# Herefordshire Local Plan Hereford Area Plan

# **Issues and Options Consultation**

# April 2017







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# 1. Introduction

1.1 Hereford provides the focus for employment, retail, education, health and other services for much of the county and beyond. It is situated near the geographic centre of the county and is the administrative centre of Herefordshire. Therefore the future prosperity of Hereford is important to the whole county.

1.2 Consequently, the city will undergo some major changes over the next 20 years. The Core Strategy highlights the strategic requirement for urban expansion, economic regeneration and improved infrastructure.

1.3 Whilst trying to build upon Hereford's role and expand the housing, retail and employment offer, the city must protect and enhance its attractive historic environment and provide for its communities.

1.4 As a result, detailed planning policy and guidance is required to consider the specific measures needed for Hereford over the next fifteen years and beyond.

# 2. What is the Hereford Area Plan?

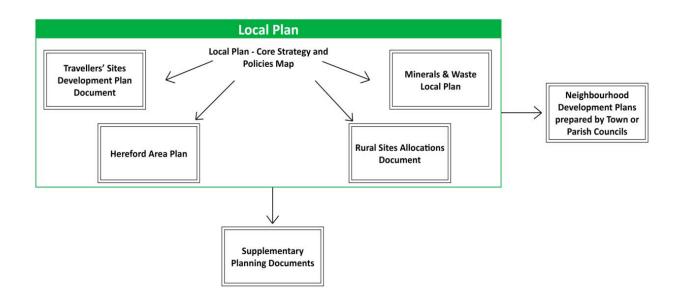
2.1 Herefordshire Local Plan - Core Strategy ("Core Strategy") was adopted in October 2015, this sets out the overall vision, objectives and spatial strategy for Herefordshire.

2.2 The Hereford Area Plan will set out the detailed proposals to ensure the full delivery of the targets for Hereford in the adopted Core Strategy. It will include policies and proposals for growth in the historic city of Hereford including specific proposals for housing, employment and urban regeneration. In doing so, the plan must also protect and enhance its attractive built and natural environment, providing for its current and future community needs.

2.3 The document will be a statutory element of the county's Local Plan, and will be one of a number of development plan documents (DPDs) currently being prepared which will provide detailed planning policies for specific locations or issues. The other DPDs include the Travellers' Sites DPD, Rural Areas Site Allocations DPD and Herefordshire Minerals and Waste Local Plan. In addition, more than one hundred neighbourhood development plans have either been prepared or are being prepared across Herefordshire.

2.4 The following diagram sets out the relationship of the documents within the Local Plan.

Figure 1 – The relationship between the various elements of the Local Plan



# 3. How the plan will be prepared

# Engagement / consultation

3.1 The process of preparing and adopting the Hereford Area Plan is anticipated to take in the order of two years. The consultation upon this issues and options paper is the first opportunity to comment upon the emerging options to be included within the Plan.

3.2 Further consultation will be undertaken as preferred options or a draft plan policies and proposals are prepared. There will also be an opportunity to comment upon the Plan prior to its submission to the Secretary of State.

3.3 Following submission to the Secretary of State the Plan will be subject to an Examination in Public by an independent inspector before it can be adopted as part of the Local Plan by Herefordshire Council.

# Hereford Area Plan Reference Group

3.4 A collaborative approach to the preparation of the Plan is being undertaken. With this in mind, a Hereford Area Plan reference group has been established in order to help to progress the preparation and delivery of the Hereford Area Plan by providing advice, guidance and information upon the plan making process and the content of the document.

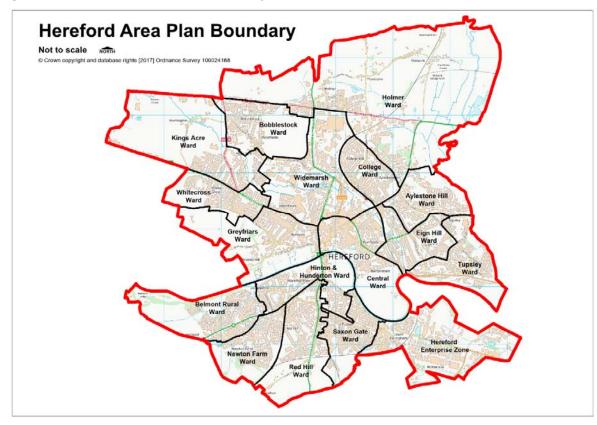
3.5 The group consists of elected councillors from Herefordshire Council, Hereford City Council and parish council's within the plan area, together with other stakeholders representing economic, social and environmental interests. The group has the ability to invite other stakeholders to attend meetings, particularly where input is required upon a specific topic or location. 3.6 The reference group is not a decision making body in itself; its recommendations will be among the considerations taken into account when formal decisions are made upon the progress of the Hereford Area Plan.

# 4. The Core Strategy vision and strategic proposals

4.1 In addition to the countywide vision and strategic objective, the Core Strategy sets out an overall vision for Hereford together with a set of strategic proposals to help deliver the vision. This provides a strategic context within which the detailed policies of the Hereford Area Plan will be developed.

4.2 The Core Strategy vision looks to 2031 and, in summary, it aspires to:

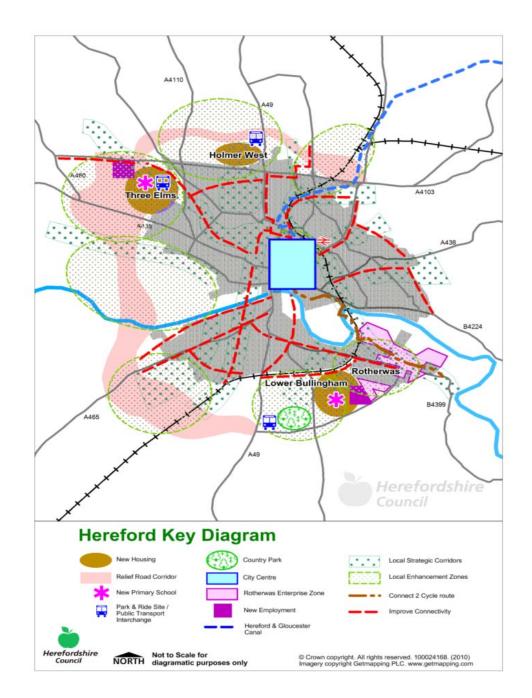
- deliver a wide range of homes and employment opportunities and address the imbalance of housing types and income levels;
- ease congestion via a number of schemes, a range of environmental enhancements, air quality improvements and active transport measures. Reduce dependency on the private car, enabling people to move between home, work, school and other facilities. Provision of a relief road (bypass) will be key element;
- provide the shopping, employment, educational (including higher education facilities), leisure and cultural focus for the county and additional good quality employment land;
- encourage new development to demonstrate innovative design and sustainable construction and provide a well-connected network of open areas and green spaces and green infrastructure, which is integrated with parcels of new residential and employment development.



# Figure 2: Hereford Area Plan Boundary

- 4.3 As set out in the Core Strategy, the policies and proposals for Hereford include:
  - A strategic policy for the regeneration of the city centre including new retail development, an urban village with 800 dwellings, opportunities for new commercial, tourism, education, leisure, health, civic and police and fire uses and new infrastructure provision;
  - Strategic urban expansion sites at Holmer, Three Elms and Lower Bullingham;
  - **Proposals to improve connectivity to the national and local transport networks** by reducing congestion and improving journey time. This is to be achieved through: maximising opportunities for the use of sustainable transport modes; behavioural change campaigns; reducing reliance on car use; improvements to public transport infrastructure; providing convenient, safe and secure car parking facilities; and the provision of a relief road to the west of Hereford.
  - Ensuring Hereford will continue to provide the focus for employment provision through expansion of the city centre, continuing development of Hereford Enterprise Zone, encouraging small scale environmental and knowledge based employment development opportunities and provision of new areas of employment land.

4.4 The full strategic policies related to Hereford in the Core Strategy are included in Appendix1. The Hereford Key Diagram in the Core Strategy can be seen below.



### Figure 3: Hereford Key Diagram (Core Strategy)

# 5. Implementation of the Core Strategy strategic proposals

5.1 The strategic proposals set out in the Core Strategy continued to be advanced and are at various stages of implementation. For example:

- a) Policy HD2 Hereford city centre:
  - the retail development at the Old Market has been completed;
  - the city link road is under construction.

- b) Strategic housing sites
  - there has been a council resolution to grant planning permission for the strategic housing site at Holmer;
  - the western urban expansion (Three Elms) is the subject of a current planning application.
- c) Policy HD3 Hereford movement
  - planning permission has been granted for the southern link road which falls within the relief road corridor defined on the Hereford key diagram in the Core Strategy;
  - work has commenced upon the development of the Hereford Transport Package.

5.2 The preparation of the Hereford Area Plan will provide an opportunity to develop a range of other more detailed land use proposals to address area specific issues.

# 6. Relationship with other strategies and emerging projects

#### **Economic Vision**

6.1 Herefordshire's emerging Economic Vision, will provide a key context to regeneration and investment work in the county. The vision identifies priority projects that will support economic growth or generate a higher value economy. The Hereford Area Plan provides an opportunity to provide a land use policy framework to enable the projects in the economic vision to be delivered.

6.2 Reference to specific projects set out in the Economic Vision is contained in the relevant section of this paper.

### Local Transport Plan and Hereford Transport Package

6.3 Herefordshire's Local Transport Plan (LTP) covers the period 2016-2031. It was adopted by the Council in May 2016. The LTP includes a range of policies and proposals for all transport modes. The LTP sets out the Council's strategy for supporting economic growth, improving health and wellbeing and reducing the environmental impacts of transport.

6.4 The Hereford Transport Package will incorporate a number of schemes contained in the LTP, including: initiatives to improve access to and within the central area; encouraging more active travel within the urban area through increased supply of pedestrian, cycling and bus networks; supporting safer routes to school; and tackling poor air quality that results from high levels of congestion and heavy good vehicles in the city. The development of the package will include the Hereford relief road, which is included within policy HD3 of the Core Strategy (widely known as the Hereford bypass).

#### New Model in Technology & Engineering University

6.5 The New Model in Technology & Engineering (NMiTE) university will be the UK's first new university for 40 years. NMiTE is projecting a student population of five thousand by 2031. NMiTE aims to address the shortage of graduate engineers in the Marches and the UK. NMiTE's ambition is to construct a campus in Hereford city centre, with linked laboratories and workshops on the Enterprise Zone at Rotherwas. The first phase of the project will see over a thousand students taking courses by 2021. Students will principally be housed within new accommodation across the city.

#### **Neighbourhood Development Plans**

6.6 Within the Hereford Area Plan boundary there are a number of Neighbourhood Development Plans (NDPs) in preparation. In particular:

- Lower Bullingham neighbourhood plan area includes much of the Hereford Enterprise Zone, which also falls within the Hereford Area Plan boundary. The Lower Bullingham NDP has been sent for examination and the examiner's report is awaited.
- Belmont Rural neighbourhood plan area falls entirely within the Hereford Area Plan area. Belmont Rural neighbourhood plan has been sent for examination and the examiner's report is awaited.
- Dinedor Parish Council have designated a neighbourhood area but are yet to produce a draft plan. As with Lower Bullingham, part of the area includes a section of the Hereford Enterprise Zone.
- Holmer and Shelwick Parish Council have designated a neighbourhood area. The parish also falls within the Hereford Area Plan boundary.

6.7 It will be important to ensure that the Hereford Area Plan policies and proposals are consistent with those policies in NDPs which have been made. Where there are emerging plans that fall within the Hereford Area Plan boundary, work is to be coordinated with the NDP to ensure there is conformity with strategic planning policies and that no areas of conflict exist between emerging plans.

6.8 In addition, all other parishes which adjoin the Hereford Area Plan have either prepared a NDP or are in the process of preparing one.

### 7. Issues for the plan to address

7.1 The Core Strategy outlines a series of social, economic and environmental issues faced by Herefordshire many of which will apply to Hereford itself.

In terms of social issues these include the need to:

- promote balanced and integrated communities
- ensure the provision of the right mix of housing, including affordable housing to maximise community benefits
- improve transport
- reduce opportunities for crime

Economic challenges include:

- diversification of the economy, creating more skilled jobs
- raising wage levels
- capitalising on educational achievements and improve rates of qualification
- promoting Hereford's tourism potential
- strengthening the role of Hereford as a centre for retail and leisure

Identified environmental issues include:

- protection, conservation and, where possible, enhancement of natural and historic assets
- the need to plan for the potential impact of climate change in new developments
- ensuring new developments are of high quality design and construction

- efficient use of resources
- improving air and water quality
- 7.2 More specifically the range of issues to be addressed by the Hereford Area Plan will include:
  - delivering a range of high quality homes, including an appropriate mix of housing of appropriate size, type and tenure to help meet the needs and demands of different groups in the community, including affordable housing needs.
  - balancing the required new housing growth with new employment opportunities including the development of Hereford Enterprise Zone with better paid jobs.
  - maintaining Hereford's role as a sub-regional shopping centre, protecting the vitality and viability of the city centre and addressing need for any required additional retail, leisure, office or other appropriate land uses
  - supporting the retention of young people through skills and training development and higher education facilities, including a new university.
  - capitalising on opportunities to make better use of the River Wye as an attraction for visitors and for leisure activities for local people
  - protecting and enhancing high quality environmental assets, including the historic town centre
  - reducing traffic congestion
  - improving air quality along the A49
  - protecting the integrity of the River Wye Special Area of Conservation (SAC)
  - enhancing existing and creation of new green infrastructure links across the city and to the wider countryside

7.3 The following sections explore a number of the issues in more detail and set out alternative approaches to addressing a number of the identified issues. Questions are embedded within each section to help provide a context for making a response to the consultation. The questions are set out in a separate questionnaire for ease of response.

# Emerging options for policies and proposals

### 8. Social Progress

#### Housing

8.1 Core Strategy Policy SS2 identifies Hereford as the focus for new development to support its role as the main centre in the county. Hereford has an allocated minimum 6,500 new homes to deliver. 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).

8.2 The above locations are shown on the Key Diagram on page 5 and the relevant Core Strategy policies are attached in Appendix 1. Strategic sites are anticipated to deliver a minimum of 3,300 new homes over the plan period. Of the strategic sites the Council have resolved to grant planning permission for the Northern Urban expansion sites at Holmer West for 460 dwellings whilst there is an outstanding planning application for the Western Urban expansion area at Three Elms for 1,200 homes.

8.3 A key aim of the Hereford Area Plan will be to set out where the remaining 3,200 dwellings will be built. In setting out policies and proposals to achieve the target the plan will need to take into account:

- 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.

8.4 The preparation of the Hereford Area Plan will 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. In informing decisions upon the form, size and type of new housing in the city, evidence such as the *Herefordshire Local Housing Market Assessment 2013*<sup>1</sup> and *Herefordshire Older People's Survey 2012*<sup>2</sup> will be utilised in preparing the plan's policies.

# Hereford Housing and Economic Land Availability Assessment (HELAA)

8.5 A key element of evidence which will inform the location of new housing development in the Hereford Area Plan will be the *Hereford Housing and Economic Land Availability Assessment 2015*<sup>3</sup> (HELAA). This study is a starting point in the early assessment of sites and will provide a context for further work to be carried out to identify sites an appropriate suite of allocated sites.

<sup>&</sup>lt;sup>1</sup> <u>https://www.herefordshire.gov.uk/download/downloads/id/1644/local\_housing\_market\_assessment\_2013.pdf</u>

<sup>&</sup>lt;sup>2</sup> <u>https://www.herefordshire.gov.uk/downloads/download/103/older\_peoples\_survey\_2012</u>

http://www.herefordshire.gov.uk/downloads/download/215/hereford housing and economic land availability asses sment helaa

8.6 A Housing Topic Paper sets out details of an initial sieving exercise on HELAA sites and is available during the consultation period. This paper suggests that the greatest scope for new housing exists mainly on greenfield land around the urban area periphery. However, it is recognised that the Government's recent *Housing White Paper: Fixing Our Broken Housing Market 2017*<sup>4</sup> stresses the important contribution that previously developed land can make to the supply. Therefore it is necessary to have full consideration of all possible sites. It is necessary to state that at this stage the Council has not made any decisions about which sites should be allocated.

8.7 With this in mind the Council is undertaking a "call for sites" process in parallel with the Issues and Options Paper consultation to provide an opportunity to submit sites for consideration as plan allocations. A call for sites form is available on the Council website should there be potential housing sites within the Hereford Area Plan boundary

8.8 Further consultation will be undertaken on potential housing sites once they have been subject to further assessment and investigation.

### Minimum site size for housing sites

8.9 In terms of plan preparation it will be necessary to determine an appropriate minimum size threshold for the identification of allocated sites. It is often not appropriate or practical to attempt to identify all potential housing opportunities especially for the smallest of sites. The threshold in the HELAA focuses on sites with capacities for five dwellings or more on sites of 0.25 hectares and above. However this could potentially lead to the identification of a significant number of sites and lengthen the time necessary to prepare the plan. In the recently published Government Housing White Paper it is proposed that 10% of allocated sites are required to be on sites of half a hectare or less. It may therefore be appropriate to set a minimum capacity threshold of ten dwellings (or 0.4 hectares for developable land).

#### Progress in achieving housing targets

8.10 In the first five years of the Core Strategy period up to April 2016, there had been just over 800 completions within the Hereford Area Plan boundary. In addition to the completions, there were around 600 planning permissions in April 2016. With the strategic sites having the capacity to deliver 3,300 new homes just under 5,000 of the overall target of 6,500 dwellings can be accounted for. The Hereford Area Plan will therefore need to plan to deliver an additional 1,500 to 2,000 new homes over the plan period.

8.11 In assessing the need to identify the remaining element of land to achieve the housing target, it is necessary to consider the role the "windfall" development can have. Windfall sites are those that have not been specifically identified but become available via planning applications.

8.12 There is a history of significant windfall housing development in Herefordshire and is acknowledged in the Core Strategy where a windfall allowance of 100 dwellings per annum across the county established (50 in urban areas and allowance of 50 in rural areas). Given that Hereford is by far the largest settlement in Herefordshire, it is a reasonable to anticipate that Hereford would

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https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/590464/Fixing\_our\_broken\_housing \_\_market - print\_ready\_version.pdf

receive around half of the urban allowance. Smaller windfall sites with developments for nine or less have contributed to the completion of over 200 dwellings since 2011. This would indicate that a windfall target of twenty five dwellings per annum would not be an overestimate.

8.13 Additional analysis of the windfall target will be required to justify any allowance but if evidence did justify in the order of 500 dwellings being provided by windfall development over the plan period, there is likely to be a requirement for between 1,000 and 1,500 dwellings to be identified on new housing allocations.

# Timely delivery of housing

8.14 The full delivery of the housing targets in the Hereford Area Plan will be dependent upon making towards the provision of key infrastructure as set out in policy SS3 of the Core Strategy. Key amongst these requirements are the continuing implementation of actions set out in the *River Wye Nutrient Management Plan*<sup>5</sup> to ensure that water quality targets do not fail as a result of new development.

8.15 The Annualised Housing Trajectory in Appendix 4 of the Core Strategy recognises that key elements of infrastructure will take time to implement and therefore has the proposed highest levels of housing growth at the end of the plan period. This is based on the necessary infrastructure for strategic sites to come forward throughout the plan. To achieve the Core Strategy housing target for Hereford, there is a need to ensure that appropriate and necessary infrastructure is co-ordinated with the development. This will particularly be the case in respect of the Hereford Transport Package including the Hereford bypass.

# 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 coordinated with the provision of key infrastructure provision and the level of development does not result in the failure of water quality targets in the River Wye SAC.

# Questions

- Q1: Can greater use be made of land that has been previously developed (brownfield land) for new housing? If yes, how?
- Q2: Should planning policies be developed to help meet the needs of specific groups of the population, for example older people?
- Q3: Should the plan provide advice upon an appropriate density of housing development in different parts of the city?

<sup>&</sup>lt;sup>5</sup> https://www.herefordshire.gov.uk/downloads/file/1652/nutrient management plan action plan november 2014

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

#### Settlement boundary

8.16 Settlement boundaries are a well-used approach in planning for guiding, controlling and identifying limits to development for an individual settlement. These are lines drawn around defined settlements to reflect their built form. A settlement boundary is used as a planning policy tool, reflecting the area where a set of plan policies is to be applied. It is not drawn to reflect the administrative or geographic limits of a settlement.

8.17 Any land and buildings outside a settlement boundary are usually considered as open countryside and, in general, development is often limited to specific circumstances. However, it should be understood that inclusion of land within the settlement boundary does not guarantee that planning permission will be granted. There will be other policies against which proposals for development will be assessed.

8.18 The Core Strategy does not identify settlement boundaries, but deferred their definition for consideration in lower tier plans such as the Hereford Area Plan and neighbourhood development plans. Advantages of defining such boundaries as a planning tool include; increasing the level of certainty in determining planning applications by having a consistent approach and helping to protect the countryside from unnecessary development. However, there has also been criticism of the use of such boundaries, which reduce flexibility, have an impact upon land values and can, without a suite of other policies, lead to an element of 'town cramming' within settlements.

8.19 Where settlement boundaries are defined, their extent will usually be determined by analysis of various criteria such as:

- physical features boundaries tend to follow physical features: buildings, fields boundaries or property curtilages; and
- planning history recent developments, identified local plan sites, existing planning permissions, recent refusals and appeal decisions relating to areas on the edge of settlements are all useful aids to defining boundaries

#### Questions

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?

### Affordable Housing

8.20 The recently produced white paper *Fixing Our Broken Housing Market (DCLG 2017)*<sup>6</sup>, sets out how the Government intends to boost housing supply, and over the long term, create a more efficient housing market whose outcomes more closely meet the needs and aspirations of all households and which supports wider economic prosperity. *"If we fail to build more homes, it will get even harder for ordinary working people to afford a roof over their head."* 

8.21 Government is proposing to provide new ways to enhance the capacity of local authorities and industry to build the new homes this country needs. Local authorities are being asked to be ambitious and innovative to get homes built in their areas. An up to date plan produced in partnership with the local community which seeks to enable the delivery of these needs is part of the support framework to allow this to happen.

8.22 As the county town, Hereford has an important role to play in the provision of new affordable homes to meet the significant needs that have been identified within the county. Planning robustly for those needs will assist in making sure that the right kinds of affordable homes are built in the right places, in the right numbers. The city's housing growth should provide all residents with access to high quality, well designed homes, which are environmentally sustainable and affordably priced, regardless of property size or tenure.

8.23 The Hereford Area Plan provides an opportunity for local people to become involved in the production of locally specific policies and the identification of sites for meeting the need for affordable homes. It is reasonable for people to have concerns about the impact that new housing will have on their communities and it is important that they can have their say over the location of these new homes and what they will look like through the development of the Hereford Area Plan.

8.24 The first thing to do in the process of planning for new residential development is to ensure that there is a clear and up to date understanding of the demand for affordable homes in Hereford. Affordable housing falls into three main categories:

- Social rented, for which guideline target rents are determined through the national rent regime;
- Affordable rented housing subject to rent controls that require no more than 80% of the local market rent; and
- Intermediate homes for sale and rent, provided at a cost above social rent but below market levels.

8.25 As part of the production of the Core Strategy, various studies<sup>7</sup> were undertaken in order to be able to produce policy guidance and policies which ensure that future housing growth is balanced and sustainable and meets the needs of all sections of the community. Based on the evidence of need and viability, Core Strategy policy H1 – Affordable Housing was developed:

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https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/590464/Fixing\_our\_broken\_housing \_\_\_\_\_market - print\_ready\_version.pdf

<sup>&</sup>lt;sup>7</sup>https://www.herefordshire.gov.uk/download/downloads/id/2261/strategic\_housing\_market\_assessment\_june\_2008. Pdf), https://www.herefordshire.gov.uk/downloads/file/1644/local\_housing\_market\_assessment\_2013,

http://www.herefordshire.gov.uk/downloads/file/1639/economic viability assessment may 2014

#### Policy H1 – Affordable housing – thresholds and targets

All new open market housing proposals on sites of more than 10 dwellings which have maximum combined gross floorspace of more than 1,000m<sup>2</sup> will be expected to contribute towards meeting affordable housing needs.

The amount and mix of affordable housing, including those on strategic housing sites, will vary depending on evidence of housing need as identified through the latest housing market assessment, and, an assessment of the viability of the development. The following indicative targets have been established based on evidence of need and viability in the county's housing market and housing value areas:

1. A target of 35% affordable housing provision on sites in the Hereford, Hereford Northern and Southern Hinterlands, and Kington and West Herefordshire housing value areas;

 A target of 40% affordable housing provision on sites in Ledbury, Ross and Rural Hinterlands; and Northern Rural housing value areas (which includes Bromyard);
 A target of 25% affordable housing provision on sites in the Leominster housing value area.

Any affordable housing provided under the terms of this policy will be expected to be available in perpetuity for those in local housing need.

8.26 In addition to this strategic policy, a supplementary planning document will be produced, covering all parts of Herefordshire, which will provide additional guidance to assist both developers and the public in understanding how policy H1 will be implemented. It will cover topics such as:

- advice on the need for affordable housing
- affordable house prices
- the negotiation process
- securing affordable housing and controlling occupancy; and
- where contributions to off-site affordable housing provision are acceptable

8.27 In order to produce a more detailed set of Hereford city affordable housing polices, there is a need to do further investigations, so that housing is planned for and delivered which specifically meets the needs of Hereford's future population. This will include an assessment of the current and predicted future requirements of particular groups such as; the elderly and disabled or young families.

8.28 Once the evidence of need has been produced, then the Hereford Area Plan policies can be developed in a way that makes good use of land and results in enabling the development of well-designed, attractive places to live, including specific provisions for those in need of social housing. There will be an opportunity to identify sufficient land in the right locations, with community involvement to secure the best outcomes for local people in housing need and for the local area in which they are planned.

#### Questions

# 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?

### Houses in Multiple Occupation (HMOs)

8.29 A number of homes within the city provide purpose built shared accommodation or are properties that have been converted to provide accommodation for a group of unrelated adults. These are known as houses in multiple occupation (HMOs). They provide an important source of affordable accommodation for a number of sections of society, including students, temporary workers, those on low incomes and young professionals. For these people, the option of renting such properties is important, where open market housing is often inaccessible within the city.

8.30 Although HMOs form a relatively small proportion of the overall housing stock, they can have a negative impact on the city's established residential communities, particularly in concentrations. This can be as a result of increased noise, anti-social behaviour, unkempt gardens and car parking issues.

8.31 For planning purposes, there is no regulatory requirement to obtain planning permission for the conversion of a dwelling house to a small HMO. However, local planning authorities have been given the power to remove permitted development rights, which can enable them to bring the change of use of residential properties into their control. Planning permission for larger HMOs continues to be required. The *Housing Act 2004*<sup>8</sup> controls the standards and safety of such accommodation and includes provisions for larger HMOs to be licensed, whilst *The Management of Houses in Multiple Occupation (England) Regulations 2006*<sup>9</sup> ensures that properties are maintained and safe and that management standards are adhered to.

8.32 Whilst the planning policies of the Hereford Area Plan can influence the location of new HMOs and the change of use of existing properties, it cannot act to address existing areas with shared residential properties or be used to reduce the number of HMOs where they already exist. The Council's departments will therefore work together and use other statutory powers available to them to address issue arising from existing HMO properties.

8.33 The potential increase in the future demand for rented accommodation through HMOs should be considered, particularly since the number of students coming to the city is likely to rise. The Hereford Area Plan provides the opportunity to control the development of new HMOs and to ensure that residential areas are home to inclusive, mixed and balanced communities.

8.34 The planning options available are:

- to set out a criteria based policy to guide the development of larger HMOs, referring to the consideration of matters such as:
- the impact on the amenity of adjoining premises and on the character of the area;
- the size and character of the property;
- the provision for car parking and the traffic situation;
- the standard of accommodation, including private amenity space;
- intensification of existing HMOs;
- flexible planning conditions to allow for HMOs to be returned to a single dwelling house without planning permission;

<sup>&</sup>lt;sup>8</sup> <u>http://www.legislation.gov.uk/ukpga/2004/34/contents</u>

<sup>&</sup>lt;sup>9</sup> http://www.legislation.gov.uk/uksi/2006/372/contents/made

- design;
- to set a restrictive policy for larger HMOs, stating that they will generally not be permitted in residential areas which are predominantly in single family occupation (although justifying this in the light of national planning policy guidance through the National Planning Policy Framework may prove difficult);
- to seek the approval of the Council for making an Article 4 Direction, which would remove the permitted development rights in relation to changes of use from dwelling houses to small HMOs. In conjunction with this, to provide a criteria based policy through which to guide planning applications for this type of development, large or small.

# Questions

# Q7: Should the plan contain guidance around Housing of Multiple Occupancy (HMO)? If yes, what are the main factors that should be considered?

# Self and custom build

8.35 The Government is promoting self and custom build as a way of meeting housing requirements and Herefordshire Council is keen to support this. Self and custom build can be a means of reducing costs of buying a home by the owner carrying out some or all of the build themselves. They can also provide the opportunity for a greater degree of individual design and layout. Self-build projects are where an individual or group of people directly organise the design and construction of their new homes either by building it themselves or commissioning others to do so. Custom build is 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.

8.36 Herefordshire Council has a self and custom build register where individuals and groups of individuals are able to register their interest in self and custom build in the county. Between 1<sup>st</sup> April and 31<sup>st</sup> October 2016 approximately 150 individuals and 1 association have entered their details on the register. Although some of these have expressed an interest in self-build in more than one county, there is nevertheless a demand to be met for self-build in Herefordshire. The Core Strategy recognises that self-build will contribute to housing supply over the plan period and the Hereford Area Plan provides an opportunity to encourage this type of development.

# Questions

# Q8: Should the Hereford Area Plan include a policy to encourage self and custom built homes?

# If yes, what issues should it include?

# **Housing Design**

8.37 Getting the right types of homes built in the right areas to meet the needs of a growing population is essential. Core Strategy policy H3 recognises this and seeks to ensure that new residential developments create balanced and inclusive sustainable communities; providing for younger single people, families and the elderly through a range of house types and sizes and building with the future potential for adaptation in mind.

8.38 Whilst the need for a range and mix of homes is provided for within the Core Strategy, the issue of design is not. The Hereford Area Plan provides the opportunity to influence the way future

developments look by giving local people a stronger voice in the quality and character of new developments. This is particularly pertinent within the city, where sites are likely to vary considerably. For example, should developments be required to include a range of accommodation types such as flats or bungalows suitable for the elderly as part of larger developments? What may be considered suitable for a large greenfield urban extension site is unlikely to be the same as on a smaller site close to a historic area of the city, or on a previously underused brownfield site away from the existing established residential areas.

8.39 The Hereford Area Plan can drive up the quality and appearance of new developments through either; the identification of specific sites and the provision of detailed policy guidance for their design, or through criteria based design policy directed towards specific parts of the city, where the townscape's character is considered to be worthy of particular conservation or enhancement. The aim will be to create attractive new environments that local people can be proud of, which make good use of the land available and which are pleasant places to live.

8.40 There are many considerations which relate to the design of new residential developments, including:

- Setting within the townscape or landscape character of the area and any specific site features;
- Relationship to and impact on adjoining properties (including privacy and overlooking, the provision of adequate space between existing and proposed buildings);
- Means of access or servicing;
- Private amenity space
- Public open space;
- Car parking provision;
- Layout and design (including physical scale, materials etc.);
- Density and making the most efficient use of the land available;
- Landscaping and means of enclosure;
- Sustainable design and construction.

8.41 Some of these matters are dealt with generally in Core Strategy policies LD1 to LD4 and SD1 to SD4 or through widely accepted design standards (such as Building for Life<sup>10</sup>). However, the Hereford Area Plan provides the opportunity to make sure that new developments are varied and create pleasant environments in which to live. Policies detailing design expectations will provide greater certainty for applicants about the sort of design which is likely to be acceptable and provide a clear basis for making decisions on development proposals.

#### Questions

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?

<sup>&</sup>lt;sup>10</sup> Birkbeck D and Kruczkowski (2015) *Building for Life 12: The sign of a good place to live*. Available at: www.designcouncil.org.uk/resources/guide/building-life-12-third-edition

#### Social and Community Facilities and Open Spaces

8.42 Social and community facilities can be defined as physical facilities for different individuals and communities, which are provided by a range of organisations (public, private and voluntary). They provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. These facilities play an important role in the development of a vibrant community by creating a sense of place and providing the opportunity for people to meet and interact socially. They also offer services that are essential for education, health and well-being; and support community cohesion and benefit the general quality of life of residents.

8.43 National planning policy states that policies and decisions should plan positively for the provision of new community facilities, guard against the unnecessary loss of existing ones, and allow established facilities to expand and modernise sustainably. Planning policy should also ensure an integrated approach to considering the location of housing, economic uses, and community facilities and services.

8.44 The Core Strategy sets out policies that identify what new community infrastructure will be required in order to accommodate the levels of growth planned. General criteria for planned housing growth that create need across the county for community infrastructure provision are also set out.

8.45 Policy SC1 of the Core Strategy sets out the criteria that aim for the retention and enhancement of community infrastructure, and for the provision of new community infrastructure across Herefordshire. New developments that create a need through an increase in population are expected make provisions, either through new facilities or by extension of existing facilities. New facilities are required to be accessible, located within or near a settlement, and can be reached by means other than private vehicle. Existing facilities are to be retained, unless it can be sufficiently demonstrated that there is no longer a demand for them, they are no longer viable or an alternative facility of equal or better quality is available.

8.46 Requirements for the three strategic urban extensions around Hereford, at Holmer West, Three Elms and Lower Bullingham are identified within specific policies and include the following:

#### HD4- Holmer West

- contributions towards indoor and outdoor sports and play facilities
- allotments
- pre-school facility
- contributions towards enhancement of existing primary and secondary school facilities

#### HD5- Three Elms

- linear park along Yazor Brook corridor
- pedestrian and cycle links
- on site sports and play facilities (outdoor and indoor)
- community orchards
- allotments
- 210 primary school places
- pre-school facility
- extension of Whitecross School with playing field provision
- neighbourhood community hub to meet any identified need for small scale convenience retail
- community meeting space
- health provision

HD6- Lower Bullingham

- creation of a new country park
- 210 primary school places
- contributions towards new pre-school facilities where appropriate
- neighbourhood community hub, to include small scale retail

8.47 These requirements were identified through the preparation of the Core Strategy via consultation and discussion with the relevant departments within the council and partner organisations. Each of the strategic allocation policies state also that provisions should be made for contributions towards any identified need for other community infrastructure or facilities where appropriate.

8.48 The Hereford Area Plan will provide an opportunity to potentially identify such facilities, and plan for the delivery of them. Hereford Council will continue to work with other public sector organisations including the emergency services, health bodies and others to help to manage and improve the range of community and social facilities available in the city.

#### Issues

- The need to deliver new community infrastructure to accommodate the planned growth of Hereford
- Enhancements or extensions required to existing facilities within Hereford
- Preventing the loss of existing facilities in Hereford
- Ensuring the delivery of appropriate types of facilities in appropriate locations

#### Questions

# Q10: Should there be policies to address how developers can contribute towards community facilities?

# Q11: Are there improvements that need to be made to existing community facilities? If yes, where?

#### **Open Space**

8.49 Open space is defined in national planning policy as *"all open space of public value including not just land, but also areas of water which offer important opportunities for sport and recreation and can act as a visual amenity"*. Open spaces on land include green spaces such as parks and allotments, natural habitats, play grounds, and amenity space.

8.50 Open spaces have many roles including providing for recreation and physical activity; encouraging social interaction; promoting health and well-being and quality of life; providing facilities for children's development; encouraging walking and cycling, reducing flood risk; and safeguarding biodiversity.

8.51 Outdoor play is central to an enjoyable childhood. An environment which is attractive and safe for children to play is also an attractive, safe place for the whole community. There is a need to protect existing open space provision from loss or harm. Well-designed parks and open spaces provide a focus for people to enjoy the outdoors, to meet and they play a role in encouraging a healthy lifestyle. They can also be a catalyst around which housing, shops and businesses can grow and generally enhance the quality of the environment.

8.52 The Core Strategy, in its objectives, sets out to improve the health, well-being and quality of life of all residents by ensuring new developments positively contribute towards better access to, provision and use of, improved public open spaces, sport and recreation, education, cultural and health facilities, local food production and ensuring safer communities

8.53 Core Strategy policy OS1, OS2 and OS3 set out the requirement for open space, sports and recreation facilities and establishes when such facilities will be required by particular developments. They also set out the circumstances when the loss of open space facilities may be acceptable subject to rigorous criteria. The Hereford Area Plan will be able to identify those important open spaces which should be protected from alternative uses and/or establish the criteria against which to assess development proposals that may necessitate the provision of a certain amount or type of open space.

8.54 Evidence based documents used to inform the Core Strategy include the *Open Space Study* 2006<sup>11</sup>, *Play Facilities Study* 2012<sup>12</sup>, *Playing Pitch Assessment* 2012<sup>13</sup>. This evidence provides an audit of the existing levels, standards and quality of open space in the county as well as identifying deficiencies in quantity, quality and accessibility to meet the future population needs up to 2031. To meet some of these deficiencies, the investment plans for both play and outdoor sport identify priority projects which require investment to improve both quantity and quality. They have been prepared in partnership with relevant organisations and are reviewed annually.

8.55 Hereford has a number of important open spaces fulfilling a variety of roles. Housing growth will increase the use of these areas and it will be essential to ensure that their full potential is secured whilst also allowing for new open space features to come forward on new development to meet the growing residential needs.

8.56 Policy LD3 of the Core Strategy sets out general principles for green infrastructure in Herefordshire, including the protection of existing green assets and the provision of new green infrastructure as part of new development. Open space can provide an important element of green infrastructure. The policy refers to the Green Infrastructure Strategy 2010 which identifies a strategic green infrastructure network of corridors, enhancement zones and fringe zones where natural and urban environments co-exist. The policy approach is that development proposals should seek to enhance and protect such areas. See also the natural environment section for reference to green infrastructure issues.

#### Current and future open space provision

8.57 The Open Space Study 2006 (PPG 17) covers all typologies of open space on land. Although some of the data is still valid, children's' play and outdoor sports requirements have largely been updated by the *Play Facilities Study* and *the Playing Pitch Assessment* and their relevant investment plans. Data for amenity/parks and gardens/natural and semi natural public open space is still considered to be accurate given that data has not significantly changed since the original assessment.

<sup>&</sup>lt;sup>11</sup> <u>https://www.herefordshire.gov.uk/downloads/download/104/open\_spaces\_study\_2006</u>

<sup>&</sup>lt;sup>12</sup> <u>https://www.herefordshire.gov.uk/downloads/download/105/play\_facilities\_study\_2012</u>

<sup>&</sup>lt;sup>13</sup> <u>https://www.herefordshire.gov.uk/downloads/download/106/playing\_pitch\_assessment\_2012</u>

#### 8.58 Provision in Hereford is described as follows:

#### Hereford City North

- extensive over provision of parks and gardens: A surplus of 7.18ha
- over provision of amenity greenspace: A surplus of 5.46ha
- extensive under provision of natural and semi natural green space: A deficit of 47.76ha

#### Hereford City South

- average provision of parks and gardens: no shortfall or surplus
- extensive over provision of amenity greenspace: A surplus of 20:34ha
- extensive under provision of natural and semi natural green space: A deficit of 20:37ha

8.59 There is an over provision of amenity greenspace in the Hereford area, so it would be appropriate to encourage more semi natural open space from new development. The development of the identified strategic sites is likely to provide more semi natural green space.

8.60 Since 2006 when the Open Space Study was produced, a new country park has been developed in Hereford South at Belmont, providing 30ha of semi natural amenity space including meadows, pools and woodland areas. This has helped to reduce shortfalls.

8.61 Much of the open space in Hereford is owned by the Council and therefore the maintenance of such space must also be carried out by the Council. In future the Council is likely to focus on maintaining the quality of existing parks and gardens, new open spaces which are provided as part of new developments are not likely to be owned and maintained by Herefordshire Council but managed through other local alternative and sustainable management options including through a management company.

8.62 It may be appropriate to reclassify and redistribute open space within the city to make the spread in type more even. There may be instances when the loss of some open space could achieve overriding open space benefits and/or be justified due to open space surpluses in a localised area combined with a low quality offer so that it is unable to meet wider open space needs and/or citywide requirements.

8.63 National planning policy has introduced the concept of *local green space* for areas identified by the local community for special protection. This designation will not be appropriate for most open spaces and should be used only where:

- the green space is in reasonably close proximity to the community it serves;
- the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and
- the green area concerned is local in character and is not an extensive tract of land.

#### **Open Space Standards**

8.64 The Core Strategy recognises the need for further policy and guidance on open space local standards. Open space standards are set for different recreational uses (such as children's play areas or parks). An Open Space Supplementary Planning Document (SPD) is being prepared in

order to assist developers and applicants to determine the requirements for providing open space in new developments to ensure sufficient facilities are provided for future residents.

# **Play facilities**

8.65 *The Play Facilities Study 2012* identifies provision north and south of the city as being 'average'. Although it has been identified that there are enough children's play areas in Hereford, access, quality and play value can be barriers to use. Assessments have been carried out to identify where improvements can be made which will help to maximise the overall provision for all ages, infants, juniors and teenagers.

8.66 Rationalising play provision and moving away from the provision of small fragmented sites to provide larger, more sustainable and better value play spaces is supported. Such an approach could increase the quality and size of play areas in some areas, improve play value and reduce the number of small play areas which offer little in play value and are costly to maintain. There can be social and community benefits of a facility which provides opportunities for children of all ages. Very small play areas for infants only are no longer required from new development.

8.67 Key issues identified through consultation in the *Play Facilities Strategy* include:

- Ensuring existing provision is fit for purpose
- Improving play value where appropriate
- renewing old outdated equipment where appropriate
- maximising opportunities to provide a mix of larger neighbourhood play areas which serve a wider area and smaller local play areas to serve residential areas :
- Maximising the opportunities to provide a range of play opportunities for all ages, both formal and informal for infants, juniors and teenagers.
- Engaging with the local community.

# Sports and playing pitches

8.68 The Council's *Playing Pitch Assessment* focuses on the four major sports provision throughout the county including cricket, football, hockey and rugby. It identifies projects for improvements and representatives from each sport make up a group who must also consider their wider area priorities and not just Herefordshire.

8.69 The group includes Sport England, the County Sports Partnership, the National Governing Bodies for Football, Cricket, Hockey and Rugby, Herefordshire Football Association and the Herefordshire Cricket Board Union. Projects have been identified to meet both existing and future deficiencies as identified in the playing pitch assessment to provide both new facilities including football and cricket and to improve existing facilities for football, cricket, hockey and rugby. The evidence supports the need to develop and improve existing facilities and provide new ones particularly for football and cricket. Although tennis and bowls were included in the original assessment no projects have come forward to date.

# Allotments

8.70 Particular value can be attached to community gardens and community open space initiatives which help provide access to nature, local food growing and well-being benefits as well as social cohesion. There are currently nine allotment sites north and south of the river managed by

the Hereford Allotment and Leisure Gardener Society. Waiting lists vary as there are preferences for some sites over others with higher waiting lists during the growing season.

### Key issues

- The protection of open space/children's play/outdoor sports in Hereford
- The need for more semi natural green space
- The need to improve and rationalise existing children's play areas
- Provision for new outdoor sports facilities and improvements to existing
- The potential for provision of community-run and managed allotments and community food growing in new developments

#### Questions

- Q12: What factors should be taken into account when protecting areas of open space?
- Q13: 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? If yes, what and where?
- Q14: Do you think there is a need for more allotment provision, for example as part of new housing developments or on existing open spaces? If yes, where?
- Q15: Do you think the correct issues have been identified relating to sport, community facilities and open space in this document? If no, please explain

#### Movement

8.71 Hereford is an important sub regional centre with retailing catchment and travel to work areas which extends beyond the county boundary particularly to the west. The transport network of the county converges on Hereford and includes access to local and long distance rail, bus and coach services making it the most accessible location for all county residents. The Core Strategy objective in relation to movement sets out to strengthen Hereford's role as a focus for the county, through city centre expansion as part of wider city regeneration and through the provision of a balanced package of transport measures and a relief road. Core Strategy policy HD3 sets out a Hereford-wide policy for movement and can be seen in Appendix 1.

8.72 The county's road network focuses on the city. The A49 provides north/south links to the north west and south wales/south west via Leominster and Ross-on-Wye. The A4103 provides connections to Worcester and the M5 corridor and the A438 links with mid wales to the west and the M5 and south west via Ledbury to the south east of the county. These key radial routes converge on the city centre along the inner ring road and Greyfriars Bridge. The convergence of both longer and shorter distance traffic on the city network and the inner ring road and a single river crossing results in regular congestion and an inefficient network prone to instability since it operates over capacity during peak periods and often throughout the day. This affects not only local journeys but the wider strategic long distance network.

8.73 The Core Strategy and Local Transport Plan (LTP) 2016-2031 identify the requirement for relief road or bypass for Hereford. This would provide an alternative route for the A49 trunk road around Hereford and reinforce its importance as a strategic route via the A465 between South Wales and the Midlands. A Hereford Transport Package is currently being developed and combines a bypass and active travel measures to encourage people to travel more sustainably for short distance journeys. There are significant links between the Hereford Transport Package process and the Hereford Area Plan and, where appropriate, joint consultation events will be held to ensure that both processes are informed fully by the views of residents and other stakeholders.

8.74 Hereford city provides the central hub for the county's core bus network. The LTP sets out policies in support of this network including feeder services and rural hubs to support interchange between bus and other transport modes and transport services. The core bus network defines longer distance bus services which converge on the city supporting movement between market towns and Hereford enabling access to key services located in the city and longer distance rail and coach services. The city is well served by an urban bus network, operated largely commercially, providing higher frequency services and good access for commuting, education, retailing, health and leisure related journeys.

8.75 The country bus station is located just off Commercial Road with Hereford railway station nearby on the outskirts of the city centre, near to Morrisons and Brook Retail Park. The railway station lies on the Welsh Marches Line between Leominster and Abergavenny, and is the western terminus of the Cotswold Line, which connects the town to Birmingham and Oxford via Worcester. The construction of the city centre link road will improve access to the rail station and will enable better interchange with bus services. The link road package includes proposals to improve the forecourt area of the station – the transport hub – which will upgrade the public realm and layout to improve access for pedestrians, cyclists and interchange with bus services. This proposal is supported by Core Strategy policy HD3 which recognises the need for better integration between bus and rail services.

8.76 Parking provision in Hereford city centre is good, with public car park spaces in short, medium and long stay facilities available. The LTP identifies that the supply and location of parking is an important factor influencing the high proportion of short distance car trips within Hereford, particularly during the congested peak travel periods. It sets out proposals to enable a more strategic approach to the provision and management of parking which would assist in reducing demand for short distance car trips, facilitate better traffic management and support redevelopment of some existing parking locations which could help improve townscape and the public realm of the central area. Rationalising the provision of parking would include the disposal of some smaller car parks with re-provision through fewer larger car parks (potentially multi-storey) to the north east of the central area where car parks currently operate at capacity for periods of the day.

8.77 Hereford has cycling levels significantly higher than the national average and cycling is regarded as a particularly effective travel option given the relatively small size of the city – the central area and key facilities can be accessed in under 15 minutes by bike from most residential areas. Provision for cyclists is generally good with well-located cycle parking and effective, dedicated cycle routes. Important routes include the Great Western Way supporting north-south movement and access to the central area and the Hereford Greenway proving links into the Enterprise Zone. The LTP proposes further expansion of the cycle network including facilities to improve access into the central area from the west and east of the city. It will be important to

ensure that new developments include direct and convenient connections into the cycle network and good provision for cycling, including parking within their sites.

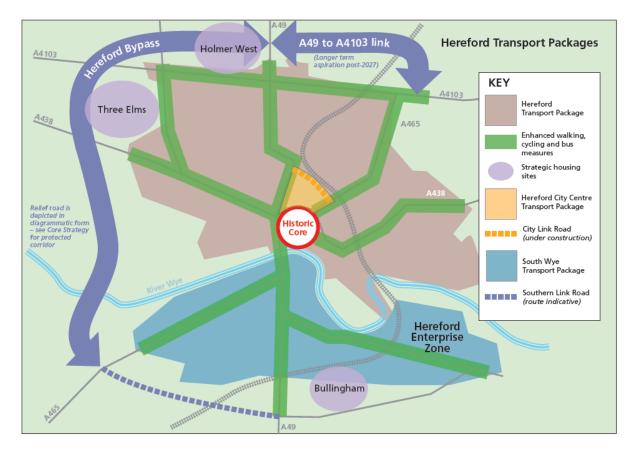
8.78 The city centre benefits from good pedestrian linkages, including areas of pedestrianisation around High Town, High Street, Widemarsh Street and Eign Gate. Poorer pedestrian links exist along the ring road, particularly around Eign Gate/Victoria Street and Commercial Street/Commercial Road.

8.79 The city link road, currently under construction, will connect Edgar Street, Widemarsh Street and Commercial Road and is intended to alleviate traffic on the inner ring road in the Blueschool Street area. The completion of this road will also allow public realm improvements to pedestrian links between the historic city core and the recently developed Old Market retail area.

- 8.80 The LTP sets out how it will address the issues identified above in four transport packages:
  - Hereford High Town Package
  - Hereford City Centre Transport Package
  - South Wye Transport Package including Enterprise Zone
  - Hereford Transport Package
- 8.81 These packages can be seen in more detail within the LTP<sup>14</sup>.
- 8.82 Key improvements that make up the Hereford transport strategy include:
  - a bypass to increase highway capacity to accommodate increased demands of new development and providing access to strategic sites;
  - improved efficiency of the existing network management tool SCOOT<sup>15</sup> to provide capacity within the urban area;
  - demand management to tackle short car trips including parking costs, location and impacts in residential areas;
  - improved bus access into the central area and integration with rail;
  - extended cycle network to increase the already high proportions of cycling and to link with park and choose sites;
  - measures focused on increasing access to the Enterprise Zone and in support of its travel plan;
  - measures supporting NMiTE University to encourage active travel behaviour.

<sup>&</sup>lt;sup>14</sup> Local Transport Plan – Strategy 2016-2031 p15

<sup>&</sup>lt;sup>15</sup> SCOOT (Split Cycle Offset Optimisation Technique) is a tool for managing and controlling traffic signals in urban areas. It is an adaptive system that responds automatically to fluctuations in traffic flow through the use of on-street detectors embedded in the road.



# Figure 4 Hereford Transport Packages Improvements

# Transport infrastructure and new developments

8.83 New development should offer realistic, safe and easy access by a range of transport modes, particularly for pedestrians and cyclists and those using public transport. The Hereford Area Plan can help to provide good accessibility and enable people to make active travel choices by shaping the pattern of development and influencing the location, scale, density, design and mix of land uses. Developments which encourage walking and cycling have been shown to reduce congestion, enable healthier lifestyles, and deliver social inclusion and community well-being.

8.84 In determining the appropriate location and scale of new development it will be important to take account of the availability of the appropriate transport infrastructure, including that which encourages active travel. The provision of safe and attractive infrastructure for cyclists and pedestrians, as well as good connections to the wider walking and cycling network and good quality public transport, will be essential elements of such assessment.

8.85 New development requires specific types of infrastructure to be in place in order to persuade those travelling to, from and within the site to do so in as sustainable a way as possible. This infrastructure also needs to be timed for implementation appropriately, so that the use of active modes of travel is embedded in the development from an early stage, as it is difficult to alter travel behaviour and modal choices once people are used to using a car.

#### Active travel

8.86 The Hereford Transport Package will include a range of proposals for active travel in the city incorporating walking, cycling and public transport improvements on routes to and within Hereford. These measures will encourage safer, cleaner and healthier forms of travel and enable improvements to the public realm. Consultation upon the Hereford Transport Package is being undertaken in parallel with the issues and options consultation for the Hereford Area Plan, relevant comments received during that process will also be used to inform the preparation of this plan.

8.87 Although Hereford has a railway with links to the wider region and beyond, access to the station could be improved. The LTP supports, through the delivery of the Hereford City Centre Transport Package, a transport hub at Hereford Railway Station which will provide improved access to rail, greater integration with bus services, cycle and walking networks and increased provision for parking. The Council's *Economic Vision* also recognises the need to continue to upgrade the public realm in the city, taking advantage of the improvements of the transport network.

#### City car parking

8.88 The management of car parking will be important in supporting the regeneration of the city centre, reducing the impact of commuter traffic. There are a series of smaller car parks within and adjacent to the city centre and a rationalising of car parking provision could have significant benefits for traffic management. The council is in the early stages of reviewing car parking within the city and evidence which emerges from this work will be taken into account as the Hereford Area Plan is developed and may enable a more effective pattern of car parking provision.

8.89 The Council's Economic Vision also recognises that there are opportunities to rationalise car parking by identifying edge of centre sites, potentially for multi-storey facilities, to replace current car parks, reducing the amount of car traffic in the city centre. In addition, current provision for lorry and bus layover parking will need to be reviewed to identify longer term solutions in the event that current locations (Merton Meadow and Country Bus Station) are redeveloped and capacity is reduced.

#### Park and choose

8.90 Park and ride was not considered a viable option for the city, therefore Park and choose is the most achievable option to encourage less commuter traffic entering the city. The Core Strategy identified three broad areas close to the strategic housing sites for Park and choose sites (see section 4 of the Core Strategy). There are already eight of these sites around the outer edges of the city<sup>16</sup>. Park and choose sites reduce reliance on private cars to access the city centre by way of connection with public transport, walking and cycling routes.

#### **Travel Plans**

8.91 Travel Plans are a tool to help change travel behaviour. Travel Plans set out a package of measures and initiatives that aim to reduce car travel by informing and encouraging people to use alternative, more active modes where possible. National planning policy recognises travel plans as a key mechanism indicating that all developments which generates significant amounts of movement should be required to provide a travel plan.

<sup>&</sup>lt;sup>16</sup> See Hereford's list of Park and Choose sites via the Council's Website -Travel Planning - Park and Cycle/Park and Share

8.92 Currently, any development that is likely to place demand on the transport network is required to provide information as to the likely scale of the impact, in the form of a transport statement or transport assessment. These cover the need for mitigation of the impacts and may result in developments requiring Travel Plans. However, given national policy, there is scope to require travel plans for all developments that create a certain amount of movement or reach a certain size as they will help to mitigate the transport impact of development.

#### **Freight movement**

8.93 Freight transport is facilitated along the strategic route of the A49 north and south and from east to west. In addition freight transport is an important component of traffic on other routes within Hereford and is an essential part of business within the city which supports the local economy. Providing good access from new and enlarged industrial and commercial sites to the strategic network can help to limit the impact of freight traffic on the local highway network. The LTP intends to review the potential access for rail freight to be increased.

8.94 Restrictions on freight delivery as set out in the LTP policy will be monitored through the Development Management process. There are numerous benefits to be gained from efficient freight deliveries, not only in terms of the convenience to people's lives and the business community, but also in regard to an urban environment in which streets not only carry traffic but are also perceived as attractive places to be.

8.95 Benefits such as shorter driving distances and driving times that contribute to reducing noise and vehicle emissions are also important. By delivering freight within specific time frames and to staffed freight reception areas, distribution can be facilitated for both suppliers and end customers. In addition, efficient freight deliveries facilitate the daily lives of the general public in terms of enhanced mobility for other high-capacity transport modes such as public transportation.

8.96 The Marches Local Enterprise Partnership has commissioned consultants to produce a freight strategy for the Marches which includes Herefordshire. Once complete the strategy will be utilised to establish a plan to help freight, and those affected by its movement in Herefordshire and will inform the development of the Hereford Area Plan.

#### Questions

Q16: How can access to the railway station be improved?

- Q17: Could the current city car parks be used more effectively or improved? If yes, how?
- Q18: Is there a need for more parking to be identified? If yes, what form should it take? Multi-storey provision Park and choose provision Other
- Q19: 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?
- Q20: Can you suggest better ways to manage freight transportation throughout the city?

# 9. Economic Prosperity

#### Jobs

9.1 Hereford provides a significant focus for employment provision in the county. Proposals such as city centre regeneration and the development of employment sites as elements of strategic urban extensions will provide new opportunities for job creation during the plan period. The Core Strategy sets out broad targets for the provision of new employment land in the county for the plan period up to 2031.

9.2 Core Strategy policy SS5 sets out the broader targets for employment growth in the county, with around 15ha of new employment land to be delivered during the plan period (2011-2031) in Hereford. Policy HD7 sets out in greater detail the employment targets for Hereford. It aims to retain Hereford's role as the main focus for employment provision in the county. It sets out to deliver this through the expansion of the city centre, with new office provision, continuing development of land at the Hereford Enterprise Zone at Rotherwas, encouraging small scale knowledge based industry, and new employment provision on the strategic urban extension sites.

9.3 The 15ha of new employment provision is directed by the Core Strategy to the Western and Southern Urban Expansion Areas, as set out in policy HD1. The majority of the growth, a minimum of 10ha, is to be provided at the Western Urban Expansion at Three Elms, detailed in policy HD5. This is to be delivered alongside a minimum of 1,000 new homes. The new employment land is to be located near to the new livestock market, with access to the Hereford Relief Road and the Roman Road. It is to comprise a mixture of use classes, predominantly B1, B2 and B8. The Western Urban Expansion site at Three Elms is currently the subject of an outline planning application comprising up to 1,200 dwellings, to include an employment development comprising a mix of B1/B2/B8 use classes.

9.4 A further 5ha of employment land is to be provided at the southern urban expansion at Lower Bullingham, detailed in policy HD6. This is to be delivered with a minimum of 1,000 new homes. It will comprise a mix of use classes B1, B2 and B8 and is included within the Hereford Enterprise Zone (HEZ) boundary at Rotherwas.

9.5 The Enterprise Zone is intended to become a catalyst for enhanced economic growth throughout the Marches with the creation of highly skilled jobs and encouragement of overseas investment into the area. The aspiration of the HEZ Board is to develop part of the site into a centre of excellence for the defence and security sector, with additional employment hubs focused on advanced technologies, environmental technologies and food and drink technologies.

9.6 The EZ is covered by a Local Development Order (LDO) which means that certain forms of development in the defined area is permitted without the requirement for individual planning applications where proposals accord with the aspirations for the Zone. Proposals of this type are also exempt from planning obligations and charges.

9.7 This is designed to incentivise businesses to locate here, by removing the more costly and time-consuming aspects of the ordinary planning application process. It provides some certainty, reduces development costs, and streamlines the process. This aims to make the area more attractive to potential investors.

9.8 Core Strategy policy E2 sets out to ensure that the best quality employment land in the county is safeguarded from redevelopment to other uses. Redevelopment proposals on employment land of a moderate quality for other non-employment uses are subject to specific criteria. Any such development would have to not lead to an overall shortage of employment land supply, result in a net improvement in amenity in the area, and would not result in a piecemeal loss of employment land where there is potential for a more comprehensive scheme.

9.9 The *Employment Land Study (2012)*<sup>17</sup> formed part of the evidence base for the employment policies of the Core Strategy. At the time of publication, it concluded that demand for warehouse and manufacturing-based employment premises were greater in the area north of the River Wye than that of the south, particularly for trade counter premises.

9.10 The Employment Land Study also recommended an approach to the safeguarding of employment land which was used to develop Core Strategy policy E2. This policy safeguards employment land rated "best" and "good" from redevelopment to non-employment uses but provides some flexibility for other uses to be permitted for land rated "moderate" or "poor". Generally, employment uses have been considered to be those which fall within the categories of general industrial, light industrial or warehousing type uses. There has been some demand however for other uses that require larger buildings to locate on employment land, for example, private gyms and other leisure uses. The Hereford Area Plan could consider whether more flexibility in the type of uses considered to be suitable to locate on land designated for employment uses.

9.11 More recently a new *Economic Vision*<sup>18</sup> has been approved by Herefordshire Council which sets out how economic growth can be delivered over the period up to 2031. The vision identifies investment opportunities which have land use planning implications and a role of the Hereford Area Plan will be to aid the delivery such projects. The 10 hectare North Magazine on the EZ is identified as a prime development site which will be developed in accordance with the design guide.

9.12 In terms of office provision, the Economic Vision has included an aspiration to deliver a new "Business Quarter" in the centre of Hereford in the Gaol Street area, comprising high quality B1 office buildings that could deliver approximately 25,000 square metres of new office space. Anecdotal evidence has suggested that there is an increasing demand for office space in Hereford.

# Key Issues

- How to improve the quality and diversity of employment buildings on offer in Hereford
- How to improve the quality of office space in the city centre
- Indications of low demand for employment land and whether there is a need for any more to be identified
- The possibility of enabling redevelopment of lower quality employment land for appropriate alternative uses
- The requirement to balance the new housing growth with creating new employment opportunities
- Delivering the employment element of the southern urban expansion (Lower Bullingham)

<sup>&</sup>lt;sup>17</sup> <u>https://www.herefordshire.gov.uk/downloads/file/1604/employment\_land\_study\_2012</u>

<sup>&</sup>lt;sup>18</sup> <u>http://councillors.herefordshire.gov.uk/documents/s50042018/Appendix%201%20-</u>

<sup>%20</sup>Economic%20Development%20Strategy.pdf

#### Questions

- Q21: Should the Hereford Area Plan identify more land for new employment development? If yes, what type of development e.g. offices, manufacturing?
- Q22: Should the Hereford Area Plan aim to broaden the local economy by supporting a wider range of employment types? If yes, what types would you suggest?
- Q23: Should the Hereford Area Plan allow for a broader range of activities on existing employment sites of poorer quality?
   If yes, what would be considered an appropriate alternative use? E.g. Sport and leisure facilities.

### City centre and retail

9.13 Hereford is the principal shopping centre within the county. In recent years the opening of the Old Market shopping centre in 2014 increased the retail and leisure offering of Hereford, adding to the mix of national chain stores and independent traders. It has served to strengthen Hereford's role as a principal centre, providing economic benefits and reducing unsustainable travel and retail expenditure leakage to other cities such as Worcester, Cheltenham, Bristol and Cardiff. There remains the potential for an additional phase of retail development at the Old Market. The Hereford Area Plan now provides an opportunity to consider how the city centre should be further developed in the plan period up to 2031.

9.14 Policy HD2 of the Core Strategy sets out broader proposals for the growth, improvements and land uses within Hereford city centre. In order to maintain vitality and viability, it focusses new retail uses to the core of the city centre, as is defined on the saved Hereford City map from the former Herefordshire Unitary Development Plan (UDP). The boundary was first defined more than ten years ago and the preparation of the *Hereford Area Plan* provides an opportunity to undertake a review in order to reassess the extent of the boundary. National planning policy in respect of town centres indicates a positive approach should be taken with the definition of town centres and primary shopping area being based upon a clear definition of primary and secondary frontages.

9.15 Core Strategy policy E6 sets criteria for safeguarding primary and secondary shopping frontages. This approach ensures that primary frontages continue to be dominated by class A1 retail uses, and secondary frontages possibly including a greater mix of uses. As with the town centre defined area, primary and secondary frontages in the Core Strategy have been saved from the Herefordshire UDP. The preparation of the Hereford Area Plan provides the opportunity for a comprehensive review of these areas.

9.16 Policy HD2 also indicates that any identified need for further new retail provision will be met in regeneration zones at Eign Gate and the part of the Edgar Street Regeneration Area lying within the defined city centre. This reflects evidence in the Town Centres Study Update which concluded that there would be no need to identify any new retail development sites for allocation within the city, and no identified need for any out of town retail proposals, as there were already opportunities identified for retail development in the city centre, particularly within the Eign Street Regeneration Area. 9.17 The Herefordshire Economic Vision (2016) identifies a 2.2ha area at Berrington Street/Aubrey Street for a potential mixed use regeneration scheme, which could include a small retail element focused on niche and small scale retailers. The intention of this is not only to serve the resident population, but for it to become a destination for visitors in itself.

9.18 Proposals for retail provision outside of the city centre is limited, by Core Strategy policy E5, to those that can pass the requirements of a sequential test and can demonstrate that any development would not have a significant adverse impact on the vitality and viability of the city. This approach continues to be consistent with national planning policy.

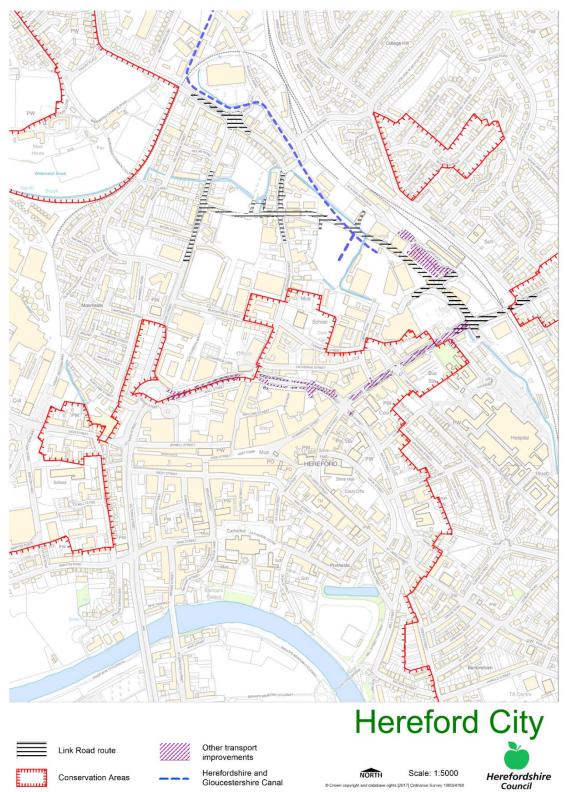
9.19 Vacant and under-used space on upper floors of buildings in town and city centres are a potential source of housing supply. Government says: *"We must make as much use as possible of previously-developed ('brownfield') land for homes – so that this resource is put to productive use, to support the regeneration of our cities...to support economic growth and to limit the pressure on the countryside" Fixing Our Broken Housing Market*, DCLG (2017). It also emphasises, through its planning policy guidance, that local planning authorities should recognise that residential development can play an important role in ensuring the vitality of town centres and that policies encouraging residential uses in appropriate areas should be developed (*National Planning Policy Framework 2012 para. 23*).

9.20 There are many benefits to promoting the provision of housing within upper floors of town centre properties within Hereford's commercial and retail centre:

- the range of services and facilities close by and easily accessible
- encouraging people to walk and cycle more
- increasing the vitality of the city centre after shopping hours and broadening its role from mainly daytime shopping and business
- helping to maintain the fabric of buildings
- making the best and most efficient use of vacant and underused spaces
- boosting the local economy through increasing footfall and general activity in the town centre
- achieving building security
- proper maintenance of buildings

9.21 To this end, the Core Strategy encourages the retention and expansion of homes within the city centre and more specifically through the use of upper floors within town centres. Policies HD2 (Hereford City Centre) and E5 (Town centres) refer to this issue.

Figure 5: Hereford City Centre



## **Key Issues**

- Any requirement to identify more land for retail development
- The need to review the central shopping and commercial area, and the primary and secondary frontages

- Ensuring that any new retail development within the city does not have an adverse impact upon the vitality and viability of the city centre
- How to enhance the Hereford shopping experience
- The potential need to offer flexibility for different types of uses in underutilised shop spaces the city centre
- Increasing the use of upper-floors of town centre buildings for housing.

#### Questions

# Q24: Should the Hereford Area Plan identify land for further new retail development?

Q25: Should the Hereford Area Plan define the key shopping streets and keep them mainly for retail uses?

Q26: Should the Hereford Area Plan allow for different uses where suitable in underutilised areas of the city centre?

Q27: Should the Hereford Area Plan offer additional policy to encourage use of the upper floors in the town centre for residential use?

# Q28: Is additional policy required for retail development proposals outside the city centre?

#### **New University**

9.22 Herefordshire Council's Economic Vision identifies Herefordshire as being a great place to learn. A key aim of the vision is to *increase the range of higher education provision and improving the balance between business demand and the supply of skills and qualifications*. Within Hereford over the timescale of the Hereford Area Plan this will mean:

- The provision of additional teaching space and student accommodation for existing higher education colleges to help attract students to courses from outside the county.
- A new Hereford University in Hereford based on a 'New Model in Technology and Engineering' referred to as 'NMiTE'.

9.23 Of these two proposals the new university is likely to have the greatest impact on the future of Hereford. Whilst the Hereford Area Plan may identify sites for the expansion of the existing higher education provision it will be appropriate for the Hereford Area Plan to address the land use planning implications of the University in greater detail. However there may be potential to have shared facilities between existing and new further education providers in the city and this is something that should be explored.

# What does the Core Strategy say about a new university?

9.24 At the time of adoption of the Core Strategy, the ambition to create a university in Hereford was in its very early stages. However the principal of a new university, along with other higher education facilities, is fully supported by policy SC1, Social and Community Facilities. The final part of this policy states that:

"The provision or improvement of higher education facilities and the continuing enhancement of existing or provision of new, training and skills facilities will be actively promoted."

# The University proposal

9.25 The development of a university in Hereford will make a difference to the city over the timescale of the Hereford Area Plan, not only in relation to new university buildings but also to the profile of the city both regionally and nationally. Its development will be incremental with a relatively small numbers of students starting courses in 2019, growing to approximately a thousand students by 2021. It is anticipated that by 2031, the end date of Hereford Area Plan, there will be 5,000 students studying in Hereford. Therefore the Hereford Area Plan will need to address how and where university development will take place and include policies to ensure that the positive impacts of a university are maximised.

9.26 The aspiration is for both the university and Hereford to become the engineering centre of excellence for West Midlands whilst at the same time addressing the shortage of graduate engineers both locally and nationally. State of the art buildings are proposed that reflect the NMiTE ethos of a pioneering approach to higher education.

9.27 The proposed degree courses offered by the university will focus on engineering and there will be close collaboration with Herefordshire industry to enable students to achieve a significant proportion of their learning through hands on work experience. Local industries will benefit from their association with the University and research projects.

9.28 The Economic Vision supports the principle of a new university and recognises its presence will help to raise the city's profile and provide opportunities for a range of services, aimed directly or partially at the student market. Being a university city will provide many opportunities for positive change over the life time of the Hereford Area Plan. The list below identifies some potential positive outcomes that should be achieved in or explored further for Hereford:

- Increasing spending in the local economy.
- More employment opportunities for teaching, administrative and a range of support staff.
- Increased demand for local businesses to supply goods and services.
- Improved public realm that is the pedestrianised areas, shared spaces, streets, pathways, parks, and public and civic buildings
- Opportunities to encourage sustainable travel movements with emphasis on cycling and walking.
- Growth in the arts and cultural sector
- Opportunities for joint university and public facilities
- Retaining young people and improving the skills base in the county.

9.29 In relation to development, a number of new or refurbished existing buildings will be required to provide teaching and administration space and student accommodation for the new university. The Hereford Area Plan will need to identify the best locations for these. The following outlines the aspirations of the NMiTE team for how the university will develop:

- The university team propose a number of individual college buildings which include both teaching space and student accommodation.
- It is anticipated that students will live in university accommodation for the duration of their degree courses. This will reduce the pressure on the existing housing stock in the city that may otherwise occur.
- Small scale retail and catering facilities may also be included in the individual college buildings.

- Some of these college buildings may be grouped together to form a campus style development or they may be sited in different locations around the city depending on land availability.
- University headquarters will also be required in a dedicated building.
- A laboratory and workshop space at the Rotherwas Enterprise Zone is key to achieving collaborating with industry and achieving real world experience for students.
- The number of individual buildings required will depend on the size of sites or the opportunity to refurbish existing buildings.
- Maximise any opportunities for shared public facilities to achieve good integration amongst students, residents and visitors to the city.

9.30 The location of the university colleges will depend on the availability of land and buildings and has to be considered in the context of other land use requirements for the development of housing and land for public services e.g. relocated police and fire stations. A challenge for the Hereford Area Plan is how Hereford can accommodate the demands for land for different uses. This could partially be addressed by shared facilities/ buildings to achieve a more efficient use of land. Similarly a more 'dispersed' approach to the location of university buildings around the city may be more achievable and could provide greater potential for a better mix of university and other land uses within the city.

# Encouraging active travel amongst students

9.31 With up to five thousand students based in the city by 2031 it is essential that the impacts of their movement around the city and between different parts of the university on the transport network is minimised. The Herefordshire Local Transport Plan (2016 -2031) identifies the university proposals as an opportunity to help create demands for sustainable modes and one of its objectives is to encourage active travel behaviour amongst its students. The Hereford Transport Package looking to bring forward measures to encourage cycling as the main mode of transport between Rotherwas and the city via the New Bridge over the Wye. Students are likely to be discouraged from having cars and it is understood that the university is considering a no car policy for students. Therefore the university buildings should only have a limited number of parking spaces for staff and people with disabilities to discourage car travel.

# Questions

- Q29: Which parts of the city could best accommodate university buildings and facilities either through conversion of existing building or new buildings?
- Q30: What opportunities are there for university facilities to be shared with the public and/or the wider community e.g. shared conference facilities?
- Q31: 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? If yes, please explain?

# Tourism and leisure

9.32 The Core Strategy recognises the importance of Hereford for the county's leisure and tourism offer and the contribution this makes to the county's economy. As a tourist destination Hereford offers many attractions for visitors and is a good base for exploring the rest of the county. Specific reference is made to the importance of tourism in Core Strategy objectives though developing the county as a destination for quality leisure visits and sustainable tourism by providing improved tourism infrastructure in appropriate locations.

9.33 Hereford has a range of leisure, tourism and entertainment opportunities which have recently been expanded with the development of the Old Market shopping and leisure area which has good links to the city centre. The Hereford Area Plan will need to consider how the current offer for leisure and tourism can be enhanced and expanded for the benefit of the county's residents, visitors and economy.

9.34 Over the life of the Hereford Area Plan, the profile of Hereford will be raised with the various developments proposed such as the university, which will inevitably encourage more visitors to the city. Additionally, Hereford is currently bidding to become the City of Culture in 2021. If successful, the designation would be an opportunity to use arts and culture as a catalyst for economic and social regeneration. It would have a big impact on Hereford and the county; raising both the national and international profile of the area and resulting in a large number of additional visitors. The winning city will be announced in December 2017.

9.35 The role of the Hereford Area Plan is to ensure that the development is in place to support and respond to the increased visitor numbers and to facilitate the provision of additional leisure facilities which will benefit both residents and visitors. This Issues and Options Consultation identifies three broad issues for consideration under leisure and tourism: hotel development, increased use of the River Wye area and the restoration of the Herefordshire and Gloucestershire Canal.

# Hotel development:

9.36 It is particularly important that there is sufficient availability and range of hotel accommodation to meet the likely increased demand for overnight stays in the city, which will have follow-on benefits to its economy. Policy E4 of the Core Strategy recognises the need to retain and enhance existing and encourage new accommodation and attractions throughout the county to help diversify the tourist provision, extend the tourist season and increase the number of visitors staying overnight. In particular it encourages proposals for new hotels in Hereford. Policy E5 identifies town centres to be the focus for retail, commercial, leisure, cultural and tourism uses. Proposals for leisure use outside the town centres will be subject to an impact assessment of the effect of the vitality and viability of the town centre.

9.37 The 2012 the *Marches Hotel Study*<sup>19</sup> found that the branded budget hotel sector was well represented in Hereford. It identified possible options for hotel development and expansion but some of these possibilities have been superseded by other developments. More recently the *Economic Vision* puts forward two broad proposals in relation to hotel development in Hereford:

<sup>&</sup>lt;sup>19</sup> https://www.herefordshire.gov.uk/media/5530254/Marches Hotel Study.pdf

- Business hotel and sports/ leisure complex at Hereford Racecourse together with an enhanced range of commercial activity. The area could become "sporting village" with facilities for a range of outdoor and indoor sporting activities, alongside a commercial presence that offers high quality hotel accommodation and conferencing facilities.
- Potential hotel development with enhanced conferencing and hospitality amenities at Hereford football ground at Edgar Street.

# Making better use of the River Wye

9.38 Policy E4 (Tourism) of the Core Strategy refers to capitalising on the county's assets including its rivers subject to there being no detrimental impact on natural and heritage assets or on the overall character and quality of the environment The Council's Economic Vision recognises that there is potential for greater use of, and access to, the River Wye in Hereford. Currently access to the river is limited and there are few premises with river frontages. The links between the city centre and river could also be improved. The vision also identifies significant potential to improve the environment, facilities and capacity for outdoor events and river based leisure activities. Alongside this, the vison suggests there could be a small scale complementary food, drink and retail offer whilst Hereford Rowing Club will also have the opportunity to redevelop their boathouse and riverside access facilities.

9.39 However all such proposals are likely to be required to be subject to an assessment of the impact on the river in relation to its nature conservation designation. Flood risk will also be a major issue that will need to be taken into consideration.

# Herefordshire and Gloucestershire Canal

9.40 Policy E4 of the Core Strategy includes safeguards for the historic route of the Herefordshire and Gloucestershire Canal together with its infrastructure buildings, towpath and features. The route of the canal comes into the north eastern part of the Hereford Area Plan area and some restoration work has been carried out in the Aylestone Park area. Policy HD2 of the core strategy encourages the provision of a canal basin with associated wharfage and visitor centre. The Core Strategy recognises the potential tourism and economic benefits that could be realised through the restoration project.

# Questions

- Q32: Should additional hotel and/or conference facilities be provided in Hereford? If yes, where?
- Q33: Could better use be made of the River Wye as a tourist attraction and for leisure activities whilst protecting its special qualities? If yes, how?
- Q34: Is there a need for any additional policy relating to the restoration of the Canal? If so, what issues should be covered by that policy?
- Q35: Are there any opportunities to provide new or expanded leisure facilities that should be considered or identified by the Hereford Area Plan? If yes, what?

# 10. Environmental Quality

#### **Natural Environment**

10.1 The Core Strategy sets out, in its objectives and policies, a context to help develop the approach to be taken through the Hereford Area Plan. For example, objective 10 of the Core Strategy sets out to deliver well-designed places, spaces and buildings supported by the necessary infrastructure including green infrastructure to achieve sustainable communities and protect the environment. Objective 11 seeks to ensure that new development: conserves natural resources; does not increase flood risk; increases the use of renewable energy, minimises waste and pollution; manages water supply; and conserves and protects biodiversity and geodiversity in order to address climate change.

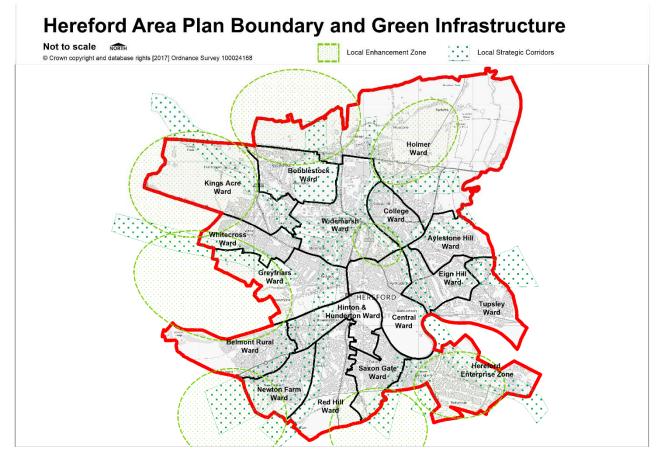
10.2 The quality of Hereford's environment, as well as being important for its own sake, is also crucial to the social, economic, and health well-being of the city. Individual green areas, open space and landscape elements, and their unique characteristics contribute to the wider green infrastructure and a setting for the built environment. The protection, enhancement and extension of the city's green infrastructure will have wide ranging positive for both local communities and wildlife. Hereford, as the main urban area of the county, is the focus for strategic development, therefore consideration needs to be given to how this development can be accommodated without compromising the biodiversity of the city and the surrounding area and how development can be designed in such a way to maximise opportunities for environmental protection and enhancement.

10.3 Hereford has an extensive network of open space which forms an important part of the city's green Infrastructure network. Green infrastructure performs a variety of functions including the conservation and enhancement of biodiversity, as well as providing space for informal and formal recreation. Its connecting corridors can also be used as key active travel routes across the county, thus resulting in further environmental wins in terms of reducing pollution from car traffic and contributing to more healthy life styles. Green infrastructure also helps reduce flood risk by helping slow down the rate of rainwater runoff.

10.4 The retention, improvement and management of green infrastructure across the city has been a priority for the council since the publication of the *Green Infrastructure Strategy in 2010*<sup>20</sup>. This identifies a number of Local Strategic Corridors and Local Enhancement Zones in and around Hereford which are shown on Figure 6. Policy LD3 of the Core Strategy sets out the requirements from development in relation to the green infrastructure network in the county. The Hereford Area Plan provides the opportunity to expand on this in more detail by identifying any areas where improvements are needed and how new development can contribute to further expansion of the network. It is vital that all new development is designed in such a way as to ensure connectivity and enhancement of the network.

<sup>&</sup>lt;sup>20</sup> https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/local-plan-evidence-base/green-infrastructure-strategy-2010-and-study-2008

# Figure 6 Green Infrastructure



10.5 The components of the green infrastructure network are also important as individual assets for landscape, recreational and wildlife value. There are numerous sites in the *Hereford Area Plan* which are protected by either international, national or local nature conservation designations. The development proposals set out in the *Hereford Area Plan* will have careful regard to these assets to ensure that they continue to be protected.

10.6 The Hereford Area Plan covers areas outside the city centre, the majority of which is currently farmland. Some of these areas will be developed as either strategic urban extensions or for the bypass as set out by Core Strategy policies. It is important that the consideration of both green infrastructure and individual assets is an integral part of the masterplanning of these developments. Opportunities for incorporating measures to support and promote biodiversity should be maximised. The strategic urban extensions to the north, west and south of the city are required by the relevant policies of the Core Strategy and the relevant neighbourhood plans to be sensitively integrated into the existing urban fabric and the wider landscape. An *Urban Fringe Sensitivity Analysis*<sup>21</sup> was produced in 2010 and this concluded that much of the landscape on the fringes of Hereford is of high value. All development on the outskirts of the city needs to respond to the existing landscape and allow for its enhancement through development whilst also protecting those areas at greatest risk.

<sup>&</sup>lt;sup>21</sup> <u>https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/local-plan-evidence-base/urban-fringe-sensitivity-analysis</u>

10.7 Of key significance in Hereford is the River Wye which is designated as a Special Area of Conservation (SAC, a European designation) and as a site of Special Scientific Interest (a national designation). The river provides a breeding and feeding ground and habitat for many species of invertebrates, fish birds and mammals. Although the river is a dominant feature in the cityscape, there could be potential for more use of the river to be made for leisure and tourism purposes. The Council's *Economic Vision* identifies a 'River Quarter' as one of its investment opportunities. This would involve opening up access to the river and the development of new facilities for outdoor events and river based leisure activities to the west of the A49. Any such development proposals that could affect the conservation status of the SAC would be subject to a Habitats Regulations Assessment as well as a detailed flood risk assessment. Close regard will also be had to the Nutrient Management Plan prepared by the Environment Agency and Natural England which will control and reduce phosphate within the River Wye SAC.

10.8 The north western area of the Lugg Meadows is within the Hereford Area Plan boundary. The meadows are designated as an SSSI because of its characteristic flora resulting from a historic approach to grazing. Consequently it is one of the few examples of this type of meadow in this part of Britain. The Economic Vision includes proposals to make this area more accessible to the public as well as suggesting the sympathetic development of overnight accommodation.

# Air quality and light pollution

10.9 Hereford city has an area designated as an Air Quality Management Area (AQMA). Improvements to the air quality have been made over recent years as a result of various transport initiatives. However there is still further progress to be made. Proposals within the *Hereford Transport Plan* consultation set out how the amount of car use in the city centre could be reduced and these measures will result in further improvements to air quality. Whilst various traffic management issues are outside the scope of the *Hereford Area Plan*, the location, design and supporting infrastructure of new development is key to making cycling, walking and public transport a more realistic alternative to car travel. Energy efficient design will also help reduce energy costs.

10.10 Changes in street lighting in Hereford have resulted in less light pollution over the recent years. It is important that this approach is continued in new developments in order not to waste energy and to achieve darker skies but whilst ensuring that lighting levels are suitable for security and addressing fear of crime issues.

10.11 The measures identified in the Hereford Transport Plan and planning policies in the Core Strategy and Hereford Area Plan will help to create better local environmental conditions reducing pollution from car use. This will also help to combat climate change and reduce use of non-renewable energy sources. Planning policies can further influence these factors through the energy efficiency of buildings and the Hereford Area Plan provides the opportunity to further develop the sustainable design policies of the Core Strategy accordingly. The council has recently been awarded government funding to carry out a feasibility study for a district heat network in Hereford city, which would represent a significant step in the transition to a low carbon future. The outcome of this feasibility study will be taken into account as the Hereford Area Plan moves towards the next stages of the plan making process. Development should also be designed in such a way that means it is resilient to, and can adapt to, the effects of climate change.

10.12 River and surface water flooding have been an issue within Hereford. The Yazor Brook flood alleviation scheme was built to enable the development of the Old Market and to help reduce

flood risk to properties downstream. All new development will have to be carefully assessed to ensure that the requirements of Core Strategy policy SD3 are met. This includes development taking into account the lifetime of the development by setting appropriate floor levels and flood storage compensation measures being provided when appropriate. Development should not result in an increase in surface water run-off.

# Questions

- Q36: Are there ways green infrastructure could be improved? If yes, how?
- Q37: Are there any areas that require better connectivity of wildlife corridors? If yes, where?

- Q39: Can we achieve greater access to, and use of, the river whilst respecting its special qualities? If yes, how?
- Q40: Should the *Hereford Area Plan* include a policy that relates to how land use affects pollution? If yes, what issues should the policy cover?

# Q41: Should the Hereford Area Plan address the issue of climate change? Y/N

#### **Built Environment**

10.13 Hereford is fortunate to have a wealth of historic buildings, streetscapes, and archaeological remains, which are viewed as a valuable asset to the city by residents and visitors alike. It is important that these are protected and, where appropriate, enhanced as the city grows and changes over time.

10.14 National planning policy encourages local plans to set out a positive strategy for the conservation and enjoyment of the historic environment. This includes managing positive change affecting heritage assets, including better revealing and enhancing their significance, adaption to new uses and retaining and repairing buildings, structures and places. A positive strategy can diversify and enhance Hereford's building stock to meet the needs of a range of occupiers for different types of retail/office accommodation, as well as enhancing the character of the city's townscape for residents, workers and visitors. National Planning Practice Guidance indicates that the inclusion of information about non-designated assets in local plans can be helpful. The Hereford Area Plan provides an opportunity to potentially identify such assets within the city.

10.15 The Core Strategy has objectives and policies that seek to preserve and enhance heritage assets. Policy SS6 sets objectives and criteria for safeguarding the environment and local distinctiveness. It requires development proposals to be shaped through an integrated approach to planning their environmental components from the outset. In doing this, the proposal's effect on

Q38: Should the Hereford Area Plan include specific policies to protect the landscape and environmental qualities of the city? If yes, what should these policies include?

landscape, townscape, local distinctiveness, historic environment, and heritage assets need to be taken into consideration.

10.16 Policy LD1 sets out criteria to ensure that all development proposals respect their surrounding land and townscape. It must be demonstrated how the character of the townscape has positively influenced the proposal's characteristics such as design, scale, and site selection. It must also demonstrate how it conserves and enhances the historic character of conservation areas, through protection and enabling appropriate uses and high quality design.

10.17 Policy LD4 sets criteria more specifically for development proposals that would affect heritage assets and the wider historic environment. It requires such development to protect heritage assets and their settings through appropriate design, management and uses. Where opportunities exist to contribute to the character and local distinctiveness of the area, make sustainable use of or repair heritage assets to provide a focus for regeneration schemes, or improve the understanding of and public access to heritage assets, these should be utilised by such proposals.

10.18 Specifically to Hereford, policy HD2 sets out proposals and criteria for development in the city centre. It includes a requirement for new developments (including changes of use) to *"enable the protection, conservation and enhancement of Hereford's heritage assets, their significance and setting, including archaeology, with particular regard to the historic street patterns and the skyline."* 

10.19 The objectives and proposals of the Core Strategy's policy relating to the protection of Hereford's heritage assets are underpinned by a number of evidence base studies. These include the *Hereford Rapid Townscape Assessment 2010*<sup>22</sup>, *A Characterisation of the Historic Townscape of Central Hereford 2010*<sup>23</sup> and the guidance contained in the *Hereford Town Centre: Streetscape Design Strategy 2009*<sup>24</sup>.

10.20 The *Characterisation of* the Historic Townscape of Central Hereford includes specific detail about local character and distinctiveness, those individual historic assets contributing to it, and the relative significance of those assets in relation to the historic environment as a whole. The study also provides key background information and an evidence base for planning policies by identifying both positive and negative existing townscape and landscape elements and opportunities for future enhancement.

10.21 Opportunities have been identified to enhance the setting of specific heritage assets within the city. Namely, some examples include the City Wall and the Blackfriars Friary. The archaeological importance of Hereford city was recognised by the designation in 1983 of a large part of the central area as an Area of Archaeological Importance (AAI).

10.22 Planning authorities have a duty to assess their conservation areas and review them from time to time to consider whether areas are suitable for designation, or to remain designated. The designation of conservation areas is undertaken outside of the local plan

<sup>&</sup>lt;sup>22</sup> <u>https://www.herefordshire.gov.uk/downloads/download/107/rapid\_townscape\_assessments\_2010</u>
<sup>23</sup>

http://www.herefordshire.gov.uk/downloads/file/1640/historic townscape of central hereford report march 2010 <sup>24</sup> https://www.herefordshire.gov.uk/downloads/file/2262/streetscape design strategy for hereford 2009

process. However the Hereford Area Plan could set out the criteria that would be taken into account in considering any review of existing conservation areas or in the designation of new areas.

10.23 In addition, the Hereford Area Plan could establish more detailed and specific policies than the strategic policies contained within the Core Strategy to ensure that the historic environment is conserved and enhanced and that new development should make a positive contribution to local character and distinctiveness.

10.24 It is essential that the Hereford Area Plan integrates the historic attributes of the city centre with the areas and activities which attract the greatest number of people to the town centre, and to use the historic elements as an enticement to draw visitors in. The historic environment and heritage assets should be seen as an opportunity to contribute to sustainable development and economic growth that should be embraced, rather than be viewed as a constraint to overcome.

10.25 Much work has already taken place on enhancement of the historic city centre, with public realm improvements to Widemarsh Street. There are further plans for improvements with the refurbishment of High Town, and plans to unite the city's travel routes through planting and transport improvements at Commercial Road.

#### Issues

- The potential for adding to and improving the quality of areas within the city
- Development of policies that support specific methods of delivering high quality design
- How to best utilise Hereford's heritage assets for economic growth without causing damage to them
- The need to consider a review of existing conservation areas and their boundaries and whether new conservation areas should be defined.

# Questions

- Q42: Do you think more specific and detailed policies for the historic environment and heritage assets in addition to those in the Core Strategy are required in the Hereford Area Plan? If yes, please explain
- Q43: Do you think that specific policies are required to achieve high quality design in locations where planning proposals could impact upon heritage assets?
- Q44: Should the plan include guidelines to be used when existing conservation areas are being reviewed or new ones designated?
- Q45: Are there additional issues or options which the *Hereford Area Plan* could look to address or do you have any other comments upon the contents of the document?

# 11. Where we are in the process

11.1 Work upon issues and options for the Hereford Area Plan was undertaken in 2009 and 2010. However with the adoption of the Core Strategy and with the emergence of significant new projects for the city it is appropriate to undertake a new process of engagement regarding the issues and options that are relevant for inclusion within the Hereford Area Plan.

11.2 Following the initial consultation on the issues and options highlighted in this document, comments received will be considered and further evidence gathered to help provide a draft plan or series of preferred options.

11.3 The preferred options will also be subject to consultation before the publication of a plan which will be submitted to the Secretary of State for Independent Examination into the soundness of the plan.

# 12. How to comment:

12.1 Your views are important to us to help to shape the future of Hereford. Each section of this paper has a number of questions and a questionnaire is available at www.herefordshire.gov.uk/herefordconsultation Please complete the questions and submit your response.

12.2 Alternatively you can view all the information you need and collect a questionnaire from information centres and libraries across the county.

12.3 Your completed form can be returned in the following ways:

- by email herefordconsultation@balfourbeatty.com
- by post FREEPOST:RTHL-BBZH-JATH (Hereford Consultation) Balfour Beatty Living Places Unit 3, Thorn Business Park Rotherwas Hereford HR2 6JT
- 12.4 Please complete and return the questionnaire by 22<sup>nd</sup> May 2017

12.5 The comments you provide will help inform the next stage of the Hereford Area Plan, the preferred options.

12.6 If you require more information or require it in a different format or language, please contact us on 01432 260386

# Appendix 1 – Strategic policies of Herefordshire Local Plan – Core Strategy related to Hereford

# Policy HD1- Hereford

Hereford will accommodate a minimum of 6,500 new homes within the plan period and a minimum of 15 ha of new employment land.

Major residential development will take place in the following locations:

- 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)

The remaining housing requirement of around 3,200 dwellings will be provided through the implementation of existing commitments, windfall development and the development of non-strategic sites allocated through the production of the Hereford Area Plan or Neighbourhood Development Plans.

Major employment development will take place in the following locations:

- 10ha of employment land at the Western Urban Expansion area
- Around 5ha of employment land at the Southern Urban Expansion area.

Further employment land provision will be made in accordance with Policy HD7.

# Policy HD2 – Hereford city centre

The city centre will accommodate around 800 new homes the majority, to be located within a new urban village. Further residential development will take place through the implementation of existing commitments, re-development of existing brownfield sites, re-use of upper floors above commercial premises, infill development and site allocations through the Hereford Area Plan. A target of 35% of these new homes will be mixed tenure affordable with a density that is compatible with the sustainable urban location of the site.

The urban village will be served by safe and attractive pedestrian and cycle links to other areas of the city, the new transport interchange, the Courtyard Arts Centre and nearby areas of green space. A new Link Road will also serve development parcels forming part of the urban village connecting Edgar Street to the west and Commercial Road to the east (with a spur linking Blackfriars Street to the south), as well as assisting in reducing traffic within the core of the city.

Newmarket Street, Blueschool Street and Commercial Square will be re-designed to become safe and attractive routes for pedestrian and cyclists, with improved public transport facilities and enhanced connectivity between the historic city centre and regeneration area partly facilitated by the construction of the new link road.

# Policy HD2 cont/d

The urban village will be complemented by other uses and infrastructure forming part of the wider regeneration area creating a sustainable mixed use development which respects and where possible enhances the historic environment. These include the following:

- land and contributions towards a canal basin forming the terminus of the Herefordshire & Gloucestershire
- Canal, which is being delivered by the Hereford & Gloucester Canal Trust;
- each stage of development which adjoins Widemarsh Brook will maximise opportunities for enhanced for biodiversity, to provide flood relief and sustainable surface water drainage solutions and optimised as a green infrastructure link;
- Herefordshire Council in partnership with public transport operators will deliver an integrated transport interchange close to the railway station to maximise opportunities for sustainable travel;
- opportunities for new commercial, tourism, education (including tertiary facilities), leisure, health, civic and police and fire uses will be available to meet any identified need;
- Herefordshire Council will work with the tenant(s) of Edgar Street football stadium to explore opportunities for a sports led mixed-use redevelopment and new public car parking facilities

In order to maintain and enhance the viability and vitality of the city centre, new retail uses will be focused to the core of the city centre as defined below. Any identified need for further major retail development over the plan period will be met within the Eign Gate and that part of the Edgar Street regeneration area which lies within the defined town centre, including the Old Market, along Blueschool Street and through the refurbishment and re-development of the Buttermarket.

Within Hereford city centre, new developments including changes of use will be approved where they:

- provide new commercial and office space in appropriate city centre locations including above existing retail and commercial premises;
- maintain and enhance the vitality and viability of the city centre. Proposals for town centre uses outside the defined town centre will be subject to the sequential test and applications for development over 700m<sup>2</sup> gross floor space will require an impact assessment to determine whether there could be any adverse impacts on the town centre;
- improve overall accessibility by walking, cycling and public transport;
- provide new, or enhanced sport, recreation and leisure facilities for local residents and visitors;
- provide new and improve existing cultural and tourism attractions and facilities, which respect the city's historic character and local distinctiveness;
- enable the provision of a canal basin with associated wharfage and visitor centre;
- enable the protection, conservation and enhancement of Hereford's heritage assets, their significance and setting, including archaeology, with particular regard to the historic street patterns and the skyline.

# Policy HD3 - Hereford movement

Herefordshire Council will:

- Improve Hereford's economy by increasing connectivity to the national and local transport networks by reducing congestion and improving journey time;
- Improve health, wellbeing and the environment by improving air quality and reducing noise through maximising opportunities for the use of sustainable transport modes, particularly for short distance journeys.

Herefordshire Council will use a variety of funding mechanisms to deliver the following:

- Packages of transport improvements focussing on key routes into the city delivering a range of public realm improvements and improving access and connectivity for sustainable mode users;
- Behavioural change campaigns which will complement infrastructure delivery to encourage sustainable mode use and healthy lifestyles.
- Reduced reliance on car use by incorporating sustainable mode routes within new developments and connecting them with existing networks;
- Improvements to public transport infrastructure enabling improved access and integration between bus and to rail services;
- Convenient, safe and secure car parking facilities which attract shoppers and visitors and deter commuter parking in the city centre, through the development of Park and Choose sites; and
- A Relief Road to the west of Hereford to reduce the volume of traffic from the city centre and enable the delivery of walking, cycling and bus improvements on the existing highway network. The road will be designed and developed in such a way which avoids and mitigates adverse impacts or physical damage to or loss of habitats, noise pollution and vibration, light pollution, air pollution, flood risk and water quality on the River Wye SAC, as well as residential amenity and business interests. Consideration of the impact of the road on heritage assets, their significance and setting, as well as the historic character of the wider landscape will also be required. Further assessments will be undertaken as part of the Hereford Area Plan and subsequent planning application(s).

The pace of delivery of transport and movement infrastructure will be aligned with that of housing provision in accordance with policy SS3.

# Policy HD4 – Northern Urban Expansion (Holmer West)

Land at Holmer west will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards. The development will be expected to provide:

- 500 new homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;
- a target of 35% of the total number of dwellings shall be affordable housing;
- Park and Choose site (land and infrastructure) adjacent to the western side of the A49 in close proximity to the Hereford Relief Road and land or a contribution to facilitate the construction of the adjoining phase of the Hereford Relief Road;
- walking and cycle routes and green infrastructure corridors linking to the Park and Choose site the existing public right of way network and existing education and community facilities and employment sites in the locality;
- appropriate new green buffers and linear green routes, particularly along Ayles Brook;
- measures to mitigate flood risk both for the new homes within the expansion area and for the benefit of existing residents and businesses in other parts of the city through the incorporation of sustainable urban drainage solutions, as part of the green infrastructure network and measures to control water levels within Ayles Brook;
- appropriate provision of and contributions towards indoor and outdoor sports and play facilities, open space and allotments;
- where appropriate a contribution towards pre-school facility and contributions towards the enhancement of existing primary and secondary school provision and any identified need for other community infrastructure/facilities; and
- sustainable standards of design and construction.

This expansion area will be accessed primarily off the A4103 Roman Road. The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure.

# Policy HD5 – Western Urban Expansion (Three Elms)

Land at Three Elms will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards. The development will be expected to provide:

- a minimum of 1,000 homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;
- a target of 35% of the total number of dwellings shall be affordable housing;
- delivery of land and infrastructure to facilitate the construction of the adjoining phase of the Hereford Relief Road;
- a minimum of 10 hectares of employment land, comprising predominantly of a mixture of use class B1, B2 and B8 located near to the new livestock market with access to the Hereford Relief Road and Roman Road;
- land and infrastructure for Park & Choose facilities;
- a new linear park along the Yazor Brook corridor connecting with the existing green infrastructure links east of the expansion area, the public rights of way network within and adjoining the expansion area and informal recreation space;
- a series of new green infrastructure connections which enhance the biodiversity value of the area and also serve as pedestrian cycle links through the development, including optimising the use of the disused railway line to connect with the transport interchange, schools, community facilities, employment land and the remainder of the city;
- provision for new bus links through the expansion area;
- development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and contributes to the distinctiveness of the site and surrounding environment;
- the provision on site of appropriate sports and play facilities, formal and informal open space, community orchards, woodland planting and allotments;
- integration of Huntington village into the development area in a way which respects, protects, conserves and, where possible, enhances the setting of the Conservation Area and heritage assets;
- 210 primary school places and where appropriate contributions towards new pre-school facilities;
- an extension of Whitecross High School to increase capacity from a 6 form entry to 7 form entry school, with commensurate school playing field provision;
- a neighbourhood community hub to meet any identified need for small scale convenience retail, community meeting space, health provision, indoor sports and other community infrastructure/facilities where appropriate;
- sustainable urban drainage and flood mitigation solutions to form an integral part of the green infrastructure network;
- opportunities to mitigate flood risk arising from Yazor Brook for existing residents and businesses within the city; and

• sustainable standards of design and construction.

The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure.

# Policy HD6 - Southern Urban Expansion (Lower Bullingham)

Land at Lower Bullingham will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford, and the wider landscape, through high design and sustainability standards. The development will be expected to provide:

- a minimum of 1,000 new homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;
- a target of 35% of the total number of dwellings shall be affordable housing;
- around 5 hectares of employment land comprising a mixture of use class B1, B2 and B8 to complement Hereford Enterprise Zone;
- suitable vehicular access to the site principally from the B4399;
- Park and Choose site (land and infrastructure) adjacent to the A49/ Rotherwas Access Road roundabout;
- green infrastructure corridors through the area to include strategic greenways along Red Brook and Norton Brook and links with Withy Brook;
- creation of a country park to incorporate new footpaths linking with the existing public right of way network in the locality, woodland and orchard planting;
- development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and contributes to the distinctiveness of the site and surrounding environment;
- the provision on site of appropriate sports and play facilities, open space, community orchards and allotments;
- 210 primary school places and where appropriate contributions towards new additional preschool facilities;
- a neighbourhood community hub, including small scale convenience retail and provision of and/or contributions towards any identified need for other community infrastructure/facilities, including community meeting space and health provision, indoor and outdoor sports, where appropriate;
- sustainable urban drainage and flood mitigation solutions to form an integral part of the green infrastructure network;
- new direct walking, cycling and bus links from the urban extension to the Park and Choose to the west, Hereford Enterprise Zone to the east and existing communities and the city centre to the north;
- sustainable standards of design and construction; and

• the protection, conservation and, where possible, enhancement of the heritage assets, their significance and setting. An evaluation of the archaeological importance of the area should be provided to ensure appropriate protection of heritage assets and inform the detailed development proposals.

The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion area and the provision of key new infrastructure.

# Policy HD7 – Hereford Employment Provision

Hereford will continue to provide focus for employment provision in the county. Employment supply at Hereford will be delivered through:

- the expansion of the city centre as part of wider city regeneration which will include commercial uses including new office provision and creating a better environment for existing businesses. Proposals for office uses outside of the city centre will be subject to the sequential test, as set out in paragraph 24 of the NPPF;
- continuing development of employment land at Hereford Enterprise Zone at Rotherwas to strengthen the enterprise zone, with particular focus on defence and knowledge sectors, creating added benefit for companies who locate in the area;
- encouraging small scale environmental and knowledge based employment development opportunities; and
- provision of new areas of employment land particularly through the development of strategic urban extensions.