

## **Written Submissions**

- Written Submissions
- Golf Inn
- Historic England
- Taylor Wimpey
- WYG Cover Letter

## **Written Submissions**

- Written Submissions

We invite you to complete this questionnaire to give us your views about the Hereford Area Plan (HAP) and Hereford Transport Package (HTP). Your comments will be treated confidentially.

The consultation exhibition materials provide information on the HAP and HTP. These are available to view at The Courtyard between Tuesday 4 April and Thursday 6 April 2017, and at Hereford Library between Tuesday 11 April and Friday 19 May 2017. Consultation information is also available online at [www.herefordshire.gov.uk/HerefordConsultation](http://www.herefordshire.gov.uk/HerefordConsultation). An online version of the questionnaire is available on this webpage.

The questionnaire has three main sections: HAP, HTP and the consultation in general. You are welcome to only answer questions on the topics which are of interest to you if you would prefer.

Post Code\*: XXXXXXXXXX

\*This is only required to check the geographical origin of responses.

## The Hereford Area Plan

Please complete this section of the questionnaire to provide feedback on the Hereford Area Plan. The associated Issues and Options Paper will help you to respond to the questions.

### Housing

**Question 1: Can greater use be made of land that has been previously developed (Brownfield land) for new housing?**

- a) Yes  
b) No

a)	<input checked="" type="checkbox"/>
b)	<input type="checkbox"/>

**If yes, how?**

See Appendix 1.

**Question 2: Should planning policies be developed to help meet the needs of specific groups of the population, for example older people?**

- a) Yes  
b) No

a)	<input type="checkbox"/>
b)	<input type="checkbox"/>

**Question 3: Should the plan provide advice upon an appropriate density of housing development in different parts of the city?**

- a) Yes  
b) No
- See Appendix 1.

a)	<input type="checkbox"/>
b)	<input checked="" type="checkbox"/>

**Question 4:** Do you agree that the HAP should only identify housing sites for a minimum of 10 or more dwellings?

- a) Yes
- b) No

a)	✓
b)	

If no, please explain

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**Question 5:** Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?

- a) Yes
- b) No

a)	
b)	✓

If yes, what are the most important factors to help define it?

See Appendix 1.

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**Question 6:** Should the HAP include additional policies for affordable housing in addition to those in the Core Strategy?

- a) Yes
- b) No See Appendix 1.

a)	
b)	✓

If yes, should the plan be specific on types and tenures of affordable homes required?

- c) Yes
- d) No

c)	
d)	✓

**Question 7:** Should the plan contain guidance around Houses in Multiple Occupation (HMO)?

- a) Yes
- b) No

a)	
b)	

If yes, what are the main factors that should be considered?

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**Question 8:** Should the HAP include a policy to encourage self and custom built homes?

- a) Yes
- b) No

a)	
b)	✓

If yes, what issues should it include?

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**Question 9:** Should guidelines be given within the plan to support methods of high quality design?

- a) Yes
- b) No

a)	
b)	✓

**If yes, are there any particular issues that should be covered?**

Guidelines on high quality design are provided in the Core Strategy. Duplication within the HAP  
\_\_\_\_\_ would not be necessary.  
\_\_\_\_\_

## Social and Community Facilities and Open Spaces

**Question 10:** Should there be policies to address how developers can contribute towards community facilities?

- a) Yes
- b) No

a)	
b)	✓

**Question 11:** Are there improvements that need to be made to existing community facilities?

- a) Yes See Appendix 1.
- b) No

a)	
b)	

**If yes, where?**

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**Question 12:** What factors should be taken into account when protecting areas of open space?

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**Question 13:** Are there under-utilised parks, playgrounds or areas of open space that could be put to a different open space use, for example allotments or community gardens?

- a) Yes
- b) No

a)	
b)	

**If yes, what and where?**

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**Question 14:** Do you think there is a need for more allotment provision, for example as part of new housing developments or on existing open spaces?

- a) Yes
- b) No

a)	
b)	

If yes, where?

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**Question 15:** Do you think the correct issues have been identified relating to sport, community facilities and open space in this document?

- a) Yes
- b) No

a)	
b)	

If no, please explain

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**Movement** (see also associated Hereford Transport Package questions 46 – 52)

**Question 16:** How can access to the railway station be improved?

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**Question 17:** Could the current city car parks be used more effectively or improved?

- a) Yes
- b) No

a)	
b)	

If yes, how?

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**Question 18:** Is there a need for more car parking to be identified?

- a) Yes
- b) No

a)	
b)	

If yes, what form should it take?

- a) Multi-storey provision
- b) Park and choose provision
- c) Other

a)	
b)	
c)	

**Question 19:** Would it be appropriate to develop a policy requirement for proposals for larger developments to provide a Travel Plan as part of a planning application?

- a) Yes
- b) No

a)	
b)	

**Question 20:** Can you suggest better ways to manage freight transportation throughout the city?

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## Jobs

**Question 21:** Should the HAP identify more land for new employment development?

- a) Yes
- b) No

a)	✓
b)	

If yes, what type of development eg. offices, manufacturing?

See Appendix 1.

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**Question 22:** Should the HAP aim to broaden the local economy by supporting a wider range of employment types?

- a) Yes
- b) No

a)	✓
b)	

If yes, what types would you suggest?

See Appendix 1.

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**Question 23:** Should the HAP allow for a broader range of activities on existing employment sites of poorer quality?

- a) Yes
- b) No

a)	
b)	

If yes, what would be considered an appropriate alternative use? Eg Sport and leisure facilities.

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## City centre and retail

**Question 24:** Should the HAP identify land for further new retail development?

- a) Yes
- b) No

a)	
b)	

**Question 25:** Should the HAP define the key shopping streets and keep them mainly for retail uses?

- a) Yes
- b) No

a)	
b)	

**Question 26:** Should the HAP allow for different uses where suitable in underutilised areas of the city centre?

- a) Yes
- b) No

a)	
b)	

**Question 27:** Should the HAP offer additional policy to encourage use of the upper floors in the town centre for residential use?

- a) Yes
- b) No

a)	
b)	

**Question 28:** Is additional policy required for retail development proposals outside the city centre?

- a) Yes
- b) No

a)	
b)	

## University

**Question 29:** Which parts of the city could best accommodate university buildings and facilities either through conversion of existing building or new buildings?

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**Question 30:** What opportunities are there for university facilities to be shared with the public and/or the wider community e.g. shared conference facilities?

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**Question 31:** Do you think there is potential for the new university to share facilities with the existing colleges to expand on existing partnership between educational institutions?

- a) Yes
- b) No

a)	
b)	

**If yes, please explain**

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## Leisure and Tourism

**Question 32:** Should additional hotel and/or conference facilities be provided in Hereford?

- a) Yes
- b) No

a)	
b)	

If yes, where?

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**Question 33:** Could better use be made of the River Wye as a tourist attraction and for leisure activities whilst protecting its special qualities?

- a) Yes
- b) No

a)	
b)	

If yes, how?

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**Question 34:** Is there a need for any additional policy relating to the restoration of the Canal?

- a) Yes
- b) No

a)	
b)	

If yes, what issues should be covered by that policy?

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**Question 35:** Are there any opportunities to provide new or expanded leisure facilities that should be considered or identified by the HAP?

- a) Yes
- b) No

a)	
b)	

If yes, what?

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## Natural Environment

**Question 36:** Are there ways the green infrastructure could be improved? Please refer to Section 15 of the HAP Issues and Options Paper.

- a) Yes
- b) No

a)	
b)	

If yes, how?

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**Question 37:** Are there any areas that require better connectivity of wildlife corridors?

- a) Yes
- b) No

a)	
b)	

If yes, where?

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**Question 38:** Should the HAP include additional policies to protect the landscape and environmental qualities of the city?

- a) Yes
- b) No

a)	
b)	

If yes, what issues should these policies include?

See Appendix 1.

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**Question 39:** Can we achieve greater access to and use of the river whilst respecting its special qualities?

- a) Yes
- b) No

a)	
b)	

If yes, how?

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**Question 40:** Should the HAP include a policy that relates to how land use affects pollution?

- a) Yes
- b) No

a)	
b)	

If so, what issues should the policy cover?

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**Question 41:** Should the HAP address the issue of climate change?

- a) Yes
- b) No

a)	
b)	

## Built Environment

**Question 42:** Do you think more specific and detailed policies for the historic environment and heritage assets in addition to those included in the Core Strategy are required in the HAP?

- a) Yes
- b) No

a)	
b)	✓

If yes, please explain

Duplication of policies and matters addressed in the Core Strategy is not necessary.

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**Question 43:** Do you think that specific policies are required to achieve high quality design in locations where planning proposals could impact upon heritage assets?

- a) Yes
- b) No

a)	
b)	✓

**Question 44:** Should the plan include guidelines to be used when existing conservation areas are being reviewed or new ones designated?

- a) Yes
- b) No

a)	
b)	✓

**Question 45:** Are there additional issues or options which the HAP could look to address or do you have any other comments upon the contents of the document?

In relation to question 43 and 43 Guidance on developments affecting heritage assets. Duplication in the HAP is not required. Statutory guidance is also already provided regarding the review or designation of Conservation Areas.

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Please go to question 53 if you do not wish to give feedback on the Hereford Transport Package

## The Hereford Transport Package

Please complete this section of the questionnaire to provide feedback on the Hereford Transport Package. Your feedback will contribute to the development of possible bypass routes, and walking, cycling, bus and public space improvements within Hereford.

**Question 46:** Do traffic conditions in Hereford need to be improved?

- a) Yes
- b) No

a)	
b)	

**Question 47:** What do you think are the current transport problems in Hereford?

*Please rank your top five responses, where 1 is the biggest problem.*

- a) Traffic congestion
- b) Long delays at signal junctions
- c) Lack of pedestrian crossings
- d) Poor access to public transport
- e) Poor cycling/walking infrastructure
- f) Difficulty crossing busy roads
- g) Traffic noise
- h) Poor air quality
- i) Vehicle emissions
- j) Poor public transport links to rural areas
- k) Volume of heavy goods vehicles
- l) Dependency on car use
- m) Other. Please specify below.

a)	
b)	
c)	
d)	
e)	
f)	
g)	
h)	
i)	
j)	
k)	
l)	
m)	

**Question 48:** Most short distance journeys in Hereford are made by car. What do you think puts some people off walking, cycling or using the bus for short trips?

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The Hereford Transport Package will help us deliver a healthy and prosperous city by enabling new jobs and homes, improving existing journeys and promoting healthy lifestyles and less polluting types of transport.

The two main components of the package are:

- A new road to the west of the city. The exact route has not been determined but would include a new river crossing and junctions.
- Improvements in Hereford to increase walking, cycling and bus use for short distance journeys, and more attractive and healthier public spaces.

## The proposed Hereford Bypass

**Question 49:** We are in the early stages of identifying possible bypass routes. How important do you think the following factors are in choosing the bypass route?

*On a scale of 1 to 5 (1 being very important and 5 being not important at all), how important do you think the following factors are in choosing the bypass route?*

Factors to consider	Level of importance (please circle)				
a) Impact on homes	1	2	3	4	5
b) Impact on businesses	1	2	3	4	5
c) Impact on landscape (e.g. historic buildings)	1	2	3	4	5
d) Reducing traffic in Hereford	1	2	3	4	5
e) Less congestion in Hereford	1	2	3	4	5
f) Access for tourism	1	2	3	4	5
g) Improved facilities for walkers, cyclists, bus users	1	2	3	4	5
h) Improved access to jobs and education	1	2	3	4	5
i) Are there other constraints within the Core Strategy bypass corridor we need to be aware of? Please specify below.	1	2	3	4	5

## The proposed walking, cycling, bus and public space improvements

**Question 50:** Which of the following improvements do you think are your priorities?

*On a scale of 1 to 5 (1 being very important and 5 being not important at all), how important are the following factors to you?*

	Level of importance (please circle)				
a) Safer and better <b>walking routes</b> (for example, the provision of wider footways, improved pedestrian crossing facilities, reduced speed limits and traffic-free routes)	1	2	3	4	5
b) Safer and better <b>cycling routes</b> (for example, the creation of dedicated cycle lanes, cycle friendly junctions, reduced speed limits and traffic-free routes)	1	2	3	4	5
c) More reliable and quicker <b>bus journeys</b> (for example, bus priority on key routes into and out of the city)	1	2	3	4	5
d) More attractive <b>public space</b> (for example, boulevard-style streets, shared space and the planting of trees to create green corridors)	1	2	3	4	5
e) More <b>reliable and quicker journeys</b> by car (for example more traffic lanes and measures that prioritise cars)	1	2	3	4	5

**Question 51:** Are there any locations where you think walking, cycling, bus and public space improvements would be beneficial? Please write up to three locations, problems and your suggested solutions.

Location	What is the problem?	How can we solve the problem?

**Question 52:** Are there any other options we need to consider to help manage Hereford's transport problems?

See Appendix 1 for comment on Hereford transport package.

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## The consultation

**Question 53: Would you like to be added to the HAP and/or HTP contact databases to be kept up to date about the project as it progresses?**

- a) Yes, both the HAP and HTP databases
- b) Yes, just the HAP database
- c) Yes, just the HTP database
- d) No

a)	<input checked="" type="checkbox"/>
b)	<input type="checkbox"/>
c)	<input type="checkbox"/>
d)	<input type="checkbox"/>

**If yes, please provide your contact details below.**

Name

Email

Phone number

**Question 54: How did you hear about the consultation? Please tick all that apply.**

- a) Received a letter or email
- b) Poster
- c) Sunshine Radio
- d) Hereford Times newspaper
- e) Hereford Times online
- f) Council's website
- g) Facebook
- h) Twitter
- i) Word of mouth
- j) Other, please specify

a)	<input type="checkbox"/>
b)	<input type="checkbox"/>
c)	<input type="checkbox"/>
d)	<input type="checkbox"/>
e)	<input type="checkbox"/>
f)	<input checked="" type="checkbox"/>
g)	<input type="checkbox"/>
h)	<input type="checkbox"/>
i)	<input type="checkbox"/>
j)	<input type="checkbox"/>

**Question 55: Did you attend a public exhibition?**

- a) Yes
- b) No (Go to question 58)

a)	<input type="checkbox"/>
b)	<input checked="" type="checkbox"/>

**Question 56**

- a) Did you receive sufficient notification about the public exhibition?
- b) Did the exhibition meet your expectations?
- c) Was the information displayed sufficient to answer any questions you had?
- d) Was the venue suitable?
- e) Were the opening hours sufficiently long?
- f) Were the staff sufficiently informed to answer your questions?

	Yes	No
a)	<input type="checkbox"/>	<input type="checkbox"/>
b)	<input type="checkbox"/>	<input type="checkbox"/>
c)	<input type="checkbox"/>	<input type="checkbox"/>
d)	<input type="checkbox"/>	<input type="checkbox"/>
e)	<input type="checkbox"/>	<input type="checkbox"/>
f)	<input type="checkbox"/>	<input type="checkbox"/>

**Question 57: Do you have any suggestions about how we might improve future exhibitions?**

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## About you (optional)

All personal data will be treated in line with our obligations under the *Data Protection Act, 1998*. This means your personal data will not be shared.

The information collected will help us identify the types of community members that we have and haven't heard from, so we can seek feedback that is broadly representative of the Hereford community.

**Question 58: Are you a member of a local business or organisation? (Please tick one box)**

a) Yes, please specify

Agent on behalf of CCE, Local Landowner

b) No

c) Prefer not to say

a)	<input checked="" type="checkbox"/>
b)	<input type="checkbox"/>
c)	<input type="checkbox"/>

**Question 59: Which age group do you belong? (Please tick one box)**

a) 0-15

b) 16-24

c) 25-34

d) 35-44

e) 45-54

f) 55-64

g) 65-74

h) 75-84

i) 85+

j) Prefer not to say

a)	<input type="checkbox"/>
b)	<input type="checkbox"/>
c)	<input type="checkbox"/>
d)	<input type="checkbox"/>
e)	<input type="checkbox"/>
f)	<input type="checkbox"/>
g)	<input type="checkbox"/>
h)	<input type="checkbox"/>
i)	<input type="checkbox"/>
j)	<input type="checkbox"/>

**Question 60: What is your gender? (Please tick one box)**

a) Male

b) Female

c) Other

d) Prefer not to say

a)	<input type="checkbox"/>
b)	<input type="checkbox"/>
c)	<input type="checkbox"/>
d)	<input type="checkbox"/>

**Question 61: Do you consider yourself to have a disability?**

a) Yes

b) No

c) Prefer not to say

a)	<input type="checkbox"/>
b)	<input type="checkbox"/>
c)	<input type="checkbox"/>

## Access to Information

Herefordshire Council and its consultants will use the questionnaires to shape the Hereford Area Plan and Hereford Transport Package. The data collected will not be used for any other purpose and the questionnaire will be disposed of securely after they have served this purpose.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information. However, all personal data will be treated in line with our obligations under the Data Protection Act, 1998. This means your personal data will not be shared.

Alternative formats of this questionnaire are available upon request by emailing [REDACTED] or by writing to us at



Please return this questionnaire and feedback by MONDAY 22 MAY 2011

THANK YOU FOR TAKING THE TIME TO COMPLETE THIS QUESTIONNAIRE

## **Appendix 1**

### **Hereford Area Plan and Hereford Transport Package – Representations on behalf of the Church Commissioners for England**

On behalf of our client, the Church Commissioners for England (CCE), we enclose representations to the Hereford Area Plan and Hereford Transport Package. For information, a separate submission has also been made directly to Hereford Council in relation to the 'Call for Sites'.

#### **Background**

CCE are a registered charity that supports the work and mission of the Church of England across the country. Their investment policy is to hold a diversified portfolio of investments across a broad range of asset classes consistent with their ethical guidelines.

CCE own land in and around the city of Hereford, including a large area to the west of the city, as well as land within the wider county. Recently, CCE has submitted an outline planning application for up to 1200 homes on land at Three Elms to deliver the Western Urban Expansion site allocation in support of Core Strategy (2015) Policy HD5 (ref. P162920/F). A decision is pending.

Overall, CCE supports the aim of the Hereford Area Plan (HAP) to allow for a range of opportunities for the provision of different types of housing to offer choice and meet local needs in a variety of locations.

Comments on specific issues and questions raised within the HAP and Hereford Transport Package (HTP) are provided below.

#### **Hereford Area Plan**

##### **Housing**

CCE notes that the HAP will identify sites and locations for the remaining 3,200 dwellings (para.8.3) required to meet the minimum housing requirement of 16,500 homes in Herefordshire by 2031 of which 6,500 dwellings will be delivered within Hereford, as set out in Core Strategy Policy SS2. We also note that para. 8.10 identifies that taking into account completions and planning permissions within the plan period, the HAP needs to plan to deliver an additional 1,500 and 2,000 dwellings. This is supported by the CCE who encourage the identification and allocation of appropriate sites for the delivery of housing in accordance with NPPF para. 157. In particular, CCE has submitted four key sites within the HAP boundary that would significantly contribute to meeting this housing demand. These include Land at Lower Hill Farm to the west of Hereford, Huntington Court Farm to the north west, land at Bullinghope to the south and Land at Vicarage Road within Central Ward.

However, it is also important to bear in mind that the housing requirement represents a minimum figure and therefore should additional, appropriate sites come forward as part of the HAP Call for Sites, these should be given due consideration .

We provide comment on specific consultation questions below.

##### **Question 3: Should the plan provide advice upon an appropriate density of housing development in different parts of the city?**

CCE supports the aim of the HAP to deliver a range and mix of housing types which meets the needs of Hereford's population. As such, it is considered that Herefordshire Council (HC) should be cautious in specifying appropriate densities for the housing developments. We are keen to ensure that any proposed controls are appropriate and not too onerous, such that they frustrate otherwise acceptable development coming forward and achieving the objectives of the plan.

The NPPF (para. 173) states that *“Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”* Accordingly, policy wording should be prepared with consideration to the NPPF to ensure that potential development sites are not unnecessarily constrained. In line with this approach, policies controlling design should be sufficiently flexible so that requirements can be assessed on a site by site basis to allow future developments to positively respond to site specific constraints and the surrounding context. Indeed, Core Strategy Policy SD1 allows the Council to manage development design by requiring developments to respect the scale, height, proportion and massing of surrounding development.

**Question 5: Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?**

It is considered that, if HC decides to proceed with the use of settlement boundaries, sufficient flexibility should be provided within these boundaries to allow for the delivery of the required development identified within the Core Strategy and HAP. Boundaries should therefore not be tightly drawn around the extent of the existing settlement. We draw the Council’s attention to the recent Examiner’s Report on the Bosbury Neighbourhood Plan in relation to this point.

**Question 6: Should the HAP include additional policies for affordable housing in addition to those in the Core Strategy?**

CCE is committed to delivering developments that meet the requirements of local demand and therefore strives to deliver affordable housing as part of residential projects, subject to viability constraints. However, it is considered that HC should be cautious in setting affordable housing requirements in the HAP so that it does not unintentionally constrain the development potential of sites. In accordance with NPPF para. 173 sites should not be subject to such policy burdens that their ability to be developed viably is threatened. Therefore any policy wording should be sufficiently flexible in line with Core Strategy Policy H1 which identifies that the amount and mix of affordable housing will vary subject to a robust viability assessment.

**Social and Community Facilities and Open Spaces**

**Question 10: Should there be policies to address how developers can contribute towards community facilities?**

In relation to the contribution to community facilities, we draw HC’s attention to paragraph 173 of the NPPF which states that:

*“To ensure viability, the costs of any requirements likely to be applied to the development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of the development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”*

Consistent with national planning policy it would be appropriate to require a contribution (either provision or funding) to mitigate the impact of a scheme in terms of community facilities. However, this contribution/mitigation must meet a number of statutory tests. In particular, in accordance with NPPF para. 204 it would need to be:

- 1 Necessary to make the development acceptable in planning terms;
- 2 Directly related to the development; and
- 3 Fairly and reasonably related in scale and kind to the development.

Accordingly, should a policy be considered necessary, it would be appropriate for the policy wording to clarify that where a contribution is required it will be assessed on a site by site basis.

## **Jobs**

### **Question 21: Should the HAP identify more land for new employment development?**

CCE supports the identification of new employment land in line with NPPF para. 157, however it is considered that this should be subject to market testing and assessments of local demand for employment development within the area in accordance with NPPF para. 158 which required Local Plans to be based on adequate, up-to-date and relevant evidence. In particular, para. 161 requires local planning authorities to use an evidence base to assess the needs for land or floorspace for economic development.

### **Question 22: Should the HAP aim to broaden the local economy by supporting a wider range of employment types?**

As mentioned above, support for a wider range of employment types should be based on market testing and assessment of local demand in accordance with the NPPF paras. 158 and 161.

## **Natural Environment**

The protection and enhancement of the natural environment along with built and historic environment is vital to achieving sustainable development. Whilst CCE supports environmental protects, it is considered that this should not preclude residential development in appropriate areas that will assist in meeting local need.

## **Hereford Transport Package (HTP)**

CCE fundamentally supports the provision of the bypass to the west of Hereford City as part of the HTP and the emphasis placed within the consultation document on the importance of the bypass in delivering the housing and economic growth to the city. In particular, we welcome the delivery of the central section of the bypass between the A465 and A438 incorporating the critical second river crossing by 2022, which will enable the delivery of the Three Elms Western Urban Expansion. Given this importance of the bypass and HTP to meeting the growth objectives and requirements of the Core Strategy and Hereford Area Plan, it is essential that this is reinforced throughout the whole consultation process.

However, whilst acknowledging the various statutory and non-statutory processes that HC will need to undertake to deliver the infrastructure, it is considered that where possible the timescales for establishing the preferred route should be expedited. This will be particularly crucial to the implementation of the Western Urban Expansion under Policy HD5, specifically the 620 residential dwellings and 10ha of employment land to be delivered as part of Phase 2, which will provide a substantial contribution to meeting the minimum housing and employment land targets identified in the Core Strategy (Policies SS2 and SS5 respectively).

In addition, the timescale for the completion of the north-western part of the bypass by 2027 could potentially delay the delivery of additional new housing sites as part of the HAP to the west of the city required to meet the housing need. These schemes might rely on the provision of the bypass to be acceptable from a transport perspective. Any delay to the delivery of the bypass could therefore reduce the Council's ability to meet key objectives within the Core Strategy.



[REDACTED]  
Leader of Herefordshire Council  
By Hand

26<sup>th</sup> April 2017

Dear Councillor Johnson,

Link Road Proposals

Recent press coverage may have given rise to the belief that the City Council is seeking to promote a route to the east of Hereford as an alternative to the proposals contained within the Core Strategy and Local Transport Plan for a bypass taking the north-south flow on the A49(T) to the west of the city. I am writing to affirm that this is not the policy of the City Council. This was explained to journalists from the Hereford Times who chose to report a fictitious east versus west debate rather than the position of the City Council.

The City Council recognises the urgent need for a bypass to alleviate the through traffic on the A49(T) which presently comes through the city. The development of such a bypass will enable the much needed additional housing called for in the Core Strategy, and I remind you that in our observations to the Inspector on that Core Strategy we did not object to the draft housing numbers or the strategic development sites. Our concern was in fact to see these developments properly supported by community infrastructure, including adequate transport links, health facilities, local schools sewerage etc, and a thorough exploration of brownfield site development to minimise the loss of valuable countryside or other amenity land.

When funding is secured for the western route it will be timely to assess the extent to which it will alleviate other traffic problems notably to the east of the city and it is possible in that context, once the western route is in place, a further development of a local relief road and the necessary new bridge may be beneficial. We know there is some support for this among people in the city and neighbouring parishes and we have agreed to support the formulation of a lobby group who wish to put that item on the agenda for consideration at the first review of the Core Strategy and the Local Transport Plan that depends on it.

I trust this makes the position of the City Council entirely clear.

Yours sincerely,

[REDACTED]  
Town Clerk

[REDACTED]

**Hereford Council**

**Hereford Area Plan**

**Regulation 18 - Issues and Options Consultation**

**April 2017**

**Consultation response**

**by**



**DEAN LEWIS.**  
ESTATES LIMITED

**Submitted May 2017**

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**1 INTRODUCTION**

**1.1 Context**

1.1.1 Dean Lewis Estates Limited is a professional strategic land promotion company specialising in the delivery of residential and mixed use development.

1.1.2 This submission provides Dean Lewis Estates Limited response to and representations in respect of this Regulation 18 consultation into the Hereford Area Plan Issues and Options consultation April 2017.

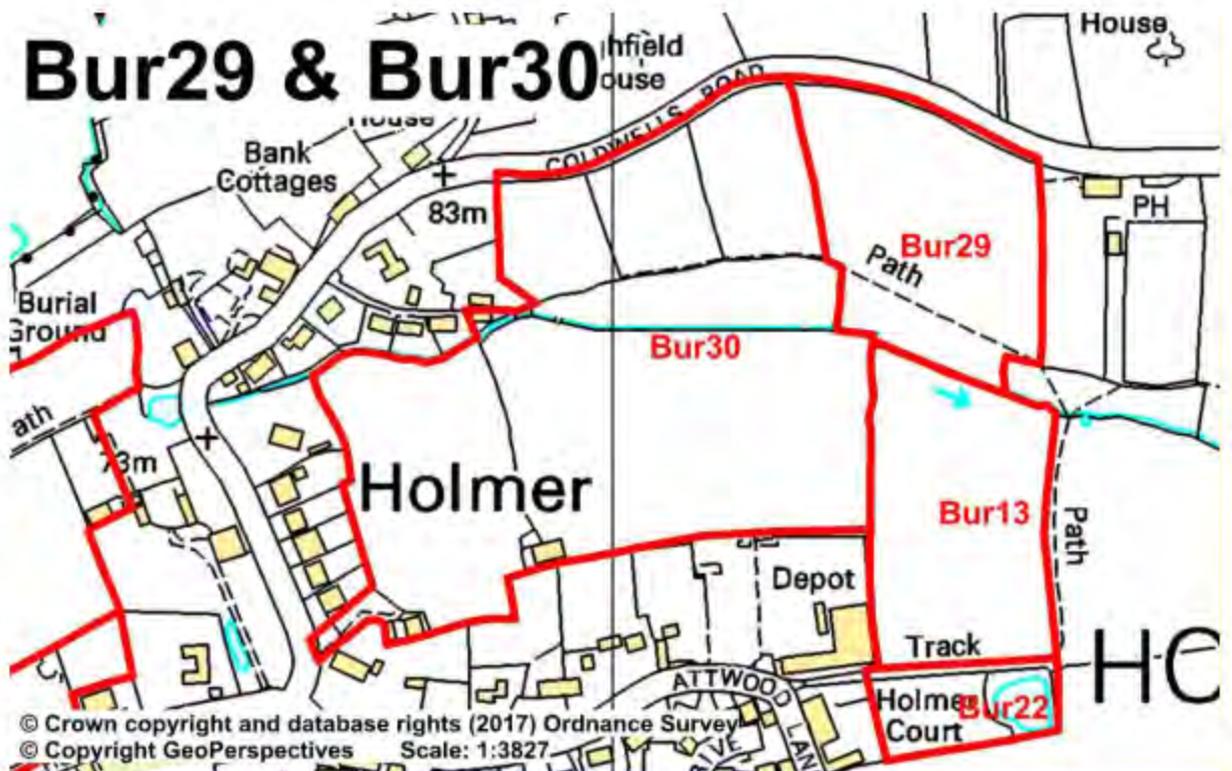
1.1.3 This submission focuses on the key planning policy considerations for the Hereford Area Plan to enable its successful implementation, thereby sustainably meeting the identified full objectively assessed needs for housing (OAN) by 2031.

**1.2 Land Under the Control of Dean Lewis Estates**

1.2.1 Whilst the identification of site specific allocations is reserved for the regulation 19 consultation stage of the HAP, we thought it important to alert the Council to the extent of land under our control within the HAP.

**Bur29.** Land adjacent to the Rose Gardens, Holmer, Hereford; and

**Bur30.** Land off Coldwells Road



## 2 DELIVERING THE CORE STRATEGY HOUSING NEED

### 2.1 Ensuring Housing Delivery

- 2.1.1 The Council's Interim Position Statement on Housing Delivery, published September 2016, recognised that Hereford was not presently able to demonstrate a five-year supply of housing land.
- 2.1.2 In this context, Core strategy policy SS3 provides the policy framework for where dwelling completions are below the target figure. The policy indicates that priority will be given to increasing housing supply using appropriate mechanisms including; the preparation of an interim position statement utilising evidence from the strategic housing land availability assessment. In essence, the interim position statement encourages developers to bring unallocated housing land forward and that is identified as being subject to the least amount of constraints by reference to the Housing and Employment Land Availability Assessment (HELAA).
- 2.1.3 Dean Lewis Estates fully endorse the council's proactive approach in this regard. It is also of vital importance that the HAP applies a consistent approach with that advocated within the Interim Position Statement i.e. the identification of housing sites should focus first on the least constrained and demonstrably deliverable housing sites.
- 2.1.4 The findings within the Interim Position Statement on Housing Delivery clearly demonstrates that successful delivery of CS housing target is heavily reliant on a range of sites that are easily deliverable, attractive to the widest market, unconstrained by viability issues and least constrained from environmental or policy impediments.
- 2.1.5 **Bur 30** is acknowledged within the Council's **Topic Paper 'Emerging potential housing options'** as a site that has; *"No known environmental constraints to development. However, there may be access constraints. Suitable for residential use, B1/B2 employment and/or mixed use"*.
- 2.1.6 **For clarity, the access arrangements to the site has been thoroughly investigated and no longer should be regarded as a constraint to development on this site.**
-

- 2.1.7 **Bur 29** is regarded within the HELAA as being linked to the delivery of Bur 30 for the purposes of access. This statement is correct.

## 2.1 Policy Rationale

- 2.1.1 CS Policy SS2 requires that provision is made for a minimum of 6,500 new homes in Hereford up to 2031. The distribution of this housing has been set out in policy HD1 for Hereford as follows;

- 800 new dwellings in Hereford City Centre (HD2).
- 500 dwellings at the Northern Urban Expansion Area (HD4).
- 1,000 dwellings at the Western Urban Expansion Area (HD5).
- 1,000 dwellings at the Southern Urban Expansion Area (HD6).

- 2.1.2 The residual housing target of 3,200 dwellings will be allocated within HAP whilst also having regard to:

- those homes already completed in the period since 2011;
- the number of houses which will be provided by sites which have the benefit of planning permission;
- new housing that will come forward on unidentified or 'windfall' sites; and
- the development of sites which will be specifically identified or allocated in the Hereford Area Plan.

- 2.1.3 The current position with regard to delivery of this housing is noted within the Council's Housing Topic Paper<sup>1</sup> which sets out the Council's 'Residual Target for Hereford' at section 5.8. There is a residual requirement for **2032 dwellings** to be delivered by 2031.

- 2.1.4 This requirement is in addition to the 3,330 dwellings that are required to be delivered through the strategic sites identified within CS Policy HD1 - Sustainable Urban Extensions. We would urge that a degree of caution is exercised over the timescales for delivery of the Urban Extensions.

---

<sup>1</sup> Herefordshire Local Plan, Hereford Area Plan: Topic Paper - Emerging Potential Housing Options - April 2017

- 
- 2.1.5 None of the Urban Extension sites have attained full planning consent as yet. Presently the City Centre/Urban Village strategic area is contingent on timely implementation of the City Link Road. Realistic judgement should be applied in respect of the timing for their collective delivery. It is well documented that strategic developments of the types planned for within the CS experience long lead in times due to the greater degree of complexity of securing connectivity with essential infrastructure.
- 2.1.6 Dean Lewis Estates would strongly advocate that the residual housing requirement that is required to be met through the HAP should be **allocated** in its entirety rather than rely on any element of windfall.
- 2.1.7 An allowance for windfall sites within the HAP is not objectionable in principle. However, **this allowance should be in addition to the 2,032-dwelling residual target**. This approach provides the greatest certainty for the Council and is likely to significantly aid them in their responsibility of creating and maintaining a rolling five-year land supply.
- 2.1.8 A further matter that must be taken into account is the fact that council has an upward stepped housing trajectory. It is significant, in the context of the rising housing target, that since the adoption of the CS in 2016, the five-year housing supply has diminished to a level below the requisite five-year minimum. The HAP **should allocate all land necessary to meet the residual housing target**. This is not to the exclusion of a windfall allowance of 25 dwellings per year. Such an allowance would simply mean that housing delivery would modestly exceed the minimum planned housing target. Such an approach would accord with the CS as the housing targets expressed within it are minima. Therefore there would be no policy breach if the housing thresholds were exceeded by the modest amount of 375 dwellings over the plan period.
-

2.1.9 Whilst not identical, the approach advocated within the LPEG group recommendations to the government has similar effect. They state;

**"11.3 There needs to be a clearer and more effective mechanism for maintaining a five-year land supply, at the same time as ensuring plans consider delivery over the whole plan period and incorporate sufficient flexibility to respond to rapid change. We also note the Government's proposed housing delivery test will increase the importance of having a proactive system to ensure the availability of a genuine supply of deliverable sites as well as a reservoir of potential development sites to address shortfalls in housing supply.**

**11.4 Accordingly, we recommend that the NPPF makes clear that local plans should be required not only to demonstrate a five-year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances"<sup>2</sup>.**

2.1.10 The approach advocated by Dean Lewis Estates would align with the LPEG objective which is to provide a "**more effective mechanism for maintaining a five-year land supply, at the same time as ensuring plans consider delivery over the whole plan period and incorporate sufficient flexibility to respond to rapid change**".

2.1.11 In this regard, we would strongly advocate that the following Housing policy delivery approach is enshrined within the HAP.

**Residual Target for Hereford**

<b>Hereford Area Plan</b>	<b>Number of Dwellings</b>
<b>Housing requirement set out in Core Strategy policy HD1 (not including the strategic sites)</b>	<b>3200</b>
<b>Total Completions 2011 -2016</b>	<b>806</b>
<b>Commitments at April 2016</b>	<b>362</b>
<b>Residual Requirement</b>	<b>2032</b>
<b>HAP Proposed Allocations</b>	<b>2032</b>
<b>Windfall Allowance</b>	<b>375</b>
<b>@ 25 Dwellings per year (15yrs)</b>	
<b>Total</b>	<b>2407</b>

2.1.12 **Most importantly, the provision of allocations for 2032 dwellings gives the greatest potential certainty to the overall plan.**

### **3 HEREFORD AREA PLAN - TOPIC PAPER**

#### **3.1 Emerging Potential Housing Options**

3.1.1 The Housing Topic Paper that accompanies the HAP contains the first sieve of sites that have been taken from the Housing and Employment Land Availability Assessment (HELAA).

3.1.2 The first matter that is evident is that the HAP will, realistically, not be able to rely on sites that are acknowledged as being affected by the, at present, unspecified route of the Hereford Western Relief Road. That is not to suggest that these sites cannot be brought forward in the future but that reliance on them now for the purposes of the HAP is entirely uncertain. i.e. they cannot be shown to be deliverable, nor can the extent to which they may be regarded as being suitable be determined, as the exact future relationship with the proposed relief road is unknown.

3.1.3 **The Council's approach of exercising caution in respect of these sites at this stage is strongly supported.**

3.1.4 To achieve timely adoption of the HAP sites that are within or affected by the safeguarded route of the relief road should be disregarded for the purposes of land use allocations for the reasons identified above.

#### **3.2 Sites with Potential for Further Assessment**

3.2.1 The Council's revised HELAA note set out within the Housing Topic Paper identifies that some **3545 dwellings** (Sites not within the Safeguarded Route of the Western Relief Road) are capable of being delivered on some **23 individual sites** within the Plan period.

3.2.2 For the avoidance of doubt, the 3545 also includes site **CEN21, Land at Edgar Street, Hereford** which is considered capable of providing **800 dwellings**. This area of Hereford City is already allocated under CS policies HD1 & 2 and therefore it is rational to exclude its contribution to the HAP sites total. The resultant number of dwellings identified within the HAP is (3545 – 800) **2745 dwellings**.

- 3.2.3 On cursory inspection of the 'Sites with Potential for Further Assessment' it is evident that a number of sites are subject to significant physical and environmental constraints that would severely impede their deliverability. These amount to some 870 potential dwellings. Therefore, the total number of dwellings that can reasonably be regarded as deliverable by reference to the sieved version of the HELAA is some **1875 dwellings**
- 3.2.4 Should the Council follow its initial approach to meeting the HAP housing target using their methodology (**1657 dwelling target**) this would mean that **1875 dwellings are available to it on 16 individual sites to meet this target.**
- 3.2.5 However, the actual residual requirement stands at **2032 dwellings** and therefore there would be a small **deficit of 157 dwellings** from the sites that can reasonably be regarded as being deliverable by reference to the sieved version of the HELAA.
- 3.2.6 Should the LPEG advice be followed and **developable 'Reserve Sites' equivalent to 20% of their housing requirement** 3200 be included within the HAP with the objective of boosting supply then sufficient land would be required to supply **2672 new dwellings.**
- 3.2.7 In our view, the correct assessment of the residual calculation should, at this stage, only refer to the need figure (**2032 dwellings**), rather than incorporate a reduction by reference to a proposed windfall allowance of 375 dwellings (25 per year).
- 3.2.8 It is then a policy decision for Hereford to content with the matter of the LPEG approach in respect of a flexibility allowance.

### **3.3 Deliverability**

- 3.3.1 At present, the 'sieved' HELAA highlights that there are less deliverable sites in contrast to the actual residual housing requirement of **2032 dwellings.**
- 3.3.2 The rational conclusion is that sites that are least constrained, and are as noted as such within the HELAA, should be prioritised above all of the other sites and selected as preferable sites to be taken forward into the next round of consultation into the HAP as the council's proposed housing allocations.

## **4        HEREFORD ARES PLAN ISSUES AND OPTIONS**

### **4.1        Background**

**4.2**        The questions cited below are taken from the HAP Issues and Options Consultation April 2017. The responses below to each question relate to those matters of greatest of relevance to the delivery of housing within the HAP area.

**4.3**        For completeness, we have also provided a response to the online survey.

### **4.4        Social Progress – Housing**

#### **Q1: Can greater use be made of land that has been previously developed (brownfield land) for new housing? If yes, how?**

4.4.1        The HELAA identifies both brownfield and greenfield development sites that are within Hereford and immediately adjacent to the existing built area. The sites within the HELAA, including sites that have been assessed as not suitable to take forward into the HAP at present, constitute the extent of identified land available to the council to deliver housing and employment up to 2031. Having been the subject of a 'Call for Sites' and thorough assessment by the Council in the HELAA, it is unlikely that opportunity will exist to significantly increase the amount of development on brownfield land within the plan period from that already identified.

#### **Q2: Should planning policies be developed to help meet the needs of specific groups of the population, for example older people?**

4.4.2        It is notable that over 17% of the Hereford City population is over 65 years of age. Whilst it is accepted that policies within the HAP need only address the matter of market and affordable housing delivery to ensure its' soundness, the HAP should also identify sites for elderly person's accommodation including C2 specialist care accommodation.

**Q3: Should the plan provide advice upon an appropriate density of housing development in different parts of the city?**

- 4.4.3 If the HAP is to include policies relating to density in different parts of the City, these policies should provide guidelines only. This will encourage innovative design within the different areas of the City.

**Q4: Do you agree that the HAP should only identify housing sites for a minimum of ten or more dwellings? If no, please explain.**

- 4.4.4 Yes - The HAP should identify housing sites for a minimum of ten or more dwellings.

**Q5: Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside? If yes, what are the most important factors to help define it?**

- 4.4.5 The use of settlement boundaries within the HAP is unnecessary. The existing CS policies set the spatial locations for where development should occur and the HAP will specify further site specific allocations. Windfall development that accords with the CS and HAP will also be enabled to come forward. This approach does not therefore rely on settlement boundaries but instead relies on proper planning balance judgement.

**Q6: Should the Hereford Area Plan include additional policies for affordable housing in addition to those in the Core Strategy? If yes, should the plan be specific on types and tenures of affordable homes required?**

No – CS Policy H1 adequately covers the principle matter of scouring affordable housing.

## **HEREFORDSHIRE SUSTAINABLE TRANSPORT GROUP**

(comprised of Herefordshire Transport Alliance & Rail and Bus for Hereford)

### **Blueprint for a Hereford Sustainable Transport Plan.**

**April 2017**

Herefordshire Council and the population of Hereford City, and the surrounding area, have common ground in their concern over traffic congestion in Hereford City and its impact on people's lives, economic activity, and air quality.

The stated objectives of Herefordshire Council's Local Transport Plan (2012-2026) are:-

- 1. To enable economic growth.**
- 2. To provide a good quality transport network for all.**
- 3. To promote healthy lifestyles.**
- 4. To make journeys safer, easier and healthier.**
- 5. To ensure access to all services for those living in rural areas.**

We absolutely agree with the Council's stated objectives. There is no issue of policy difference between us.

### **Herefordshire Council's strategy to achieve its transport objectives**

To its credit Herefordshire Council has promoted sustainable active travel for cyclists and pedestrians through its South Wye Transport Plan and 'Destination Hereford' initiatives.

However, we note that the Hereford bypass features prominently in the Midlands Connect Strategy regional plan. A bypass, and the economic growth it's intended to promote, will inevitably channel more traffic into Herefordshire. Any additional road capacity created will rapidly be taken up by traffic generated by the bypass, both local and regional.

With the indeterminate phasing of the bypass, DfT's recent rejection of funding for the western phase, and Highways England's review of road investment priorities, significant slippage in the bypass programme is almost inevitable.

This "road centric" approach is costly, both financially and environmentally. The argument for major additional road building is fundamentally flawed because:-

- A high proportion of the traffic in Hereford city - around 85 % - is internal, with most journeys being of two miles or less. This causes congestion on roads into the city centre, especially at commuting times.*
- Figures comparing traffic levels during the school term traffic with those during holiday periods show that managing school-related traffic systematically would substantially reduce congestion.*
- It fails to give bus traffic priority, which discourages modal shift.*
- Pollution from traffic presents a serious threat to human health and makes a significant contribution to climate change, and*
- It fails to limit or reduce CO2 emissions and air, noise, and light pollution.*
- "There are less expensive, more sustainable solutions to Hereford City's internal congestion, which can be executed quickly and reliably, and are also less disruptive to the environment, and landscape."*

## **A Sustainable Approach**

Herefordshire Transport Alliance and Rail & Bus for Herefordshire are both highly concerned by the Council's failure adequately to address the objectives of its own LTP. This concern of the two groups is such that they have formed a joint Working Group (HSTG) tasked with the identification of sustainable proposals that will address those objectives positively and evidentially.

Hereford needs environmentally sensitive public transport **now** to stimulate the development of a new university, and support its high tech enterprise zone and regenerated city centre. How better to complement these developments than a series of sustainable transport measures which will deliver health and environment improvements? The group's blueprint sets out achievable measures that can and should be worked upon **now**, not in the shadow of a bypass that may never be built and even if built will not significantly reduce congestion in the City. An effective public transport system is vital if the city is to market itself successfully as a vibrant centre for work, study, and tourism.

This 'Sustainable Approach' fully addresses the problems of traffic congestion in Hereford City. It takes into account the needs of all, including those for whom neither the car, nor active travel is an option. It identifies a number of possible strategies including those set out below.

The initiatives to be addressed include the following:-

- A detailed examination of the feasibility of a high capacity light tram route between the large residential areas south of the river Wye and the city centre. The route would use a council owned former railway corridor, including a river crossing, and incorporate a segregated footpath and cycleway.
- The development of a new city-wide bus network utilising electric or other zero-emission vehicles.
- A detailed examination of the demand for and feasibility of peripheral park and ride sites on main road corridors into the city.
- Development of a city wide network of safe well-defined footways and cycleways, segregated from traffic as far as possible.
- A detailed study of means of reducing traffic peaks caused by school travel. The study will include the potential impact of traffic generated by the proposed University of Hereford.
- A comprehensive programme of traffic management and pedestrian safety measures including re-designed junctions, easing or elimination of pinch points, centralised traffic signal control and provision of bus-only lanes.
- A re-evaluation of proposed residential development locations in order to better connect them with existing and proposed employment zones by means of new or improved public transport links.
- The development of a local Sustainable Transport Plan for each market town and its catchment area.

**Herefordshire Sustainable Transport Group believes that no further road building proposals should be entertained until all of the more sustainable initiatives listed above have been fully explored.**

### **The Business Case**

Given the need to address Hereford's transport problems **now**, the Sustainable Transport Group would be pleased to work with Herefordshire Council, the Marches Local Enterprise Partnership and the Department for Transport in developing sustainable transport initiatives as part of a robust case for change in line with the DfT Transport Business Case Procedure.

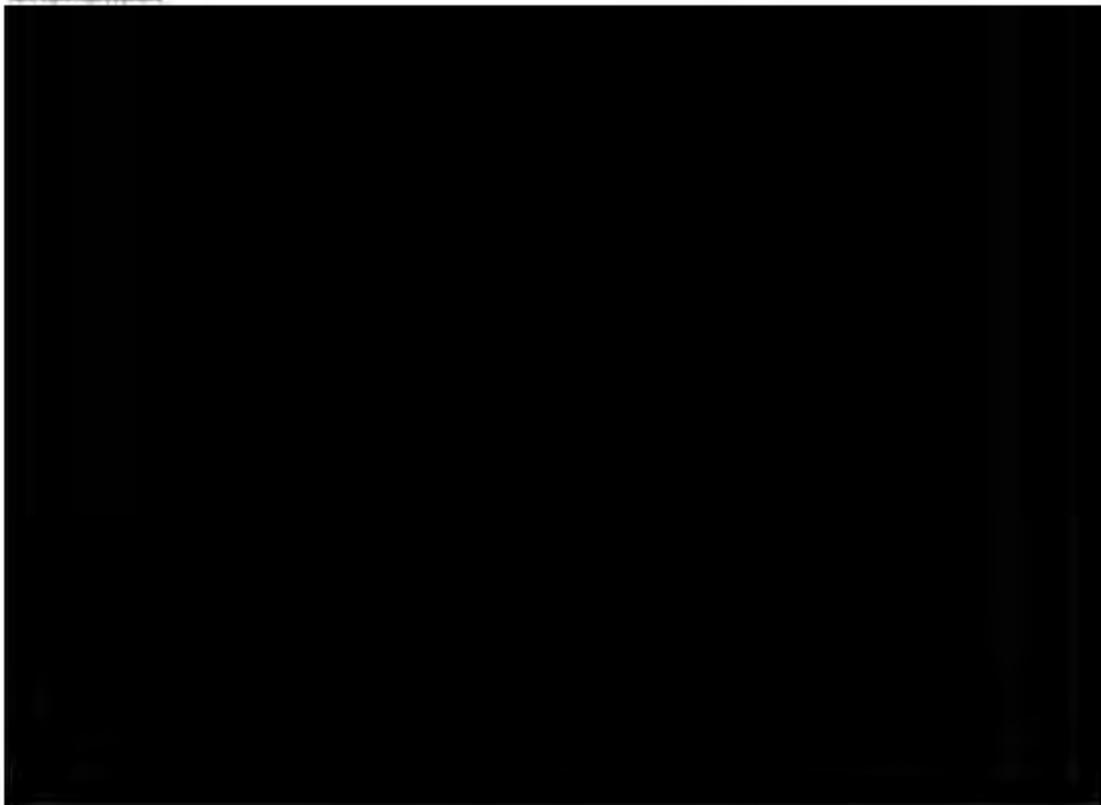
### **Conclusion**

Hereford Sustainable Transport Group proposes a fresh approach to resolving longstanding traffic problems in Hereford City.

The result will be an inspiration to the City's residents, as well as an example to the people of Britain on how to manage transport responsibly. Many communities in Europe have already successfully addressed the challenge of twenty first century mobility. Britain, including Herefordshire, can now demonstrate true vision and show that we can achieve a high quality of life, both sustainably and affordably.

The Group is grateful to Professor John Whitelegg of the Stockholm Environment Institute, who is the Honorary President of Rail and Bus for Herefordshire, for his advice in the preparation of this document.

### **Contacts:**



Herefordshire Sustainable Transport Group



This response has been prepared by the Board of the Hereford Business Improvement District (HBID) on behalf of the 480 HBID member businesses. Given the general nature of the consultation questions at this stage in the process we have not consulted fully with members, which we feel will be more appropriate once specific proposals are available for members to provide comments on.

It would be inappropriate for HBID to comment on many of the specific questions in the full consultation as they are either not directly relevant to businesses, or to the HBID geographic area. We have therefore confined our comments to 6 key principles that we would like to see embedded in the appropriate policy areas of the HAP

1. **Parking.** As a direct result of some excellent progress in recent years Hereford has greatly improved as a shopping and leisure destination, with a widened catchment area, and almost certainly a longer average length of stay. However, our parking provisions are one of the main areas that now let Hereford down as a destination. Appropriate potential locations should be identified and if possible protected in the HAP, for construction of modern, fit for purpose car parks. Within this consideration should be also be given to:
  - a. Alternative uses for some current car parks that will become available for redevelopment as a result of the provision of better facilities
  - b. The location of clearly differentiated long and short stay parking. Long stay being located further out for commuters. Short stay in very central locations, on each of the key access roads for shoppers and tourists.
2. **Urban Living.** The retail heart of the city lacks atmosphere after shop closing time, an issue that can in part be addressed by having more residential property in the centre of the City. Appropriate policies should be in place to encourage conversion of vacant and underutilised space above shops, into residential accommodation. This area of policy will most likely need to address the needs for university accommodation, and HMO, as well as the private market.
3. **Retail consolidation.** It is without doubt that nationwide less retail space will be needed in the future, and Hereford is no exception to this cultural change. We currently have a significant amount of long term, empty retail properties that are not fit for purpose (as a result of many factors including, small size, lack of loading access, poor conditions, poor location, and other factors). Equally we also have a lack of availability on larger, modern, fit for purpose retail units in the heart of the city. To ensure Hereford continues its revival as a retail and leisure destination we therefore need to:
  - a. Proactively address the need for less retail space in the future, by identifying a future use for areas that are unlikely to be needed for retail in the future; most like for use as leisure, residential or education space.
  - b. Identify appropriate areas in the heart of the city for redevelopment to provide the large retail units that are currently in short supply.
  - c. Ensure a total stop to any additional retail space beyond existing locations, that will only add to an oversupply problem, that drives down quality as a result.
4. **Location of the university.** It is our belief that the university is likely to prove the catalyst for a huge boost to the local economy, that can be best achieved and exploited by having it situated in the very heart of the city. Being in the centre of the city it can also help provide new purpose to some parts of the city that have currently lost their identity and purpose (see point 3 above), we would therefore like adequate space protected for the University to take

up, most likely centred on the Commercial Road, Commercial Street and Blueschool Street Areas.

5. **New Tourism and leisure uses.** The centre of the city currently lacks tourist attractions, particularly anything suitable on a wet day. We would therefore like to see policies that allow any kind of appropriate tourist and leisure facility to be located within the heart of the city, to enhance the overall offer of Hereford as a destination.
  
6. **Simplicity.** There are a number of other policy areas we have not covered in this feedback, partly because as a general principle that will help encourage investment, we would like the HAP to be as simple as possible, relying on the Core Strategy where appropriate, rather than introduce extra complexity for businesses and developers to contend with.



18<sup>th</sup> May 2017

Dear Madam,

### **Hereford Transport Plan Consultation**

This letter is written on behalf of the HWGT, the writer is a member of its Executive Committee and its designated activist in Herefordshire on planning matters relating to historic gardens and landscapes. The Trust works closely with the Woolhope Naturalists Field Club, which similarly has a strong interest in heritage matters.

1. The local concern for the Belmont landscape extends back to the early 1980s when the first proposals were made to establish a golf course on what was known to be a landscape designed by Humphry Repton. The Herefordshire CPRE wrote protesting about this since it was proposed that many trees were to be felled and the Hereford Civic Trust also took up the cause since it was on their doorstep. During the 1990s the changes brought about by the golf course were monitored by the Civic Trust and recorded in their regular newsletters. The present writer provided the historical content for the club's glossy brochure and in 1995-6 wrote three research articles on the early history of the estate for the *Journal of the Picturesque Society* – available in Hereford City Library. Subsequently, a précis was included in the Hereford and Worcester Garden Trust's *Survey of the Historic Parks and Gardens of Herefordshire* (2001). Meanwhile and independent scholar, Nigel Temple had written about the enhancement of the estate by the national architect, John Nash (1752-1835), a partner of Repton. This is found in *John Nash and the Village Picturesque* (1979). This involved the building a several cottages on the estate, plans for which were published in Temple's *George Repton's Pavilion Notebook* (1993). All this research considerably enhanced the significance of the Belmont landscape and raised it to national significance and in the late 1990s the present writer, Repton's recent biographer, Stephen Daniels and an English Heritage gardens specialist walked over the estate and came to the conclusion that it was worthy of Registering as an historic landscape.

2. With no obvious threat to the estate – the golf course contracted from the upper parkland – the matter lay dormant until April 2013 when new housing was proposed on the parkland and the Western Relief Road became public knowledge. The HWGT decided to make a formal application for Registration to English Heritage (Case number 468360). The application was turned down but the Advice Note which explained this decision was so full of mistakes and misunderstandings, and clearly

written by someone who did not understand the historic context of the landscape, the Trust appealed against the decision. Historic England re-wrote the advice note but it did not change the negative decision. The matter was reviewed by the national Gardens Trust in their annual report for January 2014 (*The Garden Trust Review* –copy attached). In effect Historic England accepted Repton's involvement but felt that the changes made to the landscape by the golf course were irreversible. This was patently not the case and since its demise five years ago their new tree planting has flourished and with judicious management a Repton specialist could easily retrieve the historic character with felling and some replanting. There are illustrations of the parkland from c.1790-1810, which together with 19<sup>th</sup> c. mapping could under-pin an accurate restoration scheme. Since 2018 is the 200<sup>th</sup> anniversary of Repton's death and is likely to be celebrated with the same zeal as 'Capability' Brown's birth year, in different circumstances, Belmont's renaissance could well be at hand. Indeed, the HWGT is already sketching-out a series of public events in Herefordshire, which will no doubt include Belmont, as the county played a large part in his early career.

3. A cursory survey of the woodland below the house, overlooking the Wye, reveals that what appears to be native woodland, is an overgrown Georgian/Victorian shrubbery planted with exotics such as cedar of Lebanon, species oaks e.g. *Quercus suber* (Cork oak) with under planting of box, to the NE of the house there is a spring with indications that this was the site of a grotto, recorded in 1795 and shown on a watercolour of c.1840. On the parkland plateau between the house and the Abbey there are still many fine trees and others survive close to the western entrance, on the Pugin (c.1860) side of the mansion. This includes a champion London plane (*Platanus x hispanica*). On a raised area to the SW of the house, near the walled garden, there is more mature planting where the oak tree, given by Uvedale Price of Foxley, was planted in 1788. Until recently this was marked by a metal sign and is noticed in Murray's *Handbook for Travellers in Herefordshire* (1884). The parkland needs a professional survey to ascertain what survives of the original planting, what is worth preserving and where it will be necessary to replant in order to restore the park to its late 19<sup>th</sup> climax.

3. In more enlightened times the estate and its house would have been purchased by the local authority and opened to the public. The upper floor of the house could have been used for residential purposes with the ground floor restored with a restaurant etc for visitors. With most of Hereford's post-war development taking place on the south side of the city, an area of picturesque parkland would have been a tremendous asset for the new community. Obviously, this golden age has passed but the huge sums to be spent on the river crossing suggest that with Lottery support, the purchase of the estate, even today, would be a fragment of the total cost of the relief road and its infrastructure.

4. The high landscape value of the Belmont estate derives, in part, from the fine scenery it faces on the north side of the river. The hanging banks of woodlands, overlooking the river-side water meadows, are a great asset. Like the Belmont woodland, it seems that much of this was deliberately planted by the Wegg-Prossers in the early 19<sup>th</sup> century. The ubiquitous presence of Bird cherry (*Prunus padus*) –planted for game cover and decoration –seems to indicate this. The *Warham Landscape Survey* (2011) discusses the woodland in more detail. The water meadows, which stretch along to Breinton Springs have been noticed in the *Water Meadow Survey of Herefordshire* (2017), commissioned by Historic England and are typical of the catch-work systems used elsewhere in the river valleys of Herefordshire in the 17<sup>th</sup> and 18<sup>th</sup> centuries. The small Warham House estate adds

considerably to the landscape value of this section of the Wye Valley. It has well planted shrubberies, orchards, a walled garden and an embellished dingle, fed by a natural stream, which was developed as a water garden in the past. As with similar features further up the river in Breinton the water fed into the water meadow system. An ornamental bonus was achieved by sensitive management of a utilitarian feature.

5. Along with the Hereford Civic Society and the Woolhope Club the HWGT has repeatedly flagged-up the beauty of the landscape immediately to the west of Hereford, which relies almost entirely on introduced elements e.g. orchards, small areas of pasture and above all else, park and garden planting. Closer to Breinton there are several notable garden landscapes, many of which have developed semi-natural fringes, especially beside the river. Some of these are briefly mentioned in the *Survey of Historic Parks and Gardens in Herefordshire* (2001). There is much to be discovered here. Recently an early 20<sup>th</sup> century garden plan surfaced, signed by the eminent designer Percy Cane (1887-1976). This gives at least one of the gardens at Breinton a significant pedigree. These gardens, which all run down to the Wye bank will be seriously affected by the new road bridge at Belmont. Like Belmont itself, these gardens have minimal protection albeit acknowledged in planning terms as 'unregistered parks and gardens' by the local authority. Thus, Herefordshire Council is *de facto* guardian of these landscapes and will no doubt be urged by the central government to take their responsibilities here seriously.

Yours faithfully,

A solid black rectangular redaction box covering the signature area.

**Subject:**

FW: For your consideration in assessing the Hereford Area Plan

22<sup>ND</sup> May 2017

HEREFORD AREA PLAN CONSULTATION  
HEREFORD COUNCIL

Dear Sirs

I write to input to the Hereford Area Plan Consultation.

I have attached below my response regarding the Transport Plan, as my objection to the Western bypass is relevant to the plan for the city.

1) CYCLE STRATEGY

Hereford is unsafe for cyclists. There needs to be a proper strategy drawn up by the council for cycling travel in the city and in the county. This area plan is not achieving it as most cyclist in town are unaware that this plan is happening. Have you sent posters up to all the bike shops in the county? Have you posted posters near the bike lock up points in town? Has your cycle/move department of the Council sent emails out to all the Bike Ambassadors on their database? No. And you should have done. I urge you to extend the period of this consultation and do it properly to include cyclists for a proper strategy.

2) You need a strategy for Walking

3) You need a strategy for Public Transport.

4) You need to interlock for all three.

5) You need a strategy for car use in town, including parking for residents, and in which cars are lower in priority in funding and on the road itself to bikers and walkers. Cars should give way to non-car users.

6) The list for where improvements for cyclists and walkers need to be changed is too long to detail, but include:

- proper signage for car drivers to respect the rights of other road and pavement users
- bring in a speed limit for all the equivalent of a runner (15mph) throughout town.
- Create a network of coloured cycle lanes through the centre of town and into the county, immediately along St Owen St and Broad Street. How long does this need to take to do????
- Give bikes and walkers right of way OVER cars.
- Put cars in subways not walkers and cyclists.

7) OPEN SPACES

Beautify and protect all open spaces. These are our breathing spaces, both in town and in the county.

8) Support rather than destroy the cultural and arts services of the county, including the Museum Services, the Library, the Archives, the Courtyard etc. If the Council helps, supports and nourishes

the arts and cultural amenities, sustained and sustainable economic growth will follow because Hereford will be a chosen place to live.

Yours faithfully



Dear Sirs

I write to express my wholehearted opposition to the Council's proposal for a Western Bypass, on any part of the proposed corridor. Amongst the many reasons behind this view are the following:

#### **I. SUSTAINABLE TRANSPORT ALTERNATIVES**

- Herefordshire Council's "Destination Hereford" application 2011 states "Short trips. The 2001 Census records 67% of Hereford residents travel less than 5km to work. This is well above the national average with 56% of journeys to work are made by car we have a fantastic opportunity to deliver much greater modal shift". Numerous reports have shown that building roads increases the number of car journeys when thinking of managing journeys less than 3 miles.
- Providing infrastructure for Safe Routes to School could cut congestion connected with the school run by up to 52% at peak times on roads in Hereford. (Data from Destination Hereford application 2011). It is currently UNSAFE for children (and adults) to cycle through Herefordshire, and in many places to walk where roads are dedicated to the sole use of cars.
- £4.97 million was spent through the Destination Hereford project from 2011 to 2015. The result was that:
  - i. active travel (cycling and walking) trips increased from a 22% mode share in 2012 to a 27% mode share in 2015
  - ii. Car trips undertaken across journeys for all purposes have decreased from a 66% mode share in 2012 to 62% in 2015. In this scenario, everyone becomes healthier, thereby reducing the demand on both physical and mental health services.
- The Department for Transport Nov 2014 Report "Claiming the Health Dividend" concluded the benefits of walking and cycling were higher than the benefits from building new roads, were quicker to implement, and the work was more likely to be contracted to local based companies. If Hereford has a healthy-transport policy, it will be a more attractive place for people to live, including entrepreneurs bringing jobs with them.

- Higher levels of walking and cycling are shown to support local shops, improve communities, reduce crime, improve health and well-being and deliver better value for money than road building schemes. It is currently unsafe to cycle and walk through much of Hereford.
- Highways Agency Letter re the Southern Link Road (7th Aug 2014) “the building of new road infrastructure could only be justified in policy terms when other avenues such as travel planning and sustainable travel modes had been developed and shown not to address the transport needs and issues identified.” So where is this work on electric bus transport, cycle and walking alternatives?

## **II. PREMATURE AND DISCONNECTED TO OTHER PLANS**

- The Hereford Transport Package only applies to the north of the City. There is no information about the South Wye Transport Package and how this would coordinate with the Hereford Transport Plan and reduce congestion in Hereford.
- There is no freight strategy for the County so it is unclear how the Council can claim the “bypass” would “remove the need for many heavy goods vehicles to travel through the City”. Improved and faster roads are likely to INCREASE the amount of regional freight travel, as an alternative to the M5. The bypass therefore would INCREASE the amount of freight transport through the county. The Council needs to recognise the need to improve freight travel OUT OF ROTHERWAS to the EAST, both by TRAIN and road.
- There is no Waste and Minerals Plan for the County. This plan would identify how movements of waste and minerals, by HGVs, would impact on the road network, especially now waste is being sent to the Hartlebury incinerator in Worcestershire.
- There is no reference to supporting evidence to explain the transport proposals, in particular why Hereford needs a Bypass, particularly one to the West of Hereford.
- Since 2000 HGV traffic crossing Greyfriars Bridge in Hereford has declined steadily from 2,173 to 1,549 vehicles a day, a drop of over 28% (Dept. for Transport AADF Stats 2000-2016) . Why is a Bypass required?
- The freight rail head at Moreton-on-Lugg has done more to move HGVs from City roads than any new road building, and yet no reference is made in the Hereford Transport Package about freight to rail. Do more to increase the viability of rail freight.
- With Herefordshire Council having insufficient money to maintain our existing road surfaces how can they promote a new road for £167Million (£132Million Bypass + £35Million Southern Link Road) attracting HGVs from the motorway network.? HGVs are up to 160,000
- times more damaging to road surfaces than the average car. Attracting extra lorries to our local roads will cause them to deteriorate faster, when they are already in a bad condition, especially on the edges of the roads where cyclists are forced to ride.

## **III. ENVIRONMENTAL AND LANDSCAPE**

- Natural England letter to Herefordshire Council Nov 2011. “The Council is aware that Natural England does not support the relief road proposal. We maintain our view that transport investment should focus on managing demand and prioritising environmentally sustainable, low carbon modes

and technologies.” The Council should acknowledge the superior expertise and role of Natural England in taking a long view on the future needs of the county (greenery rather than roads).

- A river crossing at Warham in Breinton would destroy the historic landscapes painted by the Herefordshire artist Brian Hatton and the setting of the Breinton Springs scheduled monument. These landscapes have remained unchanged for hundreds of years. Brian Hatton is a huge and underrated asset for Hereford. The Council cuts to the Museum Service are making his work, like the other 100,000 items in the collection, virtually non-accessible to the public. Stop destroying the environmental and cultural assets of this county by spending vast resources on covering the landscape with concrete highways.
- The proposed Bypass will destroy open countryside and high grade agricultural land, severing quiet lanes and the tourist cycle route that passes through historic orchards. The Council already does not regard tourism as a serious economic activity, which of course is a nonsense perspective. If the Council is not prepared to support and nurture the tourism business, then at least do not destroy the very rural beauty people both come to Hereford to visit, or to live in.
- Breinton was identified by the Victorians as the “Green lung” of Hereford as prevailing winds bring fresh air across the City. Building a high level bridge in Breinton will allow pollution (air pollution, light pollution from headlights, noise) from extra cars and lorries to spread across the whole City. The Council allows the smell from Cargill to continue, is building more roads in the city to increase to the fumes, without any strategy for clean air. This road would dramatically increase air and light and noise pollution for the whole of the city and a significant patch of the now-rural county.
- Any accident on this bridge would pose a pollution risk to the City water intake just a short distance below the proposed River crossing. The bridges are already used as a way to throw rubbish of all kinds into the river. Another bridge would pollute yet more stretches of the river. Given this stretch at Breinton is one of the foremost canoeing and rowing river ways in the country, urbanising it as the bypass and bridge would be criminally short minded.
- Building the Bypass to the West of Hereford through the Three Elms area poses a risk to an important geological Water Protection Zone which is the main source of water for the 2 largest employers in Hereford, Cargill and Heineken. Pollution risks over 3,000 jobs and also the jobs of their local suppliers.

#### **IV. VALUE FOR MONEY OR WASTE OF OUR MONEY**

- What evidence is there to show that £132 Million spent on a Bypass will improve transport choice and reduce the high level of short car trips in Hereford? Get people on bicycles, ensure safe lanes, storage, lock ups etc.
- CPRE March 2017 have demonstrated that road building schemes never deliver the net economic benefits they promise. New road projects underestimate the economic value of the environment and the landscape. The bypass has not been shown to deliver better value to the taxpayer than alternatives to road building. Supporting the Arts and Culture in the county would have a greater impact on economic development.
- Herefordshire Council’s Local Transport Plan consultation 2015 - local people gave priority to “improving access to services for those living in rural areas – by improving the resilience of our road network and by working closely with all transport operators to deliver a range of transport

options particularly for those without a car.” (Responses were 40.61% 1st choice). The Council does not appear to be following the people’s choice, but the lowest ranked choice of building new roads, which is the most expensive and least effective way to tackle urban congestion. Restore a working, electric bus network (the network is now moribund). Have proper park and rides, with parks on brownfield sites. Access to all is not achieved by increasing car dependency.

- Road building discriminates against 17-20 year olds as 60% of these young people do not have a licence to drive. Overall 20% of adults in the UK do not have access to a car. It also discriminates against people with all sorts of mental health problems – almost one in three of our population – many of whom cannot drive, as well as those with physical difficulties – most of us, including those with permanent disabilities as well as those with temporary disabilities.

Building roads for cars lacks vision and understanding in what creates economic development, a quality place to live, and move-ability for all. Stop trying to solve traffic problems with new roads, but make Hereford and the county a place where all can safely move around by bike, by walking, and by public transport.

Above, all, stop building on the countryside. Greenery and tranquillity are essential for the mental and physical wellbeing for all residents, those who live in the area, visit the area, hang out in it for any reason, depend up on it cleansing attributes of the city air.

DO NOT BUILD THIS ROAD.

Yours faithfully



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[REDACTED]

**Subject:** FW: Hereford Area Plan

National Rail

**From:** ldf

**Sent:** 19 May 2017 09:37

[REDACTED]

**Subject:** FW: Hereford Area Plan

[REDACTED]

**Sent:** 18 May 2017 14:08

[REDACTED]

**Subject:** Hereford Area Plan

Dear Sir/Madam

Network Rail has been consulted on the Hereford Area Plan. Thank you for providing us with this opportunity to comment on this Planning Policy document. This email forms the basis of our response to this consultation request.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

We note in paragraph 8.93 Freight Transport that the LTP intends to review the potential access for rail freight to be increased. [REDACTED]

Network Rail would draw the council's attention to the following (which applies to England only):

**The Town and Country Planning (Development Management Procedure) (England) Order 2015 Publicity for applications for planning permission within 10 metres of relevant railway land**

**16.**—(1) This article applies where the development to which the application relates is situated within 10 metres of relevant railway land.

(2) The local planning authority must, except where paragraph (3) applies, publicise an application for planning permission by serving requisite notice on any infrastructure manager of relevant railway land.

(3) Where an infrastructure manager has instructed the local planning authority in writing that they do not require notification in relation to a particular description of development, type of building operation or in relation to specified sites or geographical areas ("the instruction"), the local planning authority is not required to notify that infrastructure manager.

(4) The infrastructure manager may withdraw the instruction at any time by notifying the local planning authority in writing.

(5) In paragraph (2) "requisite notice" means a notice in the appropriate form as set out in Schedule 3 or in a form substantially to the same effect.

**Developer Contributions**

The Hereford Area Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.

Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

To ensure that developer contributions can deliver appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:

- Network Rail believes that developments on the railway infrastructure should be exempt from CIL or that its development should at least be classified as payments in-kind.
- We would encourage the railways to be included on the Regulation 123 list of the types of infrastructure projects that will be funded through CIL.
- Network Rail would like to seek a clear definition of buildings in the draft charging schedule. Railway stations are open-ended gateways to railway infrastructure and should not be treated as buildings. Likewise lineside infrastructure used to operate the railway (such as sheds, depot buildings etc) should be classed as railway infrastructure and not treated as buildings for the purposes of the charging schedule.
- Network Rail would like confirmation that its developments over 100sqm undertaken using our Permitted Development Rights will not be CIL chargeable.
- We consider that imposing a charge on one infrastructure project to pay for another in an inefficient way of securing funding
- A requirement for development contributions to deliver improvements to the rail network where appropriate.
- A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.
- A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

### Level Crossings

Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.

As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services.

In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that:

- The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:
  - *Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".*

- Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and
- The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.

#### Planning Applications

We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above).

We trust these comments will be considered in your preparation of the forthcoming Hereford Area Plan document.

Yours faithfully,



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Date: 22 May 2017  
Our ref: 204712  
Your ref: Local Transport Plan 2017-2030



**BY EMAIL ONLY**

Dear Sir/Madam

**Re: Hereford Area Plan and Hereford Transport Package**

Thank you for your consultation on the above dated and received by Natural England on 11 April 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**The Plan's vision and strategy**

Natural England advises that the Plan's vision and emerging development strategy should address impacts and opportunities for the natural environment with particular emphasis on designated environmental assets. The plan should take a strategic approach to the protection and enhancement of the natural environment and aim for a net gain for biodiversity considering opportunities for enhancement and improving connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Nature Improvement Area, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies.

**Sites of Least Environmental Value**

In accordance with the NPPF, the plan's development strategy should seek to avoid areas of high environmental value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and should consider the direct and indirect effects of development on land within the setting of designated landscapes.

The Hereford Area Plan

**Housing**

*Question 1: Can greater use be made of land that has been previously developed (Brownfield land) for new housing?*

Previously developed land (brownfield land) can have a high ecological value. The ecological value of proposed brownfield site should be assessed when considering if the site could be used for new housing.

Question 9: Should guidelines be given within the plan to support methods of high quality design?  
a.) Yes.

There are opportunities to ensure that new housing is built sustainability and functions efficiently ensuring a minimum use of resources. There is also an opportunity to ensure that new housing includes sustainable urban drainage for both flooding and water quality and other measures that will help with reducing the impacts from climate change.

### **University**

It is our understanding that when the Nutrient Management Plan modelled housing numbers for Hereford, a new University was not taken into account. We note that the first phase of the project will see over a thousand students taking courses by 2021 and a potential student population of five thousand by 2031 with students mostly being housed within new accommodation across the city. The Local Planning Authority will need to assess how the students and staff from the new University will be accommodated and whether this can be achieved through the existing proposed housing numbers in the local plan or not. The ability of the Nutrient Management Plan to guarantee that reductions in phosphate can be achieved and the River Wye SAC be returned to favourable condition is based on development not being over what is set out in the [adopted Herefordshire Core Strategy](#).

### **Leisure and Tourism**

*Question 33: Could better use be made of the River Wye as a tourist attraction and for leisure activities whilst protecting its special qualities?*

This would have to be carefully thought out and designed to ensure that the proposals would not affect the special qualities of the SAC and SSSI. There are already problems with some residents using the river for leisure activities which have already affected otters which are one of the special qualities of the SAC/SSSI.

Development would need to be at specific locations agreed with Natural England. We would welcome the opportunity to discuss these plans in detail to help Herefordshire Council decide where some of the most sensitive locations are in the city

*Question 34: Is there a need for any additional policy relating to the restoration of the Canal?*

Yes. The canal should not connect to the River Wye SAC as this could affect water levels and risk the introduction of invasive species. The canal is a good opportunity to improve green infrastructure and people's access to nature.

### **Natural Environment**

*Question 36: Are there ways the green infrastructure could be improved? Please refer to Section 15 of the HAP Issues and Options Paper. If yes, how?*

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Park and Ride proposals could include green infrastructure, for example tree planting, SUDs for example. Improvements to walking and cycling paths should also make the best of opportunities to improve and connect up green infrastructure and to make them more attractive.

Improving water quality for the water courses within the Hereford area. Yazor Brook which runs into the River Wye could be improved by preventing run off and discharges entering it and greening up sites near to it. Improvements to the highways and reducing sewage losses in the city would be beneficial to the River Wye.

Creating natural areas within new development or through retrofitting green infrastructure such as rain gardens, green roofs, creating open space etc.

*Question 37: Are there any areas that require better connectivity of wildlife corridors?*

*If yes, where?*

- The canal could be used to link people and wildlife to the wider countryside.
- Linking corridors to Yazor Brook and the River Wye SAC/SSSI. Maintaining and creating wilder areas by the rivers, including greening the river and planting trees.
- There is greening work at Credenhill which could be linked to Yazor Brook.
- The new relief road- could provide opportunities for a circular route for walkers and cyclists.
- Any opportunity to link green space and water areas should be explored. Mapping current resources including multifunctionality, carbon storage etc could help to identify opportunities.
- In some places the areas available/opportunities may be small, but these should still be considered and explored.

*Question 38: Should the HAP include additional policies to protect the landscape and environmental qualities of the city?*

*If yes, what issues should these policies include?*

- Water resources and in particular focusing on water quality.
- Protection of wildlife habitat and green spaces and a commitment to creating and expanding wildlife corridors to provide better links to the wider countryside.

*Question 39: Can we achieve greater access to and use of the river whilst respecting its special qualities?*

*If yes, how?*

Please refer to question 33 above. It depends on the proposal. Activities would have to ensure that they do not impact on species, affect water quality and ensure that they do not damage or destroy the special qualities of the River Wye SAC and SSSI. We would welcome further discussions with Herefordshire Council on the conservation needs of the river and proposed activities.

*Question 40: Should the HAP include a policy that relates to how land use affects pollution?*

*If so, what issues should the policy cover?*

- Water quality- run off from sites is an issue.
- Air pollution- this could be improved with a reduction in traffic and increased use of sustainable traffic methods. Planting trees in streets can help mitigate air pollution, however if not thought out they can also trap air pollution in an area.
- Light pollution can affect otters and bats for example- So a policy could cover Lux levels and light spill on green infrastructure especially the water courses and other key corridors.

*Question 41: Should the HAP address the issue of climate change?*

*a.) Yes.*

The HAP should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation. There are opportunities to do this with the Hereford By pass and through greening up the river corridors.

## Hereford Transport Package

The proposed Hereford Bypass

*Question 49: We are in the early stages of identifying possible bypass routes. How important do you think the following factors are in choosing the bypass route?*

i) Are there other constraints within the Core Strategy bypass corridor we need to be aware of? Please specify below.

- Impacts on River Wye Special Area of Conservation (SAC)/ Site of Special Scientific Interest (SSSI)
- Hydrological impacts on the River Wye, Yazor Brook, and aquifer west of Hereford. There is an aquifer to the west of the city and proposals will need to ensure that the connection between above ground features and ground water are not adversely affected.
- Impacts on ancient woodland
- Impacts on protected species
- Impacts on priority habitats (for example traditional orchards)
- Impacts on best and most versatile land and soil.
- Impacts on habitats causing fragmentation.

The Bypass will have an impact on the environment and will need to be carefully considered and planned to minimise the impacts and mitigate for them. It is also an opportunity to improve green infrastructure, connectivity to fragmented habitats and wildlife corridors and water quality. The proposal should seek to ensure improvements and net gains in line with section 109 of the [National Planning Policy Framework](#). Natural England welcomes engagement at an early stage to ensure the best environmental outcomes.

Below is some general advice which should be considered when preparing the plans.

### **Priority habitats, ecological networks and priority and/or legally protected species populations**

The Plans should be underpinned by up to date environmental evidence, this should include an assessment of existing and potential components of ecological networks working with Local Nature Partnerships, as recommended by paragraph 165 of the NPPF to inform the Sustainability Appraisal, the development constraints of particular sites, to ensure that land of least environment value is chosen for development, and to ensure the mitigation hierarchy is followed.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.

(Where NIAs have been identified) The Plan should also reference [Nature Improvement Areas](#) (NIAs) and consider specifying appropriate types of development within them. NIAs can provide a focal point for creating more and better-connected habitats. Where housing allocations are proposed in the environs of NIAs opportunities to contribute to habitat enhancement should be explored. Planning positively for ecological networks will contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 114 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice](#) on ancient woodland and veteran trees.

### **Soils**

The Plans should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 112 to safeguard 'best and most versatile' agricultural land.

### **Air pollution**

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic<sup>1</sup>, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides a searchable database and **information on pollutants and their impacts on habitats and species**.

### **Water Quality and Resources and Flood Risk Management**

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 100-104 of the NPPF.

The Plans should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Plans. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Plans should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on N2K sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

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<sup>1</sup> The ecological effects of diffuse air pollution (2004) English Nature Research Report 580  
Design Manual for Roads and Bridges Volume 11. Section 3 Part 1 (2007), Highways Agency

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.



We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully



 Strategic Director – Place  
Cyfarwyddwr Strategol – Lle

  
Tel / Ffôn:  
Fax / Ffacs:  
Mobile / Ffôn symudol:  
Email / E-bost:  
Your ref / Eich cyf:  
Our ref / Ein cyf: lpg02052017FLJB  
Date / Dyddiad: 02 May 2017

Dear Minister,

### Hereford Western Bypass

As Portfolio Holder for Highways, I am keen to highlight Powys County Council's support of the proposed Hereford Western Bypass.

The Bypass is a category one priority pipeline investment project within the Joint Transport Strategy which has been agreed by the Marches Local Enterprise Partnership, of which Powys is a member. We are pleased to support the project and would welcome the wider economic benefits and opportunities that the project would bring to the surrounding regions, including Mid Wales.

Powys representatives will continue to engage with colleagues to maximise opportunities. Indeed, work is currently ongoing between the Growing Mid Wales Partnership and the Marches Local Enterprise Partnership to create a Joint Freight Strategy.

Group / Stakeholder	HTP	HAP
	CCE fundamentally supports the provision on the bypass to the west of Hereford City as part of the HTP, especially welcoming the delivery of the central section of the bypass between the A465 and A438, incorporating the critical second river crossing by 2022. Where possible the timescales for establishing the preferred route should be expedited. Timescale of completion of the bypass could potentially delay the delivery of housing	CCE supports the aim of the Hereford Area Plan (HAP) to allow for a range of opportunities for the provision of different types of housing to offer choice and meet local needs in a variety of locations. CCE fundamentally supports the provision on the bypass to the west of Hereford City as part of the HTP
	No comments on the HTP	Response in relation to the HAP. They endorse the councils proactive approach to housing delivery and that the council should allocate all land necessary to meet the residual housing target. Dean Estates also responded to Q1-6 of the HAP (housing)
	No comments on the HTP	They have not consulted fully with members as they feel it would be more appropriate once specific proposals are available for members to provide comments on.
	Would like to see shared space design and 20mph throughout the city.	Provided a written response the consultation questionnaire. They consider the initial consultation document to be quite confusing , as well as confusion over the role of the council
	Agree with Council's stated objectives, however believe that the 'road centric' approach is financially and environmentally costly and would like their listed sustainable initiatives to be fully explored before further entertaining road building proposals. Their 'sustainable approach' sets out achievable measures that should be worked upon now, not in the shadow of a bypass.	Agree with Council's stated objectives, however believe that the 'road centric' approach is financially and environmentally costly and would like their listed sustainable initiatives to be fully explored before further entertaining road building proposals
	Their main comments relate to the proposed Hereford Bypass and the need for the historic environment to be fully considered in any proposal or route selection. Historic England would like to be fully engaged in the process and to comment on the route selection methodology and routes proposed at the earliest stage. They would welcome a meeting to discuss the proposed bypass and the Area Plan. They support the principles of a better urban environment and promoting walking and cycling and request that any proposals are sensitive to the historic environment or Hereford and are in keeping with local plan policies and the NPPF	Their main comments relate to the proposed Hereford Bypass and the need for the historic environment to be fully considered in any proposal or route selection. Historic England would like to be fully engaged in the process and to comment on the route selection methodology and routes proposed at the earliest stage. They would welcome a meeting to discuss the proposed bypass and the Area Plan. They support the principles of a better urban environment and request that any proposals are sensitive to the historic environment or Hereford and are in keeping with local plan policies and the NPPF
	No comments on the HTP	Would welcome the opportunity to meet with the council to discuss the potential access for rail freight to be increased. They believe the HAP should set a strategic context requiring developer contributions to fund rail improvements
	The Bypass will have an impact on the environment and will need to be carefully considered and planned to minimise the impacts and mitigate for them. It is also an opportunity to improve green infrastructure, connectivity to fragmented habitats and wildlife corridors and water quality. The proposal should seek to ensure improvements and net gains in line with section 109 of the National Planning Policy Framework. Natural England welcomes engagement at an early stage to ensure the best environmental outcomes.	Reponse gives advice on some of the HTP and HAP questions from the consultation questionnaire. Gave advice to the council when preparing the plans on matters such as habitats, ecological networks, soils, air pollution, water quality and flood risk management
	Support for the proposed bypass and would welcome the wider economic benefits and opportunities the project would bring.	Support for the proposed bypass
	Savills chose to respond on the HTP with the consultation questionnaire. Their responses have been incorporated into the overall survey analysis, but key comments are the route needs to be developed to provide sufficient access junctions onto the bypass, for future development to the west of Hereford and existing development. They consider that new development opportunities could assist in the delivery of the bypass	As part of the Hereford Area Plan (HAP) requirements to deliver an additional 1,500 to 2,000 new homes over the plan period, we consider that the former Belmont Golf Course also provides a significant opportunity to assist in meeting this requirement. Development at this scale would make the most of the sustainability and accessibility opportunities that the proposed Relief Road will provide and help assist Herefordshire Council in meeting their housing requirements. At a density of 35dph this same area of land could deliver around 820 dwellings
	Taylor Wimpey are concerned about the absence of a firm timescale of the consultation stages and establishing the preferred western corridor route. They would want to see the HTP adopted in a timely manner with a framework that will enhance housing delivery. They also regard landscape and historic buildings should be given a high level of importance when determining the preferred route	No comments on the HAP
	Strongly supports the provision of the western bypass as it will greatly improve its connectivity to those south of the river, but would like to be consulted on the route and its proximity to the Livestock Market as they do not want to affect the site	Strongly supports the provision of the western bypass as it will greatly improve its connectivity to those south of the river, but would like to be consulted on the route and its proximity to the Livestock Market as they do not want to affect the site
	When a more defined route is determined, Welsh Water will provide an update in terms of the location of their assets.	Provided comments on the strategic sites, and advise the council they are in the process of upgrading the public water supply network within Hereford and as such cannot allow new connections until the improvements are completed. They commented on the key headings of the HAP
	No comments on the HTP	Emphasise their desire to be part of any future discussions regarding future retail and leisure provision within Hereford, and enclose a completed questionnaire.
	Relief Road will only have minimal impact on Herefords traffic. The road will simply serve the residents of the new housing estates, which have yet to be built.	No comments on the HAP
	The Bypass will seriously affect the beauty of the landscape immediately to the west of Hereford, including orchards, pasture, parks and gardens	No comments on the HAP



Reg No: 1684720 Cardiff

Reg Office: As Address

19<sup>th</sup> May 2017

Our Ref: JRD/DG



By Post and Email

Dear Sirs

I am writing on behalf of the Directors of Hereford Market Auctioneers Ltd and in particular the Hereford Area Plan and Hereford Transport Package Consultation.

We note that as part of the consultation you are asking for comments on the proposed route of the western bypass that will divert the A49 out of the historic city centre and around a western route of the city.

We note that the exact route has not yet been determined but the corridor being considered includes a wide area between Wyevale Nurseries and Huntington and would seem to include the site of the new Livestock Market and its ancillary facilities.

The Livestock Market strongly supports the provision of the western bypass as it will greatly improve its connectivity to those south of the river who either have to cross the river through the city centre which is often congested. Alternatively the traffic will cross the river at Bridge Sollars where the local road network is not ideal in terms of the ability for vehicles to pass. A new river crossing and trunk road that links the A49 and the A465 almost directly to the site of the market will be a huge improvement both to the Livestock Market and transport users generally in removing livestock trailers from the local roads and the city centre.

Needless to say we will not want the new route of the relief road to any way affect the site of the market. It is already internally congested at peak times of year because of its continuing success which is of course partly due to its relocation out of the city centre and on to the less congested Roman Road.

The Directors shall be grateful therefore if you can consult with us on its route in the proximity of the Livestock Market in order that its route and detail can both best serve the market and the transport network.

The Directors look forward to hearing from you in due course to discuss matters further.





Hereford Area Plan

Enquiries:

*Sent via email*

22<sup>nd</sup> May 2017

Dear

## **HEREFORD AREA PLAN CONSULTATION – MAY 2017**

I refer to your email dated the 16<sup>th</sup> March 2017 regarding the above consultation. Welsh Water appreciates the opportunity to respond and we offer the following representation:

As you will be aware, we are a 'specific consultation body' in the Local Plan process and as such were consulted throughout the Herefordshire Council Core Strategy process, culminating in the production of a Statement of Common Ground between our two organisations in advance of the Core Strategy Examination in Public.

Accordingly, we have provided comments on the Strategic Sites and the capabilities of our infrastructure within Hereford previously. We understand that the Area Plan will contain detailed proposals to ensure the full delivery of the City specific objectives in the Core Strategy. As such, our comments focus on the proposed growth but also picks up on some other themes too.

On a general water supply point, we can advise that we are in the process of upgrading the public water supply network within Hereford and as such cannot allow new connections until the improvements are completed. The works are due to be completed by 31<sup>st</sup> March 2020 therefore we are requesting the Council impose a Grampian style planning condition on development within the City of this date.

### **Natural environment and green infrastructure**

We are fully supportive of any proposal that removes the ability of surface water from entering the public sewerage network, and as such support the implementation of Sustainable Drainage Systems (SuDS) such as swales and retention ponds into any new development as well as in any planned green infrastructure development.

We are signatories of the River Wye Nutrients Management Plan, and as such we welcome anything that can be done to achieve the water quality targets on the River Wye. This includes the Council's position under Policy SD4 of the Core Strategy.

### **Jobs**

We understand that 10 hectares of employment land have already been identified on the Three Elms Strategic Site, whilst a further 5 hectares have been identified adjacent to the existing Rotherwas Industrial Estate, which is within the boundary of the Hereford Enterprise Zone.

We note that there is also the possibility that further employment land will be identified and that there will also likely be further opportunity for new office development in the City Centre.

In all of these instances, until such a time that we know the total floorspace proposed and the end user (B1, B2 or B8 use together with specific end user), we will be unable to provide any comment other than to advise that should any end use require to discharge trade effluent into the public sewer then the Consent of the statutory sewerage undertaker is required (Section 118 Water Industry Act 1991). Additionally, dependant on the processes involved, an element of pre-treatment may also be required.

### **New university**

We look to support economic development and educational facilities wherever we can, as such are supportive of the proposal to establish a new university within the City. We understand that a number of university buildings are proposed to be located within the City itself and will include both teaching space and student accommodation. We also understand that there will be associated laboratories and workshops at Rotherwas Enterprise Zone.

As with the proposed employment provision, until such a time that there is further information with regard to specific university proposals we will be unable to provide any specific comment.

### **Housing**

As we have stated above, we have provided comments on the Strategic Sites as part of the Core Strategy process. We understand that the Area Plan will need to identify land for approximately a further 2000 units to the end of the Core Strategy period in 2031.

Again, we can provide specific comment when there is more information available such as site location and number of units proposed. What we can advise at this stage is that there ought to be no issues with the two Hereford Wastewater Treatment Works (WwTW) accommodating the level of growth proposed.

### **Leisure and Tourism**

We abstract water from the River Wye at Broomy Hill for treatment at our Broomy Hill Water Treatment Works (WTW). River abstraction (subsequently treated) is a vital source of potable water supplies to our customers. Our abstractions are licensed by the Environment Agency in England who are responsible for ensuring the sustainable use of water resources. As such, we support the use of the River Wye for leisure and tourism activities where there is no derogation of water quality and the ecologic value is protected.

### **Movement**

We have provided separate representation on the Hereford Transport Package but can advise that with regard to the Hereford Bypass corridor, there are numerous points where the route would pass over our assets. Accordingly, when a more defined route is determined we will provide an update in terms of the location of our assets. It is likely that we will require easement widths or the diversion of our assets in order to accommodate the route of the bypass.

We hope that the above information will assist you as you progress the Area Plan and we look forward to providing further comments as it progresses. In the meantime, should you require any further information please do not hesitate to contact us at [Forward.Plans@dwrcymru.com](mailto:Forward.Plans@dwrcymru.com) or via telephone on 0800 917 2652.

Yours sincerely,





## WOOLHOPE NATURALISTS' FIELD CLUB

Registered Charity No. 521000

[REDACTED]

[REDACTED]

17<sup>th</sup> May 2017

Dear Madam/Sir,

### **Hereford Transport Plan Consultation**

I am writing on behalf of the Executive Committee of the Woolhope Naturalists Field Club who have asked me to comment, once again, on the proposed Hereford Western Relief Road and, in particular, on the proposed river crossing at Belmont/Breinton.

1. The articulate population of Hereford is completely exhausted by the almost unremitting process of public consultation by Herefordshire Council to drum-up support for its ill-conceived Western Relief Road. The expense of these procedures is alarming for all rate-payers, especially in these straitened times. The consensus of local and national opinion has long been that the Relief Road will only have a minimal impact upon Hereford's traffic, which as long ago as the 1990s was shown by independent consultants to be self-generated. Less than 20% of the city's traffic, passing through the city, is from sources and destinations outside its immediate hinterland. The road will simply serve the residents of the new housing estates, which have yet to be built. They could, of course, be served by public transport or other sustainable modes of people carrying. Government finance for the project is being sought, not for any strategic purpose, but simply to compensate for Herefordshire Council's flawed planning.

2. The Woolhope Club is the county archaeological and history society for Herefordshire and since its establishment in 1851 has been concerned with celebrating the unique natural and cultural history of Herefordshire (see our

Sesquicentennial Volume for 2000 – *A Herefordshire Miscellany*). The setting of the city of Hereford in its fulcrum of river valleys is regarded as one of the finest in the country, where the beauty of the Wye Valley, specifically, can be enjoyed immediately to the east and west of the historic town. I have written previously, in regard to this proposal, about the Wye Valley at Belmont and Breinton and attached are some pertinent remarks found in my *Landscape Appraisal of Warham House* (2011). It is simply an administrative oversight that the Wye Valley above Hereford has no protective designations albeit its landscape character has been lauded since the late 18<sup>th</sup> century. The private estates on both sides of the river have substantially enhanced the landscape value of this section of the Wye and the *Woolhope Transactions*, published annually since 1851 are full of references relating to our 'forays' into the countryside on both sides of the Wye above the city. We have also published major articles on both Belmont and Breinton in the last 60 years.

3. The building of a prohibitively expensive bridge across the Wye at Belmont would have a catastrophic impact upon this precious and hitherto unspoilt river-valley setting. In any other location in southern England such a sensitive area would have some sort of legislative protection but as the Woolhope Club has noticed before, Herefordshire, albeit renowned for its picturesque countryside, is short of statutory instruments protecting its character. The landscape is well endowed with ancient monuments but only a select few are scheduled. Similarly, this is a county full of gentry estates but few have registered parks and gardens and even the national park boundaries stop short at the country boundary, as if nature terminated the South Shropshire Hills at the administrative frontier between two shires. More pertinent in the light of this letter is the Wye Valley of Outstanding Natural Beauty, which stops at Mordiford, to the south of Hereford, but fails to protect the river above the city where the character of the countryside is identical to that deemed so precious between Ross and Mordiford.

4. There are, however, several listed buildings, which will undoubtedly be adversely affected by the new bridge and its approach roads. These include the cluster of grade I and II\* buildings at Belmont Abbey. At a recent planning inquiry in November 2013 (Ref: App/YW1850/A/13/2192461) the inspector upheld the Council's decision not to grant permission for new housing, close to the listed buildings because of the detrimental impact the development would have upon the appreciation of this complex heritage asset. The new bridge would equally damage the setting of Belmont House (Grade II\*), designed by James Wyatt and altered by Edward Welby Pugin, which is unused and on the Historic England Register of Buildings at Risk. The proximity of the new bridge would render the house uninhabitable. On the other side of the river there are a number of listed buildings at Breinton and a scheduled ancient monument – Breinton Camp – protected by the National Trust. Lying next to the medieval parish church, this pleasant oasis depends, for its appreciation, upon the wider setting. The magic of these ambiguous earthworks will be destroyed by an intrusive bridge, buzzing with traffic, a hundred yards away. Most obviously in the firing line will be Warham House and its small estate. The excellent early gothic house is probably by Edward Welby Pugin, but remarkably unlisted. It has fine setting perched above the river, made famous by the local artist, Brian Hatton, whose anniversary year is being celebrated in 2007. Of course, this property was developed in tandem with the Belmont estate, to which it was an annex

in the 19<sup>th</sup> century when it all belonged to the Wegg-Prossers. As a cultural package, Belmont and Warham should be treated as an entity.

5. The present writer produced two reports on the heritage of Warham, copies of which can be provided. Also there is extensive documentation on the Belmont estate, which was produced for the Lioncourt Development Appeal for Home Farm, Belmont (2013) – the reference number is noted above and is presumably available from Herefordshire Council. We have left the key landscape issues relating to the relief road route to be re-iterated by the Hereford and Worcester Gardens Trust and, no doubt, the CPRE.

6. With so many calls upon its shrinking finances, particularly in terms of health and social care, Herefordshire Council would be foolish to embark upon a Western Relief Road, which includes a major river crossing, without any visible financial support from the central government and, as yet no sensible evaluation of the heritage assets, which will be irretrievably damaged. Common sense suggests that this development, within a mile of the historic city of Hereford, which is facing serious commercial decline, will have a serious impact upon Hereford as a major tourist designation. Until recently the city's tourist literature celebrated the Wye Valley above Hereford, which was so easily accessed by river, footpath and country lanes from the city. This development will place an ugly barrier across this escape route and force tourists to rely upon their cars to escape to less exploited scenery.

Yours sincerely,

  
Hon. Secretary of the Woolhope Naturalists Field Club

**Subject:**

proposed western bypass

Dear Sir,

I wish to strongly oppose the plans for this bypass and the attendant development, and make the following points:

- 1) as planned, the route through Breinton will blight one of the most beautiful areas of countryside which is within easy reach of the city, and importantly, open to all of us.
- 2) the high level bridge will be an affront to the area, and detract from the views far and wide.
- 3) I believe, as do others, that the costings have not been properly estimated, and are likely to be far higher than suggested.
- 4) In many respects the Eastern route would have so much more to recommend it. The presence of fritillaries on the Lugg flats seem to have dominated planners views; these flowers are after all, common enough and found in many gardens and fields, often wild.
- 5) with the increased housing, traffic problems within the city will not be eased, only worsened. You have wildly optimistic hopes of better use of cycling and public transport, sadly people do not behave as you would wish predict.

In short, I think the plan ill-conceived by people in whom I have little trust, who have succumbed to pressure from self interested parties.

yours sincerely,

“Any opinion expressed in this e-mail or any attached files are those of the individual and not necessarily those of Herefordshire Council, Herefordshire Clinical Commissioning Group (HCCG), Wye Valley NHS Trust or 2gether NHS Foundation Trust. You should be aware that Herefordshire Council, Herefordshire Clinical Commissioning Group (HCCG), Wye Valley NHS Trust & 2gether NHS Foundation Trust monitors its email service. This e-mail and any attached files are confidential and intended solely for the use of the addressee. This communication may contain material protected by law from being passed on. If you are not the intended recipient and have received this e-mail in error, you are advised that any use, dissemination, forwarding, printing or copying of this e-mail is strictly prohibited. If you have received this e-mail in error please contact the sender immediately and destroy all copies of it.”

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## **Written Submissions**

- Golf Inn

We invite you to complete this questionnaire to give us your views about the Hereford Area Plan (HAP) and Hereford Transport Package (HTP). Your comments will be treated confidentially.

The consultation exhibition materials provide information on the HAP and HTP. These are available to view at The Courtyard between Tuesday 4 April and Thursday 6 April 2017, and at Hereford Library between Tuesday 11 April and Friday 19 May 2017. Consultation information is also available online at [www.herefordshire.gov.uk/HerefordConsultation](http://www.herefordshire.gov.uk/HerefordConsultation). An online version of the questionnaire is available on this webpage.

The questionnaire has three main sections: HAP, HTP and the consultation in general. You are welcome to only answer questions on the topics which are of interest to you if you would prefer.

Post Code\*: XXXXXXXXXX

\*This is only required to check the geographical origin of responses.

## The Hereford Area Plan

Please complete this section of the questionnaire to provide feedback on the Hereford Area Plan. The associated Issues and Options Paper will help you to respond to the questions.

### Housing

**Question 1: Can greater use be made of land that has been previously developed (Brownfield land) for new housing?**

- a) Yes  
b) No

a)		n/a
b)		

**If yes, how?**

**Question 2: Should planning policies be developed to help meet the needs of specific groups of the population, for example older people?**

- a) Yes  
b) No

a)	x
b)	

**Question 3: Should the plan provide advice upon an appropriate density of housing development in different parts of the city?**

- a) Yes  
b) No

a)	x
b)	

**Question 4:** Do you agree that the HAP should only identify housing sites for a minimum of 10 or more dwellings?

- a) Yes
- b) No

a)	x
b)	

If no, please explain

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**Question 5:** Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?

- a) Yes
- b) No

a)	x
b)	

If yes, what are the most important factors to help define it?

Recognition of strategic development opportunities alongside new investment such as the Western Relief Road.

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**Question 6:** Should the HAP include additional policies for affordable housing in addition to those in the Core Strategy?

- a) Yes
- b) No

a)	x
b)	

If yes, should the plan be specific on types and tenures of affordable homes required?

- c) Yes
- d) No

c)	x
d)	

**Question 7:** Should the plan contain guidance around Houses in Multiple Occupation (HMO)?

- a) Yes
- b) No

a)	
b)	

n/a

If yes, what are the main factors that should be considered?

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**Question 8:** Should the HAP include a policy to encourage self and custom built homes?

- a) Yes
- b) No

a)	
b)	

n/a

If yes, what issues should it include?

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**Question 9: Should guidelines be given within the plan to support methods of high quality design?**

- a) Yes
- b) No

a)	x
b)	

**If yes, are there any particular issues that should be covered?**

Clarity on what high quality means, but avoid being overly prescriptive.

---

## Social and Community Facilities and Open Spaces

**Question 10: Should there be policies to address how developers can contribute towards community facilities?**

- a) Yes
- b) No

a)	x
b)	

**Question 11: Are there improvements that need to be made to existing community facilities?**

- a) Yes
- b) No

a)	x
b)	

**If yes, where?**

Clear identification of community facilities required and cost estimates are required.

**Question 12: What factors should be taken into account when protecting areas of open space?**

How existing open space relates to existing and future requirements (both qualitative and quantitatively).

**Question 13: Are there under-utilised parks, playgrounds or areas of open space that could be put to a different open space use, for example allotments or community gardens?**

- a) Yes
- b) No

a)	
b)	

n/a

**If yes, what and where?**

---

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**Question 14:** Do you think there is a need for more allotment provision, for example as part of new housing developments or on existing open spaces?

- a) Yes
- b) No

a)	
b)	

n/a

**If yes, where?**

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**Question 15:** Do you think the correct issues have been identified relating to sport, community facilities and open space in this document?

- a) Yes
- b) No

a)	
b)	

**If no, please explain**

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**Movement** (see also associated Hereford Transport Package questions 46 – 52)

**Question 16:** How can access to the railway station be improved?

Greater investment in bus services / foot and cycle facilities between the station key bus routes, residential and employment areas.

**Question 17:** Could the current city car parks be used more effectively or improved?

- a) Yes
- b) No

a)	
b)	

n/a

**If yes, how?**

---

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**Question 18:** Is there a need for more car parking to be identified?

- a) Yes
- b) No

a)	
b)	

n/a

**If yes, what form should it take?**

- a) Multi-storey provision
- b) Park and choose provision
- c) Other

a)	
b)	
c)	

n/a

**Question 19:** Would it be appropriate to develop a policy requirement for proposals for larger developments to provide a Travel Plan as part of a planning application?

- a) Yes
- b) No

a)	x
b)	

**Question 20:** Can you suggest better ways to manage freight transportation throughout the city?

\_\_\_\_\_ n/a

## Jobs

**Question 21:** Should the HAP identify more land for new employment development?

- a) Yes
- b) No

a)	x
b)	

**If yes, what type of development eg. offices, manufacturing?**

Recognition should be given to where market demand is seeking greater site opportunities.

**Question 22:** Should the HAP aim to broaden the local economy by supporting a wider range of employment types?

- a) Yes
- b) No

a)	x
b)	

**If yes, what types would you suggest?**

**Question 23:** Should the HAP allow for a broader range of activities on existing employment sites of poorer quality?

- a) Yes
- b) No

a)	
b)	

n/a

**If yes, what would be considered an appropriate alternative use? Eg Sport and leisure facilities.**

## City centre and retail

**Question 24:** Should the HAP identify land for further new retail development?

- a) Yes
- b) No

a)	
b)	

n/a

**Question 25:** Should the HAP define the key shopping streets and keep them mainly for retail uses?

- a) Yes
- b) No

a)		n/a
b)		

**Question 26:** Should the HAP allow for different uses where suitable in underutilised areas of the city centre?

- a) Yes
- b) No

a)		n/a
b)		

**Question 27:** Should the HAP offer additional policy to encourage use of the upper floors in the town centre for residential use?

- a) Yes
- b) No

a)		n/a
b)		

**Question 28:** Is additional policy required for retail development proposals outside the city centre?

- a) Yes
- b) No

a)		n/a
b)		

## University

**Question 29:** Which parts of the city could best accommodate university buildings and facilities either through conversion of existing building or new buildings?

\_\_\_\_\_ n/a

**Question 30:** What opportunities are there for university facilities to be shared with the public and/or the wider community e.g. shared conference facilities?

\_\_\_\_\_ n/a

**Question 31:** Do you think there is potential for the new university to share facilities with the existing colleges to expand on existing partnership between educational institutions?

- a) Yes
- b) No

a)		n/a
b)		

**If yes, please explain**

\_\_\_\_\_  
\_\_\_\_\_

## Leisure and Tourism

**Question 32:** Should additional hotel and/or conference facilities be provided in Hereford?

- a) Yes
- b) No

a)		n/a
b)		

If yes, where?

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**Question 33:** Could better use be made of the River Wye as a tourist attraction and for leisure activities whilst protecting its special qualities?

- a) Yes
- b) No

a)	x
b)	

If yes, how?

Where new investment is proposed (e.g. Hereford Western Relief Road), then opportunities should be considered to provide better communities and leisure access to the waterfront where possible.

**Question 34:** Is there a need for any additional policy relating to the restoration of the Canal?

- a) Yes
- b) No

a)		n/a
b)		

If yes, what issues should be covered by that policy?

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**Question 35:** Are there any opportunities to provide new or expanded leisure facilities that should be considered or identified by the HAP?

- a) Yes
- b) No

a)		n/a
b)		

If yes, what?

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## Natural Environment

**Question 36:** Are there ways the green infrastructure could be improved? Please refer to Section 15 of the HAP Issues and Options Paper.

- a) Yes
- b) No

a)	x
b)	

**If yes, how?**

Areas which are not currently accessible to the public can be made accessible, better managed and enhanced through strategic development opportunities.

**Question 37:** Are there any areas that require better connectivity of wildlife corridors?

- a) Yes
- b) No

a)	x
b)	

**If yes, where?**

Belmont & Clehonger Rural areas.

**Question 38:** Should the HAP include additional policies to protect the landscape and environmental qualities of the city?

- a) Yes
- b) No

a)	
b)	

n/a

**If yes, what issues should these policies include?**

\_\_\_\_\_

\_\_\_\_\_

**Question 39:** Can we achieve greater access to and use of the river whilst respecting its special qualities?

- a) Yes
- b) No

a)	x
b)	

**If yes, how?**

Development proposals adjacent to or close to the river can generate better interaction and uses by the general public that are not currently on offer.

**Question 40:** Should the HAP include a policy that relates to how land use affects pollution?

- a) Yes
- b) No

a)		n/a
b)		

If so, what issues should the policy cover?

---

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**Question 41:** Should the HAP address the issue of climate change?

- a) Yes
- b) No

a)		n/a
b)		

## Built Environment

**Question 42:** Do you think more specific and detailed policies for the historic environment and heritage assets in addition to those included in the Core Strategy are required in the HAP?

- a) Yes
- b) No

a)	
b)	x

If yes, please explain

---

---

**Question 43:** Do you think that specific policies are required to achieve high quality design in locations where planning proposals could impact upon heritage assets?

- a) Yes
- b) No

a)	x
b)	

**Question 44:** Should the plan include guidelines to be used when existing conservation areas are being reviewed or new ones designated?

- a) Yes
- b) No

a)	x
b)	

**Question 45:** Are there additional issues or options which the HAP could look to address or do you have any other comments upon the contents of the document?

---

---

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n/a

Please go to question 53 if you do not wish to give feedback on the Hereford Transport Package

## The Hereford Transport Package

Please complete this section of the questionnaire to provide feedback on the Hereford Transport Package. Your feedback will contribute to the development of possible bypass routes, and walking, cycling, bus and public space improvements within Hereford.

**Question 46:** Do traffic conditions in Hereford need to be improved?

- a) Yes  
b) No

a)	x
b)	

**Question 47:** What do you think are the current transport problems in Hereford?  
Please rank your top five responses, where 1 is the biggest problem.

- a) Traffic congestion  
b) Long delays at signal junctions  
c) Lack of pedestrian crossings  
d) Poor access to public transport  
e) Poor cycling/walking infrastructure  
f) Difficulty crossing busy roads  
g) Traffic noise  
h) Poor air quality  
i) Vehicle emissions  
j) Poor public transport links to rural areas  
k) Volume of heavy goods vehicles  
l) Dependency on car use  
m) Other. Please specify below.

a)	2
b)	3
c)	
d)	4
e)	5
f)	
g)	
h)	
i)	
j)	
k)	
l)	
m)	1

Need to provide better strategic highways infrastructure to the west of Hereford

**Question 48:** Most short distance journeys in Hereford are made by car. What do you think puts some people off walking, cycling or using the bus for short trips?

n/a

The Hereford Transport Package will help us deliver a healthy and prosperous city by enabling new jobs and homes, improving existing journeys and promoting healthy lifestyles and less polluting types of transport.

The two main components of the package are:

- A new road to the west of the city. The exact route has not been determined but would include a new river crossing and junctions.
- Improvements in Hereford to increase walking, cycling and bus use for short distance journeys, and more attractive and healthier public spaces.

## The proposed Hereford Bypass

**Question 49:** We are in the early stages of identifying possible bypass routes. How important do you think the following factors are in choosing the bypass route?

*On a scale of 1 to 5 (1 being very important and 5 being not important at all), how important do you think the following factors are in choosing the bypass route?*

Factors to consider	Level of importance (please circle)				
a) Impact on homes (positive)	1	2	3	4	5
b) Impact on businesses (positive)	1	2	3	4	5
c) Impact on landscape (e.g. historic buildings)	1	2	3	4	5
d) Reducing traffic in Hereford	1	2	3	4	5
e) Less congestion in Hereford	1	2	3	4	5
f) Access for tourism	1	2	3	4	5
g) Improved facilities for walkers, cyclists, bus users	1	2	3	4	5
h) Improved access to jobs and education	1	2	3	4	5
i) Are there other constraints within the Core Strategy bypass corridor we need to be aware of? Please specify below.	1	2	3	4	5
<u>Other options for the bypass.</u>					

## The proposed walking, cycling, bus and public space improvements

**Question 50:** Which of the following improvements do you think are your priorities?

*On a scale of 1 to 5 (1 being very important and 5 being not important at all), how important are the following factors to you?*

	Level of importance (please circle)				
a) Safer and better <b>walking routes</b> (for example, the provision of wider footways, improved pedestrian crossing facilities, reduced speed limits and traffic-free routes)	1	2	3	4	5
b) Safer and better <b>cycling routes</b> (for example, the creation of dedicated cycle lanes, cycle friendly junctions, reduced speed limits and traffic-free routes)	1	2	3	4	5
c) More reliable and quicker <b>bus journeys</b> (for example, bus priority on key routes into and out of the city)	1	2	3	4	5
d) More attractive <b>public space</b> (for example, boulevard-style streets, shared space and the planting of trees to create green corridors)	1	2	3	4	5
e) More <b>reliable and quicker journeys</b> by car (for example more traffic lanes and measures that prioritise cars)	1	2	3	4	5

**Question 51:** Are there any locations where you think walking, cycling, bus and public space improvements would be beneficial? Please write up to three locations, problems and your suggested solutions.

Location	What is the problem?	How can we solve the problem?
Belmont Rural	Accessibility by car, public transport, cycling, walking	Intro Western bypass will enhance access for all
Clehonger	Accessibility by car, public transport, cycling, walking	

**Question 52:** Are there any other options we need to consider to help manage Hereford's transport problems?

The route needs to be developed to provide sufficient access junctions onto the bypass, for future development to the west of Hereford and existing development. We consider that new development opportunities could assist in the delivery of the bypass. Without sufficient access onto the bypass from the west, future traffic demand will be forced onto small outer routes causing further congestion. Lack of appropriate access junctions onto the bypass could create severance issues.

## The consultation

**Question 53: Would you like to be added to the HAP and/or HTP contact databases to be kept up to date about the project as it progresses?**

- a) Yes, both the HAP and HTP databases
- b) Yes, just the HAP database
- c) Yes, just the HTP database
- d) No

a)	x
b)	
c)	
d)	

**If yes, please provide your contact details below.**

Name

Email

Phone number

**Question 54: How did you hear about the consultation? Please tick all that apply.**

- a) Received a letter or email
- b) Poster
- c) Sunshine Radio
- d) Hereford Times newspaper
- e) Hereford Times online
- f) Council's website
- g) Facebook
- h) Twitter
- i) Word of mouth
- j) Other, please specify

a)	
b)	
c)	
d)	
e)	
f)	x
g)	
h)	
i)	
j)	

**Question 55: Did you attend a public exhibition?**

- a) Yes
- b) No (Go to question 58)

a)	
b)	x

**Question 56**

- a) Did you receive sufficient notification about the public exhibition?
- b) Did the exhibition meet your expectations?
- c) Was the information displayed sufficient to answer any questions you had?
- d) Was the venue suitable?
- e) Were the opening hours sufficiently long?
- f) Were the staff sufficiently informed to answer your questions?

	Yes	No
a)		
b)		
c)		
d)		
e)		
f)		

**Question 57: Do you have any suggestions about how we might improve future exhibitions?**

## About you (optional)

All personal data will be treated in line with our obligations under the *Data Protection Act, 1998*. This means your personal data will not be shared.

The information collected will help us identify the types of community members that we have and haven't heard from, so we can seek feedback that is broadly representative of the Hereford community.

**Question 58: Are you a member of a local business or organisation? (Please tick one box)**

a) Yes, please specify

a)	
b)	
c)	x

b) No

c) Prefer not to say

**Question 59: Which age group do you belong? (Please tick one box)**

a) 0-15

b) 16-24

c) 25-34

d) 35-44

e) 45-54

f) 55-64

g) 65-74

h) 75-84

i) 85+

j) Prefer not to say

a)	
b)	
c)	
d)	
e)	
f)	
g)	
h)	
i)	
j)	x

**Question 60: What is your gender? (Please tick one box)**

a) Male

b) Female

c) Other

d) Prefer not to say

a)	
b)	
c)	
d)	x

**Question 61: Do you consider yourself to have a disability?**

a) Yes

b) No

c) Prefer not to say

a)	
b)	
c)	x

## Access to Information

Herefordshire Council and its consultants will use the questionnaires to shape the Hereford Area Plan and Hereford Transport Package. The data collected will not be used for any other purpose and the questionnaire will be disposed of securely after they have served this purpose.

Herefordshire Council is subject to the Freedom of Information Act, 2000, (Fol) and Environmental Information Regulations (EIRs) which means that questionnaires may be released in response to a request for information. However, all personal data will be treated in line with our obligations under the Data Protection Act, 1998. This means your personal data will not be shared.

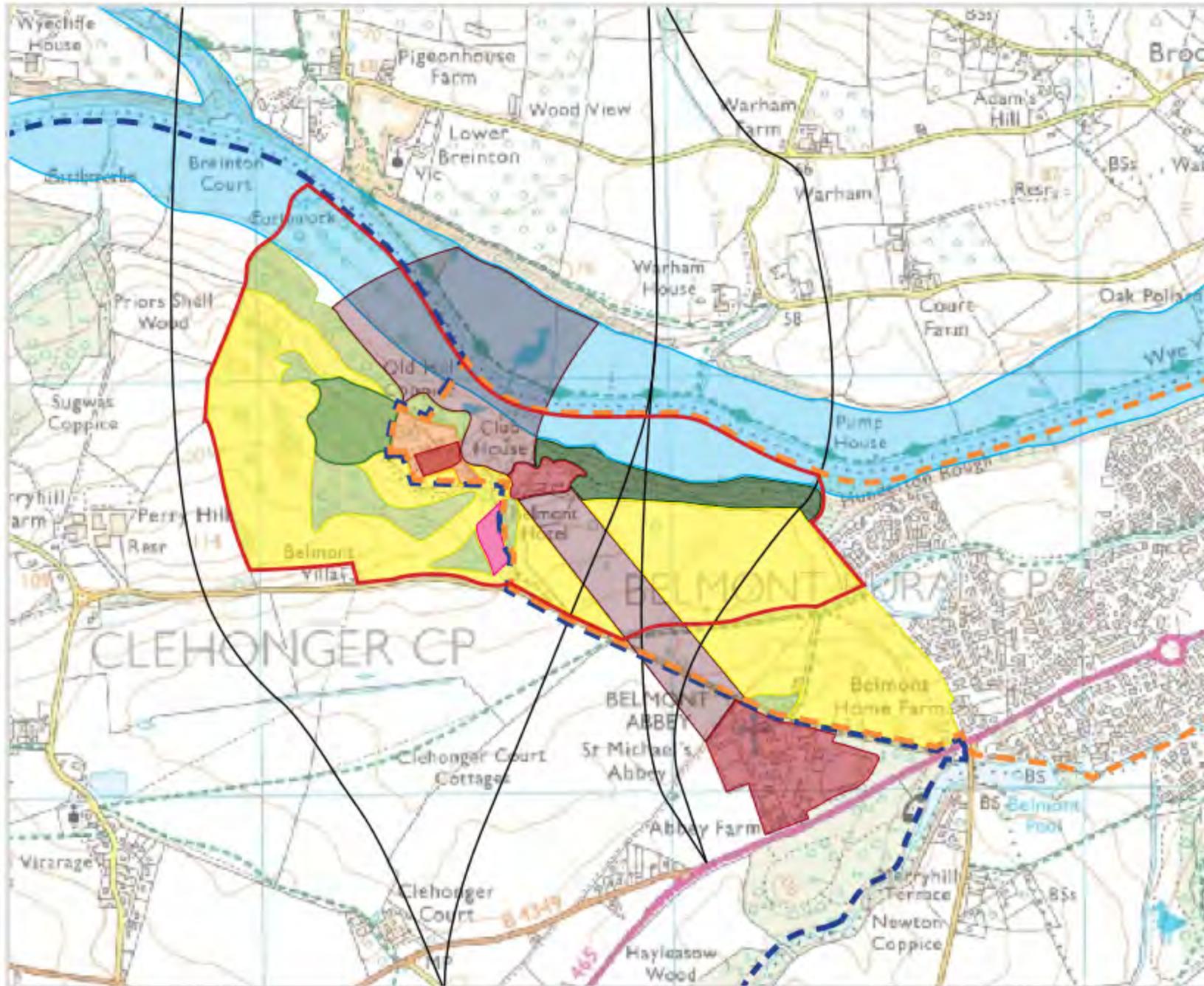
Alternative formats of this questionnaire are available upon request by emailing [herefordconsultation@balfourbeatty.com](mailto:herefordconsultation@balfourbeatty.com) or by writing to us at



Please return this questionnaire and feedback by **MONDAY 22 MAY 2017**

**THANK YOU FOR TAKING THE TIME TO COMPLETE THIS QUESTIONNAIRE**

# PLAN 3 Wider Belmont Rural Development Opportunity Plan



-  Golf Inns Ltd (Client) Land Ownership
-  Potential Development Area
-  Other Ownership within Golf Inns Ltd Land Ownership Boundary
-  Woodland
-  Ancient Woodland
-  Woodland / Site of Importance for Nature Conservation
-  Flood Zone 3
-  Historic Assets & Setting (Belmont House, Walled Garden, Stone and Plaque & Belmont Abbey)
-  Belmont House Assumed Significant View Corridors & Steep Topography
-  Western Relief Road Options
-  Area Previously Supported by English Heritage as Enabling Development
-  Clehonger Neighbourhood Plan Area Boundary
-  Belmont Rural Neighbourhood Plan Area Boundary

Ordnance Survey extracted from <https://www.bing.com/maps/Location:52.043000,-2.747>  
 Copyright Savills (UK) Ltd. No dimensions are to be scaled from this drawing. All dimensions to be checked on site. Area measurements for indicative purposes only.



## Hereford Area Plan - Housing options “Call for Sites” form

This is an interactive form that you can fill in electronically. When you have completed the form – please either email the form to [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) or by post to Planning Policy, Herefordshire Council, PO Box 230, Plough Lane, Hereford HR4 0LE

Herefordshire Council is preparing a Hereford Area Plan (HAP). This document will set out the detailed proposals to ensure delivery of the targets in the Core Strategy specifically for Hereford. The Council is currently in the process of consulting on the key issues and options in the early stages of the preparation of this document.

A key policy area that the HAP needs to ensure delivery of is new housing. Supplementary to the strategic allocations already identified in the Core Strategy, it will be the task of the HAP to identify further deliverable site allocations to aid the delivery of Hereford's housing target to 2031. Alongside consulting on Issues and Options on the different policy topic areas, the Council is issuing a call for sites in order to identify potential housing allocations in the HAP.

We welcome your site suggestions within the HAP area. You may wish to check that the land falls within this area by consulting the map available on the call for sites web page.

### Information required:

- Please use a separate form for each site.
- We need an accurate map, clearly showing the boundary of the site so we can identify where it is.
- Please highlight the proposed site in red, including all land required for access, landscaping, etc. If you own adjacent land please also edge this in blue.
- Whilst we recognise that it might not be possible to supply all the requested information, please supply as much as possible.

Please note that some Parishes within the HAP area are producing Neighbourhood Development Plans (NDPs). Therefore, depending on the site in question's location, the information you submit to us may also be passed on to the relevant Parish Council for their consideration in identifying allocations for their NDP.

## **Confidentiality**

Please be aware that your site suggestions cannot be kept confidential. If this causes you concern, you may wish to use an agent (for example a planning consultant, solicitor, estate agent, family member, etc.) to send in the site details on your behalf.

## **What happens next?**

- All sites put forward will be technically assessed to see if they are suitable.
- Not all the sites sent in will necessarily be selected but the best sites may be included as an allocation in the HAP.
- You will be kept informed of the process.

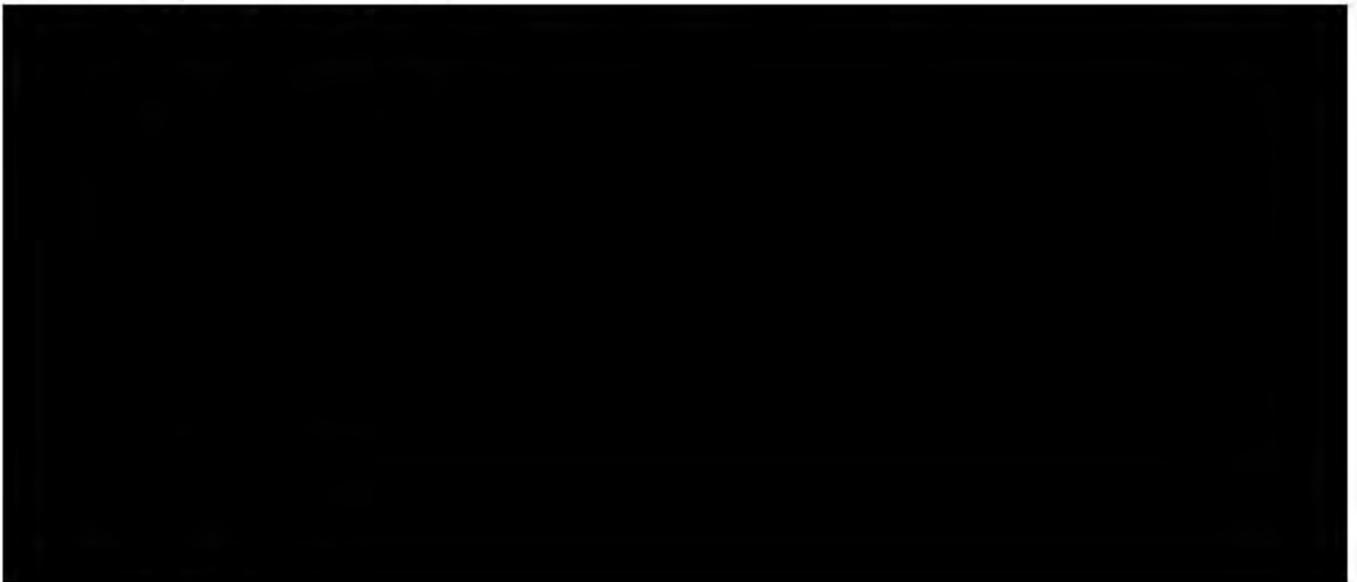
## **Help available:**

We are happy to help with any questions that you may have about this. You are welcome to contact us if you would like to discuss a site informally and in confidence, before deciding whether to send in any details about it.

Please contact a member of the planning policy team by telephone on 01432 383637 / 01432 260189 or by email at [ldf@herefordshire.gov.uk](mailto:ldf@herefordshire.gov.uk) for any advice and help on this issue.

Please return completed forms to us by 19 May 2017 at the latest. Thank you.

## **Section 1 - your contact details**



## **Section 2 - Site details**

Within which area of Hereford is the site located or adjacent to?

Belmont Rural/Cleghonger Parish areas

Site address:

The Former Belmont Golf Course, Ruckhall Lane, Hereford, GL16 7FA

Grid reference (if known) 347594 (Eastings), 238726 (Northings)

Site area in hectares: 84 hectares (208 acres)

What is your interest in the land (e.g. landowner/developer)?

Golf Inns Limited is the current landowner

Previous use: Golf Course

Current use: Partially agricultural

Proposed use:

Residential and Western Relief Road

Site description:

Part of the site is currently being used for agricultural use, crops in the western part of the site and grazing of animals in the south eastern part of the site.

Vegetation on site:

There are some areas of self seeded woodland on the western edge of the site with more mature areas at the centre and east of the site.

Hydrological features on site:

A small pond in the western part of the site

Other on site features:

### Timescales

Awaiting relocation of existing use? Yes  No

When will the site be available for development?

1-5 years  11-15 years

6-10 years  16-20 years

What available utility services are there?

Water supply? Yes  No  Not sure

Sewage infrastructure? Yes  No  Not sure

Electricity supply? Yes  No  Not sure

Gas supply? Yes  No  Not sure

Distance from city centre (approx):

Accessibility to services and facilities? (please indicate the approximate distance to the following in metres)

Primary school

Secondary school

GP surgery/Health centre

Local shops

Other (please state)

Access to an adopted highway? please describe:

Are there any physical problems with the site such as flooding or is it contaminated?

Is the site level?

Are there any other relevant issues? e.g. restrictions or covenants?

Is the site being submitted with a view to a custom or self-build project?\*

Yes  No

\* Self build: Where an individual or group of people directly organise and commission the design and construction of their new homes. Custom build: When an individual or group of people work closely with a developer to build new homes. This could include fully commissioned homes or fitting out a previously constructed shell.

22 May 2017

Hereford Area Plan - May 2017.docx

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a bright yellow rectangular background.

Council

By email only : 

Dear Sir / Madam

### Hereford Area Plan – Consultation Response

On behalf of Golf Inns Limited, please find enclosed our formal responses to the following consultations:

1. Hereford Area Plan (Issues and Options);
2. The Hereford Transport Package; and
3. Call for Sites.

We have attempted to complete as many of the response that are relevant to our client's land holding and proposals to promote the former Belmont Golf Course for residential use.

We have enclosed a plan (Plan 3 - Wider Belmont Rural Development Opportunity Plan) which shows the wider context of our client's land (shown by the red line boundary) and the potential for further development. The extent of the development opportunity shown could provide an opportunity to resolve the financial problems associated with the restoration of Belmont House whilst at the same time providing an opportunity to deliver part of the inner western relief road and associated residential development.

Plan 3 shows an area of land within our client's land ownership which was previously supported by English Heritage for enabling development (shown in pink) which could contribute towards a case for enabling development to restore Belmont House.

As part of the Hereford Area Plan (HAP) requirements to deliver an additional 1,500 to 2,000 new homes over the plan period, we consider that the former Belmont Golf Course also provides a significant opportunity to assist in meeting this requirement. On Plan 3, we have shown the wider potential development area in yellow. There is approximately 39 hectares (96 acres) of land under the control of Golf Inns Ltd which could potentially yield a minimum of approximately 700 dwellings (calculated at 30 dwellings per hectare at 60% capacity). Development at this scale would make the most of the sustainability and accessibility opportunities that the proposed Relief Road will provide and help assist Herefordshire Council in meeting their housing requirements. At a density of 35dph this same area of land could deliver around 820 dwellings.

Plan 3 also identifies some additional potential development land outside of our client's ownership at Home Farm to the south east of the red line boundary. This could provide a further 11 hectares (27 acres) of potential development land shown on Plan 3. The appeal at Home Farm (reference APP/W1850/A/13/2192461) was refused primarily because of its impact on the environment and the harm to the setting of heritage assets. At the time, the Inspector concluded that the proposals for the Western Relief Road had not been determined and it was uncertain whether it would bisect the unregistered Belmont Parkland. Therefore the Relief Road was not given weight in the determination of the appeal. The Western Relief Road options are currently being consulted on and the proposed inner route options pass through the unregistered Belmont Parkland.

We have secured heritage and landscape advice to assist us in ascertaining the development option that would have the least impact on the landscape and heritage assets in the area. Cotswold Archaeology (Heritage Consultant) have undertaken an assessment of all of the route options shown on Plan 3 and they concluded that the 3 'inner corridor' options would harm the significance of Belmont House and other heritage assets outside of our client's ownership. If any of the 'inner' route options are taken then the sensitivity of this heritage landscape will reduce. Waterman Infrastructure & Environment Limited's Landscape Assessment also concluded that the Relief Road passing through the Unregistered Parkland will lower the sensitivity of the landscape. Therefore, the landscape sensitivities that exist at the moment will change significantly should the Relief Road be developed along one of the inner alignments and therefore we consider that the area highlighted in yellow on Plan 3 should be considered for development as part of the proposals in the emerging in the HAP.

We trust that the above and enclosed is helpful to your further consideration of strategic residential and highways opportunities to be considered on the western side of Hereford. We would welcome the opportunity to meet with officers at an appropriate time to discuss the former Belmont Golf Course and prior to the next stage of the Area Plan.

Yours sincerely



- Plan 3 – Wider Belmont Rural Development Opportunity Plan

## **Written Submissions**

- Taylor Wimpey

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A key policy area that the HAP needs to ensure delivery of is new housing. Supplementary to the strategic allocations already identified in the Core Strategy, it will be the task of the HAP to identify further deliverable site allocations to aid the delivery of Hereford's housing target to 2031. Alongside consulting on Issues and Options on the different policy topic areas, the Council is issuing a call for sites in order to identify potential housing allocations in the HAP.

We welcome your site suggestions within the HAP area. You may wish to check that the land falls within this area by consulting the map available on the call for sites web page.

### Information required:

- Please use a separate form for each site.
- We need an accurate map, clearly showing the boundary of the site so we can identify where it is.
- Please highlight the proposed site in red, including all land required for access, landscaping, etc. If you own adjacent land please also edge this in blue.
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Please note that some Parishes within the HAP area are producing Neighbourhood Development Plans (NDPs). Therefore, depending on the site in question's location, the information you submit to us may also be passed on to the relevant Parish Council for their consideration in identifying allocations for their NDP.

## **Confidentiality**

Please be aware that your site suggestions cannot be kept confidential. If this causes you concern, you may wish to use an agent (for example a planning consultant, solicitor, estate agent, family member, etc.) to send in the site details on your behalf.

## **What happens next?**

- All sites put forward will be technically assessed to see if they are suitable.
- Not all the sites sent in will necessarily be selected but the best sites may be included as an allocation in the HAP.
- You will be kept informed of the process.

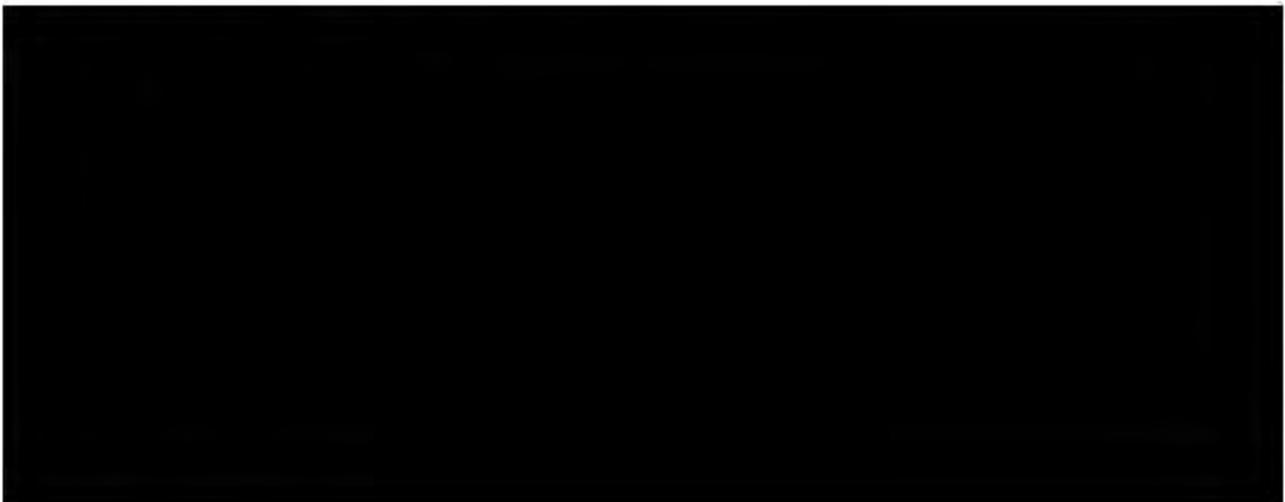
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Please return completed forms to us by 19 May 2017 at the latest. Thank you.

## **Section 1 - your contact details**



## **Section 2 - Site details**

Within which area of Hereford is the site located or adjacent to?

Holmer Ward

Site address:

Land East of Canon Pyon Road

Grid reference (if known) 349299 242501

Site area in hectares: 3.69 hectares

What is your interest in the land (e.g. landowner/developer)?

Developer

Previous use: Agriculture

Current use: Agriculture

Proposed use:

Residential

Site description:

Single field of arable land rising from south to north, east of the A4110 Canon Pyon Road. To the south bounded by the rear of properties along A4103 Roman Road.

Vegetation on site:

Agricultural land with hedgerow boundaries

Hydrological features on site:

None

Other on site features: None

### Timescales

Awaiting relocation of existing use? Yes  No

When will the site be available for development?

1-5 years  11-15 years

6-10 years  16-20 years

What available utility services are there?

Water supply? Yes  No  Not sure

Sewage infrastructure? Yes  No  Not sure

Electricity supply? Yes  No  Not sure

Gas supply? Yes  No  Not sure

Distance from city centre (approx):

Accessibility to services and facilities? (please indicate the approximate distance to the following in metres)

Primary school

Secondary school

GP surgery/Health centre

Local shops

Other (please state)

Access to an adopted highway? please describe:

Are there any physical problems with the site such as flooding or is it contaminated?

Is the site level?

Are there any other relevant issues? e.g. restrictions or covenants?

Is the site being submitted with a view to a custom or self-build project?\*

Yes  No

\* Self build: Where an individual or group of people directly organise and commission the design and construction of their new homes. Custom build: When an individual or group of people work closely with a developer to build new homes. This could include fully commissioned homes or fitting out a previously constructed shell.

# Homer Hereford



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We invite you to complete this questionnaire to give us your views about the Hereford Area Plan (HAP) and Hereford Transport Package (HTP). Your comments will be treated confidentially.

The consultation exhibition materials provide information on the HAP and HTP. These are available to view at The Courtyard between Tuesday 4 April and Thursday 6 April 2017, and at Hereford Library between Tuesday 11 April and Friday 19 May 2017. Consultation information is also available online at [www.herefordshire.gov.uk/HerefordConsultation](http://www.herefordshire.gov.uk/HerefordConsultation). An online version of the questionnaire is available on this webpage.

The questionnaire has three main sections: HAP, HTP and the consultation in general. You are welcome to only answer questions on the topics which are of interest to you if you would prefer.

See attached document submitted obo Taylor Wimpey plc

Post Code\*: [REDACTED] \_\_\_\_\_

\*This is only required to check the geographical origin of responses.

## The Hereford Area Plan

Please complete this section of the questionnaire to provide feedback on the Hereford Area Plan. The associated Issues and Options Paper will help you to respond to the questions.

### Housing

**Question 1: Can greater use be made of land that has been previously developed (Brownfield land) for new housing?**

- a) Yes
- b) No

a)	
b)	√

**If yes, how?**

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**Question 2: Should planning policies be developed to help meet the needs of specific groups of the population, for example older people?**

- a) Yes
- b) No

a)	√
b)	

**Question 3: Should the plan provide advice upon an appropriate density of housing development in different parts of the city?**

- a) Yes
- b) No

a)	√
b)	

**Question 4:** Do you agree that the HAP should only identify housing sites for a minimum of 10 or more dwellings?

- a) Yes
- b) No

a)	√
b)	

If no, please explain

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**Question 5:** Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?

- a) Yes
- b) No

a)	√
b)	

If yes, what are the most important factors to help define it?

See attached document submitted obo Taylor Wimpey plc

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**Question 6:** Should the HAP include additional policies for affordable housing in addition to those in the Core Strategy?

- a) Yes
- b) No

a)	√
b)	

If yes, should the plan be specific on types and tenures of affordable homes required?

- c) Yes
- d) No

c)	√
d)	

**Question 7:** Should the plan contain guidance around Houses in Multiple Occupation (HMO)?

- a) Yes
- b) No

a)	√
b)	

If yes, what are the main factors that should be considered?

See attached document submitted obo Taylor Wimpey plc

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**Question 8:** Should the HAP include a policy to encourage self and custom built homes?

- a) Yes
- b) No

a)	√
b)	

If yes, what issues should it include?

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**Question 9:** Should guidelines be given within the plan to support methods of high quality design?

- a) Yes
- b) No

a)	✓
b)	

If yes, are there any particular issues that should be covered?

See attached document submitted obo Taylor Wimpey plc

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## Social and Community Facilities and Open Spaces

**Question 10:** Should there be policies to address how developers can contribute towards community facilities?

- a) Yes
- b) No

a)	
b)	

**Question 11:** Are there improvements that need to be made to existing community facilities?

- a) Yes
- b) No

a)	
b)	

If yes, where?

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**Question 12:** What factors should be taken into account when protecting areas of open space?

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**Question 13:** Are there under-utilised parks, playgrounds or areas of open space that could be put to a different open space use, for example allotments or community gardens?

- a) Yes
- b) No

a)	
b)	

If yes, what and where?

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Drawing Title  Preliminary Roundabout design on Canaan Pyon Road to the Site Access	Client  Taylor Wimpey	 Unit 9 Oak Tree Court Mulberry Drive Cardiff Gate Business Park Cardiff CF23 5RG 029 2073 2052	Scale: 1:2000 @ A3					
	Job Title  Hereford sites - appraisal		Designed by: LV					
			Drawn by: LV	Rev.	Date.	Amendment.	Des.	Drn.
			Ckd/Appd: POC					
			1st Issued: May 2017	Drg No:		Figure 1		Rev
			Job No: T16.134					

Herefordshire Area Plan  
Issues and Options  
Consultation

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**Representations Submitted  
on behalf of Taylor Wimpey  
plc**

**Re: Land at Canon Pyon  
Road, Hereford**

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May 2017



**Section 1**

Introduction

**Section 2**

Site Locations and Descriptions

**Section 3**

Comment on Emerging Potential Housing Options

**Section 4**

Comments on Issues and Options Paper

**Section 5**

Supporting Transport Information

**Section 6**

Conclusions

**Appendices**

**A Call for Sites Form – Canon Pyon Road**

**B Site Location – Canon Pyon Road**

**C HAP Issues and Options Questionnaire**

**D Access Drawing – Canon Pyon Road**

## Introduction

- 1.1 This submission document has been prepared in order to accompany the forms submitted in response to the current Call for Sites exercise and also to comment on the Herefordshire Area Plan Issues and Options documentation on behalf of Taylor Wimpey plc.
- 1.2 The site in question, at Canon Pyon Road was previously promoted as a potential strategic release through the Herefordshire Core Strategy process. The opportunity to promote the site through the Hereford Area Plan is therefore welcomed.
- 1.3 In responding to the Call for Sites, additional complementary information is provided in this document which seeks to confirm that the site can be developed in a sustainable manner with a suitable access point achieved from the local highway network. Further studies are in the process of being commissioned with a view to supporting a future planning application. Emphasis is therefore placed on the compatibility of the site with the emerging Plan strategy and their contribution to meeting housing needs.
- 1.5 The Submission is structured as follows:
- In Section 2 we describe the sites and their promotion history ;
  - In Section 3 we discuss the sites in the context of the Emerging Potential Housing Options;
  - In Section 4 we comment on the Issues and Options;
  - In Section 5 we refer to Supporting Transport Evidence;
  - Our Conclusions are highlighted in Section 6.

## Site Description and Promotion History

- 2.1 In response to a letter of 30<sup>th</sup> April 2014 from URS Infrastructure and Environment UK Limited addressed to landowners, Taylor Wimpey Strategic Land who are in negotiation with several land owners in the area, submitted up to date Call for Sites proformas on the basis that land at Roman Road, Hereford remained available and should be considered by the Council for housing development.
- 2.2 The site was subsequently subject to representations promoting it as part of a strategic release through the Core Strategy process, which were subsequently heard at the Core Strategy Examination in Public.
- 2.3 It is now however proposed that a reduced scale site be promoted as a non strategic housing land allocation through the Hereford Area Plan. Consequently a smaller site on land east of Canon Pyon Road, and a separate site at Cot Barn Farm, are promoted. Separate "Call for Sites" forms are submitted for each of these sites.

### **Land East of Canon Pyon Road**

- 2.4 The site consists of a single field parcel amounting to 3.674 hectares in area which fronts onto the A4110 Canon Pyon Road and extends to the rear of frontage dwellings to the north. To the south the site is bounded by the rear of properties along the A4103 Roman Road.
- 2.5 The wider strategic site previously promoted included land North of Roman Road and Cot Barn Farm, extending over an area of some 32.33 hectares. The site is referenced as Bur09 in the 2015 HELAA and includes additional land between, and to the north of the aforementioned sites which is in Council ownership.

## Comment on Emerging Potential Housing Options

- 3.1 The Paper has been prepared to inform the preparation of the Hereford Area Plan and focusses on initial, emerging site options with reference to existing, published information. It is acknowledged that it is not a policy document and that additional technical work and community engagement will be required.
- 3.2 Reference is made to the housing provisions of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) and the adopted Herefordshire County Council Core Strategy. The Core Strategy, as set out in Policy HD1, sets out a requirement for 6,500 new dwellings in Hereford up to 2031, of which some 3,300 can be provided through the release of strategic allocations, including sites in the City Centre.
- 3.3 Deducting completions (806), Commitments (362), and windfalls anticipated (375), a remaining residual requirement of 1,657 dwellings is identified to be met through new releases.
- 3.4 The Paper describes the Site Selection Methodology which will be applied and refers to the Hereford Housing and Economic Availability Assessment (HELAA) published in September 2015. This reflects the most recent 'call for sites' carried out in May 2014 and referred to in the previous Section.
- 3.5 The HELAA assessment represents Stage 1 of the process, i.e the identification and preliminary assessment of a list of sites with the potential to deliver residential and economic development.
- 3.6 Stage 2 involves further evidence gathering and more detailed assessment including:
1. Consultation within the local authority;
  2. Community engagement;
  3. Sustainability Appraisal/Habitats Regulation Assessment;
  4. Topic Based Studies
- 3.7 Stage 3 requires the use of the evidence base and Sustainability Appraisal to appraise potential development sites against site selection criteria.
- 3.8 In terms of the HELAA assessment of the larger areas which include the 2 sites promoted at Canon Pyon Road and Cot Barn Farm it is noted that they are included within the 'Sites with potential for further assessment', i.e. Bur 09.
- 3.9 Bur 09 (Land at Canon Pyon Road) covers an area of 28.9 hectares (within the HAP boundary) and has a revised capacity of 600 dwellings. The assessment states:
- "No known environmental constraints to development. Suitable for residential use, B1/B2 employment use and/or mixed. The site has a high/medium landscape sensitivity therefore a sensitive design approach would be necessary."*
- 3.10 This initial assessments are welcomed and Taylor Wimpey plc intend to commission studies, including landscape and visual work, in order to firmly establish the impact on the landscape and to inform the layout accordingly.

Such work which will also include ecology, drainage, archaeology, ground investigations and transport and will inform a future planning application, but will also demonstrate how the sites can be delivered in a sustainable and sympathetic manner.

- 3.11 Work on transportation has already been advanced and has identified how the site can be accessed from the local road network. This is discussed further in Section 5 of these representations.

## Comments on Issues and Options Paper

- 4.1 The Issues and Options Consultation document establishes the extent of the Hereford Area Plan boundary, and explains how the plan will be prepared, particularly in the context of the adopted Core Strategy. Reference is also made to the Housing and Economic Land Availability Assessment (HELAA) and the Housing Topic Paper discussed in the previous Section. sets out the minimum size for future allocated sites of 10 dwellings or 0.4 hectares in area.
- 4.2 A section discusses 'Progress in Achieving Housing Targets' and establishes that the Hereford Area Plan will need to deliver an additional 1,500 to 2,000 new homes over the plan period. i.e. up to 2031. With an additional 500 units anticipated to emerge from the release of 'windfall' sites, based on 25 per year in Hereford, having occurred since 2011 and projected over a 20 year period, a remaining requirement of between 1,000 and 1,500 dwellings is identified as required through specific housing allocations.
- 4.3 The document sets out emerging options for policies and proposals in the Hereford Area Plan, and, in relation to the 'Timely Delivery of Housing' sets out the following Key Issues:
- Allocation of new housing sites in the most sustainable locations;
  - Integrating new housing into the community by getting the right densities and character appropriate to the city neighbourhoods whether that is in the city centre or beyond;
  - Delivering a range and mix of housing types which meets the needs of Hereford's population;
  - Ensuring that the delivery of housing is co-ordinated with the provision of key infrastructure and the level of development does not result in the failure of water quality targets in the River Wye SAC.
- 4.4 A series of Questions are asked. A completed form is appended to this submission which addresses the relevant housing related questions. Comments are made below in order to elaborate on the responses given in the form.
- Q1 Can greater use be made of land that has been previously developed (brownfield) land for new housing?***
- 4.5 No. With 800 dwellings forecast to be delivered through City Centre schemes and a further 500 allowed for from currently unidentified 'windfall' sites in the City there is no need for the Plan to make further provision for previously developed land. Indeed there may be an element of double counting in this overall figure of 1,300 dwellings, and it should not be used to restrict the number of dwellings which are needed on edge of settlement 'greenfield' extensions.
- 4.6 Furthermore urban brownfield sites generally accommodate high density forms of housing. A concentration of allocations on such sites will limit provision for a sufficient range and choice of sites including the need for family housing.

**Q2: Should planning policies be developed to help meet the needs of specific groups of the population, for example older people?**

47 Yes. Provision may be made in larger proposed developments to include care home schemes. However policies should not be prescriptive in advocating percentage targets for elderly or special needs dwellings.

**Q3: Should the plan provide advice upon an appropriate density of housing development in different parts of the city?**

48 Yes. It is generally accepted, however, that urban redevelopment sites will be delivered at higher densities.

**Q4: Do you agree that the HAP should only identify housing sites for a minimum of ten or more dwellings?**

49 Yes. It is agreed that this is an accepted threshold for housing land allocations in urban locations.

**Q5: Should there be a boundary drawn to show where new development can happen and where it should be limited to protect the countryside?**

410 Yes. Such boundaries should follow physical features where appropriate, with provision for buffer landscaping in order to reduce the visual impact.

**Q6: Should the Hereford Area Plan include additional policies for affordable housing in addition to those in the Core Strategy? If yes should the plan be specific on types and tenures of affordable homes required?**

411 Yes. An appropriate policy could reflect Core Strategy Policy H1 but on a Hereford specific basis. The supporting text could update and elaborate on the mix likely to be required in terms of the latest housing need requirements, including low cost housing provision.

**Q7: Should the plan contain guidance around Housing of Multiple Occupancy (HMO)?**

412 Yes. An over-arching policy would be necessary. Further detailed guidance would, however, be more appropriate as Supplementary Planning Guidance.

**Q8: Should the Hereford Area Plan include a policy to encourage self and custom built homes? If yes what issues should it include?**

413 Yes. It should be acknowledged, however, that such sites will come forward at lower densities, with less certainty regarding development rates and contributions to the 5 year land supply.

**Q9: Should guidelines be given within the plan to support methods of high quality design? If yes are there any particular issues that should be covered?**

414 Yes. In terms of creating attractive environments and achieving a sense of place on new greenfield urban extension sites.

## Supporting Transport Evidence

- 5.1 In promoting the currently unallocated sites for development, it will be important to ensure that the proposals are compatible with Core Strategy objectives, particularly MT1, which seeks to ensure the highway network can absorb the traffic impacts of the development, encourages active travel behaviour, has regard to the council's Highways Development Design Guide and cycle and vehicle parking standards and has regard to the location of the site and need to promote sustainable travel choices.
- 5.2 A Technical Note has been prepared which details a proposed access strategy for the site. This is summarised below.
- 5.3 Asbri Transport have investigated and assessed an access strategy via a roundabout onto Canon Pyon Road, which potentially could serve additional land to the east and link with the wider corridor of land which extends to Holmer West. For the purposes of this assessment a total of 750 residential dwellings has been assumed based on the following breakdown:
1. Up to 90 residential dwellings on land to the east of Cannon Pyon Road accessed via a roundabout junction;
  2. Up to 280 residential dwellings on land to the north of Roman Road (Cot Barn Farm) accessed via a priority junction;
  3. Sensitivity test to determine the impact of up to 380 residential dwellings on the Herefordshire Council owned land accessed through the proposed Roman Road access junction.
- 5.4 Access to the development is proposed to be gained via an eastern arm to a proposed roundabout on Canon Pyon Road, approximately 160m north of the Canon Pyon Rd/Roman Rd crossroads. Based on the forecast traffic generation for a 100 unit residential development and by reference to Volume 6 of the Design Manual for Roads and Bridges, TD 42/95 'Geometric Design of Major/Minor priority Junctions,' it is considered that the provision of a new priority junction would provide safe and satisfactory access to a 100 unit residential development.
- 5.5 Capacity analysis indicates that the two proposed access junctions, i.e. at Canon Pyon Road, and Cot Barn Farm (see separate Submission) will have sufficient capacity to accommodate the development proposal. However, the impact of the proposed development at the Roman Road/Canon Pyon Road signalised junction will cause the junction to operate over capacity in 2022. In order to improve the operation of the junction and mitigate the effects of the development, the existing four-stage traffic sequence could be replaced with a more efficient two-stage sequence that would incorporate right-turning traffic operating under priority control in the middle of the junction.
- 5.6 A drawing is appended which shows the proposed access arrangements for the Canon Pyon Road site.

## Conclusions

- 6.1 This supporting document accompanies representations which promote the release of land at Canon Pyon Road through the Hereford Area Plan process on behalf of Taylor Wimpey plc. A Call for Sites form is therefore submitted for the site which is appended.
- 6.2 This, together with other sites subject to separate representations, in being promoted by a major national house builder can provide for shorter term requirements to address the 5 year housing land deficit in Herefordshire, whilst also contributing to the overall housing land requirement of 16,500 in Policy SS2 and the apportionment of 6,500 of these in the City of Hereford.
- 6.3 The Public Questionnaire is therefore completed in relation to relevant Housing Considerations.
- 6.4 Work has been carried out by Asbri Transport to establish that the promoted site can be accessed in a satisfactory manner. The results are summarised in this document with a drawing appended.
- 6.5 In conclusion, Taylor Wimpey Ltd wish to see the Hereford Area Plan adopted with a framework which will enhance housing delivery on sites such as that promoted at Canon Pyon Road, which is deliverable in the shorter term, lies in a sustainable location, and which can be accessed by a suitable means which allows for phases of a larger development to the east.

## **Written Submissions**

- WYG Cover Letter



Our Ref: A099231  
Date: 18<sup>th</sup> May 2017



Dear Sirs,

**BRITISH LAND PLC  
HEREFORD ACTION PLAN CONSULTATION**

On behalf of our client, The British Land Company Plc ("British Land") we submit this letter and the enclosed questionnaire in response to the current Hereford Area Plan Issues and Options consultation.

British Land, as owners of the Old Market development in Hereford would like to register their interest to Herefordshire Council in respect of the preparation of the emerging Hereford Action Plan. British Land seek to continue to invest in, improve and expand the facilities available at the Old Market which we trust is welcomed in view of the shopping centre development's prominence in the town and its valuable contribution to the overall health of the town centre. Accordingly, British Land seek to emphasize their desire to be part of any future discussions regarding future retail and leisure provision within Hereford.

Should you wish to discuss any of the comments made in further detail, please feel free to contact us.

Yours faithfully

