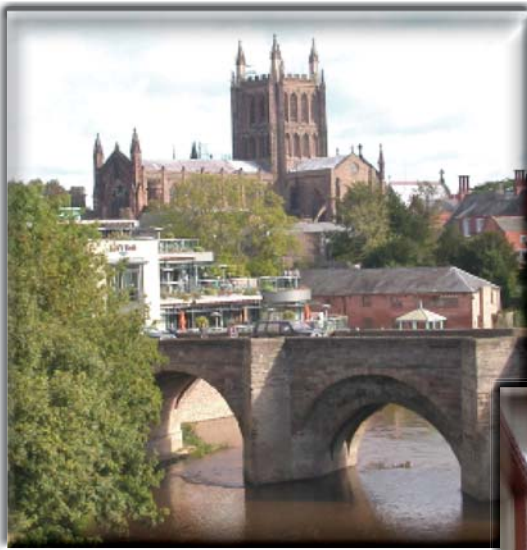


Shaping our Place 2026

Local Development Framework

# Preferred Option: Hereford consultation report

June 2011



# **Hereford Preferred Option – Consultation Report / Summary of Results and free-write analysis schedules**

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## **Hereford Preferred Option – Consultation Report/Summary of Results**

### **1 Background**

- 1.1 In January last year, the Council consulted upon its Place Shaping Paper which set out planning policy options for the County for the period to 2026. The consultation programme was extensive involving over 60 events with an aggregate attendance of around 3,000 people over a ten week period. After analysing comments received Core Strategy Preferred Option documents were prepared and consulted upon throughout July to November.
- 1.2 The documents consulted upon were Preferred Options: Rural Areas (July 2010), Preferred Options: Bromyard, Ledbury and Ross-on-Wye (July 2010), Preferred Options: Rural Areas (August 2010) and finally Preferred Option: Hereford (September 2010). In addition, consultation took place on General Policies. The policies and proposals set out in all documents will ultimately form part of the Council's Core Strategy.
- 1.3 The Core Strategy is a long term strategic planning document which sets the vision and objectives for the County and establishes the policy framework and the broad locations for development necessary to deliver them. The more detailed planning policies will be outlined in area specific plans – the Market Towns and Rural Areas Plan and the Hereford Area Plan.

### **2 Hereford: Preferred Option**

- 2.1 This document is divided into three policy areas;
  - City centre  
This sets out the development and regeneration proposals for the historic central area along with its expansion to the west and north. Policy H1 identifies the requirements for shopping, recreation and leisure, city centre living, jobs and enterprise and movement, whilst retaining and enhancing historic heritage.
  - Move ment  
This addresses existing transport constraints within the city. Policy H2 sets out the package of sustainable transport measures along with the provision of a new relief road that will be required to enable further growth.
  - Urban expansion  
Policy H3 identifies the areas of growth for Hereford to be planned as attractive, well serviced, integrated developments. Specific urban expansion policies H4, H5 and H6 address the development requirements of each area in more detail.
- 2.2 In addition to setting out the Preferred Option policies, the document outlines what the evidence is telling us, what the consultation has told us and why alternative options have not been taken forward.
- 2.3 A variety of evidence base studies have informed Core Strategy options. For Hereford, the Strategic Housing Land Availability Assessment (SHLAA) and

Hereford Relief Road – Study of Options have been two particular pieces of work that have assisted the framing of the Preferred Option.

### **3 Consultation**

- 3.1 Consultation took place from 27<sup>th</sup> September to 5<sup>th</sup> November 2010. Due to particular local interest, this was extended to 19<sup>th</sup> November to enable residents and parish councils to make their specific comments.
- 3.2 Whilst any view or general comment welcomed, the preferred option document asked the following question in relation to each policy area ‘Do you agree with this preferred option? If not, please explain which element of the policy you do not agree with and why.’
- 3.3 The consultation process involved the following;
  - Publication of the Preferred Option document, a summary leaflet, questionnaire, sustainability appraisal and all available evidence base on the Council’s website, with document deposits in Info Shops and libraries
  - Invitations to comment sent to all stakeholders, Parish Councils, Herefordshire based businesses and those who replied to the Hereford questions of the previous Place Shaping Paper
  - Various advertisement and press releases within the Hereford Times and Hereford Journal outlining the main issues being proposed and dates of the drop-in sessions and public meetings arranged with Ward Members and Parish Councils in and around Hereford.
- 3.4 In respect of the public meetings referred to above this amounted to 19 mainly evening meetings/exhibitions where further explanation of the proposals could be provided and questions answered. Appendix 1 sets out the consultation events staged. In total over 860 people attended these events.

### **4 Summary of Hereford Preferred Option responses.**

- 4.1 This report contains a summary of the responses to both the yes/no questions and a number of schedules summarising the responses to the free write questions. The schedules list the comments which were raised most often but it should be noted that the total number of comments made can be seen in the summary of questionnaire responses. The schedules also highlight some of the key stakeholders responses and any additional issues which need to be addressed.
- 4.2 A total of **611** formal responses were received and registered to the Hereford consultation.

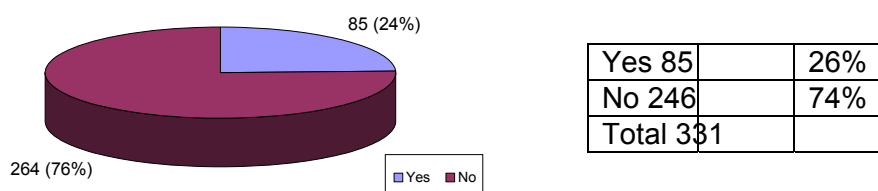
#### **Responses from questionnaires**

- 4.3 The following gives a summary of the answers to the yes/no questions and highlights the top five summary comments to each.

## Policy H1 - Hereford City Centre policy

Question 1 – Do you agree with the preferred policy for the city centre?

- 4.4 A total of 378 respondents answered this question. Of these 331 completed the yes/no box. Of those that did not register 'yes/no', 7 made positive comments within their submission whilst a further 40 made comments which suggested 'no'.



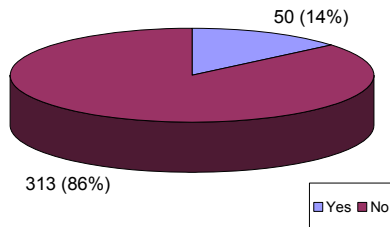
Question 2 – if not, explain which elements you don't agree with and why?

- 4.5 Top five comments made to Q2 were:
- Need growth/improvements/regeneration of existing city centre retail core (70)
  - Disagree with need for retail expansion on livestock market site (57)
  - Retail expansion proposed will be to detriment of existing retail core (45)
  - Need to protect/enhance city's heritage assets (21)
  - Disagree with the link road / inner ring road upgrade (20)

## Policy H2 - Hereford Movement policy

Question 3 – Do you agree with the preferred movement policy for Hereford?

- 4.6 A total of 523 respondents answered this question. Of these 363 completed the yes/no box. Of those that did not register 'yes/no', 25 agreed in principle with the policy with a further 135 making comments which highlighted concerns with the policy.



Yes	50	14%
No	313	86%
Total	363	

Question 4 – if not, explain which elements you don't agree with and why?

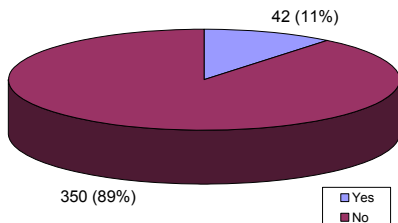
4.7 Top five comments made to Q4 were:

- Disagree with need for relief road /no road (98)
- Provide further sustainable transport measures (82)
- Prefer an eastern route (62)
- Disagree with the western inner road (45)
- Question phasing and delivery (36)

**Policy H3 - Urban growth distribution policy**

Question 5 – Do you agree with the preferred growth distribution policy for Hereford?

4.8 A total of 459 responses commented on this policy with 392 answering the yes/no question. Of those that did not register 'yes/no', 5 respondents agreed with the policy with a further 62 making comments indicative of not agreeing.



Yes	42	11%
No	350	89%
Total	392	

Question 6 – if not, explain which elements you don't agree with and why?

4.9 Top five comments made to Q6 were:

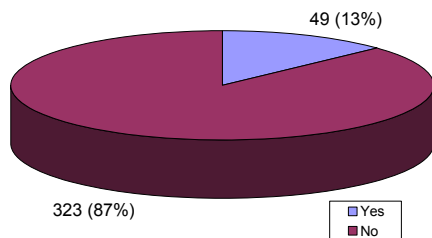
- Disagree with housing growth agenda for Hereford (141)

- Concern regarding infrastructure provision – water, sewerage, energy (126)
- Concern regarding health provision (69)
- Question where the population are coming from (52)
- Concern over loss of farmland (51)

**Policy H4 - Northern expansion policy**

Question 7 – Do you agree with the preferred northern expansion policy?

4.10 A total of 398 respondents answered this question. Of these 372 completed the yes/no box. Of those that did not register 'yes/no', only 2 respondents made comments agreeing with the northern expansion with 24 indicating disagreement.



Yes 49		13%
No 323		87%
Total 372		

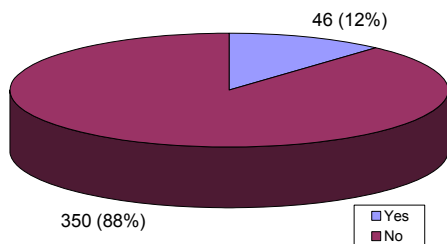
Question 8 – if not, explain which elements you don't agree with and why?

- 4.11 Top five comments made to Q8 were:
- Concern regarding the loss of farmland (91)
  - Concern regarding infrastructure provision – water, sewerage, energy (74)
  - Disagree with numbers of homes to area (49)
  - Concern about loss of landscape character (43)
  - Use more brownfield land (40)

**Policy H5 - Western expansion policy**

Question 9 – Do you agree with the preferred western expansion policy?

4.12 A total of 421 responded to this question of which 396 registered in the yes/no box. Of the 21 not registering 'yes/no', only 2 responded positively to the question.



Yes	46	12%
No	350	88%
Total	396	

Question 10 - if not, explain which elements you don't agree with and why?

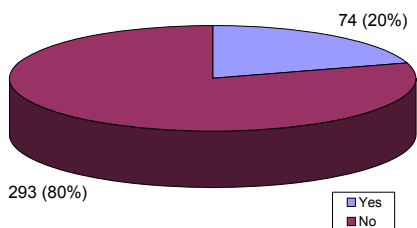
4.13 Top five comments to Q10 were:

- Concern over loss of farmland (89)
- Concern regarding infrastructure provision – water, sewerage, energy (78)
- Concern about loss of landscape character (54)
- Disagree with number of homes to the area (52)
- Disagree with the Three Elms expansion area (33)
- Concern about increased traffic levels on local roads (33)

**Policy H6 - Southern expansion policy**

Question 11 – Do you agree with the preferred southern expansion policy for Hereford?

4.14 A total of 391 respondents commented to this question with 367 answering the yes/no question. Of the 24 who did not register 'yes/no', only 1 made positive comments in their response.



Yes	74	20%
No	293	80%
Total	367	

Question 12 - if not, explain which elements you don't agree with and why?

4.13 Top five comments to Q12 were:

- Concern over loss of farmland (84)
- Concern regarding infrastructure provision – water, sewerage, energy (76)
- Concern regarding loss of landscape character (51)
- Disagree with the numbers of homes to the area (46)
- Concern about increase traffic on local roads (38) either road options.

<b>Question:</b>	<b>Hereford Q1/2</b>
<b>Do you agree with the preferred policy for the city centre?</b>	
378 respondents answered this question of which 331 completed the yes/no boxes	
Yes - 85 (26%) No - 246 (74%)	
<b>Summary of free-write questionnaire comments received</b>	<b>How addressed in Core Strategy</b>
A number of comments were received, the most common of which are indicated below.	
Need growth / improvement / regeneration of existing city centre retail centre (70)	Policy H1 specifically states that the Core Strategy will be delivered through, amongst other things, the protection, restoration and enhancement of the existing historic retail core of the city, to ensure its continued vitality and viability.
Disagree with need for retail expansion on livestock market site (57)	The retail element of Policy H1 has been formulated as a result of information obtained through the evidence base, in particular the PPS4 Assessment, which highlighted the need for additional retail floorspace up to 2026 and through previous land use allocations and policy in the UDP. The redevelopment of the former livestock market site for retail, leisure and associated uses obtained planning permission in March 2011, in accordance with UDP policies and proposals.
Retail expansion proposed will be to detriment of existing retail core (45)	Policy H1 specifically states that the Core Strategy will be delivered through, amongst other things, the protection, restoration and enhancement of the existing historic retail core of the city, to ensure its continued vitality and viability. Policy H1 under the heading 'shopping' states that there should be provision of easily accessible and visually attractive pedestrian links to and from the existing retail centre to new expanded retail and commercial parts of the city centre. Para. 3.17 further states that successful integration with the existing historic retail core is dependant upon the creation of new pedestrian links.
Need to protect/enhance city's heritage assets (21)	Heritage, in all its forms, including green infrastructure, are very important elements in the Core Strategy, and in relation to Hereford city in particular. This is recognised in Policy H1. In built up urban areas, green spaces are key. Their protection, enhancement and creation are valuable elements of Policy H1 and will also be pursued in the forthcoming Hereford Area Plan.
Disagree with the link road /inner ring road upgrade (20)	As set out in Policy H1 and the movement section of its explanatory text, a new link road connecting Edgar St to Commercial Rd is planned. This will provide access to the northern city centre expansion area and reduce the amount of traffic travelling along the inner ring road. The Link Road obtained planning permission in March 2010 and the application included traffic impact assessments as appropriate.
Disagree with transport hub / need better links to town centre (16)	Hereford has 4 transport interchanges, meaning that integration of services is limited. A transport hub will provide users with a safe and attractive environment to wait for their connecting services. Policy H1 recognises that successful integration of the new retail area on the livestock market with the historic retail core is dependant upon the creation of new pedestrian friendly links and the upgrading of Newmarket St/Blueschool St for pedestrians. The planned Link Road between Edgar St, Widemarsh St and Commercial Rd will assist in reducing traffic along Blueschool St/Newmarket St and subsequently help to reduce the barrier effects of this highway between the new retail quarter and the historic retail core.

Concern regarding / questioning evidence base (11)	The Council commissioned a retail study to form part of the evidence base and this was updated in Sept 2010. The study identifies a theoretical gross comparison floorspace requirement of 46,000 sqm up to 2026. This is additional to the 25,000 sqm net floorspace to be provided on the livestock market site. It is anticipated that redevelopment sites in Bewell St, Berrington St and Blueschool St offer the most potential to deliver new comparison goods shopping facilities and the study also confirms that after accounting for a new supermarket on the livestock market site there is no additional floorspace requirement for further convenience goods in the city centre. All sites will be detailed within the Hereford Area Plan. Updated PPS4 Assessment will be made in the future to assess floorspace requirements during the last 5 years of the plan period.
<b>Summary of responses from Stakeholders</b>	
<b>Advantage West Midlands:</b> Redevelopment and delivery of ESG is of greatest relevance to the Agency's interest and we welcome provisions in Policy H1. The Agency has made major investments in this area. It is envisaged that Hereford Futures Ltd will work in partnership with HC and the Marches LEP to help deliver regeneration and promote opportunities for development and public realm improvements within the city centre and create new employment opportunities in Hereford.	Comments noted. No change.
<b>Ballingham, Bolstone and Hentland Group Parish Council:</b> Do not agree with city centre policy. Current policy is unsustainable. Preference for more facilities for young and old.	Policy H1 seeks to provide for a range of new facilities which will benefit all age groups. This includes new shops, new/enhanced sport, recreation and leisure facilities, such as: a multi-screen cinema; bars, restaurants, cafes, affordable homes, education facilities etc. It is acknowledged that, in particular, the young people of Hereford have expressed their wishes for more things to do. Non-strategic sport, leisure and recreation policies and proposals will be detailed in the HAP.
<b>Ballingham, Bolstone and Hentland Group Parish Council:</b> Do not agree with city centre policy. ESG relief road should be reinstated to reduce traffic from Newmarket Street and Blueschool Street.	As set out in Policy H1 and the movement section of its explanatory text, a new link road connecting Edgar St to Commercial Rd is planned. This will provide access to the northern city centre expansion area and reduce the amount of traffic travelling along the inner ring road.
<b>Belmont Rural PC:</b> Agree with city centre policy.	No changes required.
<b>Bridstow Parish Council:</b> Agree all policy areas.	No changes required.
<b>Campaign for the Protection of Rural England:</b> Policy H1 - City Centre Policy. Proposed expansion of Hereford and its impact on other retail centres within the county must be assessed before final decisions are made. Policy H1 - City Centre Policy. Employment growth in Hereford and its impact on commuting from rural areas/market towns needs further expansion. Policy H1 - City Centre Policy. Employment growth in Hereford and its impact on commuting from rural areas/market towns needs further expansion.	The retail element of Policy H1 has been formulated as a result of information obtained through the evidence base, in particular the PPS4 Assessment, which highlighted the need for additional retail floorspace up to 2026 and through previous land use allocations and policy in the UDP. The PPS4 study looked at retail issues across the county, not Hereford city in isolation, and will be updated in the future to cover the last 5 years of the plan period. Hereford city is a county town with Growth Point status and is a settlement of significant importance. This role will be maintained and enhanced. It is the main centre for growth and regeneration. Although some commuting from rural parts of the county is inevitable, it is considered that Hereford is the most sustainable location for employment (and other) growth. In order to cater for the needs of those living in rural towns, the CS also includes policies and proposals for employment growth in the market towns. Support is also given to a range of appropriate employment sites across the county, to home based businesses, rural businesses.

	<p>agriculture and tourism - see Policy EC1. Policy H1 does not include a specific employment allocation, however, the CS recognises that the city regeneration areas are places where a mixture of uses is to be encouraged. Modern medium sized offices are highlighted in the ELR 2010 as being in demand in the city's central area.</p>
<p><b>Dinedor Parish Council:</b> Do not agree with city centre policy. City will be split in two unless complete ban on traffic along Blueschool Street. Do not agree with city centre policy. No provision in policy for filling empty shops before any retail development on livestock market. Do not agree with city centre policy.</p>	<p>Policy H1 recognises that successful integration of the new retail area on the livestock market with the historic retail core is dependant upon the creation of new pedestrian friendly links and the upgrading of Newmarket St/Blueschool St for pedestrians. The planned Link Road between Edgar St, Widemarsh St and Commercial Rd will assist in reducing traffic along Blueschool St/Newmarket St and subsequently help to reduce the barrier effects of this highway between the new retail quarter and the historic retail core. Recently the take up of vacant units in High Town has been good, with only one currently vacant premises. In the period (Oct - Dec 2010) there have been a number of national chains and local retailers who have either set up in the city centre or expanded their operations. Doing something about empty properties is difficult to influence at local level. It is not possible, through planning policy, to compel commercial enterprises to take up vacant retail units. Rents are set by landlords and business rates are set by central Government.</p> <p>The Council could offer subsidised business rates but, in doing so, it would have to fund the subsidy. Local taxpayers would then bear the cost of the subsidy. There are other means, such as creating the right type of atmosphere within the city and investing in the infrastructure and streetscape e.g. Eign Gate and Widemarsh St and plans to improve the Buttermarket and offering Shop Front Grants, which can be used to promote the take up of vacant retail properties. New retail expansion is required to both provide for the evidenced need for retail growth over the plan period and to provide for a wider range of retail units to meet the demand for modern, larger footplate premises, thus providing a more attractive mix of shops for today's shoppers, this growth cannot be solely met through the use of existing shop units in the historic retail core.</p>
<p><b>Lower Bullingham Parish Council:</b> Disagree with city centre policy: little indication of how objectives will be achieved. Disagree with city centre policy: link road is essential for livestock market development. Disagree with city centre policy: retail/leisure development on livestock market site will have a detrimental impact on heart of city and so should be used for leisure/parking.</p>	<p>The Implementation Plan outlines how policies in the CS will be delivered and monitored. It also outlines the key infrastructure requirements needed to support the proposed level of growth in the spatial strategy and place shaping policies. The plan is supported by the Infrastructure Delivery Programme (IDP), which lists all strategic infrastructure requirements for the CS in a project programme, covering costs, sources of funding, timescales in delivery and gaps in funding. The Link Road is not considered essential to the retail and leisure redevelopment scheme on the old livestock market site. Planning permission was granted in March 2011 for the redevelopment of the livestock market area, which addresses matters relating to traffic movements. Further redevelopment to the north of the city centre will be enabled through improvements to connections between Edgar Street, Commercial St and Widemarsh St by way of the construction of a new link road. This has now has planning permission, although its funding and subsequent delivery is currently being further investigated.</p>

	<p>A requirement for additional retail floorspace was identified through previous and updated evidence base studies. The UDP identified an expansion of the central shopping and commercial area and retail development on the current livestock market site. The city centre is to remain the focus for shopping and is also the subject of a regeneration strategy in the Eign Gate area and townscape and other improvements, such as the updating of the Butter Market. Leisure facilities and parking are included within the Livestock Market regeneration scheme.</p>
<p><b>English Heritage:</b> Welcome the inclusion of a specific heritage strand to the policy but consider it requires further development and clarification. The policy should remain to be clearly focussed on the historic environment with expansion of the importance of heritage assets and historic character of the townscape. Identified areas (e.g. Berrington Street) should be expanded upon. Other relevant evidence base and information sources should be identified. Our detailed comments on the sustainability appraisal offer help to policy formulation.</p>	<p>Change proposed. Include suggested wording in Policy H1 to develop and clarify Heritage strand. Add further wording to explanatory text which identifies additional sources of evidence and information relating to Hereford's heritage. Example areas expanded upon in explanatory text, rather than in policy.</p>
<p><b>Environment Agency:</b> Policy should require flooding to be reduced. Requirement for Surface Water Management Strategy, reference to sequential test and inclusion of water efficiency measures.</p>	<p>Change proposed. Policy H1 amended to include suggested wording on reducing flooding and policy preamble amended to refer to flood mitigation and reduction. Para 3.24 amended to include reference to SWMPs and suggested wording. New para added (para 3.45) referring to sequential approach. Reference made in city centre living section to water efficiency and the Design Code SPD.</p>
<p><b>Hereford and Gloucester Canal Trust:</b> Surprised little mention of the canal throughout the document even though it has ability to deliver many strategic objectives (tourism, flood management, recreation, green infrastructure). Expect provisions of current extant documents to be rolled on. Need to be clear in future policy where the canal fits into any ongoing strategy.</p>	<p>At para. 3.25, in the explanation of the City Centre Living section of Policy H1, it is stated that opportunities exist to make a feature of the canal basin and its corridor within the new urban village residential area. In addition, the Hereford-Gloucester canal restoration is specifically mentioned in the Ledbury CS policy, viaduct urban extension site. It is intended that CS Policy EC2 Tourism, will replace UDP Policy RST8. Policy EC2 does not mention the canal specifically, however, its wording is sufficient to encompass schemes such as the canal route's continued restoration. The forthcoming MTRAP will provide site specific details and it is within this document that the H &amp; G canal can be dealt within greater depth.</p>
<p><b>Hereford Futures:</b> Agree all policies</p>	<p>No changes required.</p>
<p><b>Herefordshire Environment Partnership:</b> Policy H1 - City Centre Policy. Heritage and green infrastructure are unifying assets in the wildest sense and important elements in the city centre as much as elsewhere.</p>	<p>Heritage, in all its forms, including green infrastructure, are very important elements in the Core Strategy, and in relation to Hereford city in particular. This is recognised in Policy H1. In built up urban areas, green spaces are key. Their protection, enhancement and creation are valuable elements of Policy H1 and will also be pursued in the forthcoming Hereford Area Plan.</p>
<p><b>Holmer &amp; Shelwick Parish Council:</b> Policy H1 - City Centre Policy: Do not agree. Not enough provision for small business services.</p>	<p>The City Centre Area is not subject to a site allocation solely for commercial or employment uses, however the CS recognises that the regeneration area to the north of the existing city centre should contain a mixture of uses. This includes providing new commercial facilities. Modern medium sized offices are appropriate since the ELR 2010 has indicated demand for more buildings of this kind.</p>
<p><b>Llangarron Parish Council:</b> Agree all policy areas.</p>	<p>No changes required.</p>

<p><b>Lyonsall Parish Council:</b> Policy H1 - City Centre Policy: Agree mostly. Make centre user friendly/less congested by providing more parking and creating a road to take through traffic.</p>	<p>As set out in Policy H1 and the movement section of its explanatory text, a new link road connecting Edgar St to Commercial Rd is planned. This will provide access to the northern city centre expansion area and reduce the amount of traffic travelling along the inner ring road. A car park is planned on the livestock market site, replacing spaces lost through the demolition of Garrick multi-storey. The new road proposals, replacement and new car parks around the edges of the city centre, along with other transport measures to be implemented mainly through the Local Transport Plan will assist delivery of the new development proposals.</p>
<p><b>Natural England:</b> Broadly agree but recommend changes based on Habitat Regulations Assessment. Changes involve greater recognition of River Wye SAC/SSSI and other natural assets, the wealth of recreational/leisure opportunities provided by the natural environment, requiring efficient water quality in the River Wye from city centre development. Large scale urban development would not be able to happen until it can be concluded that it would not result in an adverse effect on the River Wye SAC.</p>	<p>Change proposed. List of natural (and built) assets now added to Heritage section of Policy H1. Para 3.15 amended as suggested. Wording added to final bullet point of City Centre Living section of Policy H1 relating to links to areas of greenspace. A new para 3.22 has been added re: green infrastructure assets. Changes made to City Centre Living part of Policy H1 to include ref to water efficiency. Issues relating to water quality/R Wye SAC dealt with elsewhere in Core Strategy. Policy H1's preamble refers to sustainability in all new development. Additional bullet point on the provision of footpaths and cycleways. Indicators will be included in pre-submission Core Strategy.</p>
<p><b>Pixley &amp; District Parish Council:</b> Policy H1 - City Centre Policy. Register disappointment of closure of TICs as important to tourism.</p>	<p>There has been a recent fall in numbers using TICs, with many finding information from the internet, however, a tourist information facility based at King St is still present. It is now known as the Discover Herefordshire Centre and provides traditional TIC services as well as being an agent for local coach trips, selling crafts and gifts and promoting local activities etc.</p>
<p><b>Pyons Group Parish Council:</b> Policy H1 - City Centre Policy: Do not agree. Unhappy with ESG policy as it creates two different centres, the movement between the two centres is unlikely to work well. Policy H1 - City Centre Policy. Do not agree. High Town shops should be first priority.</p>	<p>Policy H1 under the heading 'shopping' states that there should be provision of easily accessible and visually attractive pedestrian links to and from the existing retail centre to new expanded retail and commercial parts of the city centre. Para. 3.17 further states that successful integration with the existing historic retail core is dependant upon the creation of new pedestrian links. A requirement for additional retail floorspace was identified through previous and updated evidence base studies. The UDP identified an expansion of the central shopping and commercial area and retail development on the current livestock market site. The city centre is to remain the focus for shopping and is also the subject of a regeneration strategy in the Eign Gate area and townscape and other improvements, such as the updating of the Butter Market. Leisure facilities and parking are included within the Livestock Market regeneration scheme.</p>

<p><b>Savills:</b> Policy HC1 - City Centre Policy: Support. Para 3.9: the status of the masterplan should be explained in the context of the UDP and emerging LDF. Need to create links between existing city centre and new retail facilities at ESG. Make clear the livestock market site as satisfying the need for additional floorspace. Include provision of a new multiplex cinema at the livestock market site. Include reference to an interim plan for Newmarket Street. Make specific reference to the need to locate leisure uses at the livestock market site. Gross comparison floorspace requirement of 52,000 sqm by 2026 is incorrect and needs amending to refer to PPS4 Assessment. The 4,000 sqm capacity for convenience goods is also incorrect - the PPS4 study identifies no additional floorspace requirement.</p>	<p>Paragraphs 3.7 and 3.8 provide information on the planned redevelopment of the ESG area and explain the masterplanning process in term of how it has evolved and how it has influenced this regeneration project. It is considered that this provides clear background information without getting into unnecessarily complicated technical planning jargon. Policy H1 is a strategic policy and covers all potential redevelopment and regeneration schemes which may take place in the city's central area over the plan period. Para 3.17 provides a more detailed explanation of the policy and makes specific reference to the successful integration of new development with the historic core of the city being dependant on the creation of new pedestrian friendly links, including a reference to the old livestock market area. Add to para. 3.18 after "...city centre". "It is anticipated that the redevelopment of the livestock market site will help to satisfy a significant proportion of the additional retail floorspace required over the plan period."</p> <p>It is intended that Policy H1 is strategic in nature and that it does not go into too much site specific detail. The explanation to the policy does, at paragraph 3.20 states that Policy H1 enables development such as a new multi-screen cinema. This is considered to be appropriate and no change is proposed. The explanation to the policy does, at paragraphs 3.28 - 3.30 refer to both the planned link road and the pedestrian upgrading of Newmarket St/Blueschool St. This is considered to provide an appropriate level of detail for a strategic policy document and further details can come forward through either the Hereford Area Plan or a planning application for the ESG site's redevelopment. The explanatory text to the policy sets out the way in which Policy H1 enables a range of both leisure and recreation development to come forward on the city centre expansion areas.</p> <p>Detail on any regeneration scheme can be clarified either through the Hereford Area Plan or as part of a planning application. No change proposed. Agreed. The evidence base (PPS4 Assessment 2010) provides estimated forecasts for theoretical retail floorspace requirements up to 2026 as 46,000sqm, (gross) (taking into account commitments arising from the planning permission granted on the former livestock market site) for the whole of Hereford city. These can be used in an amended Policy H1. The extended Plan period (up to 2031) will mean that a revised/new PPS4 assessment will be needed to provide more accurate forecasts for the latter stages of the plan period. However, there are increased uncertainties and inaccuracies the further projections are made into the future and therefore it is considered that estimated figures up to 2026 are appropriate for the policy at this time. Agreed, the PPS4 study concludes that after accounting for a new supermarket on the livestock market site, there is no additional floorspace requirement for further convenience goods.</p> <p>It does, however confirm a need to provide some new convenience facilities close to residential areas as part of urban expansion proposals for the city.</p>
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<p><b>Sport England:</b> Concern that there is no completed PPG17 assessment for Herefordshire at this time, vital to have this as evidence base to underpin the strategy. It is unclear what the role/needs/proposals are for the city centre in relation to sport and recreation.</p>	<p>Although the PPG17 Assessment for Herefordshire has not been updated since 2006, the following documents are also considered as part of the CS's evidence base: Indoor Sports Facilities Strategy (2010), Draft Play Facilities Strategy (2010) and the Playing Pitch Strategy is under preparation. The need for additional sports facilities is being regularly assessed and any deficiencies in Hereford City can be addressed through the policies and proposals of the forthcoming Hereford Area Plan.</p>
<p><b>West Mercia Police:</b> Serious concerns about ability to secure site for Hereford headquarters. There is insufficient funding to deliver the entirety of the ESG regeneration scheme, which raises questions of soundness. The infrastructure necessary to support the development of the city centre needs to be identified and included in the LDF Implementation Delivery Plan. It is not clear that infrastructure will be delivered in a timely fashion and that the necessary mechanisms will be in place to ensure its delivery.</p>	<p>The requirement for a new headquarters is a detailed issue to be addressed within the following Hereford Area Plan. The LDF Infrastructure Delivery Plan will identify how schemes are to be delivered, the timescale for delivery, why the infrastructure is required, what it will include and who it is likely to be delivered by.</p>
<p><b>Any new issues to be considered in HAP:</b></p>	
<p>None</p>	
<p><b>Any new options to be considered before Submission?</b></p>	
<p>Changes to plan period to 2031.</p>	
<p>Reassess retail floorspace requirements/policy wording.</p>	
<p><b>Any new evidence required?</b></p>	
<p>Updated PPS4 Assessment to cover 2026 - 2031</p>	

<b>Question:</b>	<b>Hereford Q3/4</b>
<b>Do you agree with the preferred movement policy for Hereford?</b>	
523 respondents answered this question of which 363 completed the yes/no boxes Yes - 50 (14%) No - 313 (86%)	
<b>Summary of free-write questionnaire comments</b>	<b>How addressed in Core Strategy</b>
A number of comments were received, the most common of which are indicated below;	
Disagree with need for relief road / no road (98)	Various transport studies including the MMM study and DaSTS have shown that sustainable transport measures alone will not address traffic issues entirely.
Provide further sustainable transport measures (82)	The Core Strategy identifies in general terms the forms of sustainable transport measures required. The Local Transport Plan and the Hereford Area Plan will contain and provide more details on sustainable transport measures. However, some measures will be difficult to implement without the full control of the A49 through the city.
Prefer an eastern route (62)	No change. Whilst further modelling has been undertaken in respect of revisions to an eastern route option the ecological issues over the Lugg Meadows and adverse impacts to the River Wye SAC significantly constrains an eastern route.
Disagree with the western inner road (45)	No change. The western route corridors are preferred as they have less impact in environmental and engineering terms and relate better to growth options.
Question phasing and delivery (36)	Further work is being undertaken on the phasing and delivery of the road and will be included within the submission Core Strategy and the Infrastructure Delivery Plan.
Delay Plan / questioning evidence base (30)	Further modelling work is being undertaken regarding the Relief Road to reinforce evidence base.
Need to protect important local features (17)	This level of detail will be addressed when defining a precise route for the Hereford Relief Road.
Disagree with the housing growth agenda for Hereford (11)	Growth is conditional on the necessary infrastructure being provided. This is to be set out within the Infrastructure Delivery Plan.

Need bridge crossing first (11)	The phasing of the Hereford Relief Road will form part of the final submission Core Strategy and the Infrastructure Delivery Plan.
Need additional Park and Ride (10)	Four Park and Rides are planned around the city, three of which being within the urban expansion areas. Additional sites can be reviewed within the Local Transport Plan or Hereford Area Plan.
Disagree with route options within study corridor (10)	Precise routes for the Hereford Relief Road will be addressed within the Hereford Area Plan. Routes within the Amey Study were indicative only.
<b>Summary of responses from Stakeholders</b>	
<b>Ballingham, Bolstone and Hentland GPC:</b> Proposal should improve rail lines. Greater provision of park and ride east of the city.	Improvements to the Worcester rail track are included within the policy and additional park and Ride sites can be reviewed within the Local Transport Plan or the Hereford Area Plan.
<b>Belmont Rural Parish Council:</b> Do not agree with movement policy - relief road should be extended to provide full ring road/ bypass. Outer preferred route should be adopted to minimise the impact on existing communities.	Four Park and Rides are planned around the city, three of which being within the urban expansion areas. Additional sites can be reviewed within the Local Transport Plan or Hereford Area Plan.

<p><b>Boyer Planning (for Bloor Homes):</b>  Support the need for blended package of transportation measures and note proposals for western alignment of road. Support the intent of the next phase of the road to be constructed between the A49 and A465. Delivery of the new link is not considered to be a necessary precursor to the development on the southern site, with financial contributions towards its construction toward the end of the development being more appropriate. The road is infrastructure required to support development not only at the city but across the county - financial contributions will therefore need to be sought from a wide range of development proposals and not merely the strategic sites. Bloor Homes are examining the transport measures required to support the level of development proposals and how it can contribute to the blended package of transport measures.</p>	<p>Comments are noted. Work is ongoing regarding the phasing and delivery of the road and will be included within the submission Core Strategy and the Infrastructure Delivery Plan.</p>
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<p><b>Breinton Parish Council:</b>  Unimproved sustainable travel has contributed to increase congestion. Proposed growth so developers build a road. Western route is the least effective in reducing over capacity on existing junctions. Inner western relief road cuts through the only tourist cycle route which starts/finishes in city, also Wye Valley national trail and historic Green Lane bridleway are tourism asset. Employment land accessed via western relief road indicates that employee car use may remain high. Of the road options, eastern routes perform best in terms of reducing delay in the city. Many over capacity junctions are on east side and as such the eastern bypass has greatest improvement opportunities. Inner western routes requires demolition of 2 houses in Kings Acre Road. Significant negative effects upon the River Wye SAC. Risk to water supply, intake is close to proposed road. No commitment by Council to reduce car use in city.</p> <p>Western inner relief road causes severance to community. Unlikely that level of housing will generate sufficient funds to fund relief road in plan period. Relief road won't improve traffic movements only provide access to housing land. No reference to improving access to rail services at rural locations where modal shift from car could result.</p>	<p>Studies have confirmed the need for a relief road along with sustainable transport measures. Modelling has predicted future traffic movements in connection with route and development options. Developer contributions will be sought towards the road. The Amey study has considered the route options and concludes that in environmental and engineering terms an inner western route corridor is preferred. A HRA on the road has assessed the ecological impacts and confirms significant impact to the River Wye SAC from an eastern route. It will be the Hereford Area Plan to determine the precise route of the western route and a number of amenity and environmental issues will need to be addressed.</p>
<p><b>Callow and Haywood Parish Council:</b> Do not agree with the proposed relief road.</p>	<p>Comments are noted.</p>

<p><b>Clethonger Parish Council:</b> No justification for a relief road without building of homes. Does not support building of a relief road in any area of the county, nor the building of homes on the scale suggested. Economics for the road do not add up, funding from builders is not enough, additional funding is required. Relief road will be piecemeal with no guarantee of its completion leaving cul de sac leading nowhere. Relief road west of city is damaging to environment, need to preserve look / feel of Hereford not destroy hectares of productive fields, west is gateway to Golden Valley. Other alternatives to relieving congestion in city should be implemented. Prevailing western wind will mean air/noise pollution from road will affect city. In need for road is proven it should be an eastern route where SSSI issues could be overcome.</p>	<p>Studies have confirmed the need for a relief road along with a package of sustainable transport measures. Developer contributions will be required as set out in the Infrastructure Delivery Plan and CIL. The relief road will form an alternative trunk road. The Amey study has considered the environmental and engineering aspects and recommends an inner western route. A HRA has considered the ecological impacts and confirms significant impacts to the River Wye SAC from an eastern route. The Hereford Area Plan will define the precise route and will need to take into account amenity and environmental issues.</p>
<p><b>CPRE:</b> Object to proposal for western relief road - need not established, viability (cost/benefits), inadequate and flawed options study, environment impact not adequately assessed - all need addressing before adopting western relief road into Core Strategy.</p>	<p>The need for a relief road has been confirmed in transport studies. The Infrastructure Delivery Plan sets out the necessary infrastructure required to deliver the planned growth of the city. A Viability Study sets out the costs and expectancy of providing such infrastructure from development proposals. The HRA confirms the ecological impacts to the River Wye SAC from either route option.</p>
<p><b>Dinedor Parish Council:</b> Plan is unclear and unsustainable, desperate need for bypass and second river crossing.</p>	<p>Comments are noted. The plan will continue to be subject to a Sustainability Appraisal in order to ensure the policies and proposals are as sustainable as possible.</p>

<p><b>Drivers Jonas Deloitte (for Church Commissioners):</b> Supports western inner alignment for relief road. This broad alignment would allow a good balance between the objectives for the relief road as a route for trunk road traffic seeking to avoid the city centre, to act as part of the network of routes for traffic travelling across the city and to serve the proposed employment areas and park and ride sites. Initial master planning contributes to the blended transport package. Supports the thrust of the phases suggested. Look forward to engaging with Herefordshire Council on viability and phasing of development.</p>	<p>Comments are noted.</p>
<p><b>English Heritage:</b> Recommend the policy incorporates a phased approach to the delivery of significant new infrastructure, particularly the proposed relief road and strategic P&amp;R sites; the introduction of sustainable transport packages and enhancement measures, as far as possible to be introduced in earlier phases. A clear statement required on all new infrastructure seeking to avoid and minimise impacts on the historic environment and historic assets and mitigate any unavoidable impacts. Welcome involvement in assessing infrastructure options for relief road.</p>	<p>The phasing of infrastructure delivery will be included within the pre-submission Core Strategy and the Infrastructure Delivery Plan. Reference to historic environment and assets has been included within the policy and text.</p>
<p><b>Environment Agency:</b> A number of significant constraints will need to be addressed in in the provision of the relief road within a western corridor route.</p>	<p>These constraints have been highlighted within the Habitat Regulation Assessment and work is ongoing to address these. Reference to the Source Protection Zone has been made within the policy.</p>

<p><b>Hereford City Council:</b> Does not accept that a proposal for an inner western route relief road that will not, when taken alongside proposed housing developments, significantly reduce congestion in the city is a reasonable option. Call for more work on properly defined traffic reduction schemes to be included in planning for Hereford. Recognise the value of a second river crossing for city. High cost of the relief road and loss of agricultural and amenity around the city could only be justified by a scheme that brought real benefits, not simply maintaining the status quo. The benefits of detrunking the A49 through the city are unproven and insufficient to warrant such a scheme.</p>	<p>Transport studies have confirmed that a relief road along with a package of sustainable transport measures are required to manage congestion and enable the planned growth of Hereford. The relief road will also offer an alternative trunk road for through traffic. The planned growth is necessary to provide new housing and job opportunities.</p>
<p><b>Hereford and Worcester Garden Trust:</b> Conflict between Herefordshire Council's green agenda and its transport aspirations is irreconcilable. Relief road route chosen will damage some of the best countryside within walking distance of Hereford. The various routes identified all cut through the Belmont parkland, would destroy historic landscape but would make existing golf course and Belmont House untenable. Breinton and Belmont tick all the boxes for fulfilling Herefordshire Council's green aspirations.</p>	<p>The Amey study has considered the environmental and engineering impacts of the road on either option. It acknowledges that the landscape implications are generally greater on the western side. The Hereford Area Plan will identify a precise route and design that take account of and address these constraints.</p>
<p><b>Herefordshire Environment Partnership:</b> Need to address reductions in car use as well as efficiency of the system as a whole - reduce co2 emissions. Relief road proposals must not be seen as an independent project but part of a comprehensive, extensive and integrated package of transportation measures. More clarity on sustainable transport measures. Integrated proposals with green infrastructure.</p>	<p>Change Proposed. Additional paragraphs have been added to the introduction of Policy H2 in order to highlight the need to reduce car use and address climate change mitigation issues. Reference to links to green infrastructure have been included within the policy text.</p>

<p><b>Herefordshire Friends of the Earth:</b> welcome and strongly support most proposals but remain wholly unconvinced that the Hereford Relief Road is appropriate, as none of the evidence base seems to suggest that it is necessary or desirable. Given funding sources have yet to be identified it is necessary to be sure that the rest of the policy can proceed without a relief road. Published evidence suggests that the road would encourage more car use and that congestion would be no less than present because of all the housing growth. Evidence suggests that a relatively small volume of traffic would find the relief useful as most traffic crossing the Wye is making journeys to or from Hereford. Cost effectiveness of the road is also questioned. A 'New Sustainable Transport Option for Hereford' report is submitted shows that according to current modelling there is hardly any difference in journey times with or without a relief road.</p>	<p>General support noted. Transport studies have confirmed the need for a relief road along with a package of sustainable transport measures to enable the planned growth of Hereford and to manage congestion. Modelling has predicted the expected traffic movements in relation to the growth proposals. It indicates the impact upon main junctions and confirms little difference between either road option.</p>
<p><b>Herefordshire and Worcestershire Chamber of Commerce:</b> Plans to develop a bypass have been resoundingly supported by City businesses. Broad agreement that a bypass is a necessity for the development of Hereford and central to the alleviation of the current traffic burden. West is more expensive but deliverable, east offers better economic potential with the linkage between Rotherwas and the Worcester Road. What is being done to show that the eastern option is undeliverable. If a case of west or no bypass, members will show support for a western route.</p>	<p>Comments and support for relief road noted. The HRA has identified the significant ecological impacts upon the River Wye SAC in respect of an eastern route. Any route that passes over or adjacent to the Lugg Meadows is also going to face strong resistance given the local and national protection afforded through planning policy in respect of its wildlife and local amenity value.</p>

<p><b>Highways Agency:</b> Recognises finding a deliverable transport strategy for growth is challenging. Concerns about effect of development on the safety and freeflow of traffic on the road network through Hereford. Plan is fundamentally dependent on the relief road and they have to be satisfied that this critical piece of infrastructure is deliverable. Questions over deliverability give rise to a number of concerns relating to several Core Strategy policies. If the relief road is to be trunked it will need to be of agreed design. Has queries in respect of the Study of Options and Sustainable Transport Options evidence base documents that have informed the Core Strategy. Will require Implementation Plan to identify approximate phasing for delivery, cost estimates, how each piece of infrastructure will be funded and in what order.</p>	<p>Transport studies have confirmed that the planned growth of Hereford can be accommodated through the provision of a relief road and associated package of sustainable transport measures. The Infrastructure Delivery Plan will confirm the cost and delivery of the road. The Viability Study will confirm the reasonable contribution from developers to be sought through the Council's CIL.</p>
<p><b>Holmer and Shelwick Parish Council:</b> Increase in housing will mean 30% more trips and traffic which even with the relief road will mean longer journey time / more congestion. Access to the employment land via the western relief road indicated car use remaining high for employment users. Eastern relief road option will reduce delays as many over capacity junctions are on the east side of the city. No commitment from Herefordshire Council to reducing car use in the city. Increase in policing needed at time of budget constraints.</p>	<p>The Council have reconsidered and reduced the amount of new housing to be built over an extended Plan period. Transport studies confirm that such a planned growth can be accommodated with congestion being managed. The Amey study and HRA make clear the preference for the western route and environmental constraints of the eastern route respectively. Modelling has predicted the expected traffic movements on main junctions as a result of the growth and with development options. The Plan policy confirms and encourages use of modes other than the car.</p>

<p><b>Lower Bullingham Parish Council:</b> Additional river crossing essential before any further large scale development/ growth. Flooding of road network. Existing bridge crossing vulnerable to incidents. Inadequate cycling provision and cycle parking. Green transport options will not achieve their aim to reduce car use.</p>	<p>The emphasis of the policy is to reduce car use in the city and increasing sustainable transport modes.</p>
<p><b>Lyonshall Parish Council:</b> Relief road welcome, improve cycling/walking routes, maintain good public transport links.</p>	<p>Comments are noted.</p>
<p><b>National Trust:</b> Although any proposed inner western route would not directly impact on NT property, need to consider them within their setting and wider context. Relief road will have an adverse effect on the tranquillity and peaceful enjoyment of the area including the Wye Valley Walk which links to NT property at Breinton.</p>	<p>Noted. The Hereford Area Plan will need to give particular regard to environmental and amenity issues when identifying the precise route and design to avoid undesirable impact.</p>
<p><b>Natural England:</b> The Hereford Relief Road is a serious concern. Relieved to see confirmation of the western route, which evaluation through the HRA process has shown poses fewer risks to the River Wye SAC. However, the inner west route is likely to have negative impacts on landscape, views and considerable work on least impact design and construction will be required if it is to avoid risks to the SAC. It is not clearly explained why Option 2 of the sustainable transport options has been chosen or how the measures are to be funded.</p>	<p>Comments particularly on western route noted. Work is ongoing to address the issues highlighted by the HRA regarding the River Wye SAC. More information regarding choice and deliverability of transport measures will also be included within the Infrastructure Delivery Plan and the Local Transport Plan.</p>
<p><b>Pixley and District Parish Council:</b> Improvements to Hereford / Ledbury rail line, continue the service. Improve parking and traffic issues.</p>	<p>Improvements to the Worcester rail track are included within the policy. Specific car parking issues will be addressed within the Local Transport Plan and the Hereford Area Plan.</p>

<p><b>Pyons GPC:</b> Relief road to be built as soon as possible to remove vehicles from centre. New river crossing needs to be prioritised. As a rural county cars will always be required, park and ride must be available if existing car parks are removed.</p>	<p>Comments are noted.</p>
<p><b>Stretton Sugwas Parish Council:</b> Increase in traffic will worsen congestion and proposed inner relief road will not alleviate anticipated increase. Traffic to employment land will add significant increases to traffic and journeys by vehicles. There will be significant deleterious effects on the River Wye SAC by construction of the bridge crossing. Herefordshire Council shows no commitment to reducing car use in city thus far.</p>	<p>Transport studies have confirmed that the increase in traffic resulting from the planned growth can be accommodated on the existing network with the provision of a relief road and associated sustainable transport measures. This will enable congestion to be managed. Whilst the Habitat Regulation Assessment is ongoing to assess the likely impacts of proposals on the River Wye SAC, work to date indicates that there are fewer risks from a western route. The emphasis of the policy is to reduce car use in the city.</p>
<p><b>West Mercia Police:</b> Support objectives to reduce congestion and improving overall transport environment for residents, visitors and shoppers. Concern that changes to existing road network should be implemented carefully to ensure emergency services reach incidents. Question whether relief road is actually deliverable by 2026.</p>	<p>Comments and support noted. Work is ongoing regarding the phasing and delivery of the road and will be included within the pre-submission Core Strategy and the Infrastructure Delivery Plan.</p>
<p><b>Any new issues to be considered in HAP</b></p> <p>Precise route for the Hereford Relief Road</p>	
<p><b>Any new options to be considered before Submission?</b></p> <p>Possible alternative eastern route - Further transportation studies have investigated an alternative eastern route. However ecologic impacts upon the River Wye SAC and Lugg Meadows is likely. Any route east will face strong resistance given the local and national protection afforded through planning policy in respect of its wildlife and local amenity value.</p>	
<p><b>Any new evidence required?</b></p> <p>Further traffic modelling  Results of the community poll  Further information regarding funding and phasing  Further details relating to historic features</p>	

<b>Question:</b>	<b>Hereford Q4/5</b>
<b>Do you agree with the preferred growth distribution policy for Hereford?</b>	
459 respondents answered this question of which 392 completed the yes/no boxes Yes - 42 (11%) No - 350 (89%)	
<b>Summary of free-write questionnaire comments received</b>	<b>How addressed in Core Strategy</b>
A number of comments were received, the most common of which are indicated below;	
Disagree with housing growth agenda for Hereford (141)	Change proposed. Following a reassessment of the spatial strategy and a housing requirements study update, 2000 fewer homes are now being planned for in Hereford. This takes account of the latest household projections, the need for affordable housing, an allowance for in-migration and the reduction in house building.
Concern regarding infrastructure provision - water, sewerage, energy (126)	As part of the Infrastructure Delivery Plan, ongoing discussions are taking place with infrastructure providers to ensure the necessary works are programmed.
Concern regarding health provision (69)	Community hubs are planned for the urban expansion areas which could include additional health provision if required.
Question where the population is coming from (52)	The local housing requirements study update has confirmed that in-migration will continue to form a significant element of the future population. Based on past trends an allowance is being made for this to continue over the Plan period. No local details are available below County level.
Concern over loss of farmland (51)	Hereford is surrounded by high class agricultural land. Whilst the need to preserve such land will feature highly in the overall assessment the loss of some high quality agricultural farmland will be inevitable.
Use more brownfield land (26)	Limited brownfield land existing in Hereford but the strategy is to use brownfield prior to greenfield when possible.
Disagree with distribution as proposed (23)	Change proposed. The revised strategy proposes a distribution that includes less strategic sites and more small non-strategic sites dispersed around the city. This reflects reduction in housing and comments made.
Concern about the loss of landscape character (23)	Further landscape assessment work has been undertaken which has helped influence the choice of strategic sites for the revised option.

Concern regarding the provision of community facilities, sport, leisure, open space, green infrastructure (23)	All urban expansion areas are being planned with community facilities, open space and green infrastructure with additional sport and leisure facilities where required. Further details will appear within masterplans and/or the Hereford Area Plan.
Disagree to number of homes to an area (16)	Changes proposed. Some expansion areas have seen a reduction in the number of new homes with the revised strategy seeking to provide more homes on smaller sites around the city.
<b>Summary of responses from Stakeholders</b>	
<b>Ballingham, Bolstone and Hentland Group Parish Council:</b> Wider distribution where there are good road / rail links rather than large estates.	Change proposed. The revised distribution is seeking to provide more smaller sites dispersed around the city where good communications exist.
<b>Belmont Parish Council:</b> Agree northern / western expansion policies but disagree with southern expansion as area is already over developed.	Support for northern/western expansion areas noted. Southern area has been selected for its suitability for development and its relationship with built form. Its development will need to include sustainable transport measures to reduce car usage.
<b>Breinton Parish Council:</b> Why build 8500 homes in Hereford when whole county only needs 7700 for local people. Sewerage treatment in Hereford can only accommodate 3500 new homes. Water quality of the River Wye SAC may be significantly affected by increase in demand for waste water treatment. Lack of bed capacity in Hereford County Hospital. Development of mainly greenfield land will have a negative effect on the efficient use of land. Best grade agricultural land should not be used for housing.	Change proposed. The overall housing distribution has been reduced for Hereford following a reassessment of local housing requirements, a reduction of recent house building and in response to public comment. Changes proposed take account of issues raised by statutory undertakers, stakeholders and issues raised in assessments including the SA/HRA.
<b>Bridstow Parish Council:</b> Agree all policy areas.	Comment noted
<b>Clehonger Parish Council:</b> Do not agree with housing growth - it is this proposition which is driving proposal for a relief road.	Change proposed. The overall housing distribution has been reduced for Hereford following a reassessment of local housing requirements, a reduction of recent house building and in response to public comment. The proposal for the relief road and package of sustainable transport measures are required to enable the growth proposals. The overall housing distribution has been reduced for Hereford following a reassessment of local housing requirements, a reduction of recent house building and in response to public comment.

<p><b>CPRE:</b> Consider previously submitted housing figures for county should be 15390 with 3300 for Hereford as being more realistic, more readily funded and less environmentally damaging. To ignore a major city centre site at the racecourse for housing with its obvious advantages for sustainability would be a major flaw. Housing numbers and the relief road are interlinked in such a way that it raises questions principally about phasing. Does the community have the skills, capacity and experience to manage over 30% growth in population in such a short period? Fundamental information is missing in respect of the impact on communities and service. Assessment required on the impact upon the River Wye SAC in respect of abstraction and discharges.</p>	<p>Changes proposed. The Plan period has been extended. The overall housing County figure has been reduced to 16,500 with distribution to Hereford being reduced by 2,000. This follows a reassessment of local housing requirements, a reduction of recent house building and in response to public comment. Housing proposals have been informed by a number of assessments and particularly the SHLAA which does not identify the racecourse as having potential. The planned growth of Hereford will require new infrastructure including a relief road, community and health facilities. The SA/HRA along with other assessments has informed Plan revisions.</p>
<p><b>Dinedor Parish Council:</b> Accept need but current plan is too concentrated on certain areas. Policy is discriminatory to rural villages. More provision for small organic growth in rural parishes without it a viilage will die.</p>	<p>Changes proposed. The overall housing County figure has been reduced to 16,500 with distribution to Hereford reduced by 2,000. This follows a reassessment of local housing requirements, a reduction of recent house building and public comment. Marginally more housing is now proposed in rural areas reflecting the need for small developments.</p>
<p><b>Environment Agency:</b> Requirement for water efficiency measures and use of SUDs in all expansion areas. Need to include all water (environmental) infrastructure in Infrastructure Delivery Plan.</p>	<p>Agreed. Changes proposed. The IDP will need to reflect the water requirements.</p>

<p><b>English Heritage:</b> Welcome the commitment for major growth to be master planned and the emphasis placed on the importance of integration with the existing urban edge and wider countryside. For each of the urban expansion areas (Policies H4-H6) the Historic Environment Development Impact and Design Study (HEDIDs) approach will offer a useful basis on which to inform any master planning process.</p>	<p>Comments noted. Studies such as HEDIDS will inform the more detailed proposals contained in the Hereford Area Plan and site specific masterplans.</p>
<p><b>Hereford City Council:</b> Confirm previous criticisms to following targets in RSS. Need to assess calculations. RSS housing targets disproportionate to the needs for Hereford. Public funding reductions weakens key argument for increase in housing. Insufficient evidence regarding community facilities / housing infrastructure.</p>	<p>Changes proposed. A reassessment of local housing requirements has reduced housing numbers from those within the RSS. Key infrastructure along with community and health facilities will be required to be provided along with development proposals.</p>
<p><b>Herefordshire Environment Partnership:</b> Need to create new networks within the existing urban areas and not rely on existing limited ones. Co-ordinated approach required using green infrastructure. Emphasis to be given to increasing water efficiency. Water related matters should be given more importance.</p>	<p>Agreed. Changes proposed. The IDP will make clear the new infrastructure required to be provided alongside new development. This will include improved/new green infrastructure and the need to reflect the water requirements.</p>
<p><b>Hereford Futures:</b> Agree all policies.</p>	<p>Comment noted</p>

<p><b>Holmer and Shelwick Parish Council:</b> Why build 8500 homes in Hereford when whole county only needs 7700 for local people. Sewerage treatment in Hereford can only accommodate 3500 new homes. Water quality of the River Wye SAC may be significantly affected by increase in demand for waste water treatment. Lack of bed capacity in Hereford County Hospital. Development of mainly greenfield land will have a negative effect on the efficient use of land. Best grade agricultural land should not be used for housing.</p>	<p>Changes are proposed to reflect local housing requirements, a slowdown in house building activity and public comment. In migration will continue within the County and an allowance is being made within the new figures to reflect past trends. The changes proposed also reflect the issues being raised from various assessments including the SA/HRA. The need for new infrastructure including health and community facilities will be set out in the Infrastructure Delivery Plan to ensure that key requirements are provided alongside the new development. Hereford is surrounded by best quality agricultural land. However, its loss will be limited and considered against other key considerations. SHLAA has helped inform the plan on potential housing land.</p>
<p><b>Lower Bullingham Parish Council:</b> Infrastructure and services will not cope with the increase demand. Growth should be organic.</p>	<p>Additional infrastructure and services will be provided and these will be identified within the Infrastructure Delivery Plan. Changes are proposed to provide more smaller non-strategic sites dispersed around the city.</p>
<p><b>National Trust:</b> Information provided is incomplete and misleading. Whilst recognition of green infrastructure corridors is welcomed some corridors are missing.</p>	<p>Changes proposed. Further work has been undertaken regarding the green infrastructure and a revised map will be included within the pre-submission version.</p>

<p><b>Natural England:</b> The HRA has highlighted uncertainties regarding water resources and water quality in relation to the River Wye SAC making it clear that development in Hereford will not be able to commence until necessary water infrastructure improvements are in place and it is therefore quite possible that development will have to be back-loaded within the plan period. The Core Strategy is overly reliant on the delivery of the relief road. Recommend both the prioritisation of other, more sustainable, transport options and the development of a viable alternative CS which would be achievable without the relief road. Alternatives could include lower housing numbers, the phasing of growth, a strategy which looks beyond 2026. Support for a dispersed distribution. Policy should make clear that Surface Water Management Plans are required and emphasise SUDs integrated into green infrastructure network.</p>	<p>The issues identified by the HRA will need to be addressed. Water supply and treatment and the impacts to ecology from development are the main concerns. The Water Cycle Study also makes clear the constraints to development. To address these issues an LDF Water Steering Group has been set up to reach consensus on how development is able to proceed. The group is to examine the impacts of water abstraction and treatment on existing watercourses based on increased demand through the revised growth now being promoted in the Core Strategy. An HRA on the provision of a Hereford Relief Road has scoped issues for both eastern and western routes. Either will have impacts upon the River Wye SAC, however greater risks of significant impact exist on an eastern route corridor given the hydrological and related flood risk issues particularly over and around the Lugg Meadows. Transport studies have confirmed the need for the relief road along with sustainable transport measures to enable the planned growth of the city.</p>
<p><b>Sport England:</b> No argument with dispersed option. Concerned to ensure existing sport facilities are protected where they are still needed and might be under threat from growth proposals. New sports facilities need to be provided to deliver sustainable communities where existing facilities do not have the capacity to absorb additional demand.</p>	<p>Comments are noted. The Sports Facilities Framework and the PPG17 Audit is informing the Plan on the sports facilities and open space/play areas needed along with new development. These also address the quality of existing facilities. Requirements for sports facilities are included within expansion areas where the need has been demonstrated. Plan policy also seeks to protect existing facilities.</p>

<p><b>Stretton Sugwas Parish Council:</b>  Need for 8500 houses not demonstrated. Growth in housing to accommodate immigration not desirable / affordable. Fail to see how additional sewerage capacity can be delivered. Significant concern over lack of hospital bed capacity. Proposed development on greenfield land will have an adverse effect on re-using brownfield land. Urban area of Hereford would change nature / character of Stretton Sugwas to an urban dormitory having a deleterious quality of life with no demonstrable improvement. Best grade agricultural land should not be used for housing.</p>	<p>Changes are proposed to reflect local housing requirements, a slowdown in house building activity and public comment. In migration will continue within the County and an allowance is being made within the new figures to reflect past trends. The changes propose a reduction of 2,000 homes. Following re-assessment, Three Elms has been confirmed as a sustainable location for new housing and employment.</p>
<p><b>Welsh Water:</b> Both trunk water mains supplying the city will require upsizing. The cost of any upsizing in advance of a water undertaker carrying out the work will fall to developers. There will also be a requirement for off-site mains extension from the trunk system to the proposed developments once there location is confirmed and again this can be done. Proposals within employment sites may need non-potable water which may need solutions with potential developers. The recent upgrade to the waste water treatment works at Eign and Rotherwas will allow for an additional 3800 homes to be connected for treatment. Further homes above this will required more improvement works.</p>	<p>Comments noted. Changes are proposed to reduce housing in Hereford by 2,000. Water supply and treatment and the impacts to ecology from development are main concerns. The Water Cycle Study also makes clear the constraints to development. To address these issues an LDF Water Steering Group has been set up to reach consensus on how development is able to proceed. The group is to examine the impacts of water abstraction and treatment on existing watercourses based on increased demand through the revised growth now being promoted in the Core Strategy.</p>

<p><b>West Mercia Police:</b> Priority to achieve safe communities. Support for proposals to concentrate development in the strategic locations to assist efficient delivery of emergency services. The locations for growth should be supported by evidence of the social infrastructure (ie police/fire) required to enable development to come forward. Developer contributions will be required from the growth proposed.</p>	<p>Comments are noted. Community facilities and protection services are requirements for growth proposals. These will be identified within the Infrastructure Delivery Plan and will form policy requirements of expansion areas.</p>
<p><b>Any new issues to be considered in HAP:</b></p> <p>None</p>	
<p><b>Any new options to be considered before Submission?</b></p> <p>none specific to this policy</p>	
<p><b>Any new evidence required?</b></p> <p>Possible review of urban expansion areas using SHLAA Surface Water Management Plans for all urban expansion areas</p>	

<b>Question:</b>		<b>Qu: No: 6/7</b>
<b>Do you agree with the preferred northern expansion policy?</b>		
398 respondents answered this question of which 372 completed the yes/no boxes Yes - 49 (13%) No - 232 (87%)		
<b>Summary of free-write questionnaire comments received</b>	<b>How addressed in Core Strategy</b>	
A number of comments were received, the most common of which are indicated below.		
Concerns regarding the loss of farmland (91)	Agricultural Land Classification provides a method for assessing farmland to enable informed choices about the future use of land. PPS7 indicates that the presence of best and most versatile agricultural land (Grades 1 to 3a) should be taken into account along with other sustainability considerations when considering alternative land use. Hereford is surrounded by high class agricultural land. Whilst the need to preserve such land will feature highly in the overall assessment, the loss of some high quality agricultural farmland will be inevitable.	
Concern regarding infrastructure provision - water, sewerage, energy (74)	As part of the Infrastructure Delivery Plan, ongoing discussions are taking place with infrastructure providers to ensure the necessary works are programmed.	
Disagree with number of homes to the area (49)	Changes proposed. Housing on the Holmer West site has been halved to reflect landscape issues and public concern. This location will include a northern park and ride and cycling links to existing facilities in the City.	
Concern about loss of landscape character (43)	Change proposed. Further landscape assessment work has been undertaken which has helped influence the choice of sites, including the halving of the proposed housing numbers on the Holmer West strategic site. Masterplans and the Hereford Area Plan will contain details to ensure the Holmer West scheme takes account of landscape character issues.	
Use more brownfield land (40)	Limited brownfield land exists within the City. The strategy seeks to use brownfield land prior to greenfield wherever possible.	

Concern regarding flooding on site (32)	The eastern boundary of the Holmer West site is defined by the Ayles Brook, which is identified by the Environment Agency as being in Flood Zone 3. Development of the site will be planned so as to ensure that the risk of flooding is mitigated through siting, design and the incorporation of flood management measures where necessary.
Concern regarding health provision (30)	The Holmer West expansion area will include a community hub which will have facilities for further health provision if required.
Disagree with specific expansion area (Holmer west) (30)	Changes proposed. Housing on the Holmer West site has been halved to reflect landscape issues and public concern.
Need to protect important local features (28)	Urban expansion areas will be masterplanned to ensure that important local features, whether they be landscape features or listed buildings for example, are protected and enhanced.
Concern about increase traffic levels on Roman Road (24)	The proposals for the relief road and a package of sustainable transport measures are required to enable the growth proposals. The Holmer West expansion area will include a network of walking and cycling routes and a park and ride facility to encourage a reduction in the use of private cars.
<b>Summary of responses from Stakeholders</b>	
<b>Hereford City Council</b> strongly oppose the implication in the earlier document that the Holmer Road allotment could be a suitable site for a park and ride scheme.	The proposals are for a Park and Ride facility to be located on part of the northern expansion area, alongside the A49, and not on the allotments adjacent to the Racecourse. The expansion area, including the park and ride proposals will be detailed further in the masterplanning of the site and in the Hereford Area Plan.

<p><b>Holmer and Shelwick Parish Council</b> development is on greenfield land which will have an adverse affect on reusing brownfield. A number of listed buildings and a scheduled ancient monument in close proximity. Site is medium - high landscape sensitivity. South and east of site at risk of flooding. Inadequate sewerage treatment capacity and hospital beds.</p>	<p>Limited brownfield land exists within the city however the strategy seeks to use brownfield land prior to greenfield wherever possible. Urban expansion areas will be masterplanned to ensure that important local features, whether they be landscape features or listed buildings for example, are protected and enhanced. Changes proposed. Housing on the Holmer West site has been halved to reflect landscape issues and public concern. The eastern boundary of the Holmer West site is defined by the Ayles Brook, which is identified by the Environment Agency as being in Flood Zone 3. Development of the site will be planned so as to ensure that the risk of flooding is mitigated through siting, design and the incorporation of flood management measures where necessary. The need for new infrastructure and services, including waste water/sewerage management systems and health, will be set out in the Infrastructure Delivery Plan to ensure that key requirements are provided alongside the new development.</p>
<p><b>Lower Bullingham Parish Council</b> Growth should be organic in partnership with parish council and communities. Correct terminology needed when talking of open countryside.</p>	<p>Changes are proposed to provide more smaller non-strategic sites dispersed around the City. Further landscape assessment work has been undertaken which has helped influence the choice of sites, including the halving of the proposed housing numbers on the Homer West strategic site. The term 'open countryside' used within the Core Strategy, is a planning term and denotes less built up parts of the County where development opportunities are limited.</p>

<p><b>Stretton Sugwas Parish Council</b>  Number of listed buildings and scheduled ancient monument in close proximity to this site. South and east of Holmer west are at risk from flooding not certain if 'SUDs' will be sufficient. Medium to high landscape sensitivity and greenfield land. Should use brownfield first. Concern regarding the lack of sewerage capacity and insufficient hospital beds.</p>	<p>Limited brownfield land exists within the city however the strategy seeks to use brownfield land prior to greenfield wherever possible. Urban expansion areas will be masterplanned to ensure that important local features, whether they be landscape features or listed buildings for example, are protected and enhanced. Changes proposed. Housing on the Holmer West site has been halved to reflect landscape issues and public concern. The eastern boundary of the Holmer West site is defined by the Ayles Brook, which is identified by the Environment Agency as being in Flood Zone 3. Development of the site will be planned so as to ensure that the risk of flooding is mitigated through siting, design and the incorporation of flood management measures where necessary. The need for new infrastructure and services, including waste water/sewerage management systems and health, will be set out in the Infrastructure Delivery Plan to ensure that key requirements are provided alongside the new development.</p>
<p><b>Any new issues to be considered in HAP:</b></p>	
<p>None.</p>	
<p><b>Any new options to be considered before Submission?</b></p>	
<p>Extent of landscaping of expansion areas to protect setting of Hereford.</p>	
<p>Protection of important local features within design of the expansion scheme.</p>	
<p><b>Any new evidence required?</b></p>	
<p>Surface Water Management Plans for all urban expansion areas</p>	

<b>Question:</b>	<b>Hereford Q 8/9</b>
<b>Do you agree with the preferred western expansion area?</b>	
421 respondents answered this question of which 396 completed the yes/no boxes Yes - 46 (12%) No - 350 (88%)	
<b>Summary of free-write questionnaire comments received</b>	<b>How addressed in Core Strategy</b>
A number of comments were received, the most common of which are indicated below;	
Concern over loss of farmland (89)	Hereford is surrounded by high quality agricultural land. Whilst the need to preserve such land will feature highly in the overall assessment, the loss of some high quality agricultural farmland will be inevitable.
Concern regarding infrastructure provision - water, sewerage, energy (78)	As part of the Infrastructure Delivery Plan, ongoing discussions are taking place with infrastructure providers to ensure the necessary works are programmed.
Concern about the loss of landscape character (54)	Change proposed. Further landscape assessment work has been undertaken which has helped influence the choice of sites, including the removal of Whitecross as a strategic site. Masterplans and the Hereford Area Plan will contain details to ensure the Three Elms scheme takes account of landscape character issues.
Disagree with number of homes to the area (52)	Changes proposed. As the Whitecross site has been removed as a strategic site, the number of new homes within the Core Strategy has been reduced in the west by 1500.
Disagree with the Three Elms expansion area (33)	There has been a reduction of 1500 new homes in the western expansion area however the Three Elms area is seen as being able to provide a more comprehensive scheme.
Concern about increase traffic levels on local roads (33)	Changes proposed. The Whitecross site has been removed as a strategic site to address some of the concerns regarding access and traffic on Barton Road. The Three Elms expansion area will include a network of walking and cycling routes and a park and ride facility to encourage a reduction in the use of private cars.
Disagree with specific expansion area (Whitecross) (29)	Change proposed. Whitecross has now been removed as a strategic site due landscape and traffic issues and the level of public concern.
Concern regarding health provision (29)	The Three Elms expansion area will include a community hub which will have facilities for further health provision if required.

Use of brownfield land (28)	Limited brownfield land exists within the city, the strategy seeks to use brownfield land prior to greenfield wherever possible.
Need to protect important local features (23)	Change proposed. The Whitecross site has been removed to acknowledge a number of valued local landscape features and masterplans and the Hereford Area Plan will contain details to ensure the Three Elms scheme takes account of important local features.
<b>Summary of responses from Stakeholders</b>	
<b>Breinton Parish Council:</b> Proposed development on greenfield land will have adverse effect on re-using brownfield land. River Wye SAC may come under increased pressure from recreation activities. Development may have a negative effect on landscape quality. Whitecross area has historic importance due to local artist. Land around Breinton is an important area for recreation and exercise. Homes built in western areas will be under aircraft flightpath.	Change proposed. Limited brownfield land exists within the city however the strategy seeks to use brownfield land prior to greenfield wherever possible. The number of new homes within the western area has now been reduced by 1500 primarily due to landscape and public concerns by the removal of the Whitecross site.
<b>Drivers Jonas Deloitte (for Church Commissioners):</b> Welcomes policy. Confirmation that all objectives set out in policy can be met. Dwelling mix and affordable content will need to be undertaken as part of the Hereford Area Plan. Affordable homes, community infrastructure and sustainable measures to be considered alongside CIL for relief road and priorities set. Additional option: Identification of a western expansion area for around 2,500 new homes and supporting uses.	Comments are noted. The overall housing distribution has been reduced for Hereford following a reassessment of local housing requirements, a reduction in recent house building and in response to public comment. The number of new homes within the western area has now been reduced by 1500 due to landscape, access and public concerns by the removal of the Whitecross site.
<b>Environment Agency:</b> Any development in this area is likely to be subject to phasing and need to accord with the timescales of the Yazor Brook Flood Alleviation Scheme and further secondary flood risk mitigation/reduction works that will be necessary for some areas.	Work has now started on the Yazor Brook Flood Alleviation Scheme and the development of this expansion area will take this scheme and any remaining flood risk into consideration. The Infrastructure Delivery Plan will need to reflect any further flood mitigation requirements.
<b>Herefordshire Environment Partnership:</b> Need to be more explicit in terms of green infrastructure within or associated with expansion areas.	Change proposed. Additional information will be added to the pre-submission text with regards to green infrastructure.

<p><b>Highways Agency:</b> Delivery of this policy is dependent on the 'expanded capacity of the A438 by the provision of sustainable transport measures and/or a Hereford Relief Road'.</p>	<p>Comments are noted. Work is ongoing on the Infrastructure Delivery Plan which will address the delivery of the Hereford Relief Road.</p>
<p><b>Holmer and Shelwick Parish Council:</b> Proposed development on greenfield land will have an adverse effect on re-using brownfield land. Negative impact on River Wye SAC from increase in vehicle traffic. Development may have a negative effect on landscape quality. Whitecross areas has historic importance due to local artist. Lack of capacity for sewerage treatment and hospital beds.</p>	<p>Change proposed. Limited brownfield land exists within the city however the strategy seeks to use brownfield land prior to greenfield wherever possible. The number of new homes within the western area has now been reduced by 1500 due to landscape and public concerns. The need for new infrastructure including health, community facilities and sewerage capacity will be set out within the Infrastructure Delivery Plan to ensure that key requirements are provided alongside new development.</p>
<p><b>Natural England:</b> Pleased that this expansion site is not seen as being entirely reliant on the relief road and in this regard support its phasing in advance of northern expansions. HRA questions around water supply, use and quality. Local Enhancement Zones and Strategic Corridors should be referenced.</p>	<p>Change proposed. Further information will be added to the pre-submission text regarding green infrastructure. HRA work is ongoing regarding water supply and quality.</p>
<p><b>Stretton Sugwas Parish Council:</b> Proposed development on greenfield land will have an adverse effect on re-using brownfield land. Development may have negative effect on landscape quality.</p>	<p>Change proposed. Limited brownfield land exists within the city however the strategy seeks to use brownfield land prior to greenfield wherever possible. The number of new homes within the western area has now been reduced by 1500 due to landscape and public concerns.</p>
<p><b>Any new issues to be considered in HAP:</b></p> <p>Extent of landscaping of expansion areas to protect setting of Hereford Protection of important local features within the design of the expansion scheme.</p>	
<p><b>Any new options to be considered before Submission?</b></p> <p>Additional 1000 homes and supporting uses on the western expansion area was raised but this has been discount due to change in overall strategy which has reduced housing in Hereford.</p>	
<p><b>Any new evidence required?</b></p> <p>Surface Water Management Plans required for the expansion area</p>	

<b>Question:</b>	<b>Hereford Q 10/11</b>
<b>Do you agree with the preferred southern expansion area?</b>	
391 respondents answered this question of which 367 completed the yes/no boxes Yes - 74 (20%) No - 293 (80%)	
<b>Summary of free-write questionnaire comments received</b>	<b>How addressed in Core Strategy</b>
A number of comments were received, the most common of which are indicated below;	
Concern over the loss of farmland (84)	Hereford is surrounded by high quality agricultural land. Whilst the need to preserve such land will feature highly in the overall assessment, the loss of some high quality agricultural farmland will be inevitable.
Concern regarding infrastructure provision - water, sewerage, energy (76)	As part of the Infrastructure Delivery Plan, ongoing discussions are taking place with infrastructure providers to ensure the necessary works are programmed.
Concern regarding loss of landscape character (51)	Urban expansion areas will be masterplanned to ensure landscape character issues are addressed in the design of the scheme. Details will be within the master plan and/or Hereford Area Plan.
Disagree with the numbers of homes to the area (46)	The Strategic Housing Land Availability Assessment has been used to determine potential sites and their capacities together with landscape and environmental factors.
Concern about increase traffic on local roads (38)	Access to the site will primarily be from the Rotherwas Access Road with additional walking and cycling facilities included to discourage journeys by car. A park and ride and further bus routes will also be provided.
Concern regarding health provision (25)	It is proposed that a community hub be provided within the expansion area which will include provision for any necessary further health care requirements.
Use more brownfield land (19)	There is limited brownfield land available in Hereford, however the strategy seeks to use brownfield prior to greenfields wherever possible.
<b>Summary of responses from Stakeholders</b>	
<b>Ballingham, Bolstone and Hentland GPC:</b> Concern that housing will generate traffic in excess of estates. A rail station at Rotherwas would attract some commuters traffic to rail.	At this stage there are no plans by Network Rail to provide an additional rail station at Rotherwas. A park and ride facility will be provided to reduce the use of private cars.

<p><b>Boyer Planning (for Bloor Homes):</b> There are no environmental constraints that preclude development in this location. Areas of flood risk can be kept free of development within a comprehensive sustainable drainage strategy provided. Landscape and visual impact can be minimised through strategic planting. The Sustainability Appraisal recognises many of the positive aspects of development in this location, consistent with sustainability objectives. An additional option suggested which would include land within the UDP settlement boundary to the east of Lower Bullingham Lane increasing overall capacity of land south of the railway line to around 1300 dwellings.</p>	<p>Comments are noted.</p>
<p><b>Breinton Parish Council:</b> River comprises a physical barrier between the development and the city. Proposed development is on greenfields and will have an adverse effect on re-using brownfield land. Potential sustainable transport use uncertain. Development may have a negative effect on landscape quality.</p>	<p>There is limited brownfield land available in Hereford, however the strategy seeks to use brownfield prior to greenfields whenever possible. Mitigation will be included within the masterplan to address any remaining landscaping concerns. A number of sustainable transport links are planning to reduce the use of private cars.</p>
<p><b>Callow and Haywood GPC:</b> Herefordshire Council need to address the serious traffic problems in parish.</p>	<p>Sustainable transport links, including walking, cycling, bus routes and a park and ride are planned to reduce the need to use the private car.</p>
<p><b>CPRE:</b> Although land at Bullinghope has limited landscape value, its development would still be undesirable because of its poor relationship with the rest of the city.</p>	<p>A number of sustainable transport links are being planned to link the expansion area into city.</p>
<p><b>Environment Agency:</b> The timing and delivery of infrastructure investment and improvement has implications for development phasing.</p>	<p>Comments are noted. Work is ongoing as part of the Infrastructure Delivery Plan to ensure any necessary works are programmed.</p>
<p><b>Herefordshire Environment Partnership:</b> need to be more explicit in terms of green infrastructure within or associated with the expansion area.</p>	<p>Comments are noted and additional information regarding green infrastructure will be included within the policy and text.</p>

<p><b>Highways Agency:</b> Delivery of this policy is dependent on the 'expanded capacity of the A49 by the provision of sustainable transport measures and/or a Hereford Relief Road'.</p>	<p>Comments are noted. Work is ongoing regarding the delivery of the Hereford Relief Road and other sustainable transport measures.</p>
<p><b>Lower Bullingham Parish Council:</b> Current infrastructure / services are inadequate. Second river crossing is required. Community facilities need to be planned and constructed with development. Provision should be made for expansion of schools in neighbouring parishes.</p>	<p>Additional infrastructure will be provided as part of the development including a second river crossing. A community hub and additional school are also planned on site.</p>
<p><b>Natural England:</b> Agree in part pending HRA. Pleased that this expansion site is dependent on expanding the capacity of the A49 through the provision of sustainable transport measures and/or a Hereford Relief Road, and in this regard we support its phasing in advance of the northern expansions. HRA questions around water supply, use and quality which may be a particular issue for this expansion given its intension to develop earliest of the three expansion areas.</p>	<p>Discussions are ongoing regarding the water quality issues highlighted within the HRA.</p>
<p><b>Stretton Sugwas Parish Council:</b> Proposed development on greenfield land will have an adverse effect on re-using brownfield land. River comprises a physical barrier between the development and the city</p>	<p>There is limited brownfield land available in Hereford, however the strategy seeks to use brownfield prior to greenfields whenever possible. A number of sustainable links are being planned to link the expansion area to the city.</p>
<p><b>Any new issues to be considered in HAP:</b></p> <p>Additional land to the west of the expansion site - the strategy is to provide more smaller sites rather than larger strategic sites.</p>	
<p><b>Any new options to be considered before Submission?</b></p> <p>Additional land to the west of the expansion site</p>	
<p><b>Any new evidence required?</b></p> <p>Surface Water Management Plan required for the urban expansion site</p>	

## 5 Alternative Options

5.1 From all written comments received, the following is a summary of suggested new alternative options that were not previously considered as part of the Core Strategy Hereford Preferred Option process and its supporting evidence base. These have subsequently been assessed and commented on below.

5.2

- **Reduce/increase overall county/Hereford housing figures**  
Change proposed. Housing numbers have been reduced both for the county and in Hereford. This reflects the proposal to revoke regional strategies and the information contained within the Local Housing Requirements Study assessing housing demand.
- **Extend house building period**  
Change proposed. The plan period has been extended to 2031 to ensure a 15year period after adoption. Rolling forward the plan period also has significant benefits for planning and delivery of infrastructure.
- **Move housing from Hereford to market towns/ rural areas**  
Change proposed. The numbers of new homes to Hereford has been reduced. In rural areas, an extra allowance of 800 dwellings has been made to assist with rural affordability.
- **Proposal for an east/west relief road (A465-A438 + link to A4103)**  
Further work has been undertaken on the Hereford relief road. This alternative, partial eastern route has been subject to transport modelling. Although, the impact on the overall performance of the network was broadly similar to the western route, there are higher volumes on main radial routes on the east and in the villages of Bartestree and Lugwardine.  
HRA works has also shown that there is a greater potential for the eastern routes to have significant adverse effects on the integrity of the River Wye SAC.
- **Western urban expansion area to accommodate around 2,500 dwellings**  
Change proposed. The western expansion area has been reduced by 1500 homes in order to take into account landscape issues and public concerns.
- **Southern urban expansion area to accommodate around 1,300 dwellings**  
There are no changes to the Southern expansion area. The strategy is now to focus on more non-strategic sites rather than larger strategic sites.
- **Extend City Centre area to include Brooke Retail Park**  
Precise city centre boundaries will be considered within the Hereford Area Plan.
- **Submission of a New Sustainable Transport Option for Hereford.**  
This submitted report suggested that current modelling shows there is hardly any difference in journey times with or without a relief road. Transport studies have confirmed the need for a relief road along with

a package of sustainable transport measures to manage congestion and enable planned growth. Modelling has predicted the expected traffic movements in relation to the growth proposals. It indicated the impact upon main junctions and confirms little difference between either road options.