CORE STRATEGY POLICY DEVELOPMENT

Core Policy Area – Economy and employment Land

Preferred Policy Direction

The two policy directions detailed within this paper are Maintaining Supply and Employment Land Provision.

Employment Land Provision
A combination of the 5 options outlined in the Developing Options Paper is preferred based on the outcomes of the Employment Land Study. This will:

- Enhance the supply of land and opportunities for new employment development (including offices in appropriate locations), address deficiencies in supply through detailed allocations and/or mixed-use schemes in the Hereford and Market Towns and Rural Areas DPDs and enable appropriate extensions of existing businesses;
- Promote a range of size and type of business development within and on the edge of Hereford and the market towns, but particularly for offices, taking a sequential approach to their provision.

Maintaining Supply
The preferred policy direction will protect employment allocations and commitments ranked as “Best”, “Good” or “Moderate” in the Employment Land Study and will include criteria based policy concerning release of employment sites classified as “Moderate” or “Poor”, based on criteria such as:

- The impact of the loss on the range of supply;
- Whether the proposal would result in a net improvement in amenity;
- Consideration of the details of active marketing of the site; and
- An assessment of the viability of development.

1.0 Introduction

1.1 This report provides background information and evidence to support the policy directions that form part of the Core Strategy Place Shaping Paper. The full policy wording will form part of the pre-submission Core Strategy.

1.2 The Core Strategy will set out the vision and objectives for the Herefordshire Local Development Framework (LDF), together with the ‘place shaping policies’ at a strategic level, explaining how the county as a whole is expected to develop up to 2026.

1.3 The remainder of this report seeks to address the following questions:

- What is the current situation (issue)?
- What is the national, regional and local policy framework?
- What is the available evidence base indicating?
- What can the Core Strategy do?
- What were the results / indications for the Developing Options Consultation?
What further consultation has taken place?
What conclusions can be drawn?
What happens next?

2.0 The need for the policy

2.1 Sustainable communities need economic growth to ensure they are active and thriving. Wealth underpins social and cultural activities and the conservation of our environment. Ensuring a strong and diverse economy will help give people in Herefordshire more opportunities for work within the county, which could reduce the number of people needing to travel outside the county, thus helping to reduce carbon emissions and increasing the prosperity of Herefordshire residents.

2.2 Draft PPS4 states that planning system plays a key role in contributing towards improving economic performance; in that the planning system both affects productivity and employment – the two drivers of economic growth; and helps to deliver wider economic and social objectives, such as the regeneration of deprived areas and the provision of new housing.

2.3 Rural areas also have an important contribution to make to the regional and national economy, therefore proper planning for economic development of an appropriate scale in rural areas can ensure that communities can prosper and thrive whilst ensuring continued protection for the countryside.

2.4 The Economy of Herefordshire

2.4.1 Herefordshire’s greatest assets are its distinctive and largely unspoiled landscape and high quality of life; furthermore, Herefordshire has a growing profile as a centre of excellence in sustainable development, knowledge and practice.

2.4.2 Although Herefordshire students perform well at GCSE and ‘A’ level, there are relatively few people in the workforce with higher level skills. Whilst unemployment in the county is low, average wages are also low compared to the rest of the West Midlands and indeed the country. The economy is characterised by a large number of small businesses – nearly 60% of businesses employ less than four people, and there are fewer than 20 businesses in the county that employ more than 200 employees. As expected from a rural area, agriculture is important to the economy, though the largest employment sector is manufacturing, accounting for almost 18% of employment. Tourism is worth £272 million to the county each year, which is complemented by a growing trend toward ‘lifestyle’ businesses; whether in supporting tourism or in other areas such as creative industries.

3.0 The policy framework

3.1 National Policy

- PPS1: Delivering Sustainable Development (2005)
The purpose of this statement is to set out the overarching planning policies for the delivery of sustainable and inclusive patterns of development through the planning system. Paragraph 5 of the PPS states that the main objectives of the planning system are:
Making suitable land available for development in line with economic, social, and environmental objectives to improve people’s quality of life;

- Contributing to sustainable economic development;
- Protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;
- Ensuring high quality development through good and inclusive design, and the efficient use of resources; and
- Ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

In line with the Government’s commitment to promoting a strong, stable and productive economy, planning authorities should provide for improved productivity, choice and competition ensuring suitable locations are available for industrial, commercial and other developments, whilst recognising that economies are subject to change.

- **PPS4: Planning for Sustainable Economic Growth (2009)**

  This PPS sets out the Government’s comprehensive policy framework for planning for sustainable economic development in urban and rural areas including town centres.

  In respect of planning for economic development it is stated in PPS4 that at the local level the evidence base should:

  - be informed by regional assessments
  - assess the detailed need for land or floorspace for economic development, including for all main town centre uses over the plan period
  - identify any deficiencies in the provision of local convenience shopping and other facilities which serve people’s day-to-day needs
  - assess the existing and future supply of land available for economic development, ensuring that existing site allocations are reassessed against the policies in this PPS, particularly if they are for single or restricted uses
  - assess the capacity of existing centres to accommodate new town centre development taking account of the role of centres in the hierarchy, and identify centres in decline where change needs to be managed

  With regard to the local planning approach to economic development, PPS4 makes note that local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth, identifying priority areas with high levels of deprivation that should be prioritised for regeneration investment. They should also seek to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use; and should plan for the delivery of sustainable transport and other infrastructure needed to support their planned economic development.
Local planning authorities must also ensure that existing site allocations for economic development are not carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained, and wider economic uses or alternative uses should be considered.

- **The Taylor Review (2008)**
  The Taylor Review focuses on the rural economy and affordable housing. It identifies that there has been significant growth in the proportion of knowledge intensive business services in rural areas compared to urban areas, and that rural economies are characterised by a higher proportion of small and micro-businesses, self employment and home-based work. It goes on to state that in order to nurture these economies there needs to be a move away from excessively restrictive and inflexible planning practices, to safeguard employment space and support small and home-based business growth, including using redundant agricultural buildings where appropriate.

- **PPS6: Planning for Town Centres (2005)**
  PPS6 promotes a sequential approach to the location of major office developments, promoting first town centres, followed by edge of centre locations and then out of centre locations well served by public transport. Specifically it provides guidance on planning for offices in town centres and identifies that:
  - An assessment of the need for new office floor space over the development plan document period should be carried out as part of the plan preparation and review process;
  - Local need assessments will need to be informed by regional assessments and will form part of the evidence base for development plan documents; and
  - The physical capacity of centres to accommodate new office development and the town centre’s role in the hierarchy is also relevant to the planning for new office development.

- **PPS7: Sustainable Development in Rural Areas (2004)**
  PPS7 states that local authorities should be aware of the circumstances, needs and priorities of the rural communities and businesses in their area in order that they can ensure that the policies contained within the development plan are relevant and effective.

  With respect to economic development, the document outlines that local planning authorities should:
  - Identify suitable sites for future economic development particularly in rural areas where there is need for employment creation and economic regeneration.
  - Set out in local development documents their criteria for permitting economic development in different locations, including future expansion of business premises to facilitate healthy and diverse economic activity in rural areas.
• **PPG13: Transport (2001)**  
The key objective set out in this guidance is to promote accessibility to jobs, shopping, leisure facilities, and services by public transport, walking and cycling. Local authorities are advised to consider this when preparing local development plans and assessing planning applications. It states that ‘local authorities should adopt a positive, plan-led approach to identifying preferred areas and sites for B1 uses which are (or will be) as far as possible highly accessible by public transport, walking, and cycling;’ and that development involving large amounts of employment should be located in city, town and district centres and near to major public transport interchanges.

• **The Barker Review (2006)**  
Kate Barker was asked to lead an independent review of land use planning to consider how planning policy and procedures can better deliver economic growth and prosperity alongside other sustainable development goals.

The review suggests development plan policies should consider how the drivers of productivity can be supported, highlighting the benefits that employment and investment can bring an area and how they can be realised in their region/locality. In short, the Barker Review recommends that an elevated status should be attached to business and economic issues in the planning process.

• **Planning White Paper (2007)**  
The White Paper sets out the Government’s aim to create a planning system that positively supports economic development and encourages greater investment, both domestic and foreign, in the UK economy.

There is continued emphasis on the development of brownfield land and locating development in sustainable locations to reduce the need to travel. It further focuses upon town centre planning and the role of planning in dealing with climate change. It is also noted that to be competitive, business needs to respond much more quickly to changes in market conditions.

Changes in the way Local Planning Authorities approach and address economic development decisions are also suggested. In particular it states that:

- Planning authorities should take full account of the longer term benefits, as well as the costs, of development that will create jobs - including those with wider benefits to national, regional or local economies by improving productivity and competitiveness;
- Development plans should promote mixed-use development and respond to new forms of economic development enabling each locality to fulfill its potential;
- Authorities should make better use of market information and other relevant evidence in planning for sustainable economic development and in considering specific proposals for development; and
- Market information as well as environmental and social information should be used when determining planning applications that do not have the specific support of plan policies.
### 3.2 Regional Policy

- **Regional Spatial Strategy 11 (formerly RPG 11) for the West Midlands (2004)**
  
  It is noted that critical to the success of the Spatial Strategy will be the future performance of the Region's economy.

  Four major challenges have been identified for the Region:
  
  o Urban Renaissance – developing the Major Urban Areas (MUAs) in such a way that they can increasingly meet their own economic and social needs in order to counter the unsustainable outward movement of people and jobs facilitated by previous strategies;
  
  o Rural Renaissance – addressing more effectively the major changes which are challenging the traditional roles of rural areas and the countryside;
  
  o Diversifying and modernising the Region’s economy – ensuring that opportunities for growth are linked to meeting needs and that they help reduce social exclusion; and
  
  o Modernising the transport infrastructure of the West Midlands – supporting the sustainable development of the Region.

  Policy PA6 of the document states that local authorities should aim to provide and maintain a range and choice of readily available employment sites to meet the needs of the regional economy attractive to developers and operators and appropriate to market needs. Policy PA14 goes on to state that development plans and other strategies should support the sustainable diversification and development of the rural economy through the growth of existing business and the creation of new enterprise.

- **Draft RSS Phase 2 - Preferred Option**
  
  The Preferred Option was submitted to the Secretary of State on 21 December 2007 as the Draft Revision to the RSS. Within the draft preferred option, it is noted that the economy of the City of Hereford is considered relatively fragile and, with limits on the existing transport capacity, the extent to which Hereford can accommodate new development is limited. A priority for Hereford therefore will be to ensure that necessary transport infrastructure is provided to deliver the level of planned economic and housing growth, support the area’s local regeneration needs and protect its historic heritage. Outside of Hereford, further development in the county will be focused within key market towns acting as strategic locations for balanced housing and employment growth whilst continuing to protect the environment and character of Herefordshire.

  With respect to economic development, the document states that in preparation of development plans, local authorities should take account of:

  o the needs of existing businesses and taking account of the needs of inward investors;
  
  o the need to ensure that employment opportunities are accessible to areas of significant new housing development; and

Delivering Advantage sets out a Vision that by 2010:

‘The West Midlands is recognised as a world-class region in which to invest, work, learn, visit and live and the most successful in creating wealth to benefit all of its people.’

By 2010 it is anticipated that the region will have a truly diverse and dynamic business base. Key priorities in achieving the vision are enterprise, manufacturing, skills, transport and economic inclusion.

Four pillars underpin the strategy and action plan, and are:

- Developing a diverse and dynamic business base;
- Promoting a learning and skilful region;
- Creating the conditions for growth; and
- Regenerating communities.


The new Economic Strategy was launched on 10 December 2007. It sets an ambitious vision for the West Midlands:

‘To be a global centre where people and businesses choose to connect.’

The headline focus of the strategy is closing the gap in performance of the West Midlands and that of the UK as a whole. The Strategy focuses on three main components of the economy – Business, Place and People.

Spatial interventions are primarily focused on the Regeneration Zones, knowledge assets (including high technology corridors) and Birmingham as the main economic drivers in the economy. The Strategy also focuses more limited resources on market towns and locations facing economic change or responding to opportunity.


Rural Renaissance sets out Advantage West Midlands integrated approach to rural development. It sets out the strategy for implementing the West Midlands Economic Strategy (WMES) in the rural West Midlands. In implementing the Vision for the Regional Economic Strategy rural activity should seek to ‘achieve sustainable development in the rural West Midlands by improving access to opportunity and the number and quality of jobs available within sustainable rural communities’.

Under the WMES, the activities for the rural areas are as follows:

- Fostering and supporting rural business growth;
- Identifying and supporting rural skills and development;
Developing a modern rural infrastructure and environmental conditions;
Regenerating sustainable, well-supported rural communities; and
Championing rural West Midlands.


  Nearly all of Herefordshire, with the exception of Hereford City itself, is within the Rural Regeneration Zone. It is the only rural area in the country that has been designated by its Regional Development Agency as a key area for investment alongside the Region’s most deprived urban areas. The Vision is that:

  *By 2020, the Rural Regeneration Zone will be a connected rural area with a strong economy, a healthy environment and a rich quality of life for all.*

  A key strategic objective for the plan period therefore, is to develop a strong, diverse and sustainable rural economy. The challenge for the zone is to invest in activity that supports the diversification of the economy towards higher waged, knowledge intensive employment whilst continuing to develop the more robust aspects of the existing economies of food and farming, tourism and creative industries.

### 3.3 Local Policy

- **Herefordshire Unitary Development Plan (2007)**

  The Herefordshire Unitary Development Plan (UDP) was adopted in March 2007. Central to its Vision is progression towards more sustainable forms of development appropriate to Herefordshire. It seeks a balance that can both allow and promote appropriate kinds of sustainable activity and development in places that are best suited. An important function of the Plan is to provide a framework for residential and economic development to meet social needs in a manner that is properly balanced with environmental factors.

  Policy P12 explains that the UDP will seek to strengthen and diversify the county’s employment base by the identification of opportunities for new economic development which are energy efficient in terms of their overall location and transport requirements. It will give priority to the development of economic activities that are appropriate to the county’s character geographical orientation and indigenous resources. The plan adopts a sequential approach to the selection of locations for development. Hereford itself is the natural focus for the county and offers a wide range of employment, leisure, education and community uses. Hereford is identified as the focus for development in the sub-region within the Regional Spatial Strategy.
Herefordshire Local Development Framework
Policies in the recently adopted Unitary Development Plan will be saved for a period of 3 years and gradually replaced by the Local Development Framework as relevant documents are prepared. Work on the Core Strategy is well underway, with adoption expected in 2011. A number of Supplementary Planning Documents have already been adopted, to include:

- Planning Obligations SPD – adopted April 2008
- Model Farm SPD – adopted October 2008
- Polytunnels SPD – adopted December 2008

Herefordshire Economic Development Strategy 2005-2025
Herefordshire has a relatively fragile economy and must improve its performance if it is to deliver higher incomes and tackle issues of isolation and social exclusion. The Economic Development Strategy therefore sets out to directly improve levels of productivity, entrepreneurship, knowledge intensity and skills. In addition, it has been shaped by a guiding set of three principles in order to guarantee integrity and accountability; these are: diversity and equality, partnership and leadership, and quality.

The main aim of the Strategy is to raise the profile of Herefordshire through:

- Well connected and inclusive communities;
- Adaptable and skilled workforce;
- Workplace and resident income comparing favourably with the regional average;
- Balanced and diversified business base;
- Genuine commitment to sustainable development to reinforce a unique quality of life; and
- Stakeholders and agencies working together across a common agenda to deliver joint priorities.

Herefordshire Community Strategy (2006)
The Community Strategy for Herefordshire sets out a Vision for 2020 as a place ‘where people, organisations and businesses working together within an outstanding natural environment to bring about sustainable prosperity and well-being for all’.

Economic Development and Enterprise is a key theme for the strategy. In improving business and employment opportunities the strategy outlines the following key outcomes:

- More and better paid employment;
- A more adaptable and higher skilled workforce; and
- Reduced traffic congestion through access to better integrated transport provision.

The central purpose of the State of Herefordshire Report is to set out and monitor a set of indicators to progress towards outcomes and visions in the community strategy.
In terms of Economic Development and Enterprise, the report notes a number of important findings as follows:

- Median earnings are lower in Herefordshire than in the West Midlands and England;
- Herefordshire has low levels of unemployment and high levels of employment and economic activity;
- Herefordshire has high levels of self-employment compared to regional and national averages; and
- Over 80 percent of Herefordshire’s residents who work, do so within the county.

4.0 Evidence base
(Appendix 1)

- Employment Land Review (2009)
  Herefordshire Council commissioned a comprehensive study to look at employment land requirements within the county for the period up to 2026. The study indicates that overall there is good quantity of existing employment land supply within Herefordshire. The supply of land is skewed towards manufacturing/industrial type uses which as a sector are predicted to decline in the amount of land occupied over the study period. However, more limited opportunities exist for office uses. Supply is not evenly distributed across the county and areas of the county would benefit from increases in the quality and quantity of employment land opportunities.

In terms of developing policy for the Core Strategy, a number of recommendations arose from the study. These are as follows:

- The Core Strategy must ensure that the regional requirement for employment land is met; for example, a 5-year supply of employment land (37 ha) with an indicative target of 148 ha over the plan period up to 2026. It must also ensure that proposals for employment sites meet any requirement for waste facilities – which would amount to approximately 8 to 10 ha of land over the plan period, up to 2026.
- Policy approaches should include the promotion of mixed use (re)development where this is a viable and effective means of enhancing a site’s qualitative contribution to local townscape and employment land supply.
- Local Plan employment site allocations (and main commitments) which are ranked as ‘best’ or ‘good’ through the Development Plan process should be retained. There is however likely justification to release the poorest performing sites from the employment portfolio (for example, those sites that are ranked as ‘poor’). Furthermore, criteria based policy should be developed for those employment sites that are considered as being ‘moderate’ or ‘poor’.
- The Core Strategy should look to enhance the supply of land and opportunities for new employment development (including offices in appropriate central locations), and address spatial and qualitative deficiencies in supply which exist within certain parts of Herefordshire. In addition, a range of potential measures should be considered that would enhance the current contribution of certain sites to the employment portfolio.
The majority of new employment growth should be directed to those areas where housing development will take place, for instance Hereford City followed by the market towns. Opportunities for rural regeneration must however, also be recognised.

- A Sustainability Plan alongside Green Travel Plans should be prepared in order to guide future development on larger sites.
- Other place specific policies should be covered in place specific documents, such as in the Hereford Area Plan and the Market Towns and Rural Areas Plan.

**Retail Study (2009)**

As part of the Herefordshire’s Local Development Framework, the council has undertaken a PPS6 Retail Study; the purpose of which is to provide an assessment of the need for further development for retail, leisure, offices and other main town centre uses up to 2026. The study also addresses any deficiencies in provision and the capacity of existing centres to accommodate new development. The focus of the study is on Hereford City and the five market towns, although reference to facilities in rural areas is also made.

The following recommendations have been made:

- Regard must be had to the RSS growth and population forecasts for Herefordshire, which will influence the potential for new retail floorspace and other town centre uses within the county.
- The hierarchy of centres within the county based on Hereford and the five market towns - as contained within the UDP – will need to be reconsidered under the LDF, and revised where appropriate.
- The need for new comparison goods retail floorspace in the city has been identified under the RSS, as part of Hereford’s status as a strategic centre.
- The UDP defined Commercial and Shopping Central Areas (CSCAs) form an important planning policy tool within Hereford City and the five market towns. The LDF will need to reconsider the justification for CSCAs and their appropriate boundaries. This review will be dealt with as part of the Hereford Area Plan and the Market Towns and rural areas Plan.
- The LDF will need to reconsider the justification for the primary and secondary shopping frontages contained within the adopted UDP.
- The LDF will need to reconsider the justification for long-term unimplemented site allocations, as contained within the UDP.
- Shopping facilities for convenience goods should be close to residential areas, therefore the provision of new floorspace outside of the city centre for these uses, would be desirable.

**Waste and Minerals Study (2009)**

The aim of the study is to provide an assessment of the development requirements for mineral workings and waste facilities up until 2026. The final document contains recommendations to enable the council to develop a robust framework and justified policies and proposals, which ensure that sufficient opportunities for the provision of minerals and waste developments are provided within its LDF.

The report concludes that there will be approximately a 1 million tonne increase in total waste over the Core Strategy plan period – up to 2026;
half of which will comprise agricultural waste. Growth in municipal and commercial and industrial waste will account for approximately 25% of all waste arisings in the county by 2026. Significant capacity increases are needed therefore over the period.

  The study has modelled the impact of the planned future growth of Hereford on the transportation networks of the city. It includes consideration of all forms of transport including public transport, cycling and walking in addition to travel by private car.

Conclusions drawn from the study include the following:

- The results of the modelling reveal the trips associated with the additional housing proposed by the Core Strategy would have a significant detrimental effect on the operation of the Hereford highway network. Many junctions are forecast to be operating beyond their capacities, link speeds are reduced and delays are commonplace.

- Adding a relief road, on either alignment, is forecast to provide some relief from the adverse effects. The resulting network operation would be similar to that if the additional trips had not been introduced.

- Of the four possible Growth Point housing and employment options, it is found that Option 3 (North-South focused) together with the relief road on the Eastern Alignment provides the lowest overall cost of travel within the highway network model.

### 5.0 Core Strategy Consultations

#### 5.1 Key Issues

5.1.1 The Herefordshire Core Strategy Issues Paper was published for consultation in September 2007, which outlined 14 key issues facing the county. Views and comments were invited on these issues in order to help determine their importance, to see if any issues had been missed and to help develop a vision of Herefordshire up to 2026.

From the 14 key issues identified, the issues that relate to economic development include:

- An ageing population and the loss of younger generations
- The need to capitalise on educational achievements
- Diversification of the economy
- Tourism and culture
- Transport and communications
- The regeneration of the county

5.1.2 The results of the consultation highlighted five key ‘sub-issues’ for each of the key issues identified, to include: affordable housing, access to adult and higher education, higher paid jobs, promotion of tourism, and regeneration throughout the county - in particular the Edgar Street Grid. Full details of these results can be found in Appendix 2 of this paper.
5.2 Developing Options

5.2.1 As part of the second stage in the production of the Core Strategy – the ‘Developing Options’ stage, suggested policy options were set out for dealing with the 14 key issues identified for Herefordshire. A consultation ran from 16th June to 8th August 2008 and the public, alongside key stakeholders, were encouraged to examine and comment upon the council’s draft spatial vision and objectives, and to help the council decide upon which options should be looked at in more detail. The following sections provide a summary of the comments made that had specific reference to economic development and employment land provision – in response to the ‘Vision’ for the county, the Objectives and the Policy Options. The results of the consultation have provided an emerging set of preferred directions for policies dealing with issues of economic development and employment land.

Core Strategy Vision

5.2.2 The Core Strategy Vision as set out in the Vision and Objectives Background Paper (updated January 2010), sets out that Herefordshire will be a place with ‘a sustainable future’ ‘based on the interdependence of the themes of social progress, economic prosperity and environmental quality with the aim of increasing the county’s self–reliance and resilience.’

5.2.3 Despite overwhelming support for the Vision as set out in the Developing Options Paper, 243 comments were made with respect to how it could be improved. In particular, the comments made highlighted the need for greater emphasis on the cost of energy, on infrastructure, on the need to protect the rural environment and quality of life, and on climate change in general. As a result, two ‘visioning’ workshops were undertaken in November and December 2008, and the wording of the vision has now been amended to take account of climate change issues. A Vision and Objectives Background Paper has been produced which contains details of how the vision has been formulated.

Objectives

5.2.4 The objectives have been substantially reworded since the Developing Options Paper (June 2008). The main differences in the final version of the objectives relate to the creation of two further objectives, which were formed as result of splitting original objectives 7 and 9, to create separate objectives on Hereford, the Market Towns and Rural Areas and on the issue of climate change.

5.2.5 Further details on how the Vision and Objectives for the Herefordshire Core Strategy have been developed so far, can be seen in the Vision and Objectives Background Paper - available on the council’s website www.herefordshire.gov.uk/ldf.

Amended Objectives

5.2.6 Objective 10 of the revised Vision and Objectives Paper focuses on the need to deliver ‘well–designed places, spaces and buildings, which use land efficiently, reinforce local distinctiveness and are supported by the necessary infrastructure including green infrastructure.’

5.2.7 Objective 11 of the Paper goes on to focus on the need to ‘address the causes and impacts of climate change through the design and location of new
development, by ensuring that sustainable methods are used to conserve natural resources and by avoiding an increase in flood risk to new or existing property.'

5.2.8 Objectives 6, 7, 8 and 9 are those which relate to economic development and employment land provision.

Policy Options

5.2.9 The Policy Options identified in the Developing Options Paper incorporate important issues, which reflect the need to bring about changes in the way we deal with development. Planning for Herefordshire’s economic development is needed to ensure active and thriving sustainable communities, and to allow for a strong and diverse economy that fosters employment opportunities for work within the county - which in turn will help to increase the prosperity of Herefordshire’s residents. Key areas addressed as part of the policy options included: sustainable communities, tourism and culture, the county’s skills base, affordable housing and the provision of employment land.

5.2.10 With reference to employment land provision, the Developing Options questionnaire posed the following questions:

Q44 What type of employment sites should we provide?
1: Locate on purpose built estates
2: Locate on a number of small sites to meet needs
3: Expand existing employment areas
4: Encourage mixed use schemes
5: Locate as part of urban extension

Q45 Should we protect existing employment land?
1: Protect all employment land from development for other uses
2: No protection, allow market forces to prevail
3: Revise criteria policy to protect employment sites on their merits at time of application

• With respect to the type of employment sites which should be provided, the most popular option was to locate on a number of small sites to meet needs (option 2), with 87% of respondents choosing this option. However the options to encourage mixed use schemes (option 4), and to expand existing employment areas (option 3) were also popular, at 86% and 83% respectively.

• With respect to protecting existing employment land, the option to revise criteria policy to protect employment sites on their merits at time of application (option 3), was the most popular - with 60% of respondents choosing this option.

Strategic Options

5.2.11 Comments made on the 4 strategic options highlighted: the need for infrastructure improvements; the need to take account of environmental assets and preserve the character of settlements and the AONB; and sustainability issues such as climate change and carbon neutral development; and greater emphasis on affordable housing.
5.3 Preferred Policy Direction

5.3.1 In terms of policy development, the Core Strategy will approach employment land provision through a combination of the 5 options outlined in the Developing Options Paper, based on the outcomes of the Employment Land Study. This will:
- enhance the supply of land and opportunities for new employment development (including offices in appropriate locations) and address deficiencies in supply through detailed allocations and/or mixed-use schemes in the Hereford and Market Towns and Rural Areas DPDs;
- promote a range of size and type of business development within and on the edge of Hereford and the market towns, but particularly for offices, taking a sequential approach to their provision.

5.3.2 With respect to maintaining supply, the preferred policy direction will protect employment allocations and commitments ranked as “Best”, “Good” or “Moderate” in the Employment Land Study and will include criteria based policy concerning release of employment sites classified as “Moderate” or “Poor”, based on criteria such as:
- The impact of the loss on the range of supply;
- Whether the proposal would result in a net improvement in amenity;
- Consideration of the details of active marketing of the site; and
- An assessment of the viability of development.

6.0 Opportunities for a way forward

6.1 The next stage for the Core Strategy is to formulate preferred strategic options, and to further general policy directions and place shaping options for Hereford, the market towns and the rural areas.

6.2 This paper, and the comments received to the Developing Options consultation and the corresponding Sustainability Appraisal, will assist in focusing on the important elements to take forward.

6.3 Whilst Herefordshire Council needs to demonstrate that there are clear mechanisms for monitoring the outcomes of policies (including design policies) within its Core Strategy, it is not the purpose of this report to propose indicators to measure their success. The range of possible indicators which could be used to monitor policies will be developed through further consultation with design practitioners and other interested bodies, as appropriate to local circumstances.

6.4 Sustainability Appraisal and Habitat Regulation Assessment at Developing Options stage

Q44 - What type of employment sites should we provide?
The Sustainability Appraisal showed that all options are considered to be moving towards sustainability

In terms of Habitats Regulations Assessment - impacts of more employment land include air quality, water levels and quality. Air quality impacts could be less under option 4.
Q45 - Should we protect existing employment land?
Options 1 & 3 are neutral as more information from the Employment Land Study is needed. Option 2 is considered to be moving away from sustainability as it may result in a lack of employment land.

In terms of Habitats Regulations Assessment – there are no known impacts on designated sites.

Q46 - How can we improve the skills base in the county?
The Sustainability Appraisal showed that options 1 & 2 are considered to be moving towards sustainability, whereas option 3 is neutral depending on implementation.

In terms of Habitats Regulations Assessment - any development could impact on air quality, water levels and quality.

Q47 - How can Herefordshire’s tourism and culture sector grow?
The Sustainability Appraisal showed that options 3-5 are considered to be moving towards sustainability, whereas options 1 & 2 are neutral in terms of both economic and social aspects.

In terms of Habitats Regulations Assessment, impacts may be localised, may affect air quality, and may cause increased pressures as a result of general disturbance. Option 1 will have the least impact.

7.0 Further consultation undertaken and Sustainability Appraisal
7.1 Over the next few months, the council will be undertaking further consultation with relevant internal departments and external organisations in order to finalise the preferred policy direction. The list of consultees can be found at Appendix 3 of this report.

7.2 This policy direction with mitigation is considered to be moving marginally towards sustainability. However issues remain regarding with the potential of new development to increase the need to travel and because of potential impact of development upon the built and natural environment and waste generation. However, these issues are dealt with elsewhere in the document (for example, within the movement and local distinctiveness policy areas). Therefore, for mitigation to take place in this policy area it needs to be made clear within the submission document that the Core Strategy should be read as a whole and that these issues will be taken into account when development is proposed.
Appendix 1 - Evidence Base Reports

Herefordshire Employment Land Review (2009)
Retail Study (2009)
Minerals and Waste Planning Assessment (2009)
Transport Study – Hereford Multi-Modal Model (2009)
Appendix 2 – The top five Sub-Issues arising from the Key Issues

<table>
<thead>
<tr>
<th>Top 5 sub-issues</th>
<th>Affordable housing</th>
<th>More higher paid jobs</th>
<th>Better services and health care</th>
<th>Encourage more young families to stay</th>
<th>More mixed age group housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>An ageing population and the loss of younger generations</td>
<td>104 (23%)</td>
<td>84 (18%)</td>
<td>63 (14%)</td>
<td>30 (7%)</td>
<td>26 (6%)</td>
</tr>
<tr>
<td>More training</td>
<td>95 (28%)</td>
<td>67 (20%)</td>
<td>43 (13%)</td>
<td>23 (7%)</td>
<td>20 (6%)</td>
</tr>
<tr>
<td>Allow growth of rural businesses</td>
<td>64 (15%)</td>
<td>59 (14%)</td>
<td>48 (11%)</td>
<td>38 (9%)</td>
<td>36 (9%)</td>
</tr>
<tr>
<td>Better promotion of Herefordshire and Hereford</td>
<td>94 (28%)</td>
<td>49 (15%)</td>
<td>45 (14%)</td>
<td>32 (10%)</td>
<td>23 (7%)</td>
</tr>
</tbody>
</table>
### Transport and Communications

<table>
<thead>
<tr>
<th>Top 5 sub-issues</th>
<th>Hereford bypass</th>
<th>Improved bus routes</th>
<th>Better links between rail and buses</th>
<th>Second river bridge in Hereford</th>
<th>Park and Ride</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of comments</td>
<td>83 (13%)</td>
<td>71 (11%)</td>
<td>69 (11%)</td>
<td>62 (10%)</td>
<td>45 (7%)</td>
</tr>
</tbody>
</table>

#### The regeneration of the county

<table>
<thead>
<tr>
<th>Top 5 sub-issues</th>
<th>Edgar Street Grid</th>
<th>Improve vitality of the market towns</th>
<th>Hereford</th>
<th>Rural regeneration</th>
<th>Improved public spaces</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of comments</td>
<td>38 (15%)</td>
<td>31 (12%)</td>
<td>27 (11%)</td>
<td>25 (10%)</td>
<td>22 (9%)</td>
</tr>
</tbody>
</table>
Appendix 3 - Internal and External Consultees

External consultees

Organisation
Advantage West Midlands
Campaign to Protect Rural England
Chamber of Commerce Herefordshire and Worcestershire
CLA Country Land & Business Association
Government Office West Midlands
Herefordshire Rural Hub
Highways Agency
Hyder Consulting (Drainage)
West Midlands Regional Planning Body

Herefordshire Council Internal Consultees

Catherine Taylor  Asset Management and Property Services
Debby Klein  Development Management – Minerals and Waste
Mike Willmont  Development Management
Richard Wood  Waste Management
Philippa Lydford  Herefordshire Partnership
Steve Burgess  Highways and Transportation
Nick Webster  Economic Development
Emma Conway  Cultural Services – Culture and Leisure