

## 2. CHARACTERISTICS AND KEY ISSUES

### 2.1 INTRODUCTION - PARAGRAPHS 2.1.1 TO 2.1.2

#### Objection

P830/2143

Herefordshire Friends of the Earth

#### Summary of Objection / Issues

- Poor accessibility should be considered as contributing positively to sustainability, encouraging reliance on local and renewable resources and protecting Herefordshire against transport-intensive development. (830)
- Objection is raised to discussion of the characteristics and key issues in the county in the absence of a discussion of sustainable development. (830)

#### Inspector's Reasoning and Conclusions

##### *Accessibility - 830*

2.1.1 In describing the key issues to be addressed in the UDP, the Council says that it has sought to avoid making value judgments. Whilst some value judgment is inherent in the selection of issues, I accept that the Council has presented these in a broadly neutral way. Commentators on the Plan will have different views as to whether remoteness and dependence on traditional patterns of land use represents a strength or a weakness. This is recognised in Paragraph 3.3.9 of the Revised Deposit Draft.

##### *Sustainability - 830*

2.1.2 The Council has introduced substantial changes to Paragraphs 3.3.3 to 3.3.11 in the Revised Deposit Draft which explain that progression towards more sustainable forms of development underlies the UDP vision. Paragraph 2.3.5 has been changed to emphasise the need to ensure that environmental sustainability criteria are built into all policies. I consider that, read as a whole, the Plan gives a high degree of emphasis to issues of environmental protection and sustainability.

#### RECOMMENDATION

2.1/1 Do not make any modification in response to the objection.

## 2.2 HEREFORDSHIRE'S CHARACTERISTICS AND QUALITIES - PARAGRAPHS 2.2.1 TO 2.2.25

### Objections

P602/1314	Herefordshire Nature Trust
P635/1444	Campaign to Protect Rural England
P1071/3249	English Nature (Conditionally Withdrawn)
P1071/3251	English Nature
P1071/3253	English Nature (Conditionally Withdrawn)
P1071/3254	English Nature (Conditionally Withdrawn)
P1082/4378	Mr R L Evans

### Summary of Objections / Issues

- Insufficient emphasis is given to the importance of biodiversity and nature conservation features within the county. The claim that Herefordshire was historically dependant on the River Wye for communications is unsupported. (602, 1071)
- It is not clear from Chapter 2 whether Herefordshire's rurality and reliance on renewable resources are considered to be strengths or weaknesses. (635)
- Herefordshire has no affinity with the West Midlands. (1082)

### Inspector's Reasoning and Conclusions

#### *Biodiversity - 602, 1071*

2.2.1 In response to these objections, the Council has made changes to Paragraphs 2.2.3, 2.2.5 and 2.2.6 in the Revised Deposit Draft to include reference to biodiversity and more detail on communications. In my view, these changes are sufficient to address the concerns of the objectors.

#### *Strengths and weaknesses - 635*

2.2.2 In describing the key issues to be addressed in the UDP, the Council says that it has sought to avoid making value judgments. Whilst some value judgment is inherent in the selection of issues, I accept that the Council has presented these in a broadly neutral way. Commentators on the Plan will have different views as to whether remoteness and dependence on traditional patterns of land use represents a strength or a weakness. This is recognised in Paragraph 3.3.9 of the Revised Deposit Draft.

2.2.3 In my view, Paragraphs 2.2.12 to 2.2.17 address economic concerns which are widely acknowledged. The potential contribution which organic and sustainable agriculture can make to rural employment and regeneration is recognised in Paragraph 2.2.15. The discussion of sustainable development and what it means for Herefordshire has been expanded in Section 3.3 and establishes a clear commitment to work towards the achievement of sustainable development in accordance with national guidance and the Regional Spatial Strategy. I do not consider that there is a need for further changes to Chapter 2 in response to this objection.

*Affinity with the West Midlands - 1082*

2.2.4 Whilst Herefordshire has close associations with neighbouring counties in The Marches, it lies within the West Midlands Region for planning purposes and this has been appropriately addressed in the preparation of the Plan.

**RECOMMENDATION**

2.2/1 Do not make any modification in response to the objections.

**2.3 KEY ISSUES - PARAGRAPHS 2.3.1 TO 2.3.8**

**Objections**

P44/10039	National Farmers' Union
P635/4088	Campaign to Protect Rural England
P830/2147	Herefordshire Friends of the Earth
P830/2148	Herefordshire Friends of the Earth
P830/2150	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/2151	Herefordshire Friends of the Earth (Conditionally Withdrawn)
P830/4229	Herefordshire Friends of the Earth
P898/2537	Herefordshire Green Party
P898/7543	Herefordshire Green Party
P1071/3256	English Nature (Conditionally Withdrawn)

**Summary of Objections / Issues**

- The last bullet point of Paragraph 2.3.5 should refer to interests of abstractors. (44)
- The UDP lacks a clear vision. The identified issues lack a clear grasp of problems facing the county and give no clear guidance to the formulation of the Plan. There is too much emphasis given to compliance with RPG 11 over the number of new houses to be built. The priority of the Plan should be to retain the county's rural inheritance and to lay foundations for turning it into a leading producer of sustainable wealth. This would be in accordance with the wider objectives of regional guidance. (635)
- Objection is raised to acceptance of the county regional share of new dwellings. (830)
- The issues should give clearer guidance as to whether a matter is regarded as a strength or a weakness. (830, 898)
- There is no discussion of Herefordshire's environmental capacity or sustainability criteria. (830)
- A new bullet point should be included in Paragraph 2.3.2 referring to the potential for ecologically sustainable housing in urban and rural areas. (830, 898)

## **Inspector's Reasoning and Conclusions**

### *Interests of abstractors - 44*

2.3.1 An additional bullet point was included in Paragraph 2.3.5 at the revised deposit stage referring to the need to limit abstraction from watercourses. As the Council points out in its response to the objection, abstraction is subject to a separate control regime. Whilst there is little the Plan can achieve directly in this respect, it is an issue of environmental concern in the county and I see no harm in identifying it as a matter of concern in this section.

### *Vision - 635*

2.3.2 The Plan's Vision for Herefordshire is set out in Section 3.3 and comprises three interlocking elements: Community, Environment and Economy. New material explaining the relationship of these strands with sustainability has been incorporated in Paragraphs 3.3.3 to 3.3.11. Several objectors consider that the protection and enhancement of Herefordshire's unique characteristics should have overriding priority.

2.3.3 In my view, the balanced approach adopted by the Council reflects the guidance in national and regional policy. PPS 1 refers to the four aims for sustainable development: social progress which recognises the needs of everyone; effective protection of the environment; the prudent use of natural resources; and the maintenance of high and stable levels of economic growth and employment.

2.3.4 Part 1 of the Plan contains a clear commitment to the achievement of sustainable development, much of which is welcomed by commentators. Several commentators remain concerned that this emphasis is not carried through into the policies and proposals in Part 2. These are the subject of separate objections and the extent to which they comply with the strategy will be assessed in the relevant parts of this report.

### *Compliance with RPG housing targets - 830*

2.3.5 With regard to the emphasis given to compliance with RPG housing targets, one of the key purposes of the development plan system is to bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing. It is unrealistic to suggest that this should not be a primary consideration of the Plan.

### *Strengths and weaknesses - 830, 898*

2.3.6 In describing the key issues to be addressed in the UDP, the Council says that it has sought to avoid making value judgments. Whilst some value judgment is inherent in the selection of issues, I accept that the Council has presented these in a broadly neutral way.

2.3.7 Commentators on the Plan will have different views as to whether remoteness and dependence on traditional patterns of land use represents a strength or a weakness. This is recognised in Paragraph 3.3.9 of the Revised Deposit Draft as part of an expanded discussion of sustainability. It highlights the importance of the county's predominantly rural and relatively isolated nature, high quality environmental assets, low level of industrialisation, focus on indigenous land based activities as well as tourism linked strongly to landscape quality.

2.3.8 In my view, Paragraphs 2.2.12 to 2.2.17 address economic concerns which are widely acknowledged. The potential contribution which organic and sustainable

agriculture can make to rural employment and regeneration is recognised in Paragraph 2.2.15. The discussion of sustainable development and what it means for Herefordshire has been expanded in Section 3.3 and establishes a clear commitment to work towards the achievement of sustainable development in accordance with national guidance and the Regional Spatial Strategy. I do not consider that there is a need for further changes to Chapter 2 in response to these objections.

*Environmental capacity and sustainability criteria - 830*

2.3.9 The revised deposit version of the Plan contains an expanded discussion of sustainable development. Section 2.3 (Key Issues) identifies numerous matters which are relevant to the consideration of environmental capacity, for example, variable capacity of main settlements and countryside to absorb new development; flood risk; transport and infrastructure capacity; road congestion; air quality; and constraints on development which arise from the high quality of certain landscapes. Paragraph 2.3.5 in particular emphasises environmental considerations relevant to an assessment of capacity.

2.3.10 The Plan reflects national and regional policies which aim to accommodate development perceived as necessary to the achievement of sustainable communities. The means by which this can be achieved are set out in Chapter 3 (Strategy). Paragraphs 3.2.2 to 3.2.4 encourage energy efficient modes of transport, prioritise the use of brownfield sites within the urban fabric and support existing centres and the provision of an adequate range of housing. Paragraph 3.2.5 emphasises the importance of ensuring that development is carried out in an environmentally sensitive manner and identifies elements of the built and natural environment to be protected and enhanced.

2.3.11 Some objectors wish to see a more rigorous definition of sustainability than that adopted in the Plan questioning, for example, the compatibility of the maintenance of high and stable levels of economic growth with the prudent use of natural resources. Nevertheless, this derives from national policy guidance. The emphasis on maintaining economic prosperity is a clear national priority; and access to employment and opportunities for individual and community prosperity is regarded as a key measure of sustainability.

2.3.12 Whilst I acknowledge that the objectors would wish the balance to place a greater emphasis on environmental matters and the sustainable use of resources, I consider that the strategic policies of the Plan already incorporate a robust emphasis on sustainability which aims to protect important environmental resources.

*Ecologically sustainable housing – 830, 898*

2.3.13 The objectors argue that the Plan should retain the flexibility to consider proposals for highly sustainable substantially self-sufficient dwellings in the countryside and request the inclusion of a new bullet point in Paragraph 2.3.2 to signal this intention.

2.3.14 The Plan has adopted a sequential approach to housing location which would restrict housing development in the countryside to that needed for agriculture or forestry. Whilst I understand there is a genuine movement behind low impact housing proposals, I consider that there is a real danger of introducing a loophole into housing policies which could be widely exploited. I do not consider this issue

is of sufficient weight to justify its identification as a separate matter under Paragraph 2.3.2.

2.3.15 It would be difficult to frame a mechanism to distinguish bona fide proposals from others which merely seek an attractive location in the countryside; also to prevent dwellings becoming more energy and resource intensive in the future. In my view, it could contribute to an unsustainable pattern of development across the county which the housing distribution policies are designed to avoid.

2.3.16 There may be scope for limited development of this type to be considered under Policy H8 (Agricultural and forestry dwellings and dwellings associated with rural business) provided the activity associated with the dwelling could be demonstrated to be financially self-sustaining. This could include low intensity agricultural activity.

*Other objections – 830, 1071*

2.3.17 The Council made appropriate changes to the Revised Deposit Draft which enabled these objections to be withdrawn conditionally.

## **RECOMMENDATION**

2.3/1 Do not make any modification in response to the objections.