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Herefordshire Local Plan Core Strategy

SA/SEA Adoption Statement

Prepared by LUC
October 2015

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Project Title: Sustainability Appraisal/Strategic Environmental Assessment of the Herefordshire Local Plan Core Strategy

Client: Herefordshire Council

| Version | Date | Version Details | Prepared by | Checked by | Approved by |
|---------|----------|--|-----------------------------------|------------------|------------------|
| 1 | 13/10/15 | Draft SA/SEA Adoption Statement for the Herefordshire Local Plan Core Strategy | Taran Livingston Kate Nicholls | Kate Nicholls | Taran Livingston |
| 2 | 14/10/15 | Final SA/SEA Adoption Statement for the Herefordshire Local Plan Core Strategy | Taran Livingston Kate Nicholls | Taran Livingston | Taran Livingston |

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1 Introduction

- 1.1 Herefordshire Council adopted the Herefordshire Local Plan – Core Strategy 2011-2031 on 16th October 2015.
- 1.2 During the preparation of the Herefordshire Local Plan – Core Strategy, the Council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports published alongside the different versions of the Herefordshire Local Plan during its development.
- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires Herefordshire Council to make the final SA Report available alongside the Adopted Local Plan.
- 1.4 The final SA Report for the Adopted Herefordshire Local Plan comprises the following documents:
 - The **May 2014 SA Report** prepared by LUC on behalf of the Council, which was consulted upon alongside the Pre-Submission version of the Herefordshire Local Plan. The SA Report was then submitted to the Secretary of State for Examination on the 23rd September 2014.
 - The **September 2014 SA Addendum** prepared by LUC on behalf of the Council. This was a one-page document that was included at the end of Section 8 in the Council’s “Summary of Main Points Raised” (September 2014), responding to consultation comments made during the Pre-Submission consultation¹.
 - The **April 2015 SA Addendum** prepared by LUC on behalf of the Council, as part of the work on the proposed main modifications requested during the Examination by the Inspector. The report is an Addendum to the full 2014 SA Report, and should be read alongside that report, as together they are intended to meet the requirements of the SEA Directive. The Main Modifications were consulted on by the Council between March and May 2015. The April 2015 SA and Habitats Regulations Assessment (HRA) Addendum, which was made publicly available, described the implications of each proposed change for the SA and HRA conclusions set out in the earlier 2014 SA and HRA reports. The SA and HRA Addendum also included a summary of the cumulative sustainability effects of the Local Plan Core Strategy and whether the cumulative effects identified in the May 2014 SA Report were affected by the proposed changes to the Plan.
 - The **July 2015 SA Addendum** prepared by LUC on behalf of the Council. Herefordshire Council had prepared an additional proposed change to the Local Plan Core Strategy. This proposed change related to policy SD2: Renewable and Low Carbon Energy and the supporting text to that policy. The purpose of the additional proposed change was to make the Local Plan Core Strategy ‘sound’ taking into account the Ministerial Statement that was issued on the 18th June 2015². The implications of the proposed change for the SA and HRA findings are described in the July 2015 SA Addendum. The proposed change did not affect either the SA or HRA findings set out in the May 2014 SA Report (Appendix 8) and the September 2014 HRA Report (Appendix 1). The cumulative effects of the Local Plan Core Strategy remained as described in the April 2015 SA Addendum.

¹ https://www.herefordshire.gov.uk/media/7923553/summary_of_points_raised.pdf

² <http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm150618/wmstext/150618m0001.htm>

Requirement for the Adoption Statement

- 1.5 In addition to the requirement in Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for publishing the final SA Report alongside the Adopted Local Plan, the SEA Regulations³ also require a number of steps to be taken upon adoption of a local plan (in this case the Herefordshire Local Plan – Core Strategy). Specifically, SEA Regulation 16 sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an ‘SEA adoption statement’, and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency. Natural Resources Wales has also been consulted throughout the SA/SEA process due to Herefordshire’s border with Wales. The SEA adoption statement must explain:
- How environmental (and sustainability) considerations have been integrated into the plan.
 - How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
 - How the opinions expressed by the public, consultation bodies and where appropriate other European Member States, during consultation on the plan and Environmental/SA Report have been taken into account.
 - The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
 - The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.
- 1.6 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Herefordshire Local Plan. The document is structured according to the SEA Regulation requirements listed above:
- **Section 2** summarises how environmental considerations have been integrated into the plan by explaining who carried out the SA/SEA and what assessment framework was used.
 - **Section 3** summarises the links between the plan-making and SA/SEA processes and how the SA/SEA recommendations were taken into account.
 - **Section 4** summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments.
 - **Section 5** describes the alternatives/options considered as part of the Local Plan preparation process, and why certain options were chosen.
 - **Section 6** describes how the significant sustainability/environmental impacts of the Local Plan will be monitored.

³ The Environmental Assessment of Plans and Programmes Regulations 2004 - SI No. 1633.

2 How environmental and sustainability considerations have been integrated into the Herefordshire Local Plan – Core Strategy

- 2.1 The SA (incorporating SEA) of the Herefordshire Local Plan was undertaken initially by Herefordshire Council (2007-2010). Between 2010 and 2015 the SA work was carried out by an independent environmental planning consultancy, LUC. LUC has also prepared this SA Adoption Statement.
- 2.2 The purpose of the SA was to assist the Council in preparing the Local Plan by identifying the key sustainability/environmental issues facing the plan area, to predict what would be the likely effects of the Local Plan on these issues, and to put forward recommendations to improve the Local Plan. The aim was to ensure that the Local Plan has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible when the policies are implemented and result in new development within Herefordshire.
- 2.3 The SA was undertaken iteratively, such that at each stage of the Local Plan's preparation an assessment of the sustainability and environmental effects of the options for the Local Plan and subsequently its policies was made. SA Reports were produced to describe the approach taken, identify the effects and put forward recommendations to avoid or minimise negative effects identified or enhance positive effects. In this way, environmental and sustainability considerations were integrated into the Local Plan as it was developed.
- 2.4 The way in which the environmental and sustainability effects of the Local Plan were described, analysed and compared was through the use of a set of SA objectives. The SA objectives for the Local Plan were developed by Herefordshire Council in collaboration with stakeholders, drawing on a review of relevant European, national and regional policies, plans and programmes and the objectives they contained. The resulting SA 'framework' comprised 20 SA objectives which were supported by a set of more detailed appraisal questions that were used to decide whether the Local Plan would be likely to achieve each objective. The SA objectives covered all of the environmental topics required by the SEA Regulations.
- 2.5 The SA framework for the Local Plan was originally presented in the 2007 SA Scoping Report (prepared at the time for the proposed Local Development Framework including the Core Strategy, which became the Local Plan – Core Strategy) and included a set of SA objectives covering all of the SEA topics (listed in Schedule 2 of the SEA Regulations). This SA framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies for the Local Plan. Using the same SA framework ensured that alternatives were assessed in a comparable way to the options previously considered as part of developing the Herefordshire Local Plan.
- 2.6 When LUC was commissioned in 2010 to take over the SA work for the Herefordshire Local Plan, the SA objectives were grouped into six themes to enable related sustainability issues to be considered together during the appraisal. The six themes are as follows:
- 1 Education and employment.
 - 2 Healthy and prosperous communities.
 - 3 Transport and access.
 - 4 Built environment.
 - 5 Resource consumption and climate change.
 - 6 Natural environment.
- 2.7 **Table 2.1** shows the SA objectives considered within each theme. Note that the sub-objectives (appraisal questions) for SA headline objectives 7 and 18 are divided into more than one theme,

according to the issues that they address. The "SEA topics" (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives as shown in the final column of Table 2.1.

Table 2.1 SA Framework for the Herefordshire Local Plan

| SA Objective | Appraisal Question | SEA Topic covered by objective |
|--|--|--------------------------------|
| Education and Employment | | |
| 1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce. | 1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors. 1.2 Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport. 1.3 Encourage fair and decent work conditions and increase median weekly earnings. 1.4 Help to increase diversity of job opportunities. | Material Assets ⁴ |
| 2. Secure a more adaptable and higher skilled workforce. | 2.1 Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs. 2.2 Reduce inequalities in skills across the county. 2.3 Promote the voluntary sector, lifelong learning and life/environmental skills. | Material Assets, Population |
| 3. Maintain or enhance conditions that enable a sustainable economy and continued investment. | 3.1 Improve the resilience and/or diversity of business and the economy. 3.2 Provide or facilitate availability of appropriate sites and properties for new business opportunities or growth whilst using natural resources efficiently. 3.3 Encourage and support a culture of enterprise and innovation, including social enterprise or the voluntary sector. 3.4 Encourage corporate social and environmental responsibility, with county organisations leading by example. 3.5 Promote and support the development of new high value and low impact technologies, especially resource-efficient technologies and environmental technology initiatives. | Material Assets |
| 7. Sustainable Regeneration | 7.2 Help create an appropriate range of independent, competitive and national retailers. 7.3 Help reduce the number of vacant properties and support vitality. | Material Assets |
| 8. Raise Educational achievements throughout the County | 8.1 Ensure that education infrastructure meets projected future demand and need. | Material Assets, Population |
| Healthy and Prosperous Communities | | |
| 5. Improve the health of the people of Herefordshire, | 5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport. | Population, Human Health |

⁴ 'Material assets' is listed as one of the topics to be considered in the SEA, but there is no clear definition of what this topic should cover in the SEA Directive or Regulations, and it has been variously defined in different SEA reports as relating to natural resources, e.g. minerals, or built infrastructure, e.g. transport infrastructure. For the purposes of this SEA, the material assets topic is assumed to include resources such as water, minerals and waste, as well as built infrastructure, including transport and waste infrastructure, but also economic and employment infrastructure and interests.

| SA Objective | Appraisal Question | SEA Topic covered by objective |
|---|--|--------------------------------|
| reduce disparities in health geographically and demographically and encourage healthy living for all. | 5.2 Help to reduce inequalities in health. 5.3 Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to physical sports, green space and recreation. | |
| 7. Sustainable regeneration | 7.4 Support or create high quality public realm and community/amenity space that is safe and encourages positive community interaction. | Material Assets, Population |
| 9. Reduce and prevent crime/fear of crime and antisocial behaviour in the county. | 9.1 Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour. 9.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour through design measures. 9.3 Encourage respect for people and the environment. | Population |
| 10. Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas in the county and the rest of the county. | 10.1 Ensure easy and equitable access to and provision of services and opportunities, including jobs and learning, and avoid negative impacts on different groups of people because of their ethnicity, gender, religion, disability, sexuality or age. 10.2 Enable the involvement of all affected parties, including hard to reach groups. 10.3 Promote equality, fairness and respect for people and the environment. 10.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages. | Population, Human Health |
| Transport and Access | | |
| 4. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking. | 4.1 Reduce the need to travel. 4.2 Promote more sustainable transport patterns in areas suffering from congestion, 4.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all. 4.4 Increase the use of public transport, cycling and walking. 4.5 Secure the implementation of green travel plans. 4.6 Minimise risks associated with car travel. 4.7 Promote a shift of freight from road to rail. | Material assets |
| 6. Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all. | 6.1 Maintain or increase the type or quality of facilities (including open space) in areas where there is need, ensuring easy and equitable access by sustainable modes of transport. 6.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all. 6.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport and/or as a catalyst for urban and rural regeneration. | Material assets, Population |
| 7. Sustainable regeneration | 7.1 Support viability or develop services and facilities appropriate to the community, function, character and scale of the centre and existing facilities using sustainable, resource-efficient designs. | Material assets, Population |
| The Built Environment | | |
| 11. Provide | 11.1 Increase access to good quality housing meeting | Population, |

| SA Objective | Appraisal Question | SEA Topic covered by objective |
|---|---|--------------------------------|
| everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments. | <p>people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people).</p> <p>11.2 Increase the supply of affordable housing.</p> <p>11.3 Reduce the percentage of unfit homes/empty homes.</p> <p>11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health.</p> <p>11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction.</p> <p>11.6 Improve the wider built environment and sense of place.</p> | Material assets |
| 19. Ensure integrated, efficient and balanced land use. | <p>19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel.</p> <p>19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design.</p> <p>19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and materials.</p> | Soil |
| 20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage. | <p>20.1 Preserve, protect and enhance Conservation Areas, Listed Buildings, archaeological remains, and other features and areas of historical heritage and cultural value e.g. locally listed buildings.</p> <p>20.2 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area.</p> <p>20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place?</p> <p>20.4 Encourage cleanliness and/or improve the general appearance of the area.</p> | Cultural Heritage |
| Resource Consumption and Climate Change | | |
| 12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling. | <p>12.1 Minimise the use of non re-usable materials.</p> <p>12.2 Minimise waste from households, businesses etc. including hazardous waste.</p> <p>12.3 Promote re-use, recovery and recycling of waste.</p> <p>12.4 Deal with waste locally and/or through the best Practical Environmental Option.</p> | Material assets |
| 14. Use natural resources and energy more efficiently. | <p>14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels.</p> <p>14.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all? E.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials.</p> <p>14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build.</p> | Material assets |
| 16. Reduce | 16.1 Reduce the county's contribution to climate change by | Climatic |

| SA Objective | Appraisal Question | SEA Topic covered by objective |
|--|--|--|
| Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem. | <p>reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources.</p> <p>16.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating and in transportation.</p> | Factors |
| 18. Minimise local and global pollution and protect or enhance environmental resources. | 18.5 Encourage the use of clean technologies and water minimisation techniques. | Material assets, Water |
| The Natural Environment | | |
| 13. Value, maintain, restore and expand county biodiversity. | <p>13.1 Protect or enhance habitats of international, national, regional or local importance.</p> <p>13.2 Protect international, national, regional or locally important terrestrial or aquatic species.</p> <p>13.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces.</p> <p>13.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value.</p> <p>13.5 Create new appropriate habitats.</p> | Biodiversity, Fauna, Flora |
| 15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces. | <p>15.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings.</p> <p>15.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management.</p> <p>15.3 Ensure that environmental impacts caused by mineral operations and the transport of minerals are minimised.</p> <p>15.4 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users.</p> | Population, Biodiversity, Fauna, Flora |
| 17. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment. | <p>17.1 Reduce flood risk both presently and taking into account climate change.</p> <p>17.2 Prevent inappropriate development of the floodplain, and include flood protection systems.</p> <p>17.3 Include sustainable urban drainage systems where appropriate.</p> | Water |
| 18. Minimise local and global pollution and protect or enhance environmental resources. | <p>18.1 Minimise water, air, soil, groundwater, noise and light pollution from current activities and the potential for such pollution.</p> <p>18.2 Protect and enhance the quality of watercourses.</p> <p>18.3 Provide opportunities to improve soil quality or reduce contaminated land.</p> <p>18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking.</p> | Water, Air, Soil |

- 2.8 In addition to the use of the SA framework to assess the potential effects of Local Plan objectives, site options and policies as they were drafted, environmental and sustainability considerations were integrated into the Local Plan through close working between LUC and Council officers drafting the plan. Early draft sections of the Local Plan – Core Strategy, including draft policies, were sent to LUC for appraisal and the SA team attended meetings to discuss the emerging plan during the process of carrying out the SA.
- 2.9 Finally, the Local Plan was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species (Amendment) Regulations 2012⁵. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Herefordshire Local Plan was undertaken separately from the SA, but the findings of the HRA Reports informed the SA process, particularly in relation to judging the potential effects on SA objective 13 (Value, maintain, restore and expand county biodiversity).
- 2.10 The HRA that was carried out concluded that none of the Hereford policies are expected to have a significant effect on European sites in and around the County. However, for policy HD3: Hereford Movement, it was recommended that HRA screening for the forthcoming Hereford Area Plan should revisit the screening conclusion regarding the potential for likely significant effects arising from physical loss or damage to habitats, noise pollution and vibration, light pollution, air pollution and water quality within the River Wye SAC, once more detail about the proposed route for the relief road should be available, and to ensure any further specific mitigation requirements are included. Water quality, particularly in the River Wye SAC could be affected by increased discharges from water treatment works; however this is addressed in policy SS3 and SD4.
- 2.11 The HRA also identified the potential for adverse effects on water quality in the River Wye SAC associated with residential development, but concluded these effects could be mitigated through policy SS3: Release of Land for Residential Development as it states that the release of specific sites may be phased or delayed in order to ensure that necessary infrastructure is in place to support the new development or in order to ensure that there will be no significant adverse effects on the integrity of the River Wye SAC. In addition, the wider River Wye Nutrient Management Plan being prepared and implemented by the Environment Agency, Natural England and relevant stakeholders aims to reduce phosphate levels in the River Wye through measures relating to phosphate-stripping of waste water treatment discharges and reducing diffuse pollution from agricultural sources.

⁵ Statutory Instrument 2012 No. 1927.

3 How the Environmental/SA Report has been taken into account

- 3.1 As stated above, the SA was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the Local Plan's development. SA Reports were produced to describe the approach taken, the potential effects identified and put forward recommendations to avoid or minimise negative effects or enhance positive effects. Council officers preparing the Local Plan took the SA findings and recommendations into account while making changes to the Plan before each round of public consultation.
- 3.2 **Table 3.1** overleaf shows how preparation of the SA Reports (including the Environmental Report requirements) corresponded with each stage of the Local Plan preparation, and how any recommendations made were taken into account. In all cases, drafts of the SA Reports or Addendums were provided to the Council prior to the Local Plan documents being finalised for consultation.

Table 3.1: Iterations of the Herefordshire Local Plan – Core Strategy and accompanying SA Work

| Plan Iteration | Accompanying SA Work | How SA Report was taken into account |
|------------------------------------|---|---|
| N/A | SA Scoping Report (2007) produced by Herefordshire Council. | The scoping stage of the SA was undertaken by Herefordshire Council officers and included compiling and understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The SA framework was then developed, setting out the SA objectives against which Core Strategy options initially, and subsequently policies, would be appraised. |
| Developing Options (June 2008) | SA Report (June 2008) produced by Herefordshire Council. SA Addendum (March 2009) produced by Herefordshire Council. | <p>The June 2008 SA Report for the Developing Options Paper updated the review of plans, policies and programmes (PPP review) and baseline information from the SA Scoping Report, and appraised the plan objectives and the four overall spatial strategy options only. The SA was undertaken by an internal group of Herefordshire Council officers during a series of workshops (held in June 2007, January and April 2008), which appraised firstly the compatibility between the plan objectives and some of the SA objectives, and secondly, how well the strategy options performed in broad economic, social and environmental terms (rather than using the full set of SA objectives). The SA found that overall each of the four options would be 'moving towards sustainability', although there were differences between the extent of their social, economic and environmental impacts, but no one option was identified as being the most sustainable. The SA Report also made some recommendations about issues that should be considered by plan-writers if each option were taken forward into the Core Strategy.</p> <p>An SA Addendum for the Developing Options Paper was also published in March 2009, which described the findings of the SA of the Strategic Objectives, Place-Shaping Options and Policy Options included in the Developing Options Paper (see Appendices B1 and B3). The appraisal process was undertaken in the same way as the first SA Report (i.e. considering broad economic, social and environmental effects rather than effects against each SA objective) by Herefordshire Council officers via a combination of individual officer appraisal of the options, consultation with other internal council departments on the findings of the SA of the place-shaping options, and a workshop with development management officers to help predict the effects of the policy options. All comments from the SA were forwarded to the Plan writers who integrated the recommendations into the emerging plan policy approaches, along with the consultation responses and currently available evidence base.</p> |
| Place Shaping Paper (January 2010) | SA and HRA Report for the Place Shaping Paper (January 2010) produced by Herefordshire Council. | The appraisal at this stage was undertaken by Council officers by selecting a list of representative SA objectives and questions (from the SA framework) to evaluate the Core Strategy preferred, refined, significantly changed and newly emerged Place Shaping Options and Policy Directions. The selected SA questions allowed the evaluation of the options to incorporate the main themes of sustainable development (economic, social and environmental) at an appropriate level, without having to do a detailed assessment of each option against all 20 SA objectives and questions. However, the Preferred |

| Plan Iteration | Accompanying SA Work | How SA Report was taken into account |
|--|---|---|
| | | <p>Spatial Strategy for Herefordshire was appraised against at least one question for all of the 20 SA objectives, because it is the overriding spatial strategy for the whole of the county. Not all of the Place Shaping Options and Policy Directions were assessed at this SA stage. This was generally because no significant changes to the options were made since the Developing Options Paper, and therefore the SA findings in the SA Report (June 2008) and SA Addendum (March 2009) for the Developing Options were still valid.</p> <p>SA workshops were organised involving Herefordshire Council officers with expertise in a variety of areas, for example Economic Development, Housing, Education and Development Management as well as external organisations including the Environment Agency, Natural England, English Heritage and a member of the Youth Council. The results of the separate workshops were combined and considered in the assessment of the options reported in the SA Report, along with recommendations for the plan.</p> |
| Preferred Options (Summer-Autumn 2010) | Six SA Notes (August, September and November 2010) produced by LUC. | <p>At this stage, Herefordshire Council decided to carry out a 'portfolio approach' to consulting on Preferred Options that had not been considered and consulted upon previously at Place Shaping stage (i.e. those elements of the Place Shaping Paper where options were still being considered, rather than a single preferred policy approach). As the Preferred Options stage was considering separate elements of the Core Strategy, and not the whole Core Strategy, LUC prepared SA Notes to accompany each of the Preferred Options papers, rather than a full SA Report at this stage. It was agreed with the Council that the full SA Report would be prepared at the following stage of plan preparation when all the policies in the Core Strategy were published as one full draft plan. The SA Notes prepared by LUC and published alongside the Preferred Options Papers were as follows:</p> <ul style="list-style-type: none"> • Preferred Options: Hereford – Sustainability Appraisal Note (September 2010) • Preferred Options: Bromyard, Ledbury, Ross-on-Wye – Sustainability Appraisal Note (August 2010) • Preferred Options: Rural Areas – Sustainability Appraisal Note (August 2010) • Preferred Options: General Policies – Sustainability Appraisal Note (August 2010) • Preferred Options: General Policies 2nd Tranche – Sustainability Appraisal Note (November 2010) • Herefordshire Core Strategy Preferred Options – Sustainability Appraisal Note: Cumulative Impacts (November 2010) <p>For each Preferred Options Paper, the appraisal was initially carried out for the draft policy preferred options prepared by the Council and recommendations for improvements were set out in appraisal matrices and sent to the Council. The Council then produced a finalised set of policy preferred options, which had been amended in light of the SA recommendations made. In order to clarify where changes were made by the Council, the appraisal was updated where relevant with a second row of scores, showing where changes to the scoring resulted from amendments made to the policies. In addition,</p> |

| Plan Iteration | Accompanying SA Work | How SA Report was taken into account |
|---|---|---|
| | | <p>notes were added in italics underneath each recommendation, explaining whether and how the policy preferred option had been amended by the Council.</p> |
| <p>Revised Preferred Options (September 2011)</p> | <p>Revised Preferred Options SA Note (July 2011) produced by LUC.</p> | <p>The 2011 Revised Preferred Options were not described as detailed policies in the same way that the 2010 Preferred Options were, but were summarised as broad changes to the 2010 Preferred Options in the consultation leaflet 'Help Plan the Future of Herefordshire' (September 2011). These revisions were subject to SA as they were prepared, and the SA work was presented in the Revised Preferred Options SA Note (July 2011) prepared by LUC. The revisions that were proposed in the 2011 Revised Preferred Options generally only affected one or two elements of each policy, therefore a lot of the SA findings remained unchanged from those presented in the 2010 Preferred Options SA Notes.</p> <p>An updated assessment of the cumulative impacts of the Revised Preferred Options considered all together was also set out in the SA Note. However, because only a few changes to the SA scores were made as a result of the 2011 revisions to the preferred options, which affected relatively few of the policies, the overall cumulative impacts of the 2011 Revised Preferred Options for the Core Strategy were broadly very similar to the 2010 Preferred Options.</p> |
| <p>Draft Core Strategy (March 2013)</p> | <p>Full SA Report (March 2013) produced by LUC.</p> | <p>Herefordshire Council decided to update proposals for the Herefordshire Core Strategy into a full Draft Core Strategy and make it available for a further round of consultation prior to Submission of the plan to the Secretary of State. The Draft Core Strategy (March 2013) was provided to LUC in an early draft form for appraisal, and the findings of the draft version of the SA report were considered by the Council when finalising the Draft Core Strategy ready for consultation. A number of recommendations were made in the draft version of the SA report in relation to the policies for Bromyard and Leominster and these were addressed by the Council as it finalised the Draft Core Strategy for public consultation.</p> |

| Plan Iteration | Accompanying SA Work | How SA Report was taken into account |
|--|--|--|
| <p>Pre-Submission Publication of the Local Plan Core Strategy 2011-2031 (May 2014)</p> | <p>Full SA Report (May 2014) produced by LUC.</p> <p>SA Addendum (September 2014) produced by LUC.</p> | <p>The consultation responses received on the Draft Core Strategy informed Herefordshire Council's changes to the Draft Core Strategy, before it was subject to a six week 'soundness' (Pre-Submission) consultation prior to the Core Strategy being submitted to government for examination. At this stage, the Council changed the name of the document to the 'Local Plan – Core Strategy'.</p> <p>Generally, only minor changes were made to the Core Strategy since the March 2013 version. Those implications were addressed in the full SA report (May 2014), which was fully updated to reflect the changes made to the Core Strategy since the March 2013 Draft version. No recommendations were needed for the Local Plan.</p> <p>The SA Addendum was a one-page document that was included at the end of Section 8 in the Council's "Summary of Main Points Raised" (September 2014)⁶, responding to consultation comments made during the Pre-Submission consultation.</p> |
| <p>Herefordshire Local Plan Core Strategy Proposed Main Modifications (March 2015)</p> | <p>SA Addendum (April 2015) produced by LUC.</p> | <p>The Herefordshire Local Plan Core Strategy was submitted to the Secretary of State for examination in September 2014 and hearing sessions were held in February 2015. Following the Examination in Public hearings, the Council prepared a schedule of proposed Main Modifications to the Plan, which addressed issues that had been raised during the hearings and seek to make the Plan sound. The Main Modifications were consulted on by the Council between March and May 2015. The April 2015 SA and HRA Addendum described the implications of each proposed change for the SA and HRA conclusions set out in the earlier 2014 SA and HRA reports. The SA and HRA Addendum also included a summary of the cumulative sustainability effects of the Local Plan Core Strategy and whether the cumulative effects identified in the May 2014 SA Report were affected by the proposed changes to the Plan. No recommendations were needed for the Local Plan.</p> |
| <p>Herefordshire Local Plan Core Strategy Proposed Main Modifications Addendum B (July 2015)</p> | <p>SA Addendum (July 2015) produced by LUC.</p> | <p>Subsequent to the Main Modifications consultation, Herefordshire Council prepared an additional proposed change to the Local Plan Core Strategy and published it for consultation between July and August 2015. This proposed change related to policy SD2: Renewable and Low Carbon Energy and the supporting text to that policy. The purpose of the additional proposed change was to make the Local Plan Core Strategy 'sound' taking into account the Ministerial Statement that was issued on the 18th June 2015⁷. The implications of the proposed change for the SA and HRA findings are described in the July 2015 SA Addendum. The proposed change did not affect either the SA or HRA findings set out in the May 2014 SA Report (Appendix 8) and the September 2014 HRA Report (Appendix 1). The cumulative effects of the Local Plan Core Strategy remained as described in the April 2015 SA Addendum. No recommendations were needed for the Local Plan.</p> |

⁶ https://www.herefordshire.gov.uk/media/7923553/summary_of_points_raised.pdf

⁷ <http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm150618/wmstext/150618m0001.htm>

4 How opinions of consultation bodies and the public have been taken into account

- 4.1 At each stage of the Local Plan's development, an SA Report was published alongside the Local Plan for consultation with the public and the consultation bodies specifically relating to the SEA Directive i.e. Historic England (formerly English Heritage), the Environment Agency and Natural England. Because Herefordshire borders Wales, the Welsh consultation bodies were also included in the consultations. The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies in relation the SEA have been taken into account.
- 4.2 The Local Plan consultation stages and responses received relating to the SA documents are summarised below.

SA Scoping (2007)

- 4.3 Prior to the production of the first iteration of the Local Plan (referred to at that time as the Local Development Framework (LDF) Core Strategy), a General SA Scoping Report for the LDF was produced by Herefordshire Council in June 2007. The SA Scoping Report was published for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and English Heritage (now Historic England)) as well as an extensive number of additional stakeholders (Appendix C1 in the Scoping Report lists the consultees who were invited to comment on the report). The Scoping Report was also made available online in order to enable members of the public to participate in the consultation more easily.
- 4.4 The Scoping Report provided the opportunity for consultees to comment on a number of issues, including whether the objectives in the SA framework provided a reasonable framework though which to address the likely significant effects of the LDF and whether the review of relevant plans, policies and programmes (the PPP review) and baseline information were appropriate and complete.
- 4.5 Responses to the Scoping consultation were taken into account by Herefordshire Council officers during the preparation of the SA Report for the Developing Options paper. Work was also undertaken at that stage to update the PPP review and baseline information.

Developing Options (2008-2009)

- 4.6 The June 2008 SA Report was prepared by Herefordshire Council and published for consultation alongside the Core Strategy Developing Options document between June and August 2008. That SA report appraised the plan objectives and the four overall spatial strategy options only, and an SA Addendum for the Developing Options Paper was also published in March 2008 to present the SA findings for the strategic objectives, place-shaping options and policy options included in the Developing Options Paper.
- 4.7 Responses received in relation to the Developing Options SA Report were taken into account by Herefordshire Council officers during the preparation of the SA Report for the Place Shaping Paper.

Place Shaping Paper (2010)

- 4.8 The January 2010 combined SA and Habitats Regulations Assessment (HRA) Report for the Place Shaping Paper was published for consultation alongside that document between January and March 2010. During the preparation of the SA Report for the Place Shaping Paper, SA workshops were held involving Herefordshire Council officers as well as external organisations including the Environment Agency, Natural England, English Heritage (now Historic England) and a member of

⁸ Herefordshire Council (March 2009) Core Strategy: Developing Options Paper Sustainability Appraisal Addendum

the Youth Council. The results of these separate workshops were combined and considered in the assessment of the options reported in the SA Report.

- 4.9 Comments referring to the SA report were received only from Natural England and these comments were taken into account by LUC during the next stage of SA work in relation to the Preferred Options. Natural England's consultation comments are set out in detail in Appendix 4 of the May 2014 SA report for the Pre-Submission Publication version of the Local Plan, and mainly comprised comments relating to the detail of the SA findings i.e. comments about the nature of particular effects identified in the SA. However, Natural England also noted the need to carry out SA in relation to options for the Hereford Relief Road and this was addressed during later stages of the SA process.

Preferred Options (Summer-Autumn 2010)

- 4.10 During summer-autumn 2010, the Council published separate Preferred Options Papers for the Core Strategy and SA Notes were prepared by LUC to accompany each of the Preferred Options papers, as well as a final SA Note to consider the potential cumulative sustainability effects of all the Core Strategy Preferred Options taken together.
- 4.11 A stakeholder workshop was held in Hereford on 4th August 2010 to discuss the findings of the initial appraisal for the first three Preferred Options Papers prepared (Market Towns, Rural Areas and General Policies 1st tranche). The workshop was facilitated by LUC and attended by Herefordshire Council officers from a number of internal departments, as well as representatives from the Environment Agency, Natural England, Countryside Council for Wales and Dwr Cymru Welsh Water. The workshop was an opportunity to update stakeholders on progress with the SA, discuss the emerging SA findings and for stakeholders to influence the evidence used, SA judgements and recommendations made.
- 4.12 Consultation comments in relation to the SA Notes for the Preferred Options were received from English Heritage (now Historic England) and Countryside Council for Wales (CCW). These comments are set out in detail in Appendix 4 of the May 2014 SA report for the Pre-Submission Publication version of the Local Plan and related to a wide range of issues including the overall approach to the SA, debate regarding judgements about likely effects and the objectives being used for the SA (the SA framework). The comments received were taken into account by LUC during the SA work for the Revised Preferred Options and addressed where relevant in the SA Note. In particular, the main concern from English Heritage related to how the SA findings had been assessed under six themes, rather than against the 20 individual SA objectives, and therefore insufficient consideration was given to the historic environment. CCW also disliked this approach. This concern was addressed in March 2013 SA Report for the Draft Core Strategy, with individual scores given for each of the SA objectives rather than a collated summary score for each theme, in order to allow for the varying and more specific effects of the emerging Core Strategy policies to be more clearly identified.

Revised Preferred Options (2011)

- 4.13 Following the Preferred Options consultation, the Council revised certain aspects of the preferred options for the Core Strategy and published a leaflet setting out the revised preferred options 'Help Plan the Future of Herefordshire' (September 2011) for consultation between October-November 2011. One of the reasons for this was that considerable opposition had been expressed to the overall scale of development proposed in Herefordshire through the Preferred Options. These revisions were subject to SA as they were prepared, and the SA work was presented in the Revised Preferred Options SA Note (July 2011) prepared by LUC.
- 4.14 The consultation on the Revised Preferred Options for Herefordshire generated a significant response and the highest level of comment was in relation to the proposals for Hereford. Consultation comments specifically relating to the SA were received from English Heritage, CCW, Sport England as well as a number of individuals. The comments are set out in detail in Appendix 4 of the May 2014 SA report for the Pre-Submission Publication version of the Local Plan, and again related to a wide range of factors including the overall approach to the SA, concern regarding appraisal of the Hereford relief road and individual judgements made about the likely sustainability effects of the Revised Preferred Options. Similar comments from English Heritage and CCW were made as at the Preferred Options stage summarised above. The comments were

taken into account by LUC and addressed where relevant during the preparation of the SA Report for the Draft Core Strategy.

Draft Core Strategy (2013)

- 4.15 The Draft Core Strategy was subject to SA by LUC and the SA Report (March 2013) was published for consultation alongside the Draft Core Strategy between March and April 2013.
- 4.16 The responses received are set out in detail in Appendix 4 of the May 2014 SA report for the Pre-Submission Publication version of the Local Plan and were received from Natural Resources Wales, English Heritage, Here for Hereford, Herefordshire Nature Trust and Breinton Parish Council. The consultation comments addressed a wide range of issues, including the overall approach to the SA, concern regarding appraisal of the Hereford relief road and individual judgements made about the likely sustainability effects of the Draft Core Strategy. Natural Resources Wales also provided helpful suggestions for the monitoring indicators and data sources. The comments were taken into account by LUC during the preparation of the SA report for the Pre-Submission Publication version of the Local Plan.

Pre-Submission Publication (2014)

- 4.17 The May 2014 SA Report was published for consultation alongside the Pre-Submission Publication version of the Local Plan – Core Strategy between May and July 2014. The responses received during that consultation are available on Herefordshire Council’s website and generally related to the Plan itself rather than the SA. Comments that did refer to the SA generally did so in support of a wider point relating to the Local Plan itself.

Examination (2014 -2015)

- 4.18 The Inspector’s Matters and Issues for the Examination in Public hearing sessions included one main question relating to the Sustainability Appraisal. The Inspector posed the following question under General Matters:
- Has the Core Strategy been the subject of suitably comprehensive and satisfactory Sustainability Appraisal and if not, what else needs to be done?
- 4.19 Representors to the Local Plan – Core Strategy submitted Statements to the Examination prior to the hearing sessions, a number of which referred to the Sustainability Appraisal both in terms of potential flaws in the way it was undertaken or its findings, or to support their objections to the Plan. The Inspector did not request any additional or supplementary work on the SA to be carried out as a result of discussions during the Examination hearing sessions for the Local Plan – Core Strategy.

Main Modifications (2015)

- 4.20 The April 2015 SA and HRA Addendum for the Local Plan – Core Strategy was published for consultation alongside the Main Modifications in spring 2015. Only one representor made specific comments relating to the SA and HRA Addendum, which expressed concern that proper guidelines had not been followed, disagreement with the SA conclusions, and concern regarding the proposed monitoring indicators. The Council’s response to this representation stated that *"The SA and HRA have been prepared in line with government guidance and regulations and are the result of a rigorous and thorough process at all stages of the plan making. They have been carried out by independent consultants who have specialist expertise in this field. The SA/HRA of the Main Modifications documents are not considered flawed and the indicators are considered to be clear and robust. The consultants reached their conclusions based on the required evidence."*
- 4.21 A final SA and HRA Addendum was prepared in August 2015 in relation to the Council’s additional proposed change to policy SD2: Renewable and Low Carbon Energy and the supporting text to that policy, which was prepared in response to the Ministerial Statement on wind energy that was issued on the 18th June 2015. None of the representations received during the additional Main Modifications consultation referred specifically to the SA.
- 4.22 Consultation responses received in relation to the Main Modifications consultation were also taken into account by the Inspector and informed the preparation of a number of amendments and additions to the detailed wording of the Main Modifications. However, the Inspector’s Report

stated that "There is nothing to suggest that the SA was undertaken other than in accordance with the Regulations. The conclusion of the SA, up to and including the Main Modifications, is that the Core Strategy is robust in terms of its sustainability. Its policies provide certainty and clarity...the Core Strategy has been subject to an adequate Sustainability Appraisal."

5 Why the adopted Local Plan – Core Strategy was chosen in light of reasonable alternatives

5.1 The options or reasonable alternatives considered during the development of Herefordshire’s Local Plan - Core Strategy included the overall spatial strategy for the county, potential strategic areas for new housing and employment development within Hereford and the market towns, strategic transport infrastructure, and alternative policy approaches for the strategic policies and general development management policies. There have been a number of stages in developing, appraising and refining the plan options, as described in Chapter 2 of the 2014 SA Report for the Pre-Submission Local Plan. Appendix 2 of the 2014 SA Report sets out in more detail the audit trail of the reasonable alternatives considered and discounted by Herefordshire Council for each policy area in the Local Plan - Core Strategy between the early Developing Options stage in 2008 up to the Draft Core Strategy consulted upon in March 2013, along with a summary of how the alternatives were subject to SA, where this is recorded and a summary of the SA findings at each stage. Appendix 3 then shows the audit trail of changes made to the policies and supporting text between the March 2013 Draft Core Strategy and the Pre-Submission Local Plan – Core Strategy (May 2014).

Developing Options Paper (June 2008)

5.2 The Developing Options Paper included a proposed Vision and ten Strategic Objectives for the Core Strategy (which later became the Local Plan – Core Strategy), and asked for comments on whether they were appropriate. It was working within the context of the higher housing requirements for Herefordshire being proposed at the time in the West Midlands Regional Spatial Strategy (January 2008 Phase 2 Revisions Preferred Option) of 16,600 (830 per annum) net new homes to be built between 2006 and 2026, half of which (i.e. 8,300) would be targeted in Hereford. There were also targets for employment land of 111 hectares with a rolling five year reservoir of 37 hectares.

5.3 Following the Vision and Strategic Objectives, the Developing Options Paper then set out a series of options to help achieve this level of growth for Herefordshire covering:

- The **Spatial Strategy** (four options A – D for whether to focus the direction of new growth on the economy, society, environment or a new or expanded settlement respectively).
- **Shaping our Place:**
 - Options for **Hereford’s** role, direction for growth, type of employment, improvements to the city centre, range of shops, new transport infrastructure (including an outer distributor road to the east or west of the city).
 - Options for the role of the **Market Towns**, directions for growth at Bromyard, Kington, Ledbury, Leominster, Ross-on-Wye, and how to protect shops in the Market Towns.
 - Options for balancing growth between the Market Towns and **Rural Areas**, whether development in Rural Areas should be limited to brownfield land within settlements or enabled on greenfield land, how to encourage diversification of the rural economy, and how to protect rural facilities.
- **Policy areas**, options for each of the following:
 - Renewable energy usage
 - Waste management
 - Minerals usage
 - Development in flood risk areas
 - Water usage and quality
 - Design and sustainable construction
 - Provision of employment sites

- Protection of existing employment land
- Improving the skills base
- Tourism and culture
- Affordable housing
- Settlement boundaries
- Housing density
- Type and mix of housing
- Needs of gypsies and travellers
- Health care provision
- Open space provision
- Green space protection and enhancement
- Locally distinctive features and assets protection and enhancement
- Finally, a list of actions was also presented for how Herefordshire Council proposed to deliver the land required to meet the Core Strategy policies.

5.4 The SA Report for the Developing Options Paper (June 2008), appraised the plan objectives and the four overall spatial strategy options only. The SA found that overall each of the four options would be 'moving towards sustainability', although there were differences between the extent of their social, economic and environmental impacts, but no one option was identified as being the most sustainable. The SA Report also made some recommendations about issues that should be considered by plan-writers if each option were taken forward into the Core Strategy.

5.5 An SA Addendum for the Developing Options Paper was also published in (March 2009), which described the findings of the SA of the Strategic Objectives, Place-Shaping Options and Policy Options included in the Developing Options Paper. All comments from the SA were forwarded to the Plan writers who integrated the recommendations into the emerging plan policy approaches, along with the consultation responses and currently available evidence base when developing the Place Shaping version of the Core Strategy.

Place Shaping Paper (January 2010)

5.6 Between the Developing Options stage in 2008 and the Place Shaping stage in January 2010, the Panel Report for the West Midlands Regional Spatial Strategy (RSS) Examination was published with a recommendation for further increasing the housing target for Herefordshire from 16,600 to 18,000 dwellings to address issues of rural affordable housing. This new amount was incorporated into the overall housing target in the Place Shaping Paper (given the then requirement for the development plan to accord with the RSS), by considering an increase of 1,200 in the number of houses to be delivered in the rural areas and a further 200 at Hereford.

5.7 The Place Shaping Paper included an expanded Vision and 12 (rather than ten) Strategic Objectives. It then set out refined options from the Developing Options Paper (and some additional alternatives) for the following topics:

- **Spatial Strategy** (a preferred strategy based on a combination of elements from Options A, B and C as set out in the Developing Options Paper (June 2008). Option D was not taken forward).
- **Place-Shaping Options:**
 - **Hereford** (four refined urban expansion options all including a relief road along an eastern or western corridor (north west focus, south west focus, north-south focus, or dispersed), plus three options for an increasing range of sustainable transport provision in combination with the relief road). The no-road option was discounted at this stage in consideration of the housing options because the scale of development proposed for Hereford would cause significant additional traffic congestion if there were no substantial improvements to the city's transport infrastructure. Analysis of the impacts of the no-road scenario against the proposed development options indicated a significant detrimental effect on the operation of Hereford's highway network with many junctions forecast to be operating beyond their capacity, reduced journey speeds and delays commonplace.
 - **Bromyard** (three refined urban expansion options).

- **Kington** (no new options put forward, as any further development for Kington was to be identified within the Market Towns and Rural Areas Plan (MTRAP)).
- **Ledbury** (two refined urban expansion options).
- **Leominster** (only one refined option taken forward).
- **Ross-on-Wye** (two refined urban expansion options).
- **Rural Areas** (preferred approach of defining Rural Service Centres/Hubs and lists the Tier 1 settlements (rural service centres and hubs) within the county and gives a definition of Tier 2 settlements (local centres), plus two options for development in the local centres, preferred approach for development in areas outside of Tiers 1 and 2).
- **General core policies** under the following themes (some included just one preferred policy approach from the Developing Options stage, others included refined versions of the options from the Developing Options stage):
 - Enabling sustainable communities
 - Renewable energy/energy efficiency
 - Managing flood risk
 - Water resources
 - Local distinctiveness
 - Design
 - Movement in Herefordshire
 - Rural services and facilities
 - Infrastructure delivery
 - Minerals and waste
 - Waste
 - Minerals
 - Diversifying and strengthening the local economy
 - Maintaining supply
 - Employment land provision
 - Education and skills
 - Tourism, culture and leisure
 - Providing new homes
 - Density
 - Type and mix
 - Affordable housing
 - Gypsies and Travellers
 - Open space, sport and recreation
 - Ensuring better health and wellbeing
 - Green infrastructure
 - Health
- Implementation and monitoring

5.8 The SA Report for the Place Shaping Paper assessed the overall spatial strategy, most of the place-shaping options and most of the core policy options, however, some of the options were not assessed at this SA stage (including the Kington options, transport options for Hereford and policy options relating to flood risk, design, waste, infrastructure delivery, tourism, culture and leisure, type and mix, open space, sport and recreation, green infrastructure. This was generally because no significant changes to the options were made since the Developing Options Paper, and therefore the SA findings in the SA Report (June 2008) and SA Addendum (March 2009) for the Developing Options were still valid.

5.9 Recommendations for mitigation and enhancement proposals relating to the Place Shaping options were presented in Section 7 of the 2010 SA Report. These recommendations, as well as

the sustainability strengths and weaknesses, were taken into account by the Council when developing the Preferred Options for the Core Strategy.

Preferred Options (Summer-Autumn 2010)

- 5.10 Herefordshire Council decided to carry out a 'portfolio approach' to consulting on Preferred Options that had not been considered and consulted upon previously at Place Shaping stage (i.e. those elements of the Place Shaping Paper where options were still being considered, rather than a single preferred policy approach). The overall level of growth for Herefordshire set out in the Place Shaping Paper was not proposed to change. During summer-autumn 2010, the Council published separate Preferred Options Papers for the Core Strategy as follows:
- **Preferred Options: Hereford paper**, included (based on the fourth 'dispersed' option from the Place-Shaping Paper):
 - H1: Hereford City Centre Policy
 - H2: Hereford Movement Policy (including the Hereford relief road)
 - H3: Growth Distribution Policy
 - H4: Northern Expansion Policy
 - H5: Western Expansion Policy
 - H6: Southern Expansion Policy
 - **Preferred Options: Market Towns (Bromyard, Ledbury, Ross-on-Wye)** paper, included:
 - One preferred 'spatial option' (or policy approach) for Bromyard, Ledbury, Ross-on-Wye (Leominster was set out as a Preferred Option at Place Shaping stage)
 - **Preferred Options: Rural Areas** paper, included preferred policy approaches on:
 - RA.1: Housing Allocation
 - RA.2: Rural Service Centres / Hubs
 - RA.3: Other Settlements Outside of the RSCs and Hubs
 - RA.4: Open Countryside
 - RA.5: Rural Economy
 - **Preferred Options: General Policies** paper, included policies relating to:
 - The Natural and Historic Environment
 - Green Infrastructure
 - Open Space, Sport and Recreation
 - Affordable Housing
 - Gypsy and Traveller Sites
 - Social and Community Infrastructure
 - Employment
 - Movement
 - Waste
 - Minerals
 - **Preferred Options: General Policies 2nd Tranche** paper, including policies relating to:
 - The Economy
 - Sustainable Strategic Design
 - Sustainable Water Management
 - Renewable Energy
 - Infrastructure Contributions
- 5.11 LUC prepared six SA Notes to accompany each of the Preferred Options papers, rather than a full SA Report at this stage. For each Preferred Options Paper, the appraisal was initially carried out for the draft policy preferred options prepared by the Council and recommendations for improvements were set out in appraisal matrices and sent to the Council. The Council then produced a finalised set of policy preferred options, which had been amended in light of the SA recommendations made.

Revised Preferred Options (September 2011)

- 5.12 The outcomes of the Preferred Options consultation undertaken in summer-autumn 2010 indicated that there was considerable opposition to the scale of housing development proposed in Herefordshire. As a result of this, new evidence (in particular the Government's Household Projections) and various other factors (such as the impact of the recession, and the need to extend or re-base the plan period), the Council revised certain aspects of the preferred options for the Core Strategy, and published a leaflet setting out the revised preferred options 'Help Plan the Future of Herefordshire' (September 2011) for consultation between October-November 2011. The changes that were made to the Core Strategy preferred options as a result of these factors are summarised below:
- The plan would cover the period 2011-2031 instead of 2006-2026.
 - The housing target for the county as a whole over the plan period was reduced from 18,000 to 16,500.
 - The housing allocation for Hereford was reduced by 2,000 dwellings, mainly through the reduced housing allocation for the Holmer West urban extension and the removal of the housing allocation for Whitecross.
 - The retail floorspace requirement for Hereford was increased from 40,000sqm to 46,000sqm.
 - The employment site allocation at Holmer East was removed.
 - The proposed new 420 place primary school at Whitecross would now be provided at the Three Elms site instead, and the existing school facilities at Holmer West would be improved instead of providing a new school there.
 - The preferred option for the Hereford relief road remained broadly as set out in the 2010 preferred option, for a western route. However, minor amendments were made to the route corridor (between the A465 Abergavenny and A49 Ross roads) to avoid residential properties and lessen landscape impacts.
 - The housing distribution in the rural areas increased by 800.
 - The allocations for the market towns were retained as similar to the 2010 preferred options, although the housing requirement for Ross-on-Wye decreased slightly, from 1,000 to 900 new homes over the plan period, and the housing allocation for Leominster was reduced by 200. There was also a new allocation for 5ha of employment land at Leominster's urban extension.
- 5.13 In deciding the revisions to individual elements of the Core Strategy preferred options, the Council also considered and discounted alternative approaches to the revisions and the overall spatial strategy, which LUC appraised, but none were found to be more sustainable than the changes the Council was proposing.
- 5.14 The proposed revisions to the Core Strategy were subject to SA as they were prepared, and the SA work was presented in the Revised Preferred Options SA Note (July 2011) prepared by LUC. The revisions that were proposed in the 2011 Revised Preferred Options generally only affected one or two elements of each policy, therefore a lot of the SA findings remained unchanged from the 2010 Preferred Options SA Notes.
- 5.15 Most of the revisions to the preferred options related to revised housing allocations. Although the overall housing allocation for Herefordshire had been reduced from 18,000 to 16,500, it was considered that this would be adequate to meet housing need in the county up to 2031 based on the evidence available (including Government housing projections and the draft Herefordshire housing needs study⁹), and therefore the SA scores relating to housing provision (SA objective 11) remained positive on that basis. Where potential environmental effects were identified through the SA as a result of the housing allocations, these remained unchanged as the reduced allocations were not considered likely to reduce the potential for these effects to such an extent that the SA scores would change.
- 5.16 An updated assessment of the cumulative impacts of the Revised Preferred Options considered all together was also set out in the SA Note (July 2011). However, because only a few changes to

⁹ GL Hearn (June 2011) DRAFT Local Housing Requirements Study for Herefordshire Council.

the SA scores were made as a result of the 2011 revisions to the preferred options, which affected relatively few of the policies, the overall cumulative impacts of the 2011 Revised Preferred Options for the Core Strategy were broadly very similar to the 2010 Preferred Options. The only specific recommendation made was that a specific target for affordable housing be included in any further revised policy for Leominster, as it was unclear in the Revised Preferred Option leaflet what the percentage of affordable housing would be.

Draft Core Strategy (March 2013)

- 5.17 Since the Revised Preferred Options consultation in 2011, the NPPF was published, and the Localism Act had introduced the intention to revoke the West Midlands Regional Spatial Strategy, as well as introducing the Neighbourhood Planning agenda, all of which had implications for the Herefordshire Core Strategy by changing the prevailing policy context for the plan and refining the policies for the rural areas, having considered the alternatives of no change or unrestricted development. In addition, further technical studies to inform the evidence base had been undertaken. In particular, further transport assessment studies were commissioned to assess the environmental and amenity issues associated with the southern corridor of the proposed relief road for Hereford. The demographic implications of providing 16,500 additional homes in the County by 2031 were examined and confirmed that this would result in an increase in the population of working age. The Strategic Housing Land Availability Report was also updated, and coupled with production of the 2011 Annual Monitoring Report, confirmed the absence of a five year housing supply within the county.
- 5.18 Therefore, Herefordshire Council decided to update proposals for the Herefordshire Core Strategy into a full Draft Core Strategy and make it available for a further round of consultation prior to Submission of the plan to the Secretary of State.
- 5.19 The Draft Core Strategy still contained a Vision and 12 Strategic Objectives, and still made provision for 16,500 homes in the plan period to 2031. The policies in the final version of the Draft Core Strategy (March 2013) were as follows:
- **Spatial Strategy** – including six overarching policies covering sustainable development, housing distribution, release of land for residential development, movement and transportation, employment provision and climate change.
 - **Place-Shaping Options:**
 - **Hereford** – including six policies covering development in the city centre, northern, western and southern expansion, movement (including the relief road) and employment provision.
 - **Bromyard** – including two policies for development in and around Bromyard, including strategic allocation sites for housing and employment.
 - **Leominster** – including two policies for development in and around Leominster, including strategic allocation sites for housing and employment.
 - **Ledbury** – including two policies for development in and around Ledbury, including strategic allocation sites for housing and employment.
 - **Ross-on-Wye** – including two policies for development in and around Ross-on-Wye, including strategic allocation sites for housing and employment.
 - **Kington** – including one policy for an amount of development at Kington, but no strategic sites were allocated.
 - **Rural Areas** – including six policies covering the rural strategy for development in the rural areas, within and outside of the villages, criteria for agricultural, forestry and rural enterprise dwellings, as well as re-use of rural buildings, and the rural economy.
 - **General policies** under the following themes:
 - **Social Progress**
 - Housing
 - Social and community facilities

- Open space, sport and recreation
- Traffic management

Economic Prosperity

- Employment
- Tourism
- Retail

Environmental Quality

- Local distinctiveness
- Sustainable design
- Natural resources: Minerals
- Waste
- Implementation and monitoring – includes a policy on Infrastructure Delivery

5.20 The Draft Core Strategy (March 2013) was provided to LUC in an early draft form for appraisal, and the findings of the draft version of the SA report were considered by the Council when finalising the Draft Core Strategy ready for consultation. A number of recommendations were made in the draft version of the SA report in relation to strengthening the policies for Bromyard and Leominster, in order to help to mitigate potentially negative sustainability effects identified at that stage, and these were addressed by the Council as it finalised the Draft Core Strategy for public consultation.

Pre-Submission Publication of the Local Plan Core Strategy (May 2014)

- 5.21 The main changes from the Draft Core Strategy March 2013 included in the Pre-Submission version of the Local Plan Core Strategy (May 2014) were the inclusion of a new overarching strategic policy on Environmental Quality and Local Distinctiveness (SS6, replacing General Policy LD1 of the Draft Core Strategy), a new overarching policy for Hereford (HD1: Hereford), and the removal of the employment site at Bromyard (south of the A44 Leominster Road) as a “strategic” site. In addition, the employment land allocation at Ledbury increased from 12ha to 15ha. Finally, references to contributing to the Government’s zero carbon building policy were removed from relevant policies due to the March 2014 Government changes to the Building Regulations.
- 5.22 The SA Report was fully updated in May 2014 to reflect the changes made to the Local Plan - Core Strategy since the March 2013 Draft version.

Post-Submission Main Modifications (March 2015)

- 5.23 The Herefordshire Local Plan - Core Strategy was submitted to the Secretary of State for examination in September 2014 and hearing sessions were held in February 2015. Following the hearings, the Council proposed a schedule of proposed Main Modifications to the Plan, which addressed issues that had been raised during the hearings and sought to make the Plan sound.
- 5.24 Modifications were defined as “Main” where they would involve a change to a policy or other text of the Core Strategy which would impact upon the implementation of a policy. Many of the Modifications made minor changes to wording in order to clarify or update the plan. No new policies were introduced into the Local Plan - Core Strategy through the Main Modifications, but one new strategic objective was introduced, which related to supporting the rural economy, in particular agriculture. However, there are some elements of the Main Modifications which proposed more significant changes, these included:
- The deletion of the minerals and waste policies and supporting text (Policies M1-6/W1-5) together with consequential modifications at other relevant sections of the plan and the commitment to future preparation of a separate minerals and waste plan.
 - Revisions to the delivery of housing growth and its links with infrastructure particularly Policy SS3 and supporting text.
 - Revisions to rural development policies RA1 to RA6 and supporting text.

- Revisions to Policy H1 upon affordable housing policies to reflect recent changes in national policy guidance.

- 5.25 The SA Addendum (April 2015) set out the findings of the proposed Main Modifications to the Local Plan, summarised as follows.
- 5.26 The most significant change to the Local Plan Core Strategy resulting from the Main Modifications would be the deletion of the minerals and waste policies from the plan, reflecting the intention to instead prepare a separate minerals and waste plan. Policies M1-6 and W1-5 would all be deleted; therefore the effects of those policies as identified in the May 2014 SA Report would no longer occur as a result of the Local Plan Core Strategy. A new SA process will need to be undertaken for the separate Minerals and Waste Local Plan as it is prepared, therefore the potential effects will be considered as part of that plan's preparation.
- 5.27 Most of the proposed Main Modifications involve amendments to policy wording. In most cases the Main Modifications resulted in the SA findings for the policies becoming more positive – in six cases, previously minor positive effects were expected to become significant positive effects, generally due to more stringent measures being incorporated into the policies. None of the Main Modifications would result in any new significant negative effects on the SA objectives, although for policy SS3, a previously mixed (minor positive and minor negative) effect (SA objective 14) would be minor negative only, and a previously minor positive effect (SA objective 12) was likely to be minor negative – this is because the policy previously referred to priority being given to the development of brownfield sites; however the revised version of the policy does not.
- 5.28 The very few changes that were identified to the SA scores as a result of the proposed Main Modifications did not affect the overall likely cumulative effects of the plan identified in the May 2014 SA Report.

Main Modification Addendum consultation on wind energy

- 5.29 Subsequent to the consultation on the Main Modifications, Herefordshire Council prepared an additional proposed change to the Local Plan - Core Strategy. This proposed change related to policy SD2: Renewable and Low Carbon Energy and the supporting text to that policy. The purpose of the additional proposed change was to make the Local Plan - Core Strategy 'sound' taking into account the Ministerial Statement that was issued on the 18th June 2015¹⁰.
- 5.30 A further SA Addendum was prepared, which found that the changes to the policy reflect national policy with regards to wind energy and do not affect the SA findings. The fact that planning impacts must be addressed before planning permission will be granted for wind energy developments may provide some mitigation for the potential negative impacts of the policy identified in the May 2014 SA Report, including in relation to SA objectives 15: landscape and 20: biodiversity. As wind energy developments will also need the backing of the local community before permission can be granted, this should help to achieve the minor positive effects already identified in the May 2014 SA Report for SA objective 11 (Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments). Should any areas or sites for wind energy be identified through the Rural Areas Site Allocation Development Plan Document and/or Neighbourhood Development Plans, they will be subject to SA and SEA as part of the preparation of those plans. Again, there would be no change to the overall cumulative effects of the Local Plan Core Strategy, as described in the April 2015 SA Addendum.

Local Plan Adoption (2015)

- 5.31 The Inspector's Report published 29th September 2015 concluded that the Herefordshire Local Plan – Core Strategy provides an appropriate basis for the planning of the County to 2031, providing a number of modifications are made. All of the modifications were proposed by the Council, but where necessary for soundness, the Inspector amended and/or deleted wording where required. The Inspector recommended the inclusion of the modifications after considering all the representations from all other parties on these issues.
- 5.32 The Main Modifications recommended by the Inspector are summarised as follows:

¹⁰ <http://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm150618/wmstext/150618m0001.htm>

- Removal of waste and minerals policies and associated explanatory text and add information about the preparation of a waste and minerals plan.
- Replacement policy and new appendices addressing the relationship between critical infrastructure, delivery and monitoring.
- Revised housing trajectory to provide more detail and up-to-date figures to assist with monitoring.
- Modifications to numerous policies to ensure that they are not restrictive/prescriptive or to provide clarity/flexibility.
- Changes to wind power development and housing standards policies to reflect recent written ministerial statements from the Secretary of State for Communities and Local Government.
- Changes to retail and affordable housing thresholds.
- Modifications to clarify the roles of neighbourhood plans and other development plan documents.
- Changes to numerous policies to update the wording to be consistent with national policy contained in the National Planning Policy Framework.

5.33 The Inspector notes at paragraphs 4 and 8 of her Report:

"The Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed main modifications and carried out sustainability appraisal where necessary and this schedule has been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made amendments and some additions to the detailed wording of the main modifications. None of these amendments significantly alters the content of the modifications as published for consultation such that they undermine the participatory processes and sustainability appraisal that has been undertaken..."

The Core Strategy has been subject to Sustainability Assessment (SA)[A4] throughout its preparation up to the time of the Hearing. In addition the Main Modifications were subject to a further Addendum SA. The Council's evidence base demonstrates that different options and alternatives have been addressed at all of the relevant stages. The SA identifies the process, including the final submission SA (and the subsequent addendum April 2015 relating to the main modifications). At each stage of its development the emerging Core Strategy policies were assessed against SA objectives, and consideration was given as to whether and how the policies would further the objectives. The SA was subject to consultation in the same way as the Core Strategy. There is nothing to suggest that the SA was undertaken other than in accordance with the Regulations. The conclusion of the SA, up to and including the Main Modifications, is that the Core Strategy is robust in terms of its sustainability. Its policies provide certainty and clarity. Taking all of the above matters together, the Core Strategy has been subject to an adequate Sustainability Appraisal."

5.34 Herefordshire Council has incorporated all of the modifications set out in the Inspector's Report into the Adopted version of the Herefordshire Local Plan Core Strategy 2011-2031, October 2015.

6 How will the environmental and sustainability effects of the Local Plan – Core Strategy be monitored?

- 6.1 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*" (Regulation 17), and that the environmental report should provide information on "*a description of the measures envisaged concerning monitoring*" (Schedule 2).
- 6.2 The Government's latest SA Guidance in the National Planning Practice Guidance¹¹ states that details of the proposals for monitoring the significant effects of implementing the adopted local plan should be included in the Sustainability Appraisal report, or the post-adoption statement (i.e. this document).
- 6.3 No significant negative effects were identified for the Herefordshire Local Plan – Core Strategy. The monitoring measures proposed in Chapter 5 of the May 2014 SA Report therefore focus on the predicted minor negative effects only (including mixed effects where some minor effects are predicted for some policies as well as positive effects), relating to a number of the strategic and development management policies in the Local Plan - Core Strategy. Therefore, it is recommended that monitoring is undertaken to determine whether these effects do indeed occur due to implementation of the Local Plan - Core Strategy, and in order to seek to remedy or reverse them.
- 6.4 The May 2014 SA Report included a proposed monitoring framework for monitoring the likely significant effects of the Local Plan (Table 5.1 in the SA Report). This presented proposed monitoring indicators in relation to the SA objectives for which likely minor negative effects were identified in the SA. Note that the indicators proposed were drawn from the indicators proposed in the Local Plan – Core Strategy in relation to monitoring implementation of the policies themselves that must be undertaken by Herefordshire Council.
- 6.5 A number of likely significant positive effects were also identified as a result of the Main Modifications in the April 2015 SA Addendum, most of which relate to SA objectives for which monitoring indicators were already proposed. However, no likely significant effects on SA objectives 6: recreational, cultural and leisure facilities or 8: education had previously been identified. Therefore, indicators relating to those SA objectives were added to the SA monitoring framework, as shown Table 6.1, with the additional indicators shown in **bold**. Only a few indicators have been suggested where the data used for monitoring in many cases will be provided by outside bodies (and these sources have been shown in brackets for the relevant indicators).

Table 6.1 Proposed monitoring indicators for monitoring the effects of the Herefordshire Local Plan on the SA objectives

| SA objectives for which potential significant effects have been identified | Policies that are likely to lead to minor negative effects | Proposed indicators |
|--|--|--|
| Education and Employment | | |
| 1. Support, maintain or enhance the provision of high quality, local or easily | <u>Place-shaping policies</u> RA4, RA5 <u>General Policies</u> | <ul style="list-style-type: none"> Amount of new employment development occurring in rural areas No. of conversions of upper floors of |

¹¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

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| accessible employment opportunities, suited to the changing needs of the local workforce. | E6 | retail and commercial premises to residential and office use |
| 2. Secure a more adaptable and higher skilled workforce. | <u>Place-shaping policies</u> RA4 | <ul style="list-style-type: none"> • Employment land floor space by type and location • Employment and income levels against regional and national levels |
| 3. Maintain or enhance conditions that enable a sustainable economy and continued investment. | <u>General Policies</u> E6 | <ul style="list-style-type: none"> • No. of conversions of upper floors of retail and commercial premises to residential and office use • No. of vacant units in town centres |
| 7. Sustainable Regeneration | <u>Place-shaping policies</u> RA4, RA5 | <ul style="list-style-type: none"> • Amount of employment in rural areas • Employment land floor space by type and location • No. of live-work units granted permission |
| 8: Raise educational achievements throughout the County | N/A | <ul style="list-style-type: none"> • Number of new work-based apprenticeships offered in the County annually. • Percentage of pupils achieving 5+ A*-C GCSEs (or equivalent) including English and maths. • Education levels of working age residents • Percentage of 16-19 year olds not in education or training. |
| Healthy and Prosperous Communities | | |
| 5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all. | <u>The Spatial Strategy</u> SS4 <u>General Policies</u> E3, M4, M5, W1, ID1 | <ul style="list-style-type: none"> • Life expectancy of residents (ONS) • Number of planning applications proposing the loss of an open space, sports or recreation facilities • Number of planning applications proposing new open space, sports and recreation facilities |
| 9: Reduce and prevent crime/fear of crime and antisocial behaviour in the County | N/A | <ul style="list-style-type: none"> • Number of crimes reported annually in the County. |
| 10. Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas in the county and the rest of the county. | <u>Place-shaping policies</u> LB1 | <ul style="list-style-type: none"> • Census information for Ledbury specifically re: deprivation |
| Transport and Access | | |
| 4. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking. | <u>The Spatial Strategy</u> Objectives 7, 8 and 9; SS2, SS4, SS5 <u>Place-shaping policies</u> HD2, HD3, HD4, HD5, HD6, BY2, LO1, LO2, LB2, RA2, RA4 <u>General Policies</u> H2, OS2, E1, E4, E5, ID1 | <ul style="list-style-type: none"> • Transport patronage by mode • Total CO₂ per capita from transport sector |
| Built Environment | | |
| 11. Provide everyone with the opportunity to live in | <u>Place-shaping policies</u> RA3, RA4, RA5 | <ul style="list-style-type: none"> • Housing completions by type and tenure and location – assessed in |

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| good quality, affordable housing of the right type and tenure, in clean, safe and pleasant local environments. | <u>General Policies</u> W5 | relation to 5 year tranches in order to ensure that there remains a flexible supply of available and deliverable land for housing across the county; <ul style="list-style-type: none"> Housing densities in urban and rural areas |
| 19. Ensure integrated, efficient and balanced land use. | <u>The Spatial Strategy</u> Objectives 7 and 8 <u>Place-shaping policies</u> HD1, HD3, HD4, HD5, HD6, LO1, LO2, LB2, RW1, RW2, RA1, RA3 | <ul style="list-style-type: none"> The percentage of all new development completed on previously developed land Housing densities in urban and rural areas Loss of open space New employment development in rural areas |
| 20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage. | <u>Place-shaping policies</u> HD4, HD5, HD6, LO2 <u>General Policies</u> W1 | <ul style="list-style-type: none"> Number and percentage of Listed Buildings and Scheduled Ancient Monuments on Buildings at Risk Register (English Heritage) No of planning permissions granted contrary to the advice of statutory agencies e.g. English Heritage |
| Resource Consumption and Climate Change | | |
| 12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling. | <u>The Spatial Strategy</u> Objectives 1, 7, 8 and 9; SS2, SS3, SS5 <u>General Policies</u> E1 | <ul style="list-style-type: none"> Total Local Authority collected waste arisings per annum |
| 14. Use natural resources and energy more efficiently. | <u>The Spatial Strategy</u> Objectives 7 and 8; SS2, SS3, SS4, SS5 <u>Place-shaping policies</u> HD3, RA1 <u>General Policies</u> SC1, E1, E4, E5, M1, M2, M3, M4, ID1 | <ul style="list-style-type: none"> The production of secondary (reused and recycled) aggregates. Comparison of production figures with national and sub-national apportionments. |
| 16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem. | <u>The Spatial Strategy</u> Objectives 7, 8 and 9; SS2, SS3, SS4, SS5 <u>Place-shaping policies</u> HD2, HD3, HD5, HD6, BY2, LO2, RA1, RA2, RA3, RA4 <u>General Policies</u> SC1, E1, E4, E5, M3, ID1 | <ul style="list-style-type: none"> Transport patronage by mode. Number of decentralised energy schemes granted permission. Total CO₂ emissions per capita (DECC). |
| Natural Environment | | |
| 13. Value, maintain, restore and expand county biodiversity. | <u>The Spatial Strategy</u> Objective 9, SS4 <u>Place-shaping policies</u> HD1, HD4, HD5, HD6, BY1, BY2, LO1, LO2, LB1, LB2, RW1, RW2, RA1, RA2, RA3, RA6 <u>General Policies</u> M1, M3, M4, M5, W1 | <ul style="list-style-type: none"> Number of SSSIs and other designated sites with unfavourable condition status (Natural England and Natural Resources Wales). After use of mineral sites especially wildlife habitat creation. Phosphate levels within the River Wye SAC and adjoining tributaries that receive increased phosphates from Core Strategy growth. Completed development that has resulted in the loss or creation/restoration of BAP habitats. |

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| <p>15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.</p> | <p><u>The Spatial Strategy</u> Objective 9; SS4 <u>Place-shaping policies</u> HD1, HD3, HD4, HD5, HD6, BY2, LO2, LB1, RA1, RA2 <u>General Policies</u> SD2, M1, M3, M4, M5, W1</p> | <ul style="list-style-type: none"> • Percentage of all new development on previously developed land • Housing densities in urban and rural areas |
| <p>17. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.</p> | <p><u>Place-shaping policies</u> HD1, HD4, HD5, HD6, LB2</p> | <ul style="list-style-type: none"> • Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds. (EA and HC). |
| <p>18. Minimise local and global pollution and protect or enhance environmental resources.</p> | <p><u>The Spatial Strategy</u> Objective 8, SS3, SS4 <u>Place-shaping policies</u> HD1, HD2, HD3, HD4, HD5, HD6, BY2, LO1, LO2, RW1, RA3 <u>General Policies</u> W1, ID1</p> | <ul style="list-style-type: none"> • Percentage of river length assessed as good biological or chemical quality (EA). • Phosphate levels in River Wye SAC |

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October 2015