and education). Given the scale of development expected, a negligible effect is expected in relation to SA objective 4 (town and retail centres).

6.371 Since the policy covers a range of settlements, and a multitude of different development sites, it is difficult to appraise the potential effects of the moderate growth proposed. It is also difficult to differentiate between the level of housing proposed for previously developed (brownfield) and previously undeveloped (greenfield) land. Given the sensitivities of rural Herefordshire, **minor negative effects** are identified for SA objective 11 (biodiversity and geodiversity), SA objective 12 (landscapes and townscapes), and SA objective 13 (heritage). Other minor negative effects are identified for SA objective 14A (flood risk), SA objective 14 (water quality and quantity) and SA objective 15 (resources). However, uncertainties are provided against each objective since final effects will be dependent on the final design, scale and layout of each development.

Reasonable alternative options

6.372 Broad spatial options, including the share to be directed to rural areas, was considered through the Spatial Options consultation of January 2022. Greater detail on these options was provided through the Place Shaping Options consultation document of June 2022, as noted above. However, neither of these documents considered specific sites.

RURA2: Housing growth within Service Settlements

6.373 This policy states how housing growth will be directed to the county's service settlements in order to help sustain rural communities and services. As the explanatory text to the policy explains, service settlements are those with at least four of the following: school; pre-school nursery; a play area; a village / community hall,; shop; pub; doctors / medical provision; access to public transport (5 return journey availability); within 5km of an employment site; and access to public EV charging.

6.374 About 40 settlements are named in the policy but housing growth varies by settlement and is dependent on the number of homes that were built and committed as of April 2022. The largest of the sites extend to 40 homes.

6.375 The arising effects of this policy are likely to be similar to those outlined for Policy RURA1. **Minor positive effects** are likely from this policy in relation to SA objective 2 (housing) as it states that Service Settlements and Second tier Service Settlements will deliver housing growth through Neighbourhood Development Plans and strategic allocations within the Local Plan. Similarly, a **minor positive effect** is identified in relation to SA objective 3 (community cohesion and safety) given the range of homes to be provided and the services that should hopefully be maintained in each village.

6.376 Minor positive effects are also expected in relation to SA objective 5 (access to services, facilities and education) as the policy states that new housing growth will help to sustain rural service provision. Given the scale of growth envisaged, only a **negligible effect** is considered likely in relation to SA objective 4 (town and retail centres).

6.377 As with Policy RURA1, development provided through Policy RURA2 is likely to impact upon the environmental sensitivities of rural Herefordshire. Consequently, **minor negative effects** are identified for SA objective 11 (biodiversity and geodiversity), SA objective 12 (landscapes and townscapes), and SA objective 13 (heritage). Other minor negative effects are identified for SA objective 14A (flood risk), SA objective 14B (water quality and quantity) and SA objective 15 (resources). However, as noted above, uncertainties are provided against each objective since final effects will be dependent on the final design, scale and layout of each development.

Policy RURA3: Strategic site allocations in the rural areas

6.378 This policy allocates five sites for strategic development, with these being located at:

- Bartestree (land adjoining Nursery Cottages) (60 dwellings)
- Bodenham (land south of Chapel Lane) (50 dwellings)
- Canon Pyon (land north of Size Brook) (60 dwellings)
- Colwall (land west of Colwall Primary School) (45 dwellings)
- Weston Under Penyard (land opposite the playing fields) (50 dwellings)

6.379 Bartestree, Bodenham, Canon Pyon and Weston under Penyard are identified as Rural Hubs through Policy AG3 (Rural Housing Growth in Hubs and Service Settlements). Colwall is also identified as a Rural Hub, but with an 'environmental constraint'. The hubs above contribute to a broader network of

68 identified settlements across Herefordshire's rural areas, with these being identified as the focus for housing development via Policy AG3. The 68 settlements were defined by using a hierarchical approach, based on their services, facilities and environmental capacities.

6.380 The site options were appraised in Chapter 5, with the allocations corresponding with site options O/Bart/006 (land adjoining Nursery Cottages); HLAA/186/001 (land south of Chapel Lane); HLAA/631/001 (land north of Size Brook); O/Col/007a (land west of Colwall Primary School); and HLAA/823/001 (land opposite the playing fields). While these appraisals were used to inform the appraisal of RURA3, reference has also been made to the policy text of RURA3, as well as the supporting explanatory text that outlines specific expectations for each site.

6.381 With regards to SA objective 1 (climate change), all five sites are expected to deliver a negligible effect. Although the policy and explanatory text to RURA3 refers to a commitment to developing active travel links with respect to the adjoining villages, the policy does not contain any additional provisions relating to the adaptation and mitigation of climate change. The other policies of the plan, such as Policy CC1 (A Carbon Neutral Herefordshire), would however apply. Consequently, Policy RURA3 is expected to have a **negligible effect** on SA objective 1 (climate change).

6.382 All of the sites are expected to deliver major development, although the expected size of the schemes varies from 45 to 60 dwellings. This scale of development should enable each site to offer a range of house types, thereby helping to respond to a variety of local demands. Furthermore, the explanatory text to the policy identifies how each of the five sites are expected to deliver 35% affordable housing. A **significant positive effect** is therefore expected for SA objective 2 (housing).

6.383 Collectively, each of the five sites are expected to deliver a **minor positive effect** in relation to SA objective 3 (community cohesion and safety), although neither the policy nor explanatory text refers to how the sites are required to provide additional community facilities. Reference is made to the

master planning of each site. These master plans should help to ensure that each development is properly connected to adjoining development and ensure that a mix of house types (in terms of size and tenure) are distributed through each development. This should prove useful with respect to community cohesion.

6.384 The delivery of each site will lead to an increase in local population, and this could also generate increased local footfall and spend within the adjoining village area. However, as noted below, the scale of existing provision varies across the five settlements. Overall, a **negligible effect** is therefore identified for SA objective 4 (town and retail centres).

6.385 There is a variation with respect to the type of services and facilities that each development can seek to benefit from. For example, at Bartestree, the development site will be within 200 metres of a convenience store and nursery, although the village's primary school is located approximately 1000 metres to the west. Similarly, at Canon Pyon, the site is also in walking distance of a convenience store, a village hall, and playing areas. The site is also within 5km of an employment site. The site at Bodenham is also close to the village centre, which includes a shop, a school, a village hall, a public house, and a doctors' surgery. Again, there is also employment land within 5km of the site. At Colwall, the allocation sits adjacent to a primary school, and close to a village hall. There are also a few nearby services within 400 metres of the site, with additional provision existing further north along the Walwyn Road. At Weston Under Penyard, the site lies adjacent to a playing field, which also includes a village hall. A primary school is approximately 400 metres from the site, but proximity is dependent upon whether direct access onto School Lane is possible, or whether pupils need to follow a longer route along the A40.

6.386 For all of the sites, the text of Policy RURA3 states how financial contributions will be sought towards education. It also notes how, for Weston under Penyard, a financial contribution will be needed towards the formation of a new one form entry primary school. Overall, a **minor positive effect** is expected for SA objective 5 (access to services, facilities and education).

6.387 In terms of SA objective 6 (physical and mental health and wellbeing), neither the policy nor the explanatory text refers to the provision of any additional health facilities. There is also a lack of health facilities within each of the villages. The explanatory text outlines a requirement for the provision of open space and active travel links, so these should prove beneficial, but overall, a **negligible** effect is expected in relation to SA objective 6 (physical and mental health and wellbeing). Similarly, a **negligible effect** is also expected for SA objectives 7 (economy) and 8 (employment and reducing inequality and poverty) as Policy RURA3 does not refer to providing employment land, or providing jobs. However, the sites are within 5km of defined employment sites which is considered to represent an accessible distance. By themselves, development of the sites is unlikely to tackle any existing inequalities across the area.

6.388 In terms of SA objective 9 (travel), only the site at Colwall can take advantage of a railway station. Being operated by West Midlands Railway, the station provides services to Birmingham and Hereford. The other villages support a limited number of bus services, with these typically providing at least five services a day, including commuter facilities. This level of service is considered to be reasonably good for the county. The explanatory text to Policy RURA3 identifies how each site will be provided with safe access, and active travel links to the adjoining village areas. Despite these interventions, there is a likelihood that given the rural nature of each village, and the range of services and facilities that they offer, residents are likely to require access to a car. Although this could lead to localised traffic congestion at peak times, a reliance on private cars is reflective of Herefordshire's broader geographical context. Consequently, a **minor negative effect** is identified for SA objective 9 (travel). Although electric vehicles are expected to become more prevalent during the plan period, car use might initially be reliant on petrol and diesel fuelled vehicles. Consequently, a **minor negative effect** is expected for SA objective 10 (air quality).

6.389 In relation to SA objective 11 (biodiversity and geodiversity), Policy RURA3 states how, for all of the sites, a Habitat Regulation Assessment must be provided, alongside targeted ecological surveys. The policy also states how

each site is expected to deliver 20% Biodiversity Net Gain benefits in accordance with Local Plan policy EE1.

6.390 In terms of the site at Bartestree, there are no nature conservation designations on the site, although the River Wye (a SAC), and the River Lugg and the Lugg and Hampton Meadows SSSIs are located 2km to the south west of the site. Similarly, there are no nature conservation designations across the site at Bodenham, although the River Lugg (SSSI) and the River Wye (SAC) are located approximately 1km to the west. There are no nature conservation designations across the site at Canon Pyon, while the nearest SSSI (Wellington Wood) is located 1.5km to the east. Likewise, at Colwall, there are no designations across the site, although the Malvern Hills SSSI is located 1.5km to the east. Lastly, with regards to the site at Weston Under Penyard, there are no nature conservation designations either on the site, or in the broader area.

6.391 Even though there are no protected sites across the five allocations, all are greenfield and are therefore likely to support biodiversity. The requirement to master plan and apply Biodiversity Net Gain will offer some safeguards but overall, Policy RURA3 is expected to generate a **minor negative effect** with respect to SA objective 11 (biodiversity and geodiversity).

6.392 In terms of landscape and townscape, the text of Policy RURA3 identifies how, in addition to the requirements of other Local Plan policies, the development of the five sites will be required to have regard to the policies of the relevant Neighbourhood Development Plan. Development proposals will also need to demonstrate that the proposals reflect the special character and distinctiveness of the settlement in accordance with the area Design Code. All five sites are located in rural locations, with varying degrees of sensitivity. The site at Colwall falls within the Malvern Hills National Landscape (which was previously described as an Area of Outstanding Natural Beauty). The explanatory text to all five sites states how a sensitive approach to design will be needed, with care being applied with respect to design, siting, massing and layout. However, despite these safeguards, a **minor negative effect** is also expected for SA objective 12 (landscapes and townscapes).

6.393 Minor negative effects are also expected with respect to SA objective 13 (heritage). None of the sites contain listed buildings or features or fall within defined Conservation Areas. The sites are in traditional rural settlements though, with traditional vernacular designs. However, as noted above, the explanatory text to Policy RURA3 outlines a need for sensitive design, and states a requirement for archaeological investigations. Consequently, on balance, a **negligible** effect is therefore identified in relation to SA objective 13 (heritage).

6.394 In terms of flood risk, all of the sites are located within Flood Zone 1 meaning that they have a low probability of flooding. However, for the sites at Bartestree and Bodenham, land beyond the southern boundaries of each site correspond with Flood Zone 3. Likewise, for the site at Canon Pyon, there is land within Flood Zones 2 and 3 further north (at an approximate distance of 450 metres). There is also an area of land, within Flood Zone 3, that extends beyond the northern boundary of the site at Colwall.

6.395 Since all of the sites will remove an area of natural flood storage, and add to existing pressures, a **minor negative effect** is identified for SA objective 14A (flood risk). A **minor negative effect** is also identified in relation to SA objective 14B (water quality and quantity) as construction activities relating to the development on the site could result in the contamination of flooded water. However, none of the sites are close to defined Source Protection Areas.

6.396 Lastly, all of the sites involve the re-use of previously undeveloped (greenfield) land. As the explanatory text to Policy RURA3 explains, three of the sites also partially overlap with areas safeguarded for minerals (namely the sites at Bartestree, Bodenham, Canon Pyon). Development of the five sites will also involve the loss of agricultural land. Predominantly this agricultural land is Grade 2, although it is Grade 3b at Colwall. The emphasis that the policy gives to master planning can potentially help to minimise land take, but on balance, a **minor negative effect** is consequently identified for SA objective 15 (resources).

RURA4: Rural strategic transport

6.397 Significant positive effects are expected for SA objective 9 (travel) as the policy promotes the development of a new railway station or parkway along the Hereford and Abergavenny rail line. This could encourage a modal shift in transportation from the private car to active travel, improve air quality and contribute towards reduced carbon emissions, resulting in **minor positive effects** in relation to SA objective 1 (climate change), SA objective 6 (physical and mental health and wellbeing) and SA objective 10 (air quality).

6.398 Further effects will be dependent on the positioning of the railway station or parkway. Positive effects can be maximised if the stop is located close to employment or other key facilities, or is effectively linked with active travel routes. Negative effects can be maximised if the site avoids areas of flood plain and the best and most versatile agricultural land, or features that are significant in historic or nature conservation terms.

Reasonable alternative options

6.399 No reasonable alternatives were identified in relation to this policy.

RURA5: Rural strategic mitigation schemes

6.400 A **significant positive effect** is likely in relation to SA objective 14B (water quality and quantity) as the policy supports the development of nutrient mitigation schemes to enable nutrient neutrality and improve the health of Herefordshire's river network. The policy is also likely to generate a **minor positive effect** in relation to SA objective 11 (biodiversity and geodiversity). Applying mitigation will help to support nature recovery since increased levels of nutrients can disrupt natural habitats and adversely affect river ecology.

Reasonable alternative options

6.401 No reasonable alternatives were identified in relation to this policy.

Chapter 7

Cumulative Effects

7.1 This section presents an assessment of the likely cumulative effects of the Draft (Regulation 18) Herefordshire Local Plan as a whole, against each of the SA objectives. The tables at the end of this chapter provide summaries of the SA findings for both the strategic policies (Table 7.1) and the place-based policies (Table 7.2a and Table 7.2b).

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

7.2 Objective 1 of the Draft (Regulation 18) Herefordshire Local Plan seeks to ensure that development requires significantly less energy use, with a requirement for all new development to be carbon neutral. The objective also seeks to increase the amount of energy generated from renewable sources. Objective 2 outlines a commitment to protect communities from the impacts and dangers of climate change, including from flooding and heat stress.

7.3 These objectives are translated into policy, in particular through CC1 (Policy CC1: A Carbon Neutral Herefordshire). Policy CC1 outlines a series of measures for ensuring that development proposals can help to achieve a carbon-neutral Herefordshire, with the first part of the policy focusing on mitigation and the second half focusing on adapting to climate change. The policy is comprehensive, with multiple expectations being presented, including on the use of energy. For example, the policy refers to a need to promote on-site renewable energy generation, and for community-owned energy schemes. The policy supports proposals for battery energy storage systems, where they

are appropriately located and designed in accordance with other relevant policies of the Local Plan. The policy also identifies how strategic sites should connect to a District Heat Network, where evidence demonstrates that this is feasible.

7.4 Part five of the policy recognises a need to facilitate a modal shift away from the private car, while part seven of the policy refers to a need to provide Electric Vehicle charging infrastructure, particularly within rural areas. Indeed, developers are required to ensure that Electric Vehicle (EV) charging points are installed in every new home with off-street parking, and outside commercial developments, village halls, and community facilities and services. Given that the sale of petrol and diesel vehicles is to end at a mid-point in the period of the plan, there is merit in giving additional thought as to what this shift might require settlement by settlement. Similarly, regard should also be given with respect to what this shift might mean for the strategic sites, as well as the growth proposed for Hereford and the market towns.

7.5 Ultimately, the plan is delivering additional housing and employment growth which, while necessary, will inevitably place pressure on the environment of Herefordshire and a likely increase in emissions over the plan period. This is reflected in some of the negative effects that were identified in the SA of other policies in relation to this objective – in Chapter 6 a minor negative effect was identified from Policy AG2 (Strategic Rural Housing Distribution), as well as mixed effects (minor positive and minor negative) in relation to Policies PE2 (Principles for Economic Growth) and PE5 (Supporting a strong Rural Economy). With regards to the place-based policies, a minor negative effect is expected for Policy BROM3 (Land west of Linton Trading Estate). The site allocations were appraised as having a negligible effect in relation to SA objective 1 (Climate Change) on the basis that effects will depend on the detailed proposals for sites and their design, rather than their location. However, the overall effect of the Draft (Regulation 18) Herefordshire Local Plan is expected to be **minor positive** on SA Objective 1 (Climate Change).

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

7.6 This SA objective is not covered by any of the objectives of the Draft (Regulation 18) Herefordshire Local Plan, although objective 13 outlines a need to provide good quality, attractive places to live and work. This topic is addressed by Policy AG1 (Accommodating Housing Growth) which outlines the amount of housing to be provided, namely a minimum delivery of 16,100 new homes over the plan period 2021-2041. The policy distributes this amount of development across Hereford, the market towns, and the county's rural areas. Although some strategic allocations are made for the county's rural areas, there is an expectation that Neighbourhood Development Plans (NDPs) will allocate sites settlement by settlement as and when these plans are developed. Such a strategy will help to give local communities the lead in responding to their housing need, but delays in production of these NDPs would adversely affect the achievement of this SA objective. There is therefore an element of uncertainty.

7.7 In terms of responding to specific housing needs, Policy AG4 focuses on rural housing need, with Policy AG6 providing support for accommodating Gypsies, Travellers and Travelling Show People. Policies BC1 (Housing Mix and Range), BC2 (Affordable Housing – Thresholds and Targets) and BC3 (Diversity of housing delivery) provide further direction over the type of housing required. This latter policy gives emphasis to the delivery of self and custom-built housing and includes an expectation that a minimum of 5% of sites of 20 or more dwellings will be made available for dedicated service plots for self and or custom build housing. NDPs are also expected to allocate sites for self and custom-built housing.

7.8 Overall, the Draft (Regulation 18) Herefordshire Local Plan sets a framework for delivering the housing needed in Herefordshire over the Plan period and the sites that are identified for development provide certainty as to where this growth will go. Consequently, a cumulative **significant positive** effect is identified for SA Objective 2 (Housing).

SA Objective 3: To support community cohesion and safety.

7.9 Objective 10 of the Draft (Regulation 18) Herefordshire Local Plan seeks to provide inclusive connectivity, development and infrastructure for all. Objective 16 seeks to ensure that residents feel safe from crime and climate change events. In terms of policies, HSC1 (Community facilities) and HSC2 (Infrastructure Delivery) are particularly relevant, and Policy BC3 seeks to encourage cohesion in the context of delivering new homes across the county.

7.10 The place-based policies, including the strategic allocations, give emphasis to providing community facilities. While this will allow for day to day needs to be met, providing such resources will also help to promote community cohesion. However, the level of identified infrastructure varies by site, both in response to the nature of local demand, but also in response to the viability of different development options.

7.11 The term 'safety' is mentioned a number of times through the text of the Draft (Regulation 18) Herefordshire Local Plan, with a number of dimensions being referred to. For example, in the context of Policy CC1, safety is mentioned with respect to battery storage systems. Similarly, community safety is discussed in the context of infrastructure through Policy HSC2. Safety is considered in the context of Herefordshire's night time economy through Local Plan Objective 27.

7.12 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor positive** effect on SA Objective 3 (Community cohesion and safety).

SA Objective 4: Support the vitality of Herefordshire's town and retail centres.

7.13 Local Plan objective 18 seeks to support, and encourage, sustainable economic growth in the county. This emphasis is maintained through three further objectives that relate to Hereford (objective 19), the market towns (objective 20), and the county's rural areas (objective 11). In terms of policy, strategic direction comes via Policy PE2 (Accommodating Economic Growth) which presents a series of principles for economic growth, while Policy PE3 focuses on enhancing town centre vitality. To achieve this, the policy outlines a need for widening the range of town uses, while maintaining a strong retail character, pursuing environmental enhancements and improving access. Policy PE3 also promotes the county's night time economy. Tourism in Herefordshire is promoted via Policy PE4, with rural growth being addressed via Policy PE5.

7.14 The majority of the growth proposed through the Local Plan is to be directed to Hereford and the market towns, which will increase footfall in those centres and help to maintain their vitality and viability.

7.15 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor positive** effect on SA Objective 4 (Town and retail centres).

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

7.16 The Draft Herefordshire (Regulation 18) Local Plan presents a couple of objectives for promoting greater accessibility. For example, objective 11 seeks to provide inclusive connectivity, development and infrastructure for all, while objective 12 seeks to ensure that all residents are well connected to a good range of nearby services and facilities for daily requirements. Access to sports facilities is prioritised through objective 14, with objective 15 focusing on access to education. In terms of policy, Policy EE2 (Protecting and Enhancing the Quality of the Historic Environment and its Setting) outlines a need to provide ease of access for all. Policy HSC1 (Promoting Health and Wellbeing) includes specific direction concerning community facilities, health, open space and sports facilities, and education and training. Policy HSC3 (Green and Blue Infrastructure) refers to the importance of accessibility and connectivity with respect to green and blue infrastructure.

7.17 The place-based policies, together with the strategic allocations, refer to the importance of providing, or improving, the provision of services and facilities, and the access to them. However, the level of detail contained across the policies varies, largely due to the varying size of each development, the existing services and facilities on offer, and the viability of each offer. For example, Policy HERE5 (Urban Expansion at Holmer North) outlines a need for a local centre with small-scale neighbourhood shops and amenities, a proportionate contribution towards the land and delivery of a new primary school, and new medical facilities. Similarly, Policy HERE7 (Urban Expansion at Lower Bullingham) refers to a need to provide appropriate sport, play facilities and open space, new or expanded medical facilities, and a three-form primary school. For other proposals, infrastructure needs are outlined by the overarching policy covering the settlement. For example, Policy BROM2 (Land at Hardwick Bank) outlines a need to provide new and improved community facilities which are outlined more thoroughly through Policy BROM1 (Strategic Development for Bromyard). Indeed, Policy BROM2 states how new development proposals in Bromyard will be supported where they secure and/or

assist in delivering provisions, where necessary, for a new or expanded General Practitioner surgery, to both alleviate current pressure and support an increase in local population. The policy also states that development proposals will be supported when they secure and/or contribute to the delivery of an expanded secondary school. Policy BROM2 also safeguards land to the west of the primary school to allow for expansion and/or other educational provision.

7.18 For future infrastructure, it will be important to ensure that facilities and services are provided in a timely manner, appropriately phased to coincide with the delivery of development. While a failure to provide infrastructure could adversely affect the quality of life of both future and existing residents, a lack of provision could lead to residents having to travel to elsewhere, lead to the generation of unnecessary emissions.

7.19 In considering longer term access to these services and facilities, it will be important to consider the changes, including those of a technological nature, which could affect how they are offered. For example, a potential uplift in the use of online doctors' consultations would lessen the need to be in physical proximity to a General Practitioners (GP) surgery. However, while online consultations may replace the need for some in-person appointments, a physical visit to a surgery is still likely to be necessary for certain ailments or treatments. Similarly, the projected growth in online shopping, and personalised food deliveries (from groceries to takeaways), might lessen the need and desirability to be located close to shops and restaurants. Likewise, the continued growth in online banking, and the progressive steps towards a largely cashless society, may make access to banks and post offices less significant. Some of these trends could be beneficial to the environment, while others less so. It is also acknowledged that beyond environmental arguments, physical visits for the purposes of accessing key services and facilities is still important for facilitating community cohesion.

7.20 There is also some uncertainty as to how certain trends will transpire across the plan period. For example, while working at home was an important intervention to help curb infection through the Covid-19 pandemic, some employers have been keen to get their employees to return to the office. How this issue will evolve in the long-term is yet to be seen.

7.21 Given these uncertainties it will be important to ensure that policies are flexibly worded and are appropriately monitored. For example, shifts in the use and provision of services, could ultimately impact on the list of places that are currently defined as service settlements. The list of identified settlements will [will be kept under review in the development of the Local Plan](#).

7.22 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor positive** effect on SA Objective 5 (Access to services, facilities and education).

SA Objective 6: Improve the physical and mental health and wellbeing of residents and reduce health inequalities.

7.23 Health is addressed through objective 14 of the Draft Herefordshire (Regulation 18) Local Plan, with the text intending to support good health and wellbeing by providing easy access to open space, sports facilities, and active travel options.

7.24 In terms of policy, the section of the Draft (Regulation 18) Herefordshire Local Plan on creating healthy and sustainable communities is particularly relevant. Policy HSC1 (Promoting Health and Wellbeing) focuses on the protection and provision of facilities, with the policy differentiating between different forms of infrastructure, including community and health facilities. Policy HSC2 focuses on infrastructure delivery, with Policy HSC3 prioritising green and blue infrastructure. Beyond the specific section of the plan, health is also promoted through other policies, such as Policy BC1 which focuses upon the mix and range of housing. Promoting better health is multi-dimensional, but the plan presents a package of measures that are designed to lead to positive change.

7.25 Health Impact Assessments (HIAs) are encouraged through Policy HSC1, with the policy outlining how development proposals must consider opportunities for improvement. The strategic housing allocations make frequent reference to the need to submit an HIA, but there would also be scope to request the same with respect to the strategic employment sites too.

7.26 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor positive** effect on SA Objective 6 (Physical and mental health and well-being).

SA Objective 7: To support the sustainable growth of the economy.

7.27 Economic growth is addressed by a number of the objectives included in the Draft (Regulation 18) Herefordshire Local Plan. Objective 21 is particularly significant since this gives support to sustainable economic growth in rural areas, the market towns and the city of Hereford. Similarly, objective 23 refers to the importance of moving towards a zero carbon and circular economy, and the green jobs that will arise in response.

7.28 In terms of policy, Policy PE1 (Accommodating Economic Growth) states how 139ha of employment land will need to be found through the plan period. Although the policy outlines an overall requirement of 182 ha, current supply totals 43ha. To deliver the additional need, six strategic sites, providing a combined total of 86ha of employment space, are listed through the policy. These sites are allocated through Policies HERE3 (Supporting jobs in Hereford, with the sites comprising Hereford Enterprise Zone and Hereford Cattle Market), (LEDB3 (Land south of Little Marcle Road), LEOM3 (Land south of Leominster Enterprise Park), BROM3 (Land west of Linton Trading Estate) and ROSS2 (Land to the east of Ross on Wye). Policy PE2 outlines six principles for economic growth, with these emphasising the importance, amongst other things, for safeguarding the Hereford Enterprise Zone as a provider for employment land and protecting the county's other strategic employment sites.

Neighbourhoods plans are also encouraged to make additional employment allocations within Neighbourhood Development Plans.

7.29 With regards to specific sectors, further direction comes via Policies PE4 (Sustainable Tourism) and Policy PE5 (Supporting a Strong Rural Economy). Policy PE4 explains how development proposals will be supported where they deliver a high-quality, sustainable tourism experience that is accessible for the diverse range of visitors to Herefordshire. The policy also states how proposals should ensure proposals benefit local communities and businesses whilst protecting the unique natural and historic environment. The policy presents direction with respect to sustainable tourism proposals, as well holiday accommodation. Each element includes criteria to help ensure and safeguard sustainability. Policy HSC4 (Herefordshire and Gloucestershire Canal) encourages economic development along this important linear corridor.

7.30 Policy PE5, amongst other items, supports the growth of the agricultural sector, supports the diversification of agricultural businesses into non-agricultural activities, and seeks to safeguard existing rural businesses outside of the agricultural sector. Collectively these elements of support provide the foundations for investment and job growth across the county. However, despite the safeguards that included through the policy, certain projects could lead to localised impacts upon the environment.

7.31 Overall, the Draft Herefordshire (Regulation 18) Local Plan is expected to have a cumulative **significant positive** effect on SA Objective 7 (Economy).

SA Objective 8: To deliver and maintain sustainable and diverse employment opportunities and reduce inequality and poverty.

7.32 Job creation is addressed by Local Plan objective 19 which prioritises Hereford. Objective 23 prioritises the creation of 'green' jobs, with objective 24 outlining the importance of providing well-paid jobs to retain people within the county. Policies PE1 (Accommodating Economic Growth) and PE2 (Principles for Economic Growth) are relevant to the achievement of this SA objective. The former outlines the scale of need, and identifies the proposals where land is to be allocated. Policy PE2 presents a series of measures for strengthening and diversifying Herefordshire's economy, , such as safeguarding existing strategic employment sites for business, and encouraging economic development in association with local educational institutions. Collectively, these two policies provide the foundation for relevant place-based policies that allocate employment sites for development (e.g. Policy LEOM3: Land South of Leominster Enterprise Park).

7.33 As with the discussion associated with SA objective 5 above, it is important to acknowledge the changes that are likely to occur with respect to employment over the plan period. The plan seeks to direct housing growth to the areas where most employment is located (from business parks to industrial estates). However, with the roll-out of high speed broadband, and innovations in business interactivity, employment activity is likely to become even more foot-loose. Certainly, rural areas are expected to accommodate a broader range of economic activities than they have done before.

7.34 A key goal of this objective is to help address inequalities which, in the context of this plan, would involve narrowing the gap between the best and least performing parts of the county. Policy HSC1 (community facilities) refers to tackling health and social inequalities by protecting and enhancing services,

while the distributing growth around the county is intended to help spread the arising benefits. Some positive impact is expected, but influence is required across a range of factors, including those that sit beyond the focus of the plan (such as the cost of food).

7.35 Overall, the Draft Herefordshire (Regulation 18) Local Plan is expected to have a cumulative **significant positive** effect on SA Objective 8 (Employment and reducing inequalities and poverty).

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

7.36 It is inevitable that journeys will increase in line with the growth of the county's population. However, it is clear that the plan can provide a genuine steer to ensure that public transport and active travel is used to maximum effect when these journeys are taken.

7.37 In terms of the contents of the Draft (Regulation 18) Herefordshire Local Plan, support for sustainable and active travel comes from both the objectives and policies of the plan. In terms of the former, objective 10 is significant since this seeks to provide inclusive connectivity, development and infrastructure for all. Objective 12 is also relevant since this seeks to ensure that all residents are well connected to nearby services and facilities for daily requirements, , thereby reducing the need to travel and enhancing social connections. In terms of policy, a number address this objective, with part 5 of Policy CC1 (A Net Zero Herefordshire) considering transport in the context of mitigating climate change. Part 7 of the policy recognises the importance of providing electric vehicle (EV) charging points, with part 9 committing to ensuring that commercial development is located close to active travel routes which link to residential development. Policy HSC2 (Infrastructure Delivery) outlines key principles with respect to delivery, with the explanatory text providing an overview of the type of infrastructure to be delivered (including highway and transport infrastructure).

Policy RURA4 (Rural strategic transport) seeks to respond to the needs of Herefordshire's rural areas. A key provision through this policy is a new railway station or parkway, including bus and active travel infrastructure, along the Hereford and Abergavenny rail line. The policy identifies how this intervention will be supported to enable a shift to a more sustainable transport network.

7.38 The proposed distribution of development, together with the allocation of the strategic sites, seeks to ensure that the need to travel is minimised. There is a general commitment to promoting active and sustainable travel within the key development sites, and to ensure they are sufficiently connected to the settlements that they are seeking to extend. A key challenge will involve managing the travel demands of those living in rural Herefordshire. Some improvement could come from the trends noted above, such as the growth in online shopping and home working. While this would be important for longer journeys, the wording of the policy should be extended to identify the importance of developing other links for the purposes of encouraging bus travel and promoting active and sustainable travel.

7.39 With regards to the strategic policies, chapter 6 reported minor negative effects in relation to Policies AG2 (Strategic Rural Housing Distribution) and PE5 (Supporting a Strong Rural Economy). This is a consequence of development being directed to locations where access to public transport, and active travel opportunities, are far less. As a result, residents and employees are more likely to use private cars, which could lead to congestion on key routes. With regards to the place-based policies, minor negative effects are identified for Policies HERE1 (Strategic Development for Hereford) and BROM3 (Land West of Linton Trading Estate) given the scale of growth and existing transport challenges in the area. Although the village locations associated with Policy RURA3 (Rural Strategic Site Allocations) offer public transport opportunities, these are less than what would be found in more urbanised locations. However, the importance of these sites in meeting rural housing need is accepted. Policy HSC4 (The Herefordshire and Gloucestershire Canal) seeks to promote greater use of this important route, and the recreational and nature conservation benefits that arise in response.

7.40 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor positive** effect on SA Objective 9 (Travel).

SA Objective 10: To improve air quality.

7.41 The overall scale of housing and employment development proposed through the Local Plan poses a risk of exacerbating air pollution in Herefordshire, particularly as much of the county is rural and levels of car use are high.

7.42 Objective 9 of the Draft Herefordshire (Regulation 18) Local Plan outlines the aim to significantly improve air quality. In terms of policy, Policy EE1 (Protecting and Enhancing the Quality of the Natural Environment) states how all development proposals must avoid and minimise air, water and noise pollution, and manage effects on habitats and species. Policy HSC1 (Promoting Health and Well-Being) directs development proposals to minimise unsafe levels of indoor or outdoor pollution. With regards to specific air quality challenges in Hereford and Leominster, place-based Policies HERE1 (Strategic Development for Hereford) and LEOM1 (Strategic development for Leominster) support new development proposals in either of the two settlements where they do not exacerbate air quality conditions and congestion within the designated Air Quality Management Areas.

7.43 While these place-based policies seek to protect particularly sensitive locations, pressure will also arise from development occurring elsewhere in the county, especially if these residents choose, or are required to visit, these centres. Air pollution has the risk of becoming more prevalent in those locations where residents or employees choose to use private transport, or are required to use private transport due to a lack of opportunities with respect to public transport and active travel. Although the strategic sites at Hereford and the market towns are well-related to existing urban areas, and the infrastructure that they support, the rural strategic sites had far fewer opportunities (with the exception, potentially, of O/Col/007a due to the railway station further north in Colwall).

7.44 With regards to the strategic policies, chapter 6 reported minor negative effects in relation to Policies AG2 (Strategic Rural Housing Distribution) and PE5 (Supporting a Strong Rural Economy). As with transport, the direction of growth to areas less-served by public transport could lead to increases in private car use and, as a result, lead to air pollution. There is an expected minor negative effect, with uncertainty, for Policy PE1 (Accommodating Economic Growth) since air quality challenges may be accentuated by the type of activity supported. With regards to the place-based policies, minor negative effects are identified for Policies HERE1 (Strategic Development for Hereford) and HERE2 (Supporting the vitality of Hereford city centre) given the nature of existing air quality challenges and the scale of growth being envisaged. BROM3 (Land west of Linton Trading Estate) also received a minor negative effect on the basis of the site's isolation from Bromyard and the range of transport options available in the town. As noted above, RURA3 (Rural Strategic Site Allocations) allocates development in locations where transport options are more limited. The arising pressure to use private transport could therefore increase air quality challenges.

7.45 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor negative** effect on SA Objective 10 (Air quality).

SA Objective 11: To conserve and enhance Herefordshire's biodiversity and geodiversity.

7.46 The overall scale of housing and employment development proposed through the Local Plan poses a risk of damaging the sensitive biodiversity and geodiversity assets that exist in and around Herefordshire. This is recognised in the SA findings for some of the strategic policies – for example, minor negative effects were identified in relation to Policies AG1 (Accommodating Housing Growth) and AG2 (Strategic Rural Housing Distribution) as well as for Policy PE1 (Accommodating Economic Growth). With regards to the place-based policies, minor negative effects are expected across the suite of development sites due to their potential to impact upon local biodiversity and geodiversity.

However, the Local Plan includes a range of policies addressing this issue which should mitigate the potential for adverse effects.

7.47 The importance of biodiversity and geodiversity is recognised through objective 5 of the Draft (Regulation 18) Herefordshire Local Plan which seeks to maximise biodiversity, and enhance and extend Herefordshire's natural capital, green and blue infrastructure and nature recovery networks. With respect to geodiversity, this is considered in part through objective 4, which seeks to protect the Wye Valley and Malvern Hills National Landscapes, and objective 8, which seeks to minimise and carefully manage the use of natural resources.

7.48 In terms of policies, Policy EE1 (Protecting and Enhancing the Quality of the Natural Environment) includes necessary direction concerning the protection and enhancement of natural resources. The policy identifies actions that must be taken through development proposals and outlines a need for priority habitats and protected species to be conserved and protected. The policy also refers to Biodiversity Net Gain, with this also being progressed through individual site allocations, and protects against introducing additional nutrient and pollution pathways, a commitment that is also advanced through Policy RURA5 which gives support for nutrient mitigation schemes. Policy HSC3 (Green and Blue Infrastructure) is also relevant, with the policy drawing from the Green and Blue Infrastructure Study that was published in 2023 [\[See reference 62\]](#). This study gives emphasis to three themes, with the promotion of nature sitting alongside goals to support people and place. The policy emphasises the importance of protecting, and delivering, green and blue infrastructure that is varied, multifunctional, connected and accessible. Policy HSC4 recognises the specific value of the Herefordshire and Gloucestershire Canal. Although the importance of green and blue infrastructure is recognised, in broad terms, through the site allocations, it is recognised that Natural England's Green Infrastructure Framework (as launched in February 2023) outlines further expectations. With regards to specific locations, Policy HERE9 gives specific support to the greening of Hereford, while the policies relating to the strategic development of each market town also refer to specific opportunities and projects relating to urban greening (e.g. Policy LEOM1: Strategic development for Leominster).

7.49 A separate Habitats Regulations Assessment Report has been prepared in support of the Draft Herefordshire (Regulation 18) Local Plan. The report, through initial screening, identified a number of policies that could give rise to significant effects on European sites, either alone or in combination with other policies and proposals. The screening process identified areas of potential concern, with these being subsequently explored through the application of Appropriate Assessment.

7.50 Through the Appropriate Assessment, it was concluded that no adverse effect on integrity will occur for the following European sites, subject to the provision of safeguarding and mitigation measures that the HRA report outlined (through Chapter 5).

- Physical damage and loss functionally linked land only - the Appropriate Assessment concluded no adverse effect on integrity as a result of offsite physical damage and loss in relation to River Wye SAC; Severn Estuary SPA, SAC and Ramsar site; and, Walmore Common SPA and Ramsar site. This included assessing each site allocation proposed in the plan for its suitability in supporting the qualifying bird species within the Severn Estuary SPA and Ramsar site and Walmore Common SPA and Ramsar site. Three site allocations (Policy ROSS2: Land to the East of Ross-on-Wye; Policy LEDB3: Land south of Little Marcle Road and Policy HERE7: Sustainable urban expansion at Lower Bullingham) were identified with moderate potential to support qualifying bird species. Non-physical disturbance including functionally linked land – the Appropriate Assessment concluded no adverse effect on integrity as a result of non-physical disturbance in relation to River Wye SAC; Severn Estuary SPA, SAC and Ramsar site; and, Walmore Common SPA and Ramsar site. Suitable mitigation is provided in the Plan through Policy EE1.
- Non-toxic contamination – the Appropriate Assessment concluded no adverse effect on the integrity as a result of non-toxic contamination in relation to the River Wye SAC. Suitable mitigation is provided in the Plan through Policy EE1.
- Recreational pressure – the Appropriate Assessment concluded no adverse effect on integrity as a result of increased recreational pressure in relation to River Wye SAC and Wye Valley Woodlands SAC. Suitable

mitigation is provided in the Plan through Policy EE1, Policy HERE9 and Policy HSC3. In addition, a number of policies that propose development require the provision of green infrastructure.

- Water quantity – the Appropriate Assessment concluded no adverse effect on integrity as a result of impact on water quality in relation to River Wye SAC and River Clun SAC.

7.51 In the absence of AADT traffic modelling data, and in line with a precautionary approach, the HRA report notes how it is unable to give a conclusion of no adverse effect on integrity since a judgement cannot be reached in relation to the effect of air pollution on River Wye SAC, River Clun SAC, Wye Valley Woodlands SAC, Wye Valley and Forest of Dean Bat Sites SAC, Usk Bat Sites SAC, River Usk SAC, Cwm Clydach Woodlands SAC and Walmore Common SPA and Ramsar site.

SA Objective 12: To conserve and enhance the character and distinctiveness of landscapes and townscapes.

7.52 The overall scale of growth proposed through the Local Plan, and the sensitivity of the local landscape, means that there is potential for negative effects on this SA objective. The SA of the strategic policies found that there could be minor negative effects in relation to Policy AG2 (Strategic Rural Housing Distribution) and Policy PE1 (Accommodating Economic Growth), while mixed effects (minor positive and minor negative) are expected for Policy AG1 (Accommodating Housing Growth). With regards to the place-based policies, minor negative effects are expected across the suite of development sites due to their potential to impact on the local landscape as a result of large-scale development on greenfield sites. However, the Local Plan includes a range of landscape-related policies that should provide some mitigation.

7.53 The Draft (Regulation 18) Herefordshire Local Plan considers landscape and townscape through a number of its objectives. For instance, objective 4 seeks to offer specific protection to the Wye Valley and Malvern Hills National Landscapes, alongside a broader commitment to value ecology and landscape across the county. Objective 7 prioritises the creation of a sense of place and promotes local distinctiveness. These objectives are advanced through a number of policies, with Policies EE1 (Protecting and Enhancing the Quality of the Natural Environment), EE2 (Protecting and Enhancing the Quality of the Historic Environment and its Setting) and EE3 (Enhancing the Quality of the Built Environment) being most relevant. The policies are again informed by the county's Green and Blue Infrastructure Strategy [\[See reference 63\]](#), and its Landscape and Character Assessment [\[See reference 64\]](#). Priority towards protecting landscape and townscape features is also advanced through individual allocations, with the explanatory text in support of Policy RURA3, for example, identifying the need for certain design responses in response to landscape and townscape considerations. The use of master plans is also prioritised through the allocation policies.

7.54 Nevertheless, despite the safeguards and measures put in place, the development that the plan proposes will inevitably lead to change occurring. The sensitivity of individual locations will determine the extent to which development can be effectively assimilated or not, but for rural locations, impact is likely to be more significant. Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor negative** effect on SA Objective 12 (Landscapes and Townscapes).

SA Objective 13: To conserve and enhance the historic environment including the setting of heritage features.

7.55 The overall scale of growth proposed through the Local Plan, and the extent of heritage assets within Herefordshire, means that there is potential for negative effects on this SA objective. Minor negative effects were identified in relation to Policy AG2 (Strategic Rural Housing Distribution) and Policy PE1 (Accommodating Economic Growth), while mixed effects (minor positive and minor negative) are expected for Policy AG1 (Accommodating Housing Growth). With regards to the place-based policies, minor negative effects on heritage are expected across the suite of development sites.

7.56 However, the Draft (Regulation 18) Herefordshire Local Plan promotes heritage through objective 6 which gives emphasis to ensuring that proper account is taken of the need to ensure the high quality and sustainable design of buildings and spaces. The objective also recognises the need to take into account considerations relating to local character, and those that seek to protect local heritage assets and their settings. Objective 7 has a broader focus, with this outlining a need to create a sense of place and local distinctiveness. Objective 17 commits to giving greater access to cultural heritage and heritage tourism. Policy EE2 (Protecting and Enhancing the Quality of the Historic Environment and its Setting) is the principal driver for delivering these objectives, but Policies EE3 (Enhancing the Quality of the Built Environment) and PE3 (Enhancing Town Centre Vitality) are also relevant. Throughout the Local Plan, there are regular references to how Heritage Impact Assessments have been undertaken. While these studies have been used to confirm the acceptability of each allocation, the studies have also helped to draw out relevant mitigation.

7.57 The same points that were raised in relation to SA objective 12 also apply to SA objective 13. Potential impacts will be most significant in the central areas of Hereford, the market towns and the villages that have a proliferation of conservation areas and listed buildings. As noted above, appropriate safeguards have been outlined through the allocating proposals, with the emphasis on master plans being a key tool in helping to ensure that assets and sensitivities are protected. Where relevant, the strategic allocations also refer to importance of undertaking archaeological assessments.

7.58 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **minor negative** effect on SA Objective 13 (Heritage).

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

7.59 The scale of new growth proposed through the Local Plan, combined with the extent of flood risk in Herefordshire, means there is a risk of exacerbating existing flood risk and exposing more assets to the risk of flooding, particularly in the face of climate change. With regards to the strategic policies, the SA has found that there are likely to be minor negative effects in relation to Policy AG1 (Accommodating Housing Growth) and AG4 (Rural Settlement Exceptions for Affordable Housing, Entry Level Homes and Affordable, Self and Custom Build housing), while a potential but uncertain minor negative effect is identified for Policy PE1 (Accommodating Economic Growth). With regards to the place-based policies, significant negative effects are identified for HERE1 (Strategic Development for Hereford), HERE2 (Supporting the Vitality of Hereford City Centre), HERE3 (Supporting Jobs in Hereford), HERE5 (Sustainable Urban Expansion at Homer North), HERE6 (Sustainable Urban Expansion at Three Elms), HERE7 (Sustainable Urban Expansion at Lower Bullingham), KING1 (Strategic Development for Kington), KING2 (Land east of Kingswood Road), LEDB1 (Strategic development for Ledbury), ROSS1 (Strategic Development for Ross-on-Wye) and ROSS2 (Land to the East of Ross-on-Wye). This is because of the location of those development allocations in relation to areas of flood risk, and the fact that they would result in the loss of greenfield land.

7.60 However, the Draft (Regulation 18) Herefordshire Local Plan outlines a commitment for addressing flood risk through a broader objective that is focused on protecting communities from the worst impacts and dangers of climate change. From a policy perspective, flood risk is targeted through Policy CC1 (A Carbon Neutral Herefordshire), as part of a broader policy to adapt to climate change. Flood risk is also targeted through Policy EE1 (Protecting and Enhancing the Quality of the Natural environment).

7.61 There are important river corridors throughout the county, with key rivers and water courses extending through, or lying adjacent, to the county's principal settlements. These include Hereford, as well as the market towns of Bromyard, Kington, Leominster, Ledbury and Ross-on-Wye. Consequently, avoiding areas of flood risk across the county is challenging. Furthermore, vulnerabilities will increase as the effects of climate change take effect. The plan, particularly through its strategic allocations, seeks to avoid the most sensitive areas, but their use of previously undeveloped land will remove areas currently used for the storage of water through natural absorption in the soil. . In relation to the site options for the plan, flood risk was considered through the HELAA assessments, although it is acknowledged that this data was missing for some sites. Some policies, such as Policy LEDB3 (Land South of Little Marcle Road) identify how Flood Risk Assessments will be needed to support certain development proposals, but all potential applicants will need to adhere to the Environment Agency's direction. The Draft (Regulation 18) Herefordshire Local Plan also directs applicants to refer to the county's Strategic Flood Risk Assessment. **[See reference 65]**

7.62 Overall, the existing (Regulation 18) version of the Herefordshire Local Plan is expected to have a cumulative **minor negative** effect on SA Objective 14a (Flooding).

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

7.63 Similarly to other SA objectives, the overall scale of growth proposed through the Local Plan could pose a risk for the availability and quality of water resources. The SA has identified a potential minor negative effect from Policy AG4 (Rural Settlement Exceptions for Affordable Housing, Entry Level Homes and Affordable, Self and Custom Build housing) while a minor negative effect is also identified as part of a mixed effect overall for Policy PE5 (Supporting a Strong Rural Economy). With regards to the place-based policies, minor negative effects are expected across the majority of the development sites.

7.64 However, objective 3 of the Draft (Regulation 18) Herefordshire Local Plan seeks to significantly improve water quality and ensure that all watercourses in the county are classified as being of a 'good' quality'. This objective is advanced by Policy EE1 which makes specific reference to water quality and states how all development proposals must improve water quality and restore and enhance riparian habitats. Part six of the policy specifically refers to nutrient neutrality, with an outlined need to protect the National (Protected Sites) Network from additional nutrient and pollution pathways. Where Nutrient Neutrality is in place, the policy outlines how developments must demonstrate phosphate neutrality or provide mitigation by utilising Natural England's budget calculation tool and methodology to demonstrate the budget. Beyond the areas of Nutrient Neutrality, the policy states how development proposals must demonstrate how best available technology has been applied, in line with Council guidance, to reduce nutrient (phosphate), sediment and pollution outputs as far as feasible. Applicants are also required to ensure that their measures are adequate for protecting protected nature sites from harm. Policy RURA5 gives specific support to those mitigation proposals that are intended to help protect the county's water quality.

7.65 The importance of water bodies, and other water assets, is also recognised through Policy HSC3 (Green and Blue Infrastructure), while the

emphasis that the strategic allocation policies give to master planning should also help to ensure that water features are properly safeguarded.

7.66 Overall, the Draft (Regulation 18) Herefordshire Local Plan is expected to have a cumulative **negligible** effect on SA Objective 14b (Water quality).

SA Objective 15: To support efficient use of resources, including land and minerals.

7.67 The scale of development that needs to be delivered through the Local Plan has inevitably resulted in the allocation of large areas of greenfield land. Where this occurs, any negative effects on the loss of high quality agricultural land will be unavoidable and will be long-term and permanent.

7.68 However, the Local Plan has as far as possible sought to incorporate relevant mitigation. Objective 8 of the Draft Herefordshire (Regulation 18) Local Plan seeks to minimise, and carefully manage, the use of natural resources, including minerals, land, and water. It also seeks to encourage the reduction, reuse and recycling of waste. Again, Policy EE1 (Protecting and Enhancing the Quality of the Natural Environment) is the principal policy for advancing the objective, with part four referring to the protection and enhancement of key natural assets, including agricultural soils, water, wetlands, woodlands, and river meadows. Policy CC1 (A Carbon Neutral Herefordshire) refers specifically to reducing waste, maximising the reuse of materials, and prioritising the use of low embodied carbon materials. The emphasis that this policy gives to the promotion of public and active travel also encourages the pursuit of more sustainable, and land efficient, development options. Other policies provide implicit support. For example, Policy PE3: (Enhancing Town centre Vitality) supports the conversion of upper floors in retail areas, while Policy HSC3 (Green and Blue Infrastructure) refers to the protection of those assets that contribute to the county's natural networks.

7.69 Nearly all of the strategic allocations involve the loss of previously undeveloped (greenfield) land, with much corresponding with the best and most versatile of Herefordshire's agricultural land. There are also sites that coincide with areas protected for minerals. However, the associated policies outline a need for the careful master planning of each site, allowing for site constraints to be articulated, and where possible, to be avoided through scheme design. The strategic allocations also refer to optimal site densities, as informed by assessments undertaken on site.

7.70 The Draft (Regulation 18) Herefordshire Local Plan has had to balance competing needs with respect to accommodating future growth and protecting the county's most valued assets. The emphasis that the Local Plan gives to the use of previously developed land helps to lessen the pressure upon the most sensitive locations, but greenfield releases are still needed. Consequently, given this, and the importance of the county for both agriculture and minerals, some impact is considered inevitable. The Draft (Regulation 18) Herefordshire Local Plan is therefore expected to have a cumulative **minor negative** effect on SA Objective 15 (Resources).

7.71 The tables at the end of this chapter provide summaries of the SA findings for both the strategic policies (Table 7.1) and the place-based policies (Table 7.2a and Table 7.2b).

Spatial effects of the Draft Herefordshire (Regulation 18) Local Plan

7.72 The Draft (Regulation 18) Herefordshire Local Plan outlines a need for a minimum of 16,100 new homes to be provided over the plan period 2021-2041. Policy AG1 distributes these homes across the county, with minimum figures being provided for Hereford (5,600 homes), Bromyard (750 homes), Kington (150 homes), Ledbury (1,700 homes), Leominster (800 homes), and Ross-on-Wye (1,800 homes). The rural areas will receive a target number of 5,320 homes. As percentages, the county's market towns will collectively

accommodate 32% of the housing growth, with rural areas (33%) and Hereford (35%) following.

7.73 Since the Draft (Regulation 18) Herefordshire Local Plan refers to 2021 census data which provides a figure for the existing number of homes in each settlement, it is possible to calculate the growth in the number of households over the plan period per location. These percentage increases are as follows:

- Ross-on-Wye: an increase of 39%
- Bromyard: an increase of 37%
- Ledbury: an increase of 24%
- Leominster: an increase of 16%
- Hereford: an increase of 21%
- Kington: an increase of 12%
- For the rural areas, the increase in homes is projected to be 14%

7.74 The Draft (Regulation 18) Herefordshire Local Plan acknowledges the respective differences per settlement, and offers some justification on the basis of identified constraints. While the provision of additional development will provide a demand, and hopefully generate a supply of additional services and facilities, existing challenges concerning infrastructure provision could be accentuated if investment is not forthcoming. Although additional evidence will help to explore the adequacy of existing infrastructure, it will also be important to monitor the implementation of development to ensure necessary services and facilities are provided in the right place and time.

7.75 In terms of development form, the Draft (Regulation 18) Herefordshire Local Plan identifies three areas for the sustainable urban expansion of Hereford. An appraisal of these, and the other sites identified for development, are provided in Chapters 5 and 6. As previously noted, this appraisal highlights areas of potential concern, as well as areas that require further consideration moving forward.

7.76 The most significant concerns relate to the loss of land with agricultural quality, but this challenge would be one experienced by the majority of sites across the county. Two of the strategic urban expansion areas fall within a Minerals Safeguarding Area, namely those sites contributing to Policies HERE5 (Holmer North) and HERE6 (Three Elms). The sites that contribute towards Policies HERE6 (Three Elms) and HERE7 (Lower Bullingham) were identified as potentially impacting a water resource. Although the two site options forming Policy BROM2 perform poorly in the SA in relation to their potential for improving health and well-being, this was only judged in the context of the accessibility of the sites to open space, a sports facility or a cycle track. In reality, these sites, together with the other urban expansion areas, could make a positive contribution through their detailed design and the facilities provided on-site. As noted through Chapter 5, the form and design of the extension sites can also help to improve performance in other areas, such as their contribution to the local landscape, and their ability to improve ecology and the opportunities for sustainable travel. Each of the enabling policies outline the type of development that is being envisaged, and the kind of mitigation that is considered necessary. However, their implementation will be dependent on how the elements of each scheme are progressed and negotiated through development management processes.

Table 7.1: Sustainability Appraisal of Strategic Policies

SA Objective	Policy CC1	Policy EE1	Policy EE2	Policy EE3	Policy AG1	Policy AG2	Policy AG3	Policy AG4	Policy AG5	Policy AG6	Policy BC1	Policy BC2	Policy BC3	Policy HSC1	Policy HSC2	Policy HSC3	Policy HSC4	Policy PE1	Policy PE2	Policy PE3	Policy PE4	Policy PE5
SA1: Climate change	++	+	0	+	+	-	+	+	0	0	0	0	+	+	+	+	+	-	+/	+	0	+/
SA2: Housing	0	0	0	0	++	++	++	+	0	++	++	++	++	0	0	0	0	0	+	+	+	0
SA3: Community cohesion and safety	0	0	0	+	0	0	+	0	0	0	+	+	+	++	0	0	+	0	0	0	0	0
SA4: Town and retail centres	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	0
SA5: Access to services, facilities and education	+	0	0	0	+	+/	+	+	0	0	+	0	0	++	++	0	0	0	+	+	0	0
SA6: Physical and mental health and wellbeing	+	+	0	+	+	0	+	+	0	0	+	0	0	++	+	++	+	0	0	0	0	+/
SA7: Economy	+	0	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	++	++	++	++	++
SA8: Employment and reducing inequality and poverty.	+	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	++	++	+	+	++
SA9: Travel	++	0	0	+	+	-	+	+	0	0	0	0	0	+	+	+	+	+/	0	+	+/	-
SA10: Air quality	+	+	0	0	+	-	+	+	0	0	0	0	0	+	+	+	+	-?	0	+	+/	-
SA11: Biodiversity and geodiversity	+	++	0	0	-	-	0	0	+	0	0	0	+	+	0	++	++	-?	0	0	+	+/

SA Objective	Policy CC1	Policy EE1	Policy EE2	Policy EE3	Policy AG1	Policy AG2	Policy AG3	Policy AG4	Policy AG5	Policy AG6	Policy BC1	Policy BC2	Policy BC3	Policy HSC1	Policy HSC2	Policy HSC3	Policy HSC4	Policy PE1	Policy PE2	Policy PE3	Policy PE4	Policy PE5
SA12: Landscapes and townscapes	0?	+	+	++	+/?	-	+	0	+	0	0	0	0	+	0	++	++	-?	0	+	+	+
SA13: Heritage	0	+	++	+	+/?	-	0	0	0	0	0	0	0	0	0	+	++	-?	0	+	+	0
SA14A: Flood risk	++	+	0	0	-	0	0	-	0	0	0	0	0	0	0	+	+	-?	0	0	0	0
SA14B: Water quality and quantity	++	+	0	0	0	0	0	-?	0	0	0	0	0	0	0	+	+	0	0	0	0	+/?
SA15: Resources	+	+	0	0	+/?	-	+	0	0	0	0	0	0	0	0	0	0	-	+	+	+/?	+

Table 7.2: Sustainability Appraisal of Place-Based Policies (HERE1 to LEDB5)

	Policy HERE1	Policy HERE2	Policy HERE3	Policy HERE4	Policy HERE5	Policy HERE6	Policy HERE7	Policy HERE8	Policy HERE9	Policy BROM1	Policy BROM2	Policy BROM3	Policy KING1	Policy KING2	Policy LEDB1	Policy LEDB2	Policy LEDB3	Policy LEDB4	Policy LEDB5
SA1: Climate change	0	+	0	+	+/?	+	+	0	+	+	+	-	+/?	+/?	+/?	+	0	+	+/?
SA2: Housing	++	++	0	0	++	++	++	0	+	++	++	0	++	+	++	++	0	+	0
SA3: Community cohesion and safety	0	+	0	0	++	++	++	+	+	++	++	0	+	+/?	+	+	0	+	++
SA4: Town and retail centres	+	+	0	0	0	0	0	+	+	+	0	0	+	+	+	+	++	++	0
SA5: Access to services, facilities and education	+	+	0	0	+	+	+	++	+	+	+	0	+	+	+	+	+	+	++

Chapter 7 Cumulative Effects

	Policy HERE1	Policy HERE2	Policy HERE3	Policy HERE4	Policy HERE5	Policy HERE6	Policy HERE7	Policy HERE8	Policy HERE9	Policy BROM1	Policy BROM2	Policy BROM3	Policy KING1	Policy KING2	Policy LEDB1	Policy LEDB2	Policy LEDB3	Policy LEDB4	Policy LEDB5
SA6: Physical and mental health and wellbeing	0	+	0	+	+	+	+	+	+	+	+	0	0	+	+	+	+	+	++
SA7: Economy	++	+	++	0	+	0	+	+	+	++	0		+	+	++	0	++	+	0
SA8: Employment and reducing inequality and poverty.	+	++	++	0	+	++	++	+	+	++	0		+	+	++	0	++		0
SA9: Travel	-	+/	0	++	+/	+/	+/	0	+	+/	+/	-	+/	+/	+/	+	+	+/	+/
SA10: Air quality	-	-	0	++	+/	+/	+/	0	+	+/	+/	-	+/	+/	+/	+	+	+	+/
SA11: Biodiversity and geodiversity	-	0	0	+	-	-	-	0	+	-	-	-	-	+/	-	-	-	0	0
SA12: Landscapes and townscapes	+/	+	0	0	-	-	-	0	+	-	-	-	-	-	-	-	-	+/	+/
SA13: Heritage	-	-	0	0	-	-	-	0	+	-	-	-	-	-	-	-	-	+/	+/
SA14A: Flood risk				0				0	+	-	-	-				-	-	-	0
SA14B: Water quality and quantity	-?	-?	0	0	-?	-?	-?	0	+	-?	-?	-?	-?	-?	-?	-	-	-	0
SA15: Resources	+/	+	0	0				0	+			-	-	-	-	-	-	+	+/

Table 7.3: Sustainability Appraisal of Place-Based Policies (LEOM1 to RURA5)

SA Objective	Policy LEOM1	Policy LEOM2	Policy LEOM3	Policy ROSS1	Policy ROSS2	Policy RURA1	Policy RURA2	Policy RURA3	Policy RURA4	Policy RURA5
SA1: Climate change	+/	+/	0	+/	+/	0	0	0	+	0
SA2: Housing	++	++	0	++	++	+	+	++	0	0
SA3: Community cohesion and safety	0	0	0	+	++	+	+	+	0	0
SA4: Town and retail centres	+	+	+	+	+	0	0	0	0	0
SA5: Access to services, facilities and education	+	+	+	+	+	+	+	+	0	0
SA6: Physical and mental health and wellbeing	0	+	+	++	+	0	0	0	+	0
SA7: Economy	++	+	++	+?	++	0	0	0	0	0
SA8: Employment and reducing inequality and poverty.	++	+	++	+?	++	0	0	0	0	0
SA9: Travel	+/	+/	+	+/	+/	0	0	-	++	0
SA10: Air quality	+/	+/	+	+/	+/	0	0	-	+	0

Chapter 7 Cumulative Effects

SA Objective	Policy LEOM1	Policy LEOM2	Policy LEOM3	Policy ROSS1	Policy ROSS2	Policy RURA1	Policy RURA2	Policy RURA3	Policy RURA4	Policy RURA5
SA11: Biodiversity and geodiversity	-	-	-	-	-	-?	-?	-	0	+
SA12: Landscapes and townscapes	-	-	-	-	-	-?	-?	-	0	0
SA13: Heritage	-	-	-	-	-	-?	-?	0	0	0
SA14A: Flood risk	-	-	-			-?	-?	-	0	0
SA14B: Water quality and quantity	-?	-	-	-?	-	-?	-?	-		++
SA15: Resources	-	-	-	-	-	-?	-?	-	0	0

Chapter 8

Monitoring

8.1 The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

8.2 Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Given the relatively early stage of the Herefordshire Local Plan, indicators for all SA objectives have been included. The monitoring framework will be updated at the next stage of the SA to take into account any additional policies proposed by the Herefordshire Local Plan and to focus on the SA objectives against which significant (including uncertain) effects have been recorded.

8.3 A number of suggested indicators for monitoring the potential sustainability effects of the Draft (Regulation 18) Herefordshire Local Plan are set out below.

8.4 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that Herefordshire Council continues the dialogue with statutory environmental consultees and other stakeholders that has already commenced, and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Proposed SA Monitoring Framework for the Herefordshire Local Plan

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

Indicators

- Energy efficiency ratings of new homes.
- Proportion of new homes/employment within 500m of energy networks that have been connected.
- Proportion of new homes/employment that incorporate renewable energy.

Possible Data Sources

- EPC certificate check.
- Planning application checks for major developments.

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

Indicators

- Annual dwelling completions.

- Net additional transit and residential pitches (Gypsy, Traveller and Travelling Showpeople) permitted and completed to meet identified requirement.
- Number and proportion of affordable dwelling completions from new development.
- Progress of allocated sites.

Possible Data Sources

- 5YLS monitoring reports.
- Planning application checks.
- Council tax records.

SA Objective 3: To support community cohesion and safety

Indicators

- Number of new community facilities developed.

Possible Data Sources

- Planning application checks.

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

Indicators

- Number of vacant units.
- Mix and type of businesses.
- Parking occupancy (of private vehicles and cycles).
- Rental values and freehold costs.

Possible Data Sources

- Commissioned physical surveys of streets and parking areas.
- Engagement with business owners and travel operators.
- ONS data on national retail spending.
- Planning application data.

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

Indicators

- Total gains and losses of services and facilities.
- Progress of infrastructure delivery identified in the Infrastructure Delivery Plan.
- Amount of money received in developer contributions through development.

Possible Data Sources

- Herefordshire Council.
- Annual infrastructure funding statement.

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

Indicators

- Proportion of development for over 30 homes or 1000 square metres that provide a health impact assessment.

Possible Data Sources

- Planning application checks.

SA Objective 7: To support the sustainable growth of the economy

Indicators

- Permitted applications for alternative uses within established employment areas protected in the Draft Local Plan.
- Number of new work hubs, collaborative workspaces or live-work units.
- Number of major development proposals containing an employment and skills plan.

Possible Data Sources

- Planning application checks.

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

Indicators

- Local unemployment / economic activity levels
- Household income
- Educational attainment

Possible Data Sources

- Office for National Statistics
- Business engagement

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

Indicators

- Proportion of new development located within Hereford and the key settlements.
- Length of cycleways created/enhanced.

- Number of new car-free developments.
- Mode of travel to the workforce.
- Distance travelled to the workplace.

Possible Data Sources

- Planning application checks.
- ONS data.

SA Objective 10: To improve air quality

Indicators

- Proportion of new development coming forward within 500m of AQMAs.
- Air quality monitoring data

Possible Data Sources

- Planning application checks.
- AQMA monitoring

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

Indicators

- Number of planning approvals that generate any adverse impacts on sites of acknowledged biodiversity importance.

- Percentage of major developments generating overall biodiversity enhancement.
- Number of hectares of biodiversity habitat delivered through strategic site allocations.

Possible Data Sources

- Planning application checks.
- Future net gain monitoring database.

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

Indicators

- Proportion of new development coming forward on brownfield land.
- Amount of new development in areas of high landscape sensitivity.

Possible Data Sources

- Planning application checks.

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

Indicators

- Condition of Conservation Areas.
- Number and condition of buildings on the Heritage at Risk register.

Possible Data Sources

- Conservation area appraisals.
- Historic England heritage at risk register.

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

Indicators

- Proportion of new development built on flood zones against EA advice.
- Record of the number of flooding incidents across Herefordshire (both fluvial and surface water events).
- Effectiveness of sustainable urban drainage systems against intended design outputs.

Possible Data Sources

- Planning applications checks.

SA Objective 14B: To protect the quality and quantity of water resources

Indicators

- Percentage of water bodies at good ecological status or potential.
- Percentage of water bodies assessed at good chemical status to denote good water quality.

Possible Data Sources

- Planning applications checks.
- Environment Agency data.

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

Indicators

- Proportion of new development coming forward on brownfield land.
- Amount of ALC grades 1, 2 and 3a lost to development.
- Amount of development coming forward in mineral safeguarding areas or waste consultation zones against DCC advice.

Possible Data Sources

- Planning applications checks.

Chapter 9

Conclusions and Next Steps

9.1 The SA of the Draft (Regulation 18) Herefordshire Local Plan has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the National Planning Practice Guidance. SA objectives developed at the Scoping stage of the SA process have been used to undertake a detailed appraisal of the current consultation document and the reasonable alternative options considered.

9.2 The Draft (Regulation 18) Herefordshire Local Plan document sets out detailed proposed policies to address strategic and non-strategic issues in the plan area, as well as identifying specific site allocations for residential and mixed use development.

9.3 The Draft Herefordshire (Regulation 18) Local Plan is likely to have an overall positive cumulative effect on the majority of the SA objectives, particularly with respect to the delivering of housing, employment development and associated infrastructure. While the policies help to ensure this new development is provided as sustainably as possible, there are still challenges with respect to improving the sustainability and resilience of existing communities. Herefordshire is an attractive, historic, and environmentally sensitive county with some significant constraints. The proposed development strategy seeks to avoid these constraints as much as possible and builds in appropriate mitigation where possible. However, the scale of growth means that some impacts will be unavoidable, leading to projected negative effects on the environmentally-focused SA objectives. The appraisal has predominantly considered the effects that the plan could generate at the end of the plan period in 2041. However, we live in a very uncertain world, with an ever-changing climate and wide-ranging shifts in how we live our lives. The plan has sought to identify these potential trends but the need for effective monitoring is clear.

9.4 It is understood that further work is underway to help develop the evidence base of the plan which should allow for a more informed and detailed consideration of effects. The next iteration of the Local Plan will allow for effects to be re-examined through an updated SA.

Next Steps

9.5 This SA Report will be available for consultation alongside the Draft Herefordshire (Regulation 18) Local Plan document between March and May 2024. The consultation responses on the Local Plan document and this SA Report will be taken into account in the next stages of the plan preparation process.

LUC

March 2024